



ST. LOUIS
HOUSING
AUTHORITY

BOARD OF COMMISSIONERS

REGULAR MEETING

JANUARY 23

2025

KING LOUIS SQUARE



TO THE COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY
ST. LOUIS, MISSOURI

PUBLIC NOTICE OF MEETING

Take notice that the **regular meeting** of the commissioners of the St. Louis Housing Authority will be held via **Zoom*** on Thursday, January 23, 2025, commencing at 4:30 p.m., to consider and act upon items shown on the attached agenda. An Executive Session may be convened to discuss legal actions, causes of actions, communications with attorneys, personnel matters, leasing, purchase or sale of real estate and bid specifications.

DATED: January 17, 2025

ST. LOUIS HOUSING AUTHORITY

Attachment

***Instructions For Joining Zoom**

Meeting ID: 939 278 0715

Via Smart Phone or Computer:

<https://bit.ly/41J3uLI>

Via Phone:

1-312-626-6799

Meeting ID: 939 278 0715

Passcode:536879

BOARD OF COMMISSIONERS, ST. LOUIS HOUSING AUTHORITY
REGULAR MEETING, JANUARY 23, 2025, 4:30 P.M.
ST. LOUIS HOUSING AUTHORITY, 3520 PAGE BOULEVARD
ST. LOUIS, MISSOURI 63106
AGENDA

ROLL CALL

CONSENT AGENDA

1. Approval of Minutes, Regular Meeting, October 24, 2024

RESIDENTS' COMMENTS ON AGENDA ITEMS

2. Resolution No. 3029

Authorizing and Approving the Selection of a Service Provider and Plan Recordkeeping and Administration, and Investment Advisory Services for the St. Louis Housing Authority's Retirement Plan

3. Resolution No. 3030

Authorizing and Approving an Emergency Winter Housing Pilot Program

ITEMS FOR INDIVIDUAL CONSIDERATION

CHAIRMAN'S REPORT

DIRECTOR'S REPORT

RESIDENTS' CONCERNS

COMMISSIONERS' CONCERNS

SPEAKERS TO ADDRESS THE BOARD

EXECUTIVE SESSION

The Executive Session may be convened pursuant to Section 610.021 of the Missouri Revised Statutes, to discuss legal actions, causes of actions or litigation, personnel matters relating to the hiring, firing, disciplining and promoting of employees, negotiations with our employees, leasing, purchase or sale of real estate and specifications for competitive bidding.

ADJOURNMENT

Please note that this is not a public hearing or forum. Anyone wishing to address the Board must follow the St. Louis Housing Authority's Speaker's Policy. (Contact the Executive Division at Central Office for a copy of the policy.)

**APPROVAL OF MINUTES
OCTOBER 24, 2024**

BOARD OF COMMISSIONERS
ST. LOUIS HOUSING AUTHORITY
REGULAR MEETING
OCTOBER 24, 2024
4:30 p.m.

CALL TO ORDER

The Board of Commissioners of the St. Louis Housing Authority held a Regular Meeting via Zoom on Thursday, October 24, 2024. Chairman Sal Martinez called the meeting to order at approximately 4:30 p.m.

Present: Annetta Booth
Benita Jones
Sal Martinez
Constantino Ochoa, Jr.

Absent: Margaret English
Regina Fowler
Shelby Watson

CONSENT AGENDA

Approval of Minutes

Commissioner Booth moved to approve the minutes of September 26, 2024. Commissioner Jones seconded the motion. The motion passed with all commissioners voting aye.

ITEMS FOR INDIVIDUAL CONSIDERATION

Resolution No. 3022

Authorizing and Approving the Execution of the Capital Fund Program Amendment to the Consolidated Annual Contributions Contract and Annual Statement – 2024 Emergency Safety and Security Grant.

Presenting Resolution No. 3022, Latasha Barnes, Executive Director, stated that the St. Louis Housing Authority (SLHA) received over \$200,000 from the U.S. Department of Housing and Urban Development to help improve the safety and security at California Gardens Apartments. She noted that this grant will specifically be used to enhance the security system and safety equipment at the site. She said board approval was requested to authorize SLHA to sign the Annual Contributions Contract Amendment that will release the funds to begin the work and implement the project.

Commissioner Martinez asked if there were any questions and/or comments regarding Resolution No. 3022.

There were none.

Commissioner Jones moved to approve Resolution No. 3022. Commissioner Ochoa seconded the motion. The motion passed with all commissioners voting aye.

Resolution No. 3023

Authorizing and Approving the Payment Standards (Small Area Fair Market Rents) for the Housing Choice Voucher Program.

Presenting Resolution No. 3023, Ms. Barnes stated that the U.S. Department of Housing and Urban Development (HUD) issued new payment standard requirements for the Saint Louis region in November 2023, which will go into effect January 1, 2025, and the St. Louis Housing Authority (SLHA) proposes to adopt the revised payment standards based on the new federal requirements. She noted that the Small Area Fair Market Rents, calculated for 50 zip codes in St. Louis City and St. Louis County, are attached to

the resolution and are divided by 100%, 110% and 120% of the local market rate. She said this will allow the agency to come into compliance with HUD mandates in time for the effective date of the new requirements and will provide additional benefits to SLHA families and landlords because it will allow voucher holders to have better access to neighborhoods and higher quality housing partners. Ms. Barnes stated that board approval was requested to move forward with the new revised Payment Standards.

Commissioner Martinez asked if there were any questions and/or comments regarding Resolution No. 3023.

Commissioner Booth asked what is the average low-end rent for an apartment overall.

Ms. Barnes stated that it was hard to say. She noted that the challenge for SLHA is that the market has been rapidly expanding and landlords have been increasing what they are able to rent. She said Section 8 voucher holders are subject to market conditions and currently the rents are higher and are increasing, particularly by zip codes. She stated that generally in the St. Louis area, city and county, rents have been increasing significantly, especially since the COVID pandemic.

Commissioner Martinez stated that rental rates have increased exponentially and it has always been incumbent on SLHA to try to match what landlords expect to get in order to assist its clients who participate in the Section 8 program. He noted that affordable is quite an interesting word as it relates to rental rates, which are continuing to increase significantly.

Commissioner Martinez asked if there were any further questions and/or comments regarding Resolution No. 3023.

There were none.

Commissioner Booth moved to approve Resolution No. 3023. Commissioner Ochoa seconded the motion. The motion passed with all commissioners voting aye.

Resolution No. 3024

Authorizing and Approving the Allowances for Tenant-Furnished Utilities and Other Services for the Housing Choice Voucher Program.

Presenting Resolution No. 3024, Ms. Barnes stated that in compliance with federal regulations, SLHA has updated its utility allowance schedule for its Section 8 program to better reflect current utility rates. She said board approval was requested to proceed with implementation.

Commissioner Martinez asked if there were any questions and/or comments regarding Resolution No. 3024.

Commissioner Ochoa asked if the utility allowances are updated every year.

Ms. Barnes responded, "Yes."

Commissioner Martinez asked if there were any further questions and/or comments regarding Resolution No. 3024.

There were none.

Commissioner Jones moved to approve Resolution No. 3024. Commissioner Ochoa seconded the motion. The motion passed with all commissioners voting aye.

Resolution No. 3025

Authorizing and Approving the Submission of the Fiscal Year 2024 Section Eight Management Assessment Program Certification (SEMAP).

Presenting Resolution No. 3025, Ms. Barnes stated that HUD uses SEMAP to evaluate the performance of the Section 8 program. She shared that SLHA received a score of 98 or 100 on 12 out of the 14 SEMAP indicators, demonstrating an improvement in the agency's overall performance. She said the agency also saw a 12-point increase on its SEMAP performance this year. She noted that the agency did not get any points on Indicator 6 for calendar year 2022, but there was a 100% improvement this time around and the agency was able to get all of the points in this area. Ms. Barnes stated that the agency was not able to meet Indicator 13 in calendar year 2023, but based on the current performance and utilization rate of 98%, the agency will receive all of points for this indicator during next year's assessment, which reflects this current calendar year. She said she was incredibly proud of the Housing Choice Voucher department and she acknowledged the HCV Director, Carla Matthews, and the HCV team for doing an astonishing job. She noted that they were able to accomplish in one year what was thought would take two or more years to do. Ms. Barnes stated that board approval was requested to submit the SEMAP certification to HUD and to have it certified as the official record for the agency.

The board congratulated Ms. Barnes and her team, noting that the agency being a standard performer should be lauded.

Commissioner Martinez asked if there were any questions and/or comments regarding Resolution No. 3025.

There were none.

Commissioner Jones moved to approve Resolution No. 3025. Commissioner Booth seconded the motion. The motion passed with all commissioners voting aye.

Resolution No. 3026

Approving and Authorizing the St. Louis Housing Authority Executive Director to Execute a Street Vacation Request with the City of St. Louis Department of Streets.

Presenting Resolution No. 3026, Ms. Barnes stated that board approval was requested to submit a street vacation request to the City of St. Louis as a part of SLHA's Clinton-Peabody redevelopment effort. She noted that this request builds on Resolution No. 3006, which was approved by the board on May 23, 2024 to realign portions of LaSalle Street for Phase I of the project. She said the current request addresses a new portion of Dillon Drive between LaSalle Street and Chouteau Avenue that was recently identified by the consultant and is about a 10-foot-wide stretch that will allow SLHA to ensure that that street is in alignment and fits the new grid pattern for the redevelopment effort. She noted that a map identifying the area is attached to the resolution.

Commissioner Martinez asked if there were any questions and/or comments regarding Resolution No. 3026.

There were none.

Commissioner Booth moved to approve Resolution No. 3026. Commissioner Jones seconded the motion. The motion passed with all commissioners voting aye.

CHAIRMAN'S REPORT

Commissioner Martinez stated that SLHA, Preservation of Affordable Housing and other organizations are hosting a Halloween event on October 31, 2024 and are looking for volunteers to start arriving by 2:00 p.m. to help with set-up and whatever else is necessary. He noted that the event would be held at the Al Chappelle Community Center from 5:30 p.m. until 7:00 p.m. He said if anyone was interested, they could reach out to him or Ms. Barnes.

DIRECTOR'S REPORT

Ms. Barnes asked, with the board's permission, to yield to Captain Dickerson with the St. Louis Metropolitan Police Department to present their update.

Capt. Dickerson stated that she did not have any stats to present, but noted that they were available on SLMPD's new website at SLMPD.org.

Commissioner Booth stated that the commissioners should not have to go online to look up the stats. She noted that for years the commissioners were given some kind of report from the police department.

Capt. Dickerson stated that they are trying to push their SLMPD.org website. She said typically they give the stats, but with the Housing Unit being in Districts 3 and 4, they are multiple neighborhoods, with each in a different district. She said she could answer any questions that the board may have.

Commissioner Jones stated that the commissioners expect a report and she asked why did they have to go to the SLMPD.org website and review the stats individually.

Commissioner Martinez informed Capt. Dickerson that the board is used to getting a report from SLMPD and SLHA has had a contractual relationship with SLMPD for several years, which is a bit of a different relationship to being a tax paying citizen in the city of Saint Louis who can visit a website. He said primarily in the past, the board received updates that were focused on Cochran/Cambridge, Clinton-Peabody, Renaissance Place and LaSalle Park because SLHA has traditionally had a contractual relationship with SLMPD.

Capt. Dickerson stated that Sergeant Teeter typically sends the crime stats to Paul Werner, Director of Operations for Public Housing, but in the future, she would bring a summary of the report. She noted that she had retrieved the stats from the website and could proceed with presenting. She reported that in LaSalle Park, there had been three felony thefts in the last 28 days compared to five in 2023, with crime being down 40%, and there were no issues in the last seven days compared to one aggravated assault in 2023. She said overall crime was down 77% in LaSalle Park. She noted that with a sky cop in the area and the new cameras being federated with SLMPD's Real Time Crime Center, there had not been any big crimes, except for car thefts. Captain Dickerson stated that there had been one aggravated assault in the Clinton-Peabody/Darst Webbe neighborhood in the last seven days compared to none in 2023, with crime being down 50%, and in the last 28 days, there had been one aggravated assault compared to one in 2023, one robbery incident compared to one in 2023, one burglary compared to one in 2023 and one auto theft compared to four in 2023, so overall there were four incidents in the Clinton-Peabody/Darst Webbe neighborhood in the last 28 days compared to 11 in 2023, with crime being down 64%. She noted that there were no shooting incidents or aggravated assaults. Capt. Dickerson stated that in the Covenant Blu Grand Center neighborhood in the last seven days, there had been one auto theft compared to one in 2023, one aggravated assault compared to one in 2023 and one burglary compared to none in 2023, so there were three incidents in 2024 compared to five incidents in 2023, with crime being down 40%; however, in the last 28 days, there had been one sexual assault compared to none in 2023, one robbery compared to one robbery in 2023, seven aggravated assaults versus seven in 2023, six burglaries compared to none in 2023, four felony thefts compared to six in 2023 and three auto thefts compared to five in 2023, so there had been 22 incidents in the last 28 days compared to 15 in 2023, with crime being up 47%.

Commissioner Martinez commented that Renaissance Place lies within the Covenant Blu neighborhood. He asked Capt. Dickerson if the numbers provided were for the entire neighborhood and not just Renaissance Place.

Capt. Dickerson responded, "Yes." She noted that it is all incorporated and that SLHA has it separated differently compared to how SLMPD compute it.

Commissioner Martinez stated that SLHA has always advocated for the fact that its residents are members of an entire neighborhood, not just the development where they reside. He asked, moving forward, that SLMPD pull out specifically what has happened at the developments that SLHA owns and operates to the extent that that data is available. He said it would be good for the commissioners to have two different stats to be able to compare what is happening in the entire neighborhood that SLHA developments are in. He said if a certain number of incidents happened in Covenant Blu, they would want to be able to extract from that number how many of those incidents actually happened at Renaissance Place.

Capt. Dickerson stated that SLMPD just implemented the new crime mapping that breaks down the numbers into neighborhoods, streets and blocks, which is on SLMPD's website and a good tool that the commissioners could definitely use.

Commissioner Martinez asked Capt. Dickerson to provide the crime stats for Columbus Square, which would include Cochran/Cambridge Heights. He also asked Ms. Barnes to have the relevant person on her team to contact the police department to have numbers specific to SLHA developments extracted.

Providing the crime stats for Columbus Square, Capt. Dickerson stated that there had been one felony theft within the last seven days compared to none in 2023 and in the last 28 days, there had been one robbery compared to none in 2023, one burglary compared to one in 2023, two felony thefts compared to two in 2023 and one auto theft compared to none in 2023. She said there were five incidents in 2024 compared to four in 2023, resulting in a 25% increase in crime.

Capt. Dickerson encouraged the commissioners to go to the SLMPD website to look at the crime stats and play around with them. She said if something has happened that they want to see, they do not have to wait until a meeting, as they have this tool is at their disposal.

Commissioner Martinez stated that he would check out SLMPD's website. He asked if there were any other questions or comments for Capt. Dickerson.

There were none.

Presenting some of the agency's highlights, Ms. Barnes stated that SLHA participated in the regional homeownership convening hosted by FDIC, which was an effort to promote SLHA's Bridge to Homeownership program and FSS programs to financial institutions and other housing partners across the region. She stated that SLHA recently partnered with HUD, the Department of Labor and Job Corps USA to host a second HUD C.A.R.E.S. recruitment fair for SLHA residents, with Employment Connection partnering with the agency in this endeavor. She said they were able to process 48 SLHA-assisted households for this recruitment fair, giving them information about the federal hiring process and directed assistance in preparing a federal resume, and over 40 of them were interviewed onsite by HUD representatives. She noted that principles from the HUD DC office and regional representatives flew into town for the event. She stated that SLHA is extremely grateful that HUD continues to consider the agency in partnership to create new opportunities for the families it serves.

Ms. Barnes stated that SLHA recently worked with HUD, the City of St. Louis, the Mayor's Office and East West Gateway to convene a regional housing summit that took place the week of October 21, 2024 to address the issue of homelessness and to expand the regional approach to this issue. She said it was very enriching for SLHA to be able to assist and support the region in this effort.

Ms. Barnes stated that SLHA's Resident Initiatives Department has been ramping up resident engagement and doing new events with new developments. She noted that the staff recently hosted a National Night Out with the Cochran families, had a senior picnic, have been holding financial literacy courses at the agency and did a utility clinic. She said they are extremely involved and very thoughtful with how they connect with residents and what resources and supports they bring when engaging with them.

Ms. Barnes stated that the Housing Choice Voucher Department achieved a 12-point increase in their overall SEMAP performance and recently achieved a utilization rate of 98%, which will put the agency in the high performer range when it is certified again. She congratulated the HCV team.

Highlighting the HCV incentives program approved by the board, Ms. Barnes stated that SLHA has provided over \$270,000 in security deposit assistance to voucher holders to help them secure new housing. She noted that it has been a great program and SLHA is thankful for the board's support in that initiative.

On the Public Housing side, Ms. Barnes stated that the agency has increased its overall occupancy rate to 95% agency-wide with its recent occupancy campaign. She said she was extremely proud of all the hard work that the Asset Management team and the Property Management Department put into pushing the campaign, getting units make-ready, cleaning up errors in the PIC system and working with HUD to address long-term vacant units. She congratulated Asset Management and Property Management, as well as the Development and Modernization Department that assisted to provide additional capacity-building support in that area.

As it pertains to data management, Ms. Barnes stated that SLHA has increased its recent recertification completion rates and has been working hard to correct data errors. She noted that since June 2024, SLHA has seen a 6% increase in its reporting rate across its entire portfolio, which includes the mixed-finance sites and the traditional public housing sites, with the SLHA-managed sites achieving a 99.89% completion rate for the recertifications. She said it is truly remarkable and points to the staff's hard work, dedication and commitment to getting things done.

Ms. Barnes stated that for SLHA's Clinton-Peabody efforts, the agency recently received an award from the Community Development Administration in the amount of \$750,000 to help with critical repairs to the Al Chappelle Community Center. She said SLHA is grateful for the City's commitment to helping the agency make sure that the Al Chappelle Community Center can remain a thriving part of that community. She noted that as SLHA continues the redevelopment efforts, it is moving forward with applying for a Choice Neighborhoods application and is doing the required preparation for that. She said SLHA will conduct additional focus groups on November 13th and 14th to continue to work with the residents and stakeholders to identify what they want to see for their communities and how SLHA can bring the vision to life for them. She noted that overall, the agency has been continuing the good work, advancing its mission and moving in the right direction on all important key indicators. Concluding, Ms. Barnes asked if there were any questions and/or concerns.

Commissioner Martinez stated that it was a great report with a lot of fantastic news, which is a result of the hard work that Ms. Barnes and her team have invested in the agency and in its portfolio, including other amenities like the Al Chappelle Community Center.

Commissioner Booth stated that she was elated that West Pine had gotten a new roof.

Ms. Barnes stated that work is currently being done on the roof at West Pine, but is not finished. She said hopefully it will be completed in the very near future.

RESIDENTS CONCERNS

Linda Dailey, a resident of Cambridge Heights, stated that the residents are concerned about the property there and what is going to happen with them. She noted that the development was once fully occupied and now there are less than 40 residents.

Ms. Barnes stated that it was her understanding that Ms. Dailey had had an opportunity to meet with some of SLHA’s staff, as well as had spoken with members of SLHA’s Resident Initiatives team and Mr. Werner, Director of Operations for Public Housing. She said SLHA is aware of the concerns and issues at Cambridge Heights and has been in active communication with the executive leadership and their attorneys about pending repairs, the status of repairs and the next steps for resolution to get things addressed for the residents. She noted that it is an ongoing process and it is believed that there are some things in the works that will give them the resources they need to turn units and get their occupancy numbers back up. Ms. Barnes stated that this is not something that SLHA has taken lightly and SLHA has been working with the Cambridge Heights representatives to find a resolution. She informed Ms. Dailey that she had gotten all of the right people’s attention and SLHA has gotten all of the right people’s attention and is working towards a solution that will hopefully get the units turned and reoccupied. She said in the meanwhile, SLHA will continue to work with Ms. Dailey to address the issues that she has directly in her unit and will continue its conversations with the Cambridge Heights representatives to address the repairs that are needed and to get the units turned.

ADJOURNMENT

Commissioner Booth moved to adjourn the meeting. Commissioner Ochoa seconded the motion. The vote was in favor of passing the motion with all commissioners voting aye. The meeting thereupon adjourned at 5:32 p.m.

Sal Martinez, Chairman
Board of Commissioners
St. Louis Housing Authority

Latasha Barnes, Secretary
Board of Commissioners
St. Louis Housing Authority

(SEAL)

RESOLUTION No. 3029

MEMORANDUM

To: Board of Commissioners

Through: Latasha Barnes, Executive Director

From: Stacy Taylor, Director of Human Resources

Date: January 8, 2025

Subject: Resolution No. 3029
Authorizing and Approving the Selection of a Service Provider and Plan Recordkeeping and Administration, and Investment Advisory Services for the St. Louis Housing Authority's Retirement Plan

For many years, the St. Louis Housing Authority (SLHA) has engaged the services of Attorney Rhonda O'Brien to provide plan documents and guidance for SLHA's 401(a) Money Purchase Plan and 457(b) Retirement Plan. Attorney O'Brien informed SLHA of her plans to retire and recommended that SLHA transition to a full-service provider that could handle an investment platform, recordkeeping services, and provide plan documents. SLHA was advised that this would be more cost-effective than continuing to engage an attorney to provide plan documents.

In response, SLHA issued a request for proposal for these services and selected the joint proposal of Voya Financial and Retirement Plan Advisors as the top bidder.

Board approval is requested for the Executive Director to execute the necessary applications to initiate negotiations with representatives of Voya Financial and Retirement Plan Advisors to further engage in negotiations for plan recordkeeping, administration and investment services and to prepare for submission to the Board all documents and plan amendments that may be necessary to facilitate the retention of Voya Financial and Retirement Plan Advisors.

**Authorizing and Approving the Selection of a Service Provider and Plan Recordkeeping
and Administration, and Investment Advisory Services for the
St. Louis Housing Authority's Retirement Plan**

WHEREAS, the St. Louis Housing Authority ("Authority") is a municipal corporation of the State of Missouri according to the provisions of Chapter 99.010 et seq; and

WHEREAS, pursuant to the Housing Authorities Law Section 99.010 to 99.230 RSMo., the Board of Commissions has authority to compensate its employees and may provide, among other benefits, retirement plan(s) to its employees; and

WHEREAS, the Authority established the St. Louis Housing Authority Retirement Plan on October 5, 1961, which has subsequently been re-stated (most recently on November 18, 2011) and amended (most recently in November 2023); and

WHEREAS, the Authority's 401(a) Money Purchase Plan is a pension defined contribution plan in which all full-time employees are eligible to participate after six months service. Principal Financial Services (Principal) is the current provider for the Authority's 401(a) plan and has been since November 18, 2011; and

WHEREAS, the Authority's 457(b) Retirement Plan is a nonqualified deferred compensation plan. The Plan is available to all employees and those choosing to participate may elect to defer a portion of their salaries. Nationwide and Security Benefit Group are currently the two providers for the Authority's 457(b) plan. Nationwide has been a provider since October 7, 1987. Security Benefit Group has been a provider since May 30, 2004; and

WHEREAS, the Authority issued Solicitation No. HR 24-02 seeking proposals from retirement plan providers for administration and recordkeeping services and investment advisory assistance for its 401(a) Money Purchase Plan and its 457(b) Retirement Plan; and

WHEREAS, the selection committee has selected the joint proposal of Voya Financial and Retirement Plan Advisors as the top bidder; and

WHEREAS, to facilitate the retention of Voya Financial and Retirement Plan Advisors, the Authority seeks to execute initial applications and engage in contract negotiations with Voya Financial and Retirement Plan Advisors.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The Executive Director, or her designees, is authorized to execute such applications for investment/recordkeeping/administrative services to initiate negotiations with representatives of Voya Financial and Retirement Plan Advisors for plan administration and recordkeeping and investment advisory assistance for the St. Louis Housing Authority's employees.
2. The Executive Director, or her designees, is authorized to engage in negotiations with the appropriate representatives of Voya Financial and Retirement Plan Advisors for plan administration and recordkeeping and investment advisory assistance.

3. The Executive Director, or her designees, is authorized to prepare for submission to the Board of Commissioners all appropriate documents necessary to effect the transactions described herein and any other actions contemplated hereunder.
4. The Executive Director is authorized and directed to do all things necessary to carry out the terms and conditions of this Resolution.

RESOLUTION No. 3030

MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Executive Director

Date: January 8, 2025

Subject: Resolution No. 3030
Authorizing and Approving an Emergency Winter Housing Pilot Program

The St. Louis Housing Authority (SLHA) is seeking Board approval to implement a critical and timely initiative: the Emergency Winter Housing Pilot Program. This program is designed to address the urgent need for shelter among unhoused families, particularly those with members facing disabilities or chronic medical conditions, during the harsh winter months.

Program Justification

St. Louis is experiencing an unprecedented surge in unhoused families, a crisis further compounded by record-low temperatures. This dire situation poses severe health risks to individuals with disabilities and chronic illnesses, potentially leading to the exacerbation of existing medical conditions, increased hospitalizations, vulnerability to infections and hypothermia, and significant deterioration in mental health.

HUD Guidance and Strong Support: This pilot program is firmly grounded in HUD's guidance and aligns with its mission to provide safe and stable housing for vulnerable populations. Specifically, this initiative is supported by:

- [PIH Notice 2024-30](#) - Provides essential flexibility in utilizing Mainstream Vouchers to serve vulnerable families.
- [PIH Notice 2024-17](#) - Streamlines the review process and facilitates expedited housing assistance for those experiencing homelessness.
- [PIH Notice 2023-13](#) - Encourages strong partnerships between PHAs and homeless service providers, a cornerstone of this pilot program.

A Collaborative Partnership for Success

This pilot leverages the unique strengths of the St. Louis City Department of Human Services (DHS) and its Designated Service Providers (DSP) through the St. Louis City Continuum of Care to ensure the most effective deployment of critical housing assistance to non-elderly persons with disabilities (aged 18-61) who are:

- Transitioning out of institutional or segregated settings
- At serious risk of institutionalization
- Homeless

- At risk of becoming homeless

Eligible households must include at least one member who meets the target population criteria, is referred by DHS, and meets all general HCV program eligibility requirements of the United States Housing Act of 1937 and 24 CFR 982.

Through formalized partnerships with DHS and DSP, SLHA will open the Housing Choice Voucher Mainstream waitlist between February 3, 2025, and March 31, 2025, or until resources are otherwise exhausted to receive applicant referrals.

Conclusion

The Emergency Winter Housing Pilot Program offers a timely and impactful solution to address the urgent needs of our community's most vulnerable members. By collaborating effectively and utilizing available resources, we can make a tangible difference in the lives of families facing homelessness while promoting a healthier and more equitable St. Louis.

Board approval is requested for this critical initiative, which will enable SLHA to proceed with program implementation and administration, providing a lifeline to those most in need during the harsh winter months.

Authorizing and Approving an Emergency Winter Housing Pilot Program Plan

WHEREAS, the St. Louis Housing Authority (SLHA) is committed to providing safe, affordable housing opportunities for all residents of the City of St. Louis, Missouri; and

WHEREAS, SLHA is dedicated to addressing the urgent needs of vulnerable populations, particularly those experiencing or at risk of homelessness; and

WHEREAS, the City of St. Louis is currently facing an unprecedented increase in unhoused families, exacerbated by record-low temperatures, posing significant health risks to vulnerable individuals, especially those with disabilities or chronic medical conditions; and

WHEREAS, SLHA recognizes the critical need for shelter and supportive services to protect the most vulnerable families during the harsh winter months; and

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) acknowledges the role public housing authorities play in the efforts to end homelessness and encourages programmatic flexibilities to leverage existing resources to meet local needs (PIH 2024-30, PIH 2024-17 and PIH 2023-13); and

WHEREAS, SLHA desires to implement an Emergency Winter Housing Pilot Program to leverage the flexibility offered by Mainstream Housing Choice Vouchers to provide critical housing assistance to eligible families facing homelessness, in collaboration with the St. Louis City Department of Human Services, St. Louis City Continuum of Care and local homeless service providers.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY AS FOLLOWS:

1. The Emergency Winter Housing Pilot Program, as presented and described in the accompanying proposal, is approved and the St. Louis Housing Authority authorized to amend its Administrative Plan to reflect the new program.
2. The St. Louis Housing Authority is authorized to collaborate with the St. Louis City Department of Human Services, the St. Louis City Continuum of Care and other community partners to effectively implement the Emergency Winter Housing Pilot Program.
3. The St. Louis Housing Authority is authorized to open a targeted Housing Choice Voucher waiting list for qualifying Mainstream Voucher referrals.
4. This pilot program shall end on March 31, 2025, or until Mainstream Voucher resources are exhausted, whichever occurs first.
5. The Executive Director is hereby directed to take all actions necessary to effectuate the same.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention of:

Directors of HUD Regional and Field
Offices of Public Housing;
Agencies that Administer the Housing
Choice Voucher (HCV) Program

Notice PIH 2024-30

Issued: August 20, 2024

Expires: This notice remains in effect until
amended, superseded, or rescinded.

Cross References: PIH 2020-01 (This notice
updates Sections 5 (f) and (g) of PIH 2020-
01); PIH 2012-31.

Subject: Statutory and Regulatory Waivers for Mainstream Vouchers

1. Purpose

Pursuant to the Consolidated Appropriations Act, 2024 (Public Law 118-42), this notice establishes waivers and alternative requirements for Mainstream Vouchers.

2. Background

The Consolidated Appropriations Act, 2024 (Public Law 118-42) (“2024 Act”) authorized the Department of Housing and Urban Development (HUD) to establish waivers and alternative requirements for Mainstream Vouchers that are necessary for the effective delivery and administration of funds. Per section 243 of the 2024 Act, HUD may waive or specify alternative requirements for Section 8(o)(6)(A) of the United States Housing Act of 1937 (1937 Act) (42 U.S.C. 1437f(o)(6)(A)) and regulatory provisions related to the administration of waiting lists, local preferences, and the initial term and extensions of tenant-based vouchers. HUD is not permitted to waive requirements related to tenant rights and protections, rent setting, fair housing, nondiscrimination, labor standards, and the environment.

Mainstream Vouchers are special purpose vouchers for non-elderly persons with disabilities that are subject to the requirements in Section 8(o) of the 1937 Act and 24 CFR 982 except as provided in this notice and any subsequent notice issued by HUD. However, funding and reporting for Mainstream Vouchers is separate from the HCV program.

In targeting housing assistance to non-elderly persons with disabilities and their families, particularly those transitioning out of institutions or at serious risk of institutionalization, Mainstream Vouchers help further the goals of the Americans with Disabilities Act (ADA). One specific goal under the ADA is to ensure that services, programs, and

activities are provided by public entities in the most integrated setting appropriate to the needs of persons with disabilities. In *Olmstead v L.C.* 527 U.S. 581 (1999), the United States Supreme Court affirmed the rights of persons with disabilities under the ADA to participate in community living. Recognizing that housing plays a central role in supporting community integration, HUD's policy priorities for Mainstream Vouchers reflect its commitment to help public housing agencies (PHA) further localities' and states' implementation of *Olmstead*-related efforts and compliance with the ADA.

The waivers and alternative requirements described below are intended to provide programmatic flexibilities to help PHAs improve Mainstream utilization and more successfully target Mainstream-eligible populations, including persons exiting institutions or at serious risk of institutionalization. PHAs with outstanding *Olmstead*-related litigation or enforcement activities, as well as those undertaking affirmative *Olmstead* planning and implementation efforts, who wish to establish preferences that target individuals with specific disabilities must request HUD approval. The process for requesting approval for a remedial preference targeting individuals with specific disabilities is outlined in [Notice PIH 2012-31](#). See also Statement of the Department of Housing and Urban Development on the Role of Housing in Accomplishing the Goals of *Olmstead*, <https://www.hud.gov/sites/documents/OLMSTEADGUIDNC060413.PDF> (Question 3).

3. Applicability

The waivers and alternative requirements listed below are applicable to all PHAs awarded Mainstream Vouchers and PHAs that administer Mainstream Vouchers through a portability billing arrangement. This Notice does not apply to Non-Elderly Disabled (NED) Vouchers or "Mainstream 1 Year" Vouchers.

4. Effective Date

This notice is effective upon publication.

5. Compliance Date

PHAs must adopt the mandatory policies described in Section 6 within 120 days from publication of this notice.

6. Mandatory Program Policies: This section describes the mandatory waivers and alternative requirements that HUD is establishing for Mainstream Vouchers. A summary of the mandatory waivers and alternative requirements is included in Attachment I of this notice.

- a. Initial Search Term.** Many Mainstream Voucher applicants face challenges in their housing search. Tight rental markets coupled with specific unit needs (e.g., accessible units, units near medical or supportive services, units near public transit, units meeting other disability-related needs, etc.) may require applicants to need

additional time to search for a suitable unit. HUD is waiving 24 Code of Federal Regulations (CFR) 982.303(a), which requires an initial search term of at least 60 days, and establishing an alternative requirement that the initial search term for a Mainstream Voucher must be at least 120 days. The initial 120-day term also applies when a family chooses to move to a new unit with continued assistance inside or outside the PHA's jurisdiction, in accordance with 24 CFR 982 subpart H.

When issuing a Mainstream Voucher, PHAs also must provide a current listing of available accessible units known to the PHA and, if necessary, otherwise assist the family in identifying an accessible unit (24 CFR 8.28(a)(3)).

- b. Extensions of Term.** The PHA's administrative plan must describe its policies for granting extensions of the initial 120-day term (24 CFR 982.303(b)(1)) and provide clear instructions to families on the procedures for requesting an extension. If a family requires additional time for their unit search, PHAs are required to provide an extension as part of a reasonable accommodation under Section 504 of the Rehabilitation Act and HUD's Section 504 requirements (24 CFR part 8; *See also* 24 CFR 982.303(b)(2)). While all Mainstream Voucher applicants include a family member with a disability and are eligible for an extension as part of a reasonable accommodation, PHAs have considerable discretion in the details they may establish for their general extension policy under (24 CFR 982.303(b)(1)) outside of the context of reasonable accommodations, including the deadline for requesting an extension and the length of the extension. National voucher success rates and median search times indicate that, on average, Mainstream Voucher applicants take longer to lease than HCV applicants and are more likely to ultimately be unsuccessful in using their voucher compared to other special purpose voucher applicants. As discussed above in Section 6(a), multiple circumstances may contribute to the barriers that Mainstream Voucher applicants experience in successfully leasing.

Given the challenges Mainstream Voucher applicants may face in securing a unit, applicants should be provided with flexible extension policies. To support this need, HUD is waiving 24 CFR 982.303(b)(1) and establishing an alternative requirement for the process of requesting search extensions. PHAs must adopt an extension policy for Mainstream Vouchers that includes the following: 1) each extension must be for a minimum of 90 days, 2) the PHA must approve the first extension request, regardless of how the request is made (written or verbal) or when it is made, as long as the request is made on or before the term expiration date and is consistent with applicable requirements; subsequent requests should be processed in accordance with the PHA's administrative plan, and 3) the PHA must, on at least one occasion after voucher issuance, notify the family prior to the initial term expiration to remind them of the term expiration date, the process for requesting an extension, and to inquire if the family is in need of assistance with their housing search. PHAs should be aware that families may require more than the minimum required initial extension to successfully lease up and must grant additional extensions if requested in accordance with the PHA's administration plan.

As part of its search extension policy, PHAs may not restrict a first extension approval to certain circumstances or require documentation from applicants. For all extension requests, the written or verbal request is sufficient. Note that this alternative requirement also applies to current Mainstream Voucher participants who choose to move to a new unit with continued assistance inside or outside the PHA's jurisdiction, in accordance with 24 CFR 982 subpart H. In providing notice to families of the expiration date and extension request process, PHAs must ensure [effective communication](#) with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities.

While HUD is establishing an alternative requirement to 24 CFR 982.303(b)(1), HUD reminds PHAs that 24 CFR 982.303(b)(2) requires PHAs to approve all extensions made as part of a reasonable accommodation and PHAs must provide this information during the family briefing (24 CFR 982.301(a)).

- c. Residency Preference.** Because Mainstream Vouchers are intended to facilitate access to housing for individuals with disabilities, including for individuals who reside in institutional or other segregated settings that may not be located in the geographic area that is typically served by a PHA, a residency preference may prevent an otherwise eligible applicant from accessing Mainstream Vouchers. Consequently, HUD is waiving Section 8(o)(6)(A) of the 1937 Act and 24 CFR 982.207(b)(1) and establishing an alternative requirement under which a PHA cannot apply a residency preference to Mainstream Voucher applicants.

7. Discretionary Program Policies. This section describes the optional waivers that HUD is establishing for Mainstream Vouchers. PHAs may choose, but are not required, to adopt any optional waivers. PHAs that choose to adopt any of the optional waivers described below must describe those policies in their administrative plan (24 CFR 982.54(d)(1)). A summary of the optional waivers is included in Attachment I of this notice.

- a. Waiting Lists.** HCV regulations require PHAs to use a single waiting list for admission to its Section 8 tenant-based assistance program. Accordingly, PHAs select Mainstream Voucher applicants from its HCV waiting list (24 CFR 982.204(f)). This requirement has led to challenges for some PHAs in administering Mainstream Vouchers, as it can be time-consuming and burdensome to identify eligible applicants from long HCV waiting lists. Further, PHAs may find it challenging to identify eligible applicants if the PHA has an established preference for targeted subgroups identified in a Mainstream Voucher Notice of Funding Opportunity (NOFO), such as persons transitioning out of institutional or other segregated settings.¹

To assist PHAs in identifying eligible applicants and enable PHAs to more effectively

¹ The [2017 Mainstream Voucher NOFO](#) and [2019 Mainstream Voucher NOFO](#) provided points to PHAs certifying a plan to adopt a preference for certain subgroups.

allocate Mainstream Vouchers, HUD is waiving 24 CFR 982.204(f) and establishing an optional waiver to maintain a separate Mainstream waiting list.

Successful establishment of a separate Mainstream Voucher waiting list requires PHAs to have or to obtain applicants' disability status to determine eligibility for Mainstream Vouchers so they can be placed on the Mainstream Voucher waiting list. To expedite issuance of Mainstream Vouchers under this notice, PHAs should determine as quickly as possible which applicants on the existing HCV waiting list are families that include non-elderly individuals who have a disability that qualifies them for Mainstream Vouchers if this information has not already been collected. That information will facilitate the prompt and effective notification of existing applicants that qualify for Mainstream Vouchers or nondiscriminatory preferences described in this notice. PHAs may obtain disability status by direct outreach to families who are currently on the HCV waiting list. HUD encourages PHAs to collect information on disability status for all applicants at the pre-application and/or the application stages.

If a PHA chooses to create a separate Mainstream Voucher waiting list, the PHA must ensure effective communication of notice is provided to ensure that families on its HCV waiting list are informed of the separate Mainstream Voucher waiting list and have an opportunity to be placed on the list. In providing this notice, PHAs must ensure effective communication of this change to persons with disabilities, including persons with vision, hearing, speech, intellectual or developmental disabilities, or any other communication-related disabilities. Effective communication is especially significant because Mainstream Vouchers are intended to serve individuals with disabilities.

PHAs must ensure effective communication of notice is provided by taking a combination of actions, which may include:

- individually notifying families that identified as having a family member with a disability at the time of application or pre-application;
- individually notifying a reasonable percentage of families from the top of the existing HCV waiting list given the anticipated number of Mainstream Vouchers that a PHA will be issuing in the next five years, while not denying the opportunity for any other household on the HCV waiting list to also be placed on the Mainstream Voucher waiting list;
- ensuring outreach to organizations serving persons with disabilities and service organizations so there is widespread awareness of the availability of a separate waiting list and how to access this resource;
- providing information on social media sites; and
- other communication methods.

PHAs must also inform families on the HCV waiting list of the Mainstream Voucher waiting list by either posting the information to their website or providing public notice in their communities.

When notifying families and providing notice, the PHA must describe the eligibility criteria for Mainstream Vouchers and describe the actions a family should take to be added to the Mainstream Voucher waiting list. The PHA notice should also make clear to applicants that if they decide to be included on the Mainstream waiting list, they will not lose their position on the HCV waiting list. PHAs must also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP). If a PHA does not pursue the optional waiver to maintain a separate Mainstream waiting list, the PHA must still ensure program access for individuals with disabilities.

To support the effective administration of Mainstream Vouchers and the expeditious implementation of a separate Mainstream waiting list, PHAs may choose and are strongly encouraged to commence notifying (as described above) families on the HCV waiting list before the establishment of a separate Mainstream waiting list is formally adopted by the PHA Board of Commissioners or other authorized PHA officials in the PHA administrative plan. The PHA notice in such a case must explain that the establishment of the Mainstream waiting list is dependent on the amendment to the PHA administrative plan being formally adopted but that families are strongly encouraged to take the necessary action now to ensure that their names are placed on the Mainstream waiting list as seamlessly and expeditiously as possible. Conducting the outreach process to HCV waiting list applicants concurrently with the actions necessary to formally adopt the establishment of the separate Mainstream waiting list in the PHA administrative plan is an important consideration for PHAs that wish to implement the separate Mainstream waiting list promptly. Taking such action allows the PHA to ensure the HCV waiting list applicants are provided reasonable time to complete the actions necessary to be added to the Mainstream waiting list at its inception without having to unduly delay the implementation and the associated benefits and efficiencies offered by the Mainstream waiting list.

PHAs must allow 60 calendar days for the effective communication of notice and to provide families an opportunity to respond before issuing vouchers from the separate Mainstream waiting list. This 60-day period may commence whenever a PHA elects to do an early notification as described above. In the interim, PHAs can continue to use its HCV waitlist for issuing Mainstream Vouchers.

PHAs may use either date and time of application or a drawing or other random choice technique in selecting families from the Mainstream waiting list among applicants with the same preference status in accordance with the PHA's administrative plan. For PHAs that rely on the date and time of application in determining the order in which families are selected from the Mainstream waiting list, HUD is waiving 982.207(c)(1) and establishing as an alternative requirement that the application date and time of the family's prior HCV application must be used for those Mainstream applicants that are already on the HCV waiting list. For example, if the PHA determines the order of selection for families that qualify for the same Mainstream waiting list local preference by date of application, the date used to

determine the family's place on the waiting list compared to the other families who qualify for that preference is the date of their application for the HCV program. However, the order that families may be reached on the Mainstream waiting list compared to the regular HCV waiting list may be different depending on the local preferences the PHA establishes for the Mainstream waiting list. Selection from the Mainstream waiting list will be in accordance with local preferences that the PHA establishes for Mainstream Voucher applicants. This may result in the selection of families from the Mainstream waiting list who were not previously on the HCV waiting list ahead of those who were on the HCV waiting list based on the family's eligibility for a Mainstream applicant preference.

- b. Local Preferences.** While PHAs may establish local preferences based on local housing needs and priorities (24 CFR 982.207(a)), HCV regulations do not permit PHAs to establish separate preferences for Mainstream Voucher applicants. Preferences apply to all vouchers on the waiting list. HUD is waiving 24 CFR 982.207(a)(1) and establishing an optional waiver permitting PHAs to establish separate preferences for Mainstream Voucher applicants. Regardless of whether a PHA chooses to adopt separate Mainstream Voucher preferences, PHAs that claimed points for a preference in a NOFO must continue to maintain a preference for at least one of the targeted groups in the NOFO. PHAs may choose to apply NOFO preferences to its entire HCV waiting list or only to Mainstream Voucher applicants as a separate Mainstream Voucher preference.

PHAs currently have the option, without an optional waiver, to establish a preference for applicants referred from certain agencies. Using the optional waiver described in the paragraph above, PHAs may choose to establish a referral preference specifically for Mainstream Voucher applicants. Referral partners may refer potential Mainstream Voucher participants directly to the PHA for processing, and such individuals can be placed on the Mainstream waiting list. A formalized partnership with a referring agency is not required for Mainstream Voucher referrals, but HUD encourages PHAs to execute MOUs with agencies providing referrals. A sample MOU can be found [here](#). PHAs that choose to use direct referrals from other agencies to place individuals onto their waiting list must make such information publicly available, by providing clear information on these partnerships and the direct referrals process on their website and in their administrative plan, including the names and contact information of their partnering agencies (24 CFR 982.54(d)(1)). Written documentation of these referrals must be maintained in the tenant file by the PHA.

When engaging in such partnerships and accepting referrals, PHAs must ensure that they are not discriminating based on disability type or on the basis of any other federally protected class. Referral partnerships cannot create, directly or indirectly, requirements to receive Mainstream Vouchers that may violate nondiscrimination requirements under any applicable federal civil rights laws, including Section 504 of the Rehabilitation Act (Section 504), the Fair Housing Act, Title VI of the Civil Rights Act (Title VI), the ADA, and the Age Discrimination Act, among others. This

means, for example, that a PHA cannot restrict Mainstream Vouchers to those referred by a specific state or local agency that provides services only to individuals with specific types of disabilities or diagnoses because such an arrangement would exclude individuals with other types of disabilities who are eligible to receive a Mainstream Voucher. Accordingly, if a PHA partners with such an organization, the PHA also must have a partnership with at least one organization that will accept and refer any potentially eligible applicant. Potential referral sources that may serve individuals with all types of disabilities and therefore will refer any potentially eligible applicant include Continuums of Care, Independent Living Centers, Area Agencies on Aging, and fair housing initiatives programs. So long as the PHA has a referral partnership with a source that serves all individuals regardless of types of disability, the PHA may create additional partnerships with disability-specific referral services or other sources that may not serve individuals with all types of disabilities, such as state Medicaid agencies. In implementing this referral process, a PHA cannot prioritize referrals from one referral source over others or provide any priority or preference over other referral sources in allocating vouchers and developing a waiting list. Any proposed preferences must comply with federal fair housing and civil rights authorities, including, but not limited to, the Fair Housing Act, Section 504, Title VI, the Age Discrimination Act, among others (24 CFR 5.105(a)).

These partnerships are intended to help PHAs more efficiently identify eligible beneficiaries and quickly utilize vouchers. Such partnerships also help facilitate access to individuals who are exiting institutional settings. Given the challenges in timing and ensuring a voucher is available when an individual is ready to leave an institutional setting, this type of arrangement allows an agency to better ensure a voucher will be available when an individual is ready to exit an institutional or other segregated setting, coordinate any application and screening issues, and build in time for finding a unit that meets the individual's disability-related needs. This advanced planning and coordination should help facilitate a timely move into a community-based, affordable, and integrated housing opportunity.

- 8. Reasonable Accommodations.** As a reminder, PHAs administering Mainstream Vouchers and landlords receiving Mainstream Vouchers may need to provide various reasonable accommodations for individuals with disabilities to ensure program access. A common reasonable accommodation is providing approval for exception payment standards (24 CFR 982.503(d)(5)), so that an individual with a disability is able to rent a unit that meets their disability-related needs in terms of features, location, or other characteristics, as well as the possible need for additional space to accommodate a live-in aide or additional equipment. Other examples of types of reasonable accommodations that may be needed in HCV programs, including Mainstream Vouchers, to ensure program access include, but are not limited to: assistance in or modifications to the application process and procedures; permitting assistance animals in housing; and providing additional time or other modifications for an individual with a disability who is unable to move within a specific time period because of their disability when the individual reaches the top of a waiting list (e.g., due to hospitalization, treatment, or other disability-related reasons). In addition, a PHA is required to take appropriate steps to

ensure [effective communication](#) with applicants, beneficiaries, and members of the public.² This effective communication obligation is separate from and in addition to a PHA's reasonable accommodation obligations.

9. Information Contact. Inquiries about this notice should be directed to MainstreamVouchers@hud.gov.

10. Paperwork Reduction Act. The information collection requirements contained in this notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C 3520). In accordance with the PRA, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. The active information collections contained in this notice have been approved under the PRA OMB Control Number 2577-0169.



Richard J. Monocchio
Principal Deputy Assistant Secretary
Office of Public and Indian Housing

² 24 CFR 8.6 Communications (Section 504); 28 CFR part 35, Subpart E –Communications (Title II ADA).



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Attachment I
Mainstream Voucher Waivers and Alternative Requirements

Item	Statutory or Regulatory	Brief Summary	Mandatory Use	Alternative Policy
Waiting Lists	24 CFR 982.204(f)	Waives the requirement that PHAs maintain one HCV waiting list.	No	PHAs may establish a waiting list separate from their HCV waiting list for Mainstream Vouchers.
Waiting Lists	24 CFR 982.207(c)(1)	Waives the requirement that date and time of application, if used by the PHA, applies only to the HCV waiting list.	No, unless establishing a separate waiting list	For PHAs that opt to establish a separate Mainstream waiting list and rely on the date and time of application method, they must rely on the date and time of application for their Mainstream waiting list as well.
Preferences	24 CFR 982.207(a)	Waives the requirement that PHAs maintain one set of HCV preferences.	No	PHAs may establish separate preferences for Mainstream Voucher applicants. PHAs that claimed points for a preference in a Notice of Funding Opportunity (NOFO) must continue to maintain a preference for at least one of the targeted groups identified in the NOFO.
Preferences	Section 8(o)(6)(A) of the United States Housing Act of 1937; 24 CFR 982.207(b)	Waives the ability for PHAs to establish a residency preference for Mainstream Voucher applicants.	Yes	A PHA may not apply any residency preference to Mainstream Voucher applicants.
Initial Search Term	24 CFR 982.303(a)	Waives the ability for PHAs to use a minimum initial search term of 60 days for Mainstream Voucher applicants.	Yes	A PHA must provide a minimum initial search term of 120 days for Mainstream Voucher applicants.

Item	Statutory or Regulatory	Brief Summary	Mandatory Use	Alternative Policy
Term Extensions	24 CFR 982.303(b)(1)	Waives the ability for PHAs to grant first extensions at its discretion.	Yes	PHAs must adopt an extension policy that includes the following features: 1) each extension must be for a minimum of 90 days, 2) the PHA must approve the first extension request, regardless of how the request is made or when it is made (written or verbal), as long as the request is made on or before the term expiration date and is consistent with applicable requirements, and 3) the PHA must, on at least one occasion after voucher issuance, notify the family prior to the initial term expiration to remind them of the term expiration date, the process for requesting an extension, and to inquire if the family is in need of assistance with their housing search.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

SPECIAL ATTENTION OF:

Office Directors of Public Housing;
Regional Directors; Public Housing
Agencies

NOTICE PIH 2024-17

Issued: May 10, 2024

Expires: This notice remains in effect until
amended, superseded, or rescinded.

Cross References: Notice PIH 2018-16
Notice PIH 2023-13

Subject: Streamlined Review Process for Regulatory Waivers to Expedite Admission to the Housing Choice Voucher (HCV), Project-based Voucher (PBV), and Public Housing Programs for Persons Experiencing Homelessness

1. Applicability

This Notice applies to public housing agencies (PHAs) administering the HCV, PBV, or Public Housing programs. The HCV program includes special purpose vouchers (SPVs). Except for Emergency Housing Vouchers (EHV) and Stability Vouchers (SV), any waiver of HCV regulations granted under this notice will apply to SPVs. Please note, waivers are not needed for the EHV and SV programs because the alternative requirements for those programs already provide the flexibilities being offered under this notice.

2. Purpose

This Notice provides a streamlined submission and review process for two regulatory waivers related to verification requirements at admission to the HCV, PBV, or Public Housing programs: (1) third-party verification of date of birth and a person's disability status, and (2) third-party verification of income and assets. This streamlined process simplifies and expedites the process PHAs may undertake to receive approval of regulatory waivers for these purposes. These regulatory waivers specifically relate to assisting PHAs in responding to the crisis of households experiencing homelessness and providing tools to house families (which may be a single person or group of persons) experiencing homelessness more quickly. When granted, these waivers will remain in effect for a period of 12 months following approval and will provide alternative requirements that the PHA must follow during the period the waiver is in effect. The notice also provides guidance on policies that have recently been streamlined to help families more easily provide documentation and allow PHAs to house families faster.

3. Background

PHAs play a critical role in the efforts to end homelessness. PHAs administer over 899,000 units of Public Housing and approximately 2.8 million HCVs. In December 2022, the United States

Interagency Council on Homelessness (USICH) released “The Federal Strategic Plan to Prevent and End Homelessness.” One of the strategies outlined in the plan is “to remove and reduce programmatic, regulatory, and other barriers that systematically delay or deny access to housing for households with the highest need.”

In June 2023, the Department published Notice PIH 2023-13, “Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher Programs.” The notice described ways PHAs could remove barriers to persons experiencing homelessness using existing flexibilities. Suggestions for PHAs included:

- Participating in the local Continuum of Care’s (CoC) Coordinated Entry System (CES) by accepting CES referrals and providing preferences for CES referrals
- Providing general nondiscriminatory preferences in admission policies for homeless applicants
- Developing universal applications with PHA partners in the region
- Providing multiple ways to access applications for housing programs
- Engaging with partner organizations to help households experiencing homelessness gather necessary information and documentation
- Implementing liberal waiting list reinstatement policies
- Establishing flexible intake and briefing schedules
- Providing longer voucher search terms
- Identifying and addressing racial equity in the PHA’s preference system
- Implementing flexible policies for rental history for those without a consistent or steady rental history

With many communities experiencing significant increases in the number of people experiencing homelessness, HUD is seeking to provide PHAs with options, including regulatory relief, when warranted based on a PHA’s circumstances.

4. Verification Policies Available to PHAs Without a Waiver

A. Verification of Social Security Number (SSN)

HUD has updated its requirements for the documentation of SSNs to make it easier for applicants to access programs if they do not have their Social Security card or other documentation that HUD typically requires at the time of initial eligibility determination. In accordance with 24 CFR 5.216(g)(1)(iii), and through Notice PIH 2023-27, HUD provided the following updated guidance.

PHAs must first attempt to obtain from an applicant, a valid SSN card issued by the Social Security Administration (SSA), or an original document issued by a federal or state government agency that contains the name and SSN of the individual, along with other identifying information of the individual. However, if the applicant is unable to provide that information, the PHA may accept as verification of an individual’s SSN the applicant’s self-certification of SSN and at least one-third party document, such as a bank statement, utility or cell phone bill, benefit letter, etc., that contains the name of the

individual. If verifying a person's SSN using this method, the PHA must document why the other SSN documentation was not available.

If the tenant's SSN is subsequently verified in EIV, no further verification is required. If the tenant's SSN fails the SSA identity match, the PHA must obtain a valid SSN card issued by the SSA, or an original document issued by a federal or state government agency that contains the name and SSN of the individual, along with other identifying information of the individual. The tenant's assistance must be terminated if they fail to provide the required documentation. Please note that the EHV, SV, and HUD-VASH programs have alternative requirements related to the verification of SSNs. Therefore, PHAs should consult program specific guidance for those SPVs.

B. Date of Written, Third-Party Verification

PHAs are responsible for verifying information that is related to family income, assets, and certain expenses and other factors that may affect a family's adjusted income and how much the family will pay for rent. HUD developed a hierarchy that describes verification documentation from the most acceptable to the least acceptable that PHAs must use when verifying a tenant's income and related information. Written, third-party verification is a type of verification within this hierarchy. Guidance issued in Notice PIH 2023-27, Section J.5.a., states that an original or authentic document generated by a third-party source dated within 120 days of the date received by the PHA, is considered acceptable third-party verification. For fixed income sources, a statement dated within the appropriate benefit year is acceptable documentation. Previously, documents were required to be dated within 60 days of the date received by the PHA. These changes are intended to ease the paperwork burden on families, while still providing timely information to the PHA. For more detailed information on verification requirements, please refer to Section J.5 of Notice PIH 2023-27.

C. Self-certification of Zero Income

PHAs may accept a self-certification of zero income from the family without taking any additional steps to verify zero reported income prior to admission of the family. HUD does not require that such self-certification be notarized. PHAs are reminded that they must verify families' income in EIV within 120 days after admission (Notice PIH 2023-27, Section J.8).

5. Streamlined Waiver Process

To help PHAs more quickly and effectively serve persons experiencing homelessness, HUD has created a streamlined waiver process.

A. Standards for Requesting Waivers

PHAs must use the process set forth in this Notice to submit waiver requests and provide justification of good cause to receive a streamlined HUD review. HUD has developed a streamlined process to respond to these waiver requests in accordance with Section 106

of the Department of Housing and Urban Development Reform Act of 1989. This streamlined review process only applies to the waivers under this notice.

In accordance with 24 CFR 5.110, regulatory waivers provide relief from certain requirements upon a finding of good cause, subject to statutory limitations. HUD will review waiver requests on a case-by-case basis, taking into consideration the specific circumstances presented by the PHA. There are several factors that a PHA may want to consider when developing its waiver request. These factors include, but are not limited to:

- A significant population of persons experiencing homelessness or significant increase in the population of persons experiencing homelessness within the PHA's jurisdiction, based on data such as the Point-in-Time (PIT) count.
- An emergency declaration by city, county, or state officials related to the homelessness crisis, in effect for the PHA's jurisdiction.
- The PHA is issuing vouchers or admitting to PBV or Public Housing units a significant number of persons experiencing homelessness, based on local waiting list preferences or the make-up of its HCV, PBV and/or Public Housing waiting lists.
- The length of time it takes the PHA to determine eligibility of applicants experiencing homelessness vs. other applicants.
- The percentage of applicant families experiencing homelessness that do not have income or other documentation readily available.
- The difficulties applicants experiencing homelessness face when attempting to gather documentation.
- The length of time it typically takes to gather appropriate documentation for persons experiencing homelessness.
- Other data or lessons learned from other programs or use of previous regulatory waivers (e.g. EHV, SVs, CARES Act).
- Policies, programs, or partnerships the PHA has put in place to reduce barriers for persons experiencing homelessness who are trying to access housing or other services.
- Existing referral partnerships with CoCs or Survivor Service Providers.
- Specific challenges your community faces and how these flexibilities would improve performance and benefit the community.

B. *Available Waivers and Alternative Requirements*

1) **24 CFR 982.201(e) and 960.259(a) and (c)(1): Verification of Date of Birth and Disability Status**

HUD may waive 24 CFR 982.201(e) and 960.259(a) and (c)(1), for persons experiencing homelessness, as it relates to verifying a family member's date of birth and/or disability status at the time of admission for purposes of determining the family's eligible expenses and deductions. For example, the PHA verifies whether

the family is eligible to receive the dependent deduction for family members with a disability or who are under the age of 18 or receive the elderly/disabled deduction if the head of household, co-head or spouse is a person with a disability or is age 62 or older.

Alternative Requirement if Waiver is Approved: For any applicant family experiencing homelessness, a PHA may accept a self-certification from the applicable family member, if the family is unable to provide third-party verification of date of birth and/or disability status for any of its members, because of loss or lack of documents. The PHA must verify the disability status and/or date of birth within 90 days after admission.

Self-certification of date of birth and disability status cannot be utilized when it is related to the eligibility for a particular special purpose voucher (e.g., Mainstream) or for Public Housing which has been officially designated, with HUD approval, in whole or in part, for families whose head of household, co-head, or spouse is a person with disabilities or age 62 or older.

The waiver will be granted for a period of 12 months following the date of waiver approval.

2) **24 CFR 982.201(e) and 960.259(a)(1), (a)(2), and (c): Eligibility Determination, Income Verification**

PHAs are required to verify a family's income eligibility within 60 days prior to voucher issuance for the tenant-based voucher program and prior to admission for the PBV and Public Housing programs. Notice PIH 2023-27 provides the verification hierarchy under which PHAs are responsible for obtaining third-party verification of reported family annual income, and PHAs must demonstrate efforts to obtain third-party verification prior to accepting self-certification except in instances when self-certification is explicitly allowed. HUD may waive these requirements if an applicant family lacks necessary income documentation because the family is experiencing homelessness.

Alternative Requirement if Waiver is Approved:

- a) For any applicant family experiencing homelessness, the PHA must first request third-party documentation from the family.
- b) If the family is unable to provide third-party documentation at the time of the request, the PHA may immediately allow self-certification. The PHA is not required to first attempt to obtain the documentation from the third-party source of income before proceeding immediately to the family self-certification, notwithstanding the requirement under Notice PIH 2023-27 that PHAs must demonstrate efforts to obtain third-party verification prior to accepting self-certification.
- c) Applicants must submit a self-certification declaration of income, assets, expenses, and other factors that would otherwise affect an income eligibility

determination within 60 days prior to voucher issuance for the tenant-based HCV program, and prior to admission for the Public Housing and PBV programs.

- d) If the family is unable to provide third-party verification, for the tenant-based HCV program, the PHA must receive information verifying that the family is eligible within 90 days after the PHA enters into a Housing Assistance Payment (HAP) contract on behalf of the family. For the Public Housing and PBV programs the PHA must receive information verifying that the family is eligible 90 days following admission.
- e) The adoption of this waiver does not authorize any ineligible family to receive assistance under these programs or relieve the PHA of its responsibilities to correct any overpayments or underpayments. The PHA must take steps to identify and resolve any income discrepancies, including updating the family's income retroactive to the New Admission (action code 1) HUD-50058 and correcting any overpayments or underpayments. If the PHA later determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program in accordance with the relevant program requirements.
- f) The waiver will be granted for a period of 12 months following the date of waiver approval.

6. Nondiscrimination Requirements

PHAs should ensure that applicants have multiple methods by which they can provide documentation to ensure persons with disabilities have an equal opportunity to access the PHA's programs. This could include accepting applications and documentation in person, by mail, or electronically (by email, or online submission, where available). Additionally, persons with disabilities may request reasonable accommodations to assist with the application process consistent with Section 504 of the Rehabilitation Act of 1973 (i.e., 24 CFR Sections 8.4 and 8.33).

7. Submission Requirements

To ensure streamlined processing, PHAs will submit their waiver request using this [LINK](#). PHAs must provide certain information within the waiver request document including:

- PHA name, code and business address
- Name and email for the PHA point of contact
- Regulatory waiver(s) being requested
- A PHA specific justification for the waiver(s) that shows good cause. The good cause justification must include (a) why a PHA needs the waiver (which may address the factors under section 5.A. of this notice, and/or other information the PHA deems as relevant) and (b) the impact on PHA operations or applicants if the waiver is not provided.

Following submission, PIH will reply via email confirming that the request has been received. Once a final determination for approval by the Assistant Secretary has been made, PHAs will receive the signed response to the waiver request via email.

No waiver(s) requested may be implemented unless written approval from HUD has been obtained.

Moving to Work (MTW) PHAs: MTW PHAs are encouraged to utilize their waiver flexibilities provided under the Standard MTW Agreement or MTW Operations Notice to better serve people experiencing homelessness in their communities. HUD-approved MTW waivers are not limited to one-year approvals.

Note: PHAs may continue to request other regulatory waivers as necessary to operate their HCV, PBV and Public Housing programs; however, they will not be subject to the streamlined process in this Notice. PHA waivers submitted under the streamlined process in this Notice may not be combined with waivers submitted under the standard process described in Notice PIH 2018-16.

8. Further Information

For further information about this notice, contact the nearest HUD Office of Public Housing. Locations of these offices are available on HUD's website at <http://www.hud.gov>.



Richard J. Monocchio
Principal Deputy Assistant Secretary
Public and Indian Housing



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention of:

Public Housing Agencies administering the Housing Choice Voucher and/or Public Housing Programs; Public Housing Field Office Directors; CPD Directors; Continuums of Care

NOTICE PIH 2023-13, CPD 2023-05

Issued: June 8, 2023

Expires: Effective until amended, superseded, or rescinded

Supersedes: PIH Notice 2013-15

Cross References: PIH Notice 2015-19, PIH Notice 2017-21 (HA), CPD Notice 2017-01

Subject: Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher Programs

1. **Applicability:** This Notice applies to public housing agencies (PHAs) administering Public Housing and/or Housing Choice Voucher (HCV) programs and Continuums of Care (CoCs).
2. **Purpose:** This Notice supersedes previous guidance found in PIH Notice 2013-15 and identifies strategies that PHAs can pursue to expand housing opportunities for individuals and families experiencing homelessness through the Public Housing and HCV programs. Specifically, this Notice:
 - Revises the definition of homelessness for the purpose of reporting in the Inventory Management System/Public Housing Information Center (IMS/PIC) or its successor system,
 - Outlines new guidance on how PHAs and CoCs can share data derived from IMS/PIC or its successor system and the Homeless Management Information System (HMIS),
 - Provides updated guidance on:
 - waiting list management and preferences,
 - screening policies regarding criminal activity, substance use, and rental history,
 - program termination and eviction policies, and
 - information regarding pairing project-based vouchers with CoC Supportive Services¹ to create Permanent Supportive Housing

As authorized by the Consolidated Appropriations Act, 2022 (P.L. 117-103), HUD

¹ [CoC Eligible Activities – Supportive Services – HUD Exchange \(This resource was developed by a HUD funded technical assistance provider\).](#)

published PIH Notice 2022-29, awarding more than 19,000 new HCVs to PHAs that may be used as an additional resource to combat homelessness in local communities. The Fiscal Year 22 Appropriations provides that “the Secretary may specify additional terms and conditions to ensure that public housing agencies provide vouchers for use by survivors of domestic violence, or individuals and families who are homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)), or at risk of homelessness as defined in section 401(1) of such Act (42 U.S.C. 11360(1)).” This Notice describes how PHAs can use these new vouchers strategically by collaborating with their local CoC to establish preferences to assist individuals and families who are experiencing or at-risk of experiencing homelessness (See Section 11 of the Notice for additional information on preferences for admission). In addition to information on preferences, this Notice addresses multiple ways in which PHAs can most effectively target and serve families experiencing homelessness through updated occupancy policies.

- 3. Background:** CoCs and PHAs play a critical role in the efforts to end homelessness. Across the country, PHAs administer approximately 850,000 units of public housing and 2.6 million HCV subsidies, providing safe, stable, and affordable housing for low- and extremely low-income households. Many households entering public housing or the HCV program transition from CoC-funded projects. HUD encourages PHAs to become familiar with their local CoC’s projects and coordinated entry systems to strengthen collaborations that can make each organization’s efforts more effective.

In partnership with the United States Interagency Council on Homelessness (USICH), HUD created a new initiative called [House America](#). Through this initiative, HUD invited mayors, city and county leaders, Tribal nation leaders, and governors to leverage American Rescue Plan funds as well as other Federal, Tribal, State, and local resources to nationally re-house 100,000 households experiencing homelessness through a Housing First approach and to bring 20,000 new units of affordable housing into development by December 31, 2022. Local collaboration is essential to House America’s success, requiring coordinated efforts by PHAs and CoCs to match available resources to unstably housed families. As of January 2023, 105 communities across 31 states and territories housed more than 100,00 households experiencing homelessness and added over 40,000 affordable housing units into development.

While coordinating with HUD on House America, USICH released its strategic plan, “[The Federal Strategic Plan to Prevent and End Homelessness](#)” in December 2022. To help meet the Administration’s goal of reducing homelessness by 25% by January 2025, the plan focuses on ways to provide housing and supports, homelessness response, and homeless prevention, by effectively using equity, data, and collaboration. The plan’s emphasis on equity reflects a priority of both HUD and USICH. Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color experience homelessness at significantly higher and disproportionate rates than White people, and eliminating these racial disparities is not only a focus of HUD and USICH but also The White House, as evidenced in the [Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#). The Administration has committed to advancing

equity, civil rights, racial justice, and equal opportunity by redressing inequities in policies and programs that serve as barriers to equal opportunity across the Federal Government.

HUD is expanding its guidance related to how PHAs can leverage their public housing and HCV resources to assist individuals and families who are experiencing homelessness, including how PHAs can work with their local CoC to accept referrals from a Coordinated Entry System (CES). This Notice also updates the definition of homeless for Form HUD-50058 reporting to include Categories 2 and 3 of the definition under 24 CFR 578.3.

PHAs play an integral role in offering safe, stable, and affordable housing solutions within their communities, particularly to households with the lowest incomes and greatest barriers to housing. PHAs have taken varied approaches to assist individuals and families experiencing homelessness, both through relationships with partnering organizations and by implementing thoughtful policies and procedures aimed at removing barriers to housing homeless individuals and families. This Notice also provides information on these strategies.

4. **Definitions:**

- Homeless² – The CoC program definition of homeless at 24 CFR 578.3 includes the following four “homeless” categories. Categories 1 through 3 are based on section 103(a) of the McKinney-Vento Homeless Assistance Act, whereas Category 4 is based on section 103(b) of that Act. PHAs should keep this distinction in mind when determining whether an individual or family is homeless as defined by section 103(a) of the McKinney-Vento Homeless Assistance Act.
 1. Category 1: Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for

² For purposes of programs such as the Emergency Solutions Grants and Continuum of Care Programs, section 605 of the Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022) amended section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider as homeless “any individual or family who— (1) is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; (2) has no other safe residence; and (3) lacks the resources to obtain other safe permanent housing.” Rulemaking will be needed to require Emergency Solutions Grants (ESG) recipients and subrecipients, Continuums of Care (CoCs), and CoC Program recipients and subrecipients to make corresponding changes to the applicable written standards, coordinated entry policies, and documentation policies used to qualify individual and families as homeless under the CoC Program. That said, because HUD must recognize as “homeless” families and individuals who meet the new statutory criteria in section 103(b) of the McKinney-Vento Homeless Assistance Act as of October 1, 2022, ESG and CoC recipients may implement the new definition prior to HUD rulemaking, provided that ESG recipients and CoCs update the relevant written standards and policies as needed to reflect the new statutory criteria. For further information, please see “[The Violence Against Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs](#),” which HUD published in the Federal Register on January 4, 2023.”

- human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
 - iii. Is exiting an institution where the individual or family resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
 - 2. Category 2: Individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. Residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing.
 - 3. Category 3: Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - i. Are defined as homeless under the other listed federal statutes;
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time due to certain special needs or barriers.
 - 4. Category 4: Any individual or family who:
 - i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks to obtain other permanent housing.
- Chronic Homelessness –
 - 1. A homeless individual with a disability, as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), is an individual who:
 - i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

- ii. Has been homeless continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph 1(i).
 - 2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in the preceding bullets of this definition before entering that facility; or
 - 3. A family with an adult head of household (or if there is no adult in the family, a minor head of household³) who meets all of the criteria in paragraphs 1 and 2 including a family whose composition has fluctuated while the head of household has been homeless.
- Centralized or Coordinated Assessment System (CE system) – The definition of Centralized or Coordinated Assessment is found at 24 CFR 578.3, 24 CFR 578.7(a)(8) details the responsibilities of the CoC to establish and operate this required system. In addition to the definition and responsibilities established in the Rule, HUD posted on its website, CPD-17-01: *Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System*, establishing additional requirements related to the development and use of a centralized or coordinated entry assessment system. These systems help communities assess the needs of program participants and effectively match individuals and families experiencing homelessness with the most appropriate resources available to address their supportive service and housing needs. CoCs may use planning costs to design and plan for the implementation of a centralized or coordinated assessment system; however, once the system is established and operating, the costs of operating it are not eligible planning costs. CoCs must operate the system with CoC Program funds, other funds, or a combination of the two.
 - Continuum of Care (CoC) (24 CFR 578.3) – The group organized to carry out the responsibilities required under this part and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.
 - Continuum of Care Program (24 CFR part 578) – Promotes a community-wide commitment toward the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, Indian Tribes or tribally designated housing entities (as defined in section 4 of the Native American Housing Assistance and Self Determination Act of 1996 (25 U.S.C. 4103) (TDHEs)), and local governments to

³ An individual who is a minor under the age of 18 who has been emancipated to act on his/her own behalf, including the ability to execute a contract or lease under state law. See 24 CFR § 5.504(b).

quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families, and to optimize self-sufficiency among those experiencing homelessness.

- Disability – The inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months; or in the case of an individual who has attained the age of 55 and is blind, the inability by reason of such blindness to engage in substantial gainful activity requiring skills or abilities comparable to those of any gainful activity in which they have previously engaged with some regularity and over a substantial period of time.⁴
- Emergency Solutions Grant (ESG) (24 CFR part 576)– A formula grant program that provides funding to cities, urban counties, territories, and states for street outreach, emergency shelter, homelessness prevention, and rapid-rehousing.
- Family – A person or group of persons, as determined by the PHA consistent with 24 CFR 5.403, approved to reside in a unit with assistance under the program. The term “family” used in EHV/HCV context always includes a family that is comprised of a single individual as well as a group of persons under the HCV program regulations at 24 CFR 982.4.
- Homeless Management Information System (HMIS) – means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.
- Housing for Persons with HIV/AIDS (HOPWA)- The only federal program dedicated to the housing needs of people living with HIV/AIDS. Under the HOPWA Program, HUD makes grants to local communities, States and nonprofit organizations for projects that benefit low-income persons living with HIV/AIDS and their families.
- House America – A partnership between HUD and The U.S. Interagency Council on Homelessness (USICH) with mayors, local government leaders, tribal nation leaders, and governors that utilize the American Rescue Plan (ARP) to address homelessness.
- Household – Includes everyone who lives in the unit, including foster children/adults and live-in aides. Household members are included when determining unit size, but are not considered family members, and have no rights to the public housing unit or Housing Choice Voucher if there are no remaining family members.
- Housing First – A model of housing assistance that prioritizes rapid placement and stability in permanent housing in which admission does not have preconditions (such as sobriety or a minimum income threshold) and in which housing assistance is not conditioned upon participation in services.

⁴42 USC § 423(d)(1)(A). For consistency with fair housing requirements, see The Fair Housing Act, 42 U.S.C. 3602(h) (defining a person with a disability as an individual who has “(1) a physical or mental impairment which substantially limits one or more of such person’s major life activities, (2) a record of having such an impairment, or (3) being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 802 of Title 21).”

- Moving On – A strategy that enables individuals and families who are able and want to move on from Permanent Supportive Housing (PSH) to do so by providing them with sustainable, affordable housing options through mainstream systems, as well as the services and resources necessary to maintain housing stability.
- Permanent Supportive Housing (PSH) – As it relates to project-based vouchers, permanent housing in which supportive services are provided to assist homeless persons or families, in which at least one person has a disability, to live independently.

5. Definition of Homeless for the Purpose of Completing Line 4c on Form HUD-50058:

For all new admissions, PHAs must determine whether an individual or family was homeless at admission, and this information must be reported on line 4c on Form HUD-50058. Note that while a PHA may adopt its own definition of the term *homeless* for purposes of a PHA-adopted waiting list preference, PHAs must use the definition provided in Section 4 above for purposes of reporting whether a new admission is homeless on the Form HUD-50058. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney Vento Act definition of homeless for HUD’s homeless assistance programs, and on December 5, 2011, HUD published its [Final Rule](#) implementing this definition.

HUD previously adopted only a portion of this definition for the purpose of reporting on Form HUD-50058 (categories 1 and 4). This Notice supersedes the definition of homeless family found in the Form HUD-50058 guide. As of this Notice, “Homeless at admission” in Section 4 is to be filled out as follows.

When using Form HUD-50058 for either the Emergency Housing Vouchers (PIH Notice 2021-15) or Stability Vouchers (PIH Notice 2022-24), PHAs should mark yes only if the applicant meets criteria in category 1, 2, or 3 of the homeless definition in 24 CFR 578.3. For any other Housing Choice Voucher, PHAs should mark yes only if the applicant meets the criteria in category 1, 2, 3, or 4 of the homeless definition in 24 CFR 578.3 or the criteria in section 103(b) of the McKinney Vento Homeless Assistance Act, as amended 42 U.S.C §11302(b).

For additional information on the Form HUD-50058, please see the Form [HUD-50058 Instruction Booklet](#).

- 6. Reporting Homelessness on the Form 50058:** The Form HUD-50058 and Form HUD-50058 MTW modules allow HUD to obtain information about participants in the Public Housing and HCV programs, including the homeless status of persons entering the program. The accuracy and reliability of this information is critical to tracking the homelessness system’s collective progress towards ending homelessness. However, based on a HUD review of PIC reporting on line 4c, some PHAs are not reporting this field accurately, or are reporting “no” for all applicants, whether they are homeless or not. It is of particular importance for PHAs to record the homeless status of individuals receiving Veterans Affairs Supportive Housing (HUD-VASH), Family Unification Program (FUP), Foster Youth to Independence Initiative (FYI), EHV, Mainstream, and Non-elderly Disabled (NED), as these special purpose vouchers serve a high percentage

of people meeting the updated homeless definition (and in the case of HUD-VASH, is statutorily required to meet the definition of homeless and for FUP-Youth and FYI, must meet the definition of homeless or at-risk of homelessness). For all new admissions to Public Housing, HCV program, and all special purpose vouchers, PHAs must determine whether an individual or family was homeless at admission using the definition detailed in Section 4 above, and this information must be reported on line 4c on Form HUD-50058. HUD does not require PHAs to collect documentation or third-party verification of any kind to verify an applicant's homelessness status for the purpose of reporting on line 4c. Verbal self-verification by the applicant that any of the above criteria are true is sufficient.

To aid PHAs in accurately reporting a new admission's homelessness status on line 4c of Form HUD-50058, the PHA may find the following list of questions helpful. If the answer to any of the following questions is *yes* regarding the family's current living situation, the PHA would mark "Y" on line 4c of the Form HUD-50058 (homeless at admission).

1. Are you currently living in a car, on the street, or another place not meant for human habitation?
2. Are you currently living in an emergency shelter, transitional housing, Safe Haven⁵, or a hotel/motel paid for by a charitable organization or by federal, state, or local government programs for low-income individuals?
3. Are you exiting an institution, including a hospital, substance abuse or mental health treatment facility, or jail/prison, where you stayed for 90 days or less? If so, were you living in an emergency shelter or place not meant for human habitation immediately before entering that institution?
4. Will you be losing your primary nighttime residence within the next 14 days, with no subsequent residence identified and no resources or support networks to obtain other permanent housing?
5. Are you an unaccompanied youth under 25 years of age, who does not otherwise qualify as homeless under the HUD definition, but who is considered to be experiencing homelessness under the definition of another federal statute⁶, have not had a lease, ownership interest or occupancy agreement in permanent housing in the past 60 days, have experienced persistent instability (2 or more moves in the past 60 days), and can be expected to continue the above instability because of various barriers, including chronic disabilities, chronic physical or behavioral issues, histories of domestic violence or child abuse and neglect, or two or more barriers to employment?
6. Are you experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic, or life-threatening conditions related to the violence against you or a family member in your current housing situation?

⁵ A Safe Haven is a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who are on the street and have been unable or unwilling to participate in housing or supportive services.

⁶ Other federal definitions of homelessness include those used by the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11434(a)(2)) and the Runaway and Homeless Youth Act (42 U.S.C. § 5732a)).

Example 1: A family that lost their home because the family was no longer able to make the mortgage payments and is living in their car **would** qualify as homeless.

Example 2: An individual that had previously lived in an emergency shelter and was admitted to the hospital for a 5-day stay **would** qualify as homeless.

Example 3: An individual being released from prison after a 3-year incarceration **would not** qualify as homeless based on the length of incarceration.

Example 4: An individual that is residing in a home with their abuser, both of whom are on the lease, and does not have sufficient resources to leave the home and obtain housing independently **would** qualify as homeless.

PHAs are encouraged to partner with a CoC or other homeless services organization to assist with documenting the homelessness status of applicants. In particular, partnerships may be valuable for determining whether individuals and families qualify under categories 2 and 3 of the homeless definition, since the documentation requirements for these categories are time-sensitive (e.g., losing housing within the next 14 days). This partnership between the PHA and other organization could be simply to verify the family's homelessness status or could be more robust in which the PHA accepts referrals from the CoC's CE System. This more robust partnership is discussed further in Section 7 of this Notice.

PHAs must follow the verification requirements established in their written policies to verify homelessness status for a preference, which may include reliance on verification from partnering organizations such as CoCs.

- 7. Partnering and Working Collaboratively with CoCs:** As demonstrated by the implementation of the Emergency Housing Voucher program, a partnership between the CoC and the PHA is a critical part of a community-wide effort to end homelessness. CoCs manage federal resources to assist individuals and families experiencing homelessness, while PHAs provide stable, long-term housing and housing subsidies which can help end the cycle of homelessness. HUD strongly encourages PHAs and CoCs to proactively engage in partnerships, since the communities that have been most successful in working toward ending homelessness are those where PHAs form direct partnerships with the local CoC, homeless service providers, and other agencies.

Partnerships between PHAs and CoCs allow the organizations to leverage their resources to better serve individuals and families experiencing homelessness. For example, a PHA and CoC may partner to create a PSH project in which the PHA provides a tenant-based or project-based voucher, while the CoC may be able to provide or coordinate the accompanying supportive services in accordance with program requirements. Other examples involve the creation of a Rapid Rehousing (RRH) project where supportive services are provided through the CoC program or ESG funds, while housing subsidies are supplied through an HCV or a Public Housing unit. Note that when funds are provided by both the CoC and PHA, there is a prohibition on duplication of subsidies.⁷

⁷ 24 CFR § 982.352(c)

In any partnership, CoCs and PHAs must follow the rules of the respective program that is being supported, including rules regarding admission to the program such as waiting list requirements and existing PHA preferences. [CPD Notice 2017-01](#) generally provides for all admissions to CoC and ESG programs to go through the CoC's CE system, while PHAs, with the exception of special admissions, are required to select participants from their waiting lists. For these resources to be leveraged, a PHA could establish a waiting list preference for referrals from the CoC, which would, in turn, refer clients from the CE system for the PHA resource. PHAs may choose to prioritize certain categories of homelessness, in accordance with the PHA's Admission and Continued Occupancy Plan (ACOP) or PHA Administrative plan when accepting referrals from the CoC for the PHA's waiting list, depending on identified local needs and racial equity considerations.⁸

Relationships between CoCs and PHAs can benefit both organizations. By working together, the organizations can help each other in a multitude of ways including by:

- Sharing best practices
- Identifying and prioritizing people experiencing homelessness for assistance
- Aiding in locating a unit, accessing additional services, etc.
- Providing documentation for verification purposes
- Sharing information on the physical location of people experiencing homelessness to ensure services can be provided
- Providing case management assistance to households when applying to PHA programs, including assistance with securing vital documents, and understanding relevant program requirements
 - Providing housing search assistance
 - Serving as a liaison between the PHA, family, and owner
 - Identifying and recruiting of landlords for HCV programs

PHAs and CoCs are encouraged to establish strong partnerships, as this enables PHAs to access larger networks of different homeless service providers throughout their community. A larger PHA provider network ensures that vulnerable individuals and families admitted to Public Housing or HCV programs are offered the supportive services necessary to remain stably housed and compliant with the family obligations and other requirements of the program. PHAs and CoCs can use both formal and informal approaches to build relationships, including:

- Participating in a Moving On Program strategy (see Section 13 of this Notice)
- Establishing Memorandums of Understanding (MOU) to detail specific roles and responsibilities of the partnership and leverage combined resources to create PSH and RRH (building off existing EHV MOUs as appropriate)
- Becoming members of the CoC, including PHA leadership holding a seat on the CoC Board and participation from CoC leadership on the PHA board
- PHAs participating in the CoC's HMIS and in the CoC's regular meetings, including ongoing case conference and prioritization meetings

⁸ 24 CFR § 960.206 for Public Housing, 24 CFR § 982.207 for the HCV program, and 24 CFR § 983.251(c)(3) for the PBV program.

- Providing training to PHA staff on the local strategic plan to end homelessness and the various supportive programs that may be available to Public Housing residents and HCV participants
- Providing training to CoC staff to ensure they understand how to best support the clients/participants navigating the HCV and Public Housing application process
- Engaging with other organizations that serve underserved communities (including individuals who belong to communities of color, such as Black and African American, Hispanic and Latino, Native American, Alaska Native and Indigenous, Asian American, Native Hawaiian and Pacific Islander, Middle Eastern, and North African persons; individuals who belong to communities that face discrimination based on sex, sexual orientation, and gender identity; and individuals with disabilities) to exchange ideas about outreach and assessment processes that improve equitable outcomes
- Identifying which other systems interact with the homelessness system. Start a committee with those community partners to address cross-system disparities
- Expanding opportunities for people of different races/ethnicities who have lived experience of homelessness to provide expert advice and opinions on policy, procedures, and services delivery. Consider mechanisms to compensate community partners

8. **Characteristics of an Effective CE Process:** The July 31, 2012, [CoC Program interim rule](#) requires CoCs to establish and operate “a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services with the intention of matching the homeless individual or family with the most appropriate resources.” Prior to coordinated entry (CE), limited housing resources were distributed separately by each housing provider and the most vulnerable households were not always prioritized for subsidies or PSH units.

A CE system is a centralized approach to assessing the needs, vulnerability level, and program eligibility of people experiencing homelessness and linking them to available housing programs in the community using a standardized access, assessment, prioritization, and referral process. With the exception of ESG-funded victim service providers, HUD requires all communities funded through its ESG or CoC program to implement a centralized or coordinated intake and assessment system. In many communities, Veterans Administration (VA) and Health and Human Services (HHS) funded programs partner with the CE to provide access to their units or subsidies. Each CE system is unique, giving CoCs flexibility to design processes and priorities that fit their local needs. HUD strongly encourages PHAs to participate in the CE system in their area by establishing a mechanism for referrals once an assessment has been made by the CoC.

As one of the largest providers of affordable housing in their communities, PHAs can play a critical role in the CE process. HUD encourages PHAs to connect with their local CoCs to understand their local CE design and operation (processes, tools, policies, and procedures). A typical process would likely include the following steps:

- Outreach – CoCs must conduct outreach in a variety of ways to homeless providers, shelters, and community partners, including human trafficking, domestic violence, and sexual assault providers, to ensure equal access to housing based on need and eligibility of homeless households. CoCs must also affirmatively market their housing and supportive services to eligible persons regardless of race, color, religion, sex (including gender identity and sexual orientation), disability, familial status (children under age 18, including pregnancy or seeking legal custody), or national origin who are least likely to apply in the absence of special outreach (see 24 CFR 578.93(c)(1));
- Access - A household experiencing homelessness requests help at one or multiple designated access points (e.g., emergency shelter(s), call line, or intake center(s));
- Assessment – A CoC staff member completes a standardized assessment and identifies which services and housing programs may be the best fit for a program participant;
- Prioritization – Policies documenting the prioritization process must align with existing CoC Program and ESG Program written standards established under HUD regulations 24 CFR 578(a)(9) and 24 CFR 576.400(e). The CoC’s coordinated entry policies and procedures must describe the factors and assessment information with which prioritization decisions are made for all homeless assistance in the CoC. Based on a local prioritization process, if the household meets program criteria and is a good candidate to receive long-term housing assistance, CoC staff prioritize the household for that type of assistance. Communities are always encouraged to evaluate and adjust their prioritization policies based on evolving information and circumstances, including new or improved data (to include potential disparate impacts by race/ethnicity), changing needs and priorities, and available resources;
- Referral/Placement - CoC staff refer eligible households to the PHA or other housing provider intake staff for documentation review and placement.

The structure and operations of a CE system will vary depending on many factors, including the size of the community it serves and the length of its history in building a CE process. HUD does not identify a specific assessment tool or process that CoCs should use for CE, and CoCs can choose to use different assessment tools for specific sub-populations. According to [CPD Notice 2017-01](#), “the coordinated entry process may, but is not required to include separate access points and variations in assessment processes to the extent necessary to meet the needs of the following five populations: (1) adults without children; (2) adults accompanied by children; (3) unaccompanied youth; (4) households fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (including human trafficking); and (5) persons at-risk of homelessness.”

A PHA can participate in their local CoC’s CE system by accepting CE system referrals of people experiencing homelessness who are eligible for and in need of the housing programs they offer, including HCV, PBVs, Public Housing, Mainstream Vouchers, NED Vouchers, FUP, FYI, Housing for Persons with HIV/AIDS (HOPWA), or PSH-funded through the CoC and supported by HCV. PHAs can also provide housing support

through EHV; however, EHV requires a direct referral from the CoC.⁹ PHAs can also use the CoC's CE system to identify households that may be eligible for any limited preference they have for people experiencing homelessness in their community. While all referrals for HUD-VASH must come directly from the PHA's partnering VA facility or designated service provider (DSP), VA facilities are encouraged to become connected with their local CE system.¹⁰

A PHA may establish a preference for families referred from the CE process in the community.¹¹ This may be a general preference or the PHA may choose to limit the number of vouchers/public housing units available under this preference.¹² Please note that this preference is somewhat different from a homeless preference since applicants would need to be referred from the CE rather than applying directly to the PHA. See section 11 of this Notice for further information on establishing a waiting list preference for referrals from a CE system.

For more information on additional CE best practices, see the following resource developed by a HUD funded TA provider: [PHA Strategies to Assist People Experiencing Homelessness Guidebook: Using Coordinated Entry to Identify People Experiencing Homelessness for Housing Assistance](#).

- 9. Pairing Data from the Form 50058 with HMIS Data:** The Homeless Management Information System (HMIS) is a local information technology system used by CoCs to comply with the data collection and reporting requirements of the CoC Program interim rule found at 24 CFR 578. It is a locally administered system used to record and analyze data on program participants on the provision of housing and services for individuals and families who are homeless or at-risk of homelessness.¹³ Further, HUD and other federal partners use aggregate data from HMIS to better inform homeless policy and decision making. Note that client-level data in HMIS is only visible at the local level and must be aggregated when reported to HUD.

HMIS can be used to generate reports, assess programs, and process intake and referral information in some CE systems. The system is a valuable tool and can be used by CoCs to make data-driven decisions, increase access to housing resources for families experiencing homelessness, and evaluate efforts at advancing racial equity. To further enhance the analytical capabilities of both PHAs and CoCs, these organizations can implement data sharing agreements to share disaggregated data, facilitated in part through joint Releases of Information (ROIs). These agreements allow PHAs to link their Form 50058 data with the CoC's HMIS systems, and vice versa, enabling both organizations to understand and analyze the individual paths taken by homeless families through the

⁹ Per [PIH Notice 2021-15](#), Congress provided HUD with broad waiver authority through the American Rescue Plan Act that permitted HUD to establish this alternative requirement for EHV. In the absence of that authority, this alternative requirement would be impermissible.

¹⁰ [VA Participation in Coordinated Entry Guidance \(hudexchange.info\)](#)

¹¹ See 24 CFR § 960.206 for Public Housing, 24 CFR § 982.207 for the HCV program, and 24 CFR § 983.251(c)(3) for the PBV program.

¹² *Id.*

¹³ [HUD Exchange HMIS Data Standards](#) - This resource was developed by a HUD funded TA provider.

system of homelessness.

CoCs often have no visibility into the outcomes of families they refer to PHAs, including application approval, voucher issuance, leasing up, their time in the program, or when they exit the program. However, CoCs, PHAs, and their partners can establish [data sharing agreements](#)¹⁴ to better understand family outcomes in order to create and coordinate strategies that support equitable access to programs and improved outcomes for the families they serve.

For example, if a large number of families are receiving vouchers, but only a small number of those families successfully lease up, it may indicate a need for support in finding units, completing landlord applications, or getting paperwork returned to the PHA. Or, if families do successfully lease up but are frequently terminated within 1-2 years, it may indicate a need for increased support throughout their time within the program. Both examples highlight instances where access to data can lead to a greater understanding of the path through homelessness, enabling PHAs and CoCs to coordinate the application of additional resources most needed by the people experiencing homelessness in their communities. Viewing these disaggregated data can also help determine disparities in lease-up by race/ethnicity to examine any racial equity concerns.

CoCs and PHAs are required to create policies and procedures regarding how data is collected, used, stored, and disclosed across the homeless services system. These policies must comply with the requirement to protect clients' personally identifying information (PII) and should follow the guiding principle to only share the minimum amount of data necessary to achieve the purpose. CoCs and PHAs must be transparent in the data collection process and articulate the policies to clients in a way that they understand, and clients must be protected from denial of services they would otherwise qualify for if they do not consent to data collection or sharing. In instances where information collection is required by law, CoCs and PHAs are not required to seek consent.

10. Waiting List Management: PHA waiting lists can be a barrier to individuals and families experiencing homelessness trying to access the Public Housing and HCV programs.¹⁵ When waiting lists are long or closed, an individual or family who lacks stable housing and reliable contact information may not be able to be contacted when they come to the top of the waiting list or when waiting lists are purged, especially if it has been months or years since the application was submitted. Additionally, when PHAs reopen waiting lists for short periods of time, people experiencing homelessness may be excluded from the application process due to a lack of information about the eligibility to apply.

PHAs may establish strong outreach and intake strategies through partnerships with key CoC leadership and service providers within the CoC such as emergency shelter staff, CE staff, and housing navigators. PHAs may also alter policies and procedures to:

¹⁴ This resource was developed by a HUD funded TA provider.

¹⁵ While HUD-VASH is included in this guidance among other special purpose voucher programs, there are several HUD-VASH policies, including waiting list management, that are unique to HUD-VASH. HUD-VASH operating requirements (86 FR 53207) supersede all guidance in this notice.

- Simplify the application process for Public Housing or HCVs, including steps such as:
 - Develop a universal application with partner PHAs in the region
 - Minimize the length and number of questions used to accurately determine program eligibility and to meet regulatory requirements, providing a balance between collecting all necessary information and ensuring that the application process is clear and accessible
 - Provide multiple ways to access and submit an application as appropriate, including to ensure a PHA meets its statutory obligation to make information accessible to people with disabilities and people with limited English proficiency (LEP). For example, PHAs must take appropriate steps to ensure effective communication with individuals with disabilities through the use of auxiliary aids and services whether the application is electronic or in hard copy. PHAs must be able to process applications to accommodate individuals who are unable to access an electronic form. Otherwise, they must offer a reasonable accommodation, or alternative application processes for those populations. They must also take appropriate steps to ensure that applications are meaningful access by individuals with Limited English Proficiency (LEP) populations by translating such materials into languages other than English.
- Engage with partner organizations to help homeless households gather necessary information and documents, and ensure that requirements are explained in clear, plain language and available in multiple languages as needed
- Strengthen the process for contacting applicants on their waiting list, providing multiple forms of communication to reduce barriers for applicants without a permanent address (e.g., contacting applicants via email, text, or phone)
- Implement liberal reinstatement policies when applicants are removed from the waiting list because of non-responsiveness
- Allow updates to address information via multiple methods, including by mail, email, and online forms
- Establish flexible intake and briefing schedules
 - Provide a window of time for appointments
 - Allow for remote briefing opportunities¹⁶
- Establish nondiscriminatory preferences in admissions policies for persons experiencing homelessness, or a subset of such persons (e.g., chronically homeless, homeless veterans, homeless identified as most vulnerable through community-based assessment strategies, etc.). See Section 11 of this Notice.
- Establish admissions preferences for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking.
- Revise criminal record and substance use policies to ensure that they are not overly restrictive and that they do not discriminate in violation of the Fair Housing Act or other civil rights authorities, based on the requirements of the individual program (e.g., HCV vs. EHV). Additional best practices can be found [in HUD's Implementation of the Office of General Counsel's Guidance on Application of](#)

¹⁶ PIH Notice 2020-32

[Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions Memo \(2022 Criminal Records Memo\)](#)

- Implement flexible policies for rental history for those individuals and families without a consistent or steady rental history
- Amend the HCV Administrative Plan to provide longer initial search terms if required by rental market conditions, and simplify processes for requesting search extensions consistent with the terms of the administrative plan.

For more guidance on waiting list and applications management, please see the following resource developed by a HUD funded TA Provider: [PHA Strategies to Assist People Experiencing Homelessness Guidebook](#). As a reminder to PHAs, all actions taken in association with the application and intake process must comply with all applicable fair housing and civil rights laws, including the Violence Against Women Act. See 24 CFR 5.105(a) and 24 CFR Part 5, subpart L.

- 11. Homeless Admissions Preference:** A PHA’s greatest tool for increasing program access for individuals and families experiencing homelessness is establishing a preference in the Admission and Continued Occupancy Plan (ACOP) for public housing and the Administrative Plan for HCV. The adoption of preferences is at the discretion of the PHA. HUD regulations¹⁷ authorize PHAs to establish certain local preferences in PHA policies. The PHA has the discretion to establish other preferences not addressed in program regulations provided they are based on local housing needs and priorities, including preferences for families who are homeless or living in substandard housing. If adopting the preference constitutes a significant amendment to the PHA Plan as defined by the PHA, the PHA must comply with the amendment provisions of 24 CFR 903.21, including soliciting public comment and consulting with the resident advisory board.

This Section describes the criteria that may be considered when establishing preferences for homeless individuals or families. For a detailed discussion of best practices for operating waiting lists and establishing preferences for people experiencing homelessness, please also see the following resource developed by a HUD funded TA Provider: [PHA Strategies to Assist People Experiencing Homelessness Guidebook](#).

a) Assessing local housing needs. PHAs should understand the unique circumstances impacting people experiencing homelessness in their communities. A PHA’s system of local preferences must be based on local housing needs and priorities by using generally accepted data sources and information obtained through the PHA Plan public comment process.¹⁸ HUD encourages PHAs to work collaboratively with CoCs, health care providers, social service providers, homeless services providers, disability organizations, organizations serving victims of domestic violence, dating violence, stalking, sexual assault, or human trafficking, and local offices of government and community organizations to establish a system of preferences based on local housing

¹⁷ 24 CFR § 960.206 for Public Housing, 24 CFR § 982.207 for HCV, and 24 CFR § 983.251(c)(3) for PBV.

¹⁸ 24 CFR § 960.206(a)(1) for Public Housing and 24 CFR §982.207(a)(2) for HCV

needs collectively identified by the community. For example, PHAs may look to their Community Plan to End Homelessness, Consolidated Plans, HIV/AIDS Housing Plan and/or data from their jurisdiction's CoC HMIS to identify whether and to what extent there is need for a homeless preference. For more information on these products, visit the following resources developed by HUD funded TA Providers: [Coordinated Community Plan](#), [Consolidated Plans](#), Housing Opportunities for Persons with [AIDS \(HOPWA\) Housing Plan](#), and [HMIS Community Examples](#).

b) Identifying and addressing racial equity in the PHA's preference system. It is important that PHAs use the resources highlighted in sub-section a) above to identify, understand, and take the necessary action to address racial disparities in their communities, particularly when establishing and applying homeless admissions preferences. Black, Hispanic, and American Indian and Alaskan Natives represent 29% of the total U.S. population but accounted for over 60% of the homeless population in 2020.¹⁹ These trends highlight the disproportionate impact on Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color and the need for PHAs to understand the demographics and particular circumstances faced by the people they serve in their communities. PHAs may utilize the following (developed by a HUD funded TA provider) [CoC Analysis Tool](#) to examine racial disparities in the numbers of individuals or families experiencing homelessness in the local community or those who obtain and maintain permanent housing. Using this information, PHAs may want to consult with their CoC and other community partners to determine changes to current preference policies that target needs, vulnerabilities, and barriers disproportionately faced by Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color, which may help address racial equity concerns. Notably, any such policy changes must not target race, national origin, or any other characteristic protected under fair housing and civil rights laws.

c) Applying and Limiting Preferences. HCV, PBV, and Public Housing regulations allow PHAs to establish waiting list preferences.²⁰ The PHA may establish a general preference for people experiencing homelessness or may create a more narrowly defined or limited preference. PHAs may also limit the number of applicants that may qualify for a particular preference.²¹

PHAs may create a preference or limited preference specifically for people who are referred by a partnering homeless service organization or consortium of organizations such as the CE System established by the CoC. Establishing a preference for clients referred by the CE system helps ensure that the housing options for families experiencing homelessness are prioritized for those who most need long-term housing support. When a PHA establishes a preference for clients referred from a CE system, the PHA should work closely with the organization in charge of the CE system to ensure that any referral agencies understand the criteria for admissions set by the PHA

¹⁹ [2020 Annual Homeless Assessment Report \(AHAR\) to Congress](#)

²⁰ 24 CFR § 982.206 for Public Housing, 24 CFR § 982.207 for HCV, and 24 CFR § 983.251 for PBV

²¹ 24 CFR § 982.206(a)(2) for Public Housing and 24 CFR § 982.207(a)(3) for HCV

during the initiation of the partnership. This will minimize the number of ineligible families that are referred, leading to time and resource savings, as well as reducing potential delays faced by eligible families awaiting referral.

PHAs may also choose to create a general or limited preference for families experiencing homelessness, including preferences limited to families with children, veterans, or other particular subgroups of families experiencing homelessness, provided that the preference reflects local housing needs and is compliant with Fair Housing rules. A PHA may also create a preference for individuals and families participating in a Moving On strategy, discussed in Section 13 of this Notice. These individuals and families are people that were previously homeless prior to entry into the PSH program but who no longer need that level of supportive services and are now transitioning from PSH units. While these persons would not be considered homeless for reporting purposes on the Form HUD-50058, creating such as a “Moving On” preference can contribute significantly to the community’s overall efforts to end homelessness by freeing up units for currently homeless families and individuals with disabilities who need housing combined with services.

d) Opening waiting lists and public notice. If a PHA does not have enough applicants on its waiting list who qualify for a specific preference, the PHA may open its waiting list strictly to people to whom the preference applies. The notification process, as well as the preferences themselves, must comply with HUD fair housing and civil rights requirements, such as adopting suitable means to assure that the notice reaches eligible individuals with disabilities and those with limited English proficiency (LEP). HCV program regulations require the public notice to appear in a local newspaper of general circulation, minority media, and other suitable means.²² These public notice practices are strongly encouraged in the Public Housing Program.

Once an adequate number of persons experiencing homelessness meeting the preference have been placed on the waiting list, the PHA may choose to keep the waiting list open only for the population qualified for the preference (i.e., continue to accept applications only from applicants that qualify for the preference), while keeping it closed for all other applicants. This can be particularly helpful if the PHA preference is for referrals from partner agencies since it will allow the agencies to continue sending referrals when more resources are available through the PHA. HUD encourages PHAs to keep their websites up to date regarding whether the waiting list is open or closed, who may currently apply for assistance, and specific information regarding the application process. PHAs may also want to share waiting list news with CoC and other community partners.

e) Verifying preference eligibility. As described in Section 6 above, while HUD does not require PHAs to collect documentation or third-party verification to verify an applicant’s homelessness status for the purpose of reporting on line 4c, PHAs must follow the verification requirements established in their written policies to verify homelessness status for a preference. If a PHA adopts a preference or limited

²² 24 CFR § 982.206

preference for people experiencing homelessness, or for a particular subset of this population, the PHA may require the individual or family to provide documentation indicating that they qualify for the preference. Alternatively, when a PHA establishes a partnership for referrals from a homeless service organization, they may allow the partnering organization to verify the individual's or family's preference qualification by providing supporting documentation before the individual or family is referred to the PHA.

f) Public Housing property designations pertaining to preference. For Public Housing developments with an active designation by HUD for a specific population, this designation remains in effect despite the adoption of the new preference. For example, if the property is a designated elderly property, then the homeless preference would not supersede this designation. Any qualified applicant benefiting from the homeless preference would need to meet both criteria, i.e., experiencing homelessness and be part of a HUD-defined elderly family by 24 CFR 5.403. PHAs are reminded that PBV projects are not designated for specific populations, and therefore this paragraph is inapplicable to PBV.

g) Ensuring Fair Housing compliance. PHAs must ensure that any waiting list preference would not have the purpose or effect of excluding other eligible families from the program because of any characteristic protected by federal fair housing and civil rights laws, including, for example, the Fair Housing Act (42 U.S.C. 3601 *et seq.*). Protected characteristics under the Fair Housing Act include: race, color, national origin, religion, sex (including sexual orientation and gender identity), disability, or familial status (children under age 18, including pregnancy or seeking legal custody). The PHA must also ensure that the preference would not have the purpose or effect of creating, increasing, or perpetuating segregation. PHAs must ensure that the adoption of a homeless preference and the opening of the waiting list, including site-based waiting lists open only to homeless families and individuals that qualify for the preference, is done in a manner that is consistent with all fair housing and civil rights laws and affirmatively furthers fair housing.

h) Residency preference. PHAs that have a residency preference as allowed under the regulations²³ are encouraged to include in their definition of the term "residence" shelters, other dwelling places, and unsheltered locations where homeless people may be living or sleeping. PHAs may also consider the circumstances leading to a family's current dwelling place when defining residency for homeless applicants. For example, in some communities, there may be a lack of suitable shelters in the community covered by the PHA's residency preference forcing the family or individual to seek shelter in another community. If an applicant family or individual resides in a shelter located outside of the area covered by the PHA's residency preference, the PHA may establish policies considering the applicant's previous residency and circumstances. PHAs with a residency preference may need to change their definition of residency in their policies for the purpose of allowing such flexibility. The preference cannot have an unjustified discriminatory effect on a group of persons with certain characteristics

²³ 24 CFR § 960.206(b) and 24 CFR § 982.207(b)(1)

protected under fair housing and civil rights laws, including race, color, national origin, sex (including sexual orientation and gender identity), religion, disability, or familial status (children under age 18, including pregnancy or seeking legal custody). See (g) above.

12. Admission and Termination of Assistance Policies Regarding Criminal Activity, and

Substance Use: Incarceration and homelessness are highly interrelated, as the difficulties of reintegrating into the community increase the risk of homelessness for returning citizens, and homelessness in turn increases the risk for subsequent re-incarceration. On June 23, 2021, [HUD issued a letter](#) to PHAs, CoCs, Multifamily Owners, and HUD Grantees, outlining steps HUD has taken to meet the housing needs of returning citizens and to reduce barriers to housing among people with criminal records, and noting that addressing reentry housing needs also further advances equity and reverses systemic racism, given the racial disparities evident in the criminal justice system. This letter strongly encouraged PHAs to work with their Continuum of Care (CoC) partners to ensure that the housing needs of individuals who are at-risk of homelessness after leaving prisons or jails were met. On April 12, 2022, [HUD issued a directive to its principal staff](#), directing all relevant HUD program offices to identify all existing HUD regulations, guidance documents, and other policies and sub-regulatory documents (including model leases and other agreements) that may pose barriers to housing for persons with criminal histories or their families and propose updates and amendments to make HUD’s programs as inclusive as possible. PHAs wishing to serve more people experiencing homelessness may consider amending their discretionary admissions policies where possible. However, PHAs must adhere to policies mandating prohibition of admission and termination of assistance regarding certain criminal activities and illegal drug use, described further in this section. PHAs are also reminded that the Violence Against Women Act (VAWA, 34 U.S.C. § 12471 *et seq.*) and HUD’s VAWA rule establish specific protections in regard to criminal activity related to domestic violence, dating violence, sexual assault, or stalking. For example, an applicant for assistance or tenant assisted under a covered housing program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a survivor of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.²⁴

In June 2015, HUD published PIH Notice 2015-19 to inform PHAs and owners of federally assisted housing that arrest records may not be the sole basis for denying admission, terminating assistance, or evicting tenants, to remind PHAs and owners that HUD does not require the adoption of “one-strike” policies, and to remind them of their obligation to safeguard the due process rights of applicants and tenants. In April 2016,

²⁴ See PIH Notice 2017-08 - Section 7, which provides guidance on HUD’s 2016 VAWA rule implementing VAWA’s housing protections. In 2022, VAWA was further amended to provide additional housing protections, including a new prohibition against penalizing homeowners, housing applicants, or housing landlords, tenants, residents, occupants, or guests based on their requests for assistance or based on criminal activity of which they are a victim or otherwise not at fault.

HUD's Office of General Counsel (OGC) published [Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions \(2016 Guidance\)](#) to remind housing providers that while having a criminal record is not a protected characteristic under the Fair Housing Act, criminal history-based restrictions on housing opportunities violate the Act if the housing provider intentionally discriminates in using criminal history information, or, without justification, their burden falls more often on renters or other housing market participants of one race or national origin over another (i.e., discriminatory effects liability). As described above, since 2021, HUD has issued further guidance and an internal directive to address how HUD and its program participants can meet the housing needs of returning citizens and reduce barriers to housing among people with criminal records. In June 2022, HUD supplemented the 2016 Guidance with a memorandum to its Office of Fair Housing and Equal Opportunity (FHEO) and its grantees ([2022 Criminal Records Memo](#)). In the 2022 Criminal Records Memo, HUD reviewed the principles outlined in the 2016 Guidance and provided tips and best practices related to the use of criminal background screening for fair housing investigators and housing providers.

a) Admissions Policies: Under federal law and HUD regulations for both the HCV and Public Housing programs, PHAs are required to adopt screening policies that absolutely prohibit admission for certain types of conduct. For other types of conduct, PHAs have discretion to allow admission (or prohibit admission) and may consider all relevant circumstances. This discretion is limited by, and must be exercised consistent with, fair housing and nondiscrimination requirements.

- **Mandatory Prohibition of Admission:** If an applicant household includes a member subject to the following two absolute prohibitions,²⁵ that household must be prohibited from admission:
 - Applicants with a household member that has ever been convicted for manufacture or production of methamphetamine on the premises of federally assisted housing
 - Applicants with a household member that is subject to a lifetime registration requirement under a State sex offender registration program
- **Potentially Mandatory Prohibition of Admission:** Under certain circumstances, it may be mandatory to prohibit admissions to certain applicant households.²⁶ For example, a PHA must prohibit admission to an applicant for three years from the date of eviction if a household member has been evicted from federally assisted housing for drug-related criminal activity *unless* the PHA determines that the evicted household member who engaged in such activity has successfully completed a supervised drug rehabilitation program approved by the PHA or the

²⁵ 24 CFR § 982.553(a)(2)(i) and 24 CFR § 982.553(a)(1)(ii)(C) for HCV, and 24 CFR § 960.204(a)(4) and 24 CFR § 960.204(a)(3) for Public Housing

²⁶ 24 CFR § 982.553(a)(1)(i), 24 CFR § 982.553(a)(1)(ii)(A), 24 CFR § 982.553(a)(1)(ii)(B), and 24 CFR § 982.553(a)(3) for HCV, and 24 CFR § 960.204(a)(1), 24 CFR § 960.204(a)(2)(i), 24 CFR § 960.204(a)(2)(ii), and 24 CFR § 960.204(b) for Public Housing

circumstances leading to the eviction no longer exist (e.g., the household member that engaged in drug-related criminal activity is no longer part of the household).²⁷

Additionally, PHAs are required to establish standards that prohibit admission for any household with a member who is currently engaged in the illegal use of a controlled substance or where the PHA determines it has reasonable cause to believe that the household member's pattern of illegal use of a controlled substance or pattern of abuse of alcohol may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents.²⁸

- **Discretion to Prohibit Admission:** Where the HCV or Public Housing applicants' conduct or activities falls outside the scope of the statutorily mandated prohibitions, PHAs may have discretion whether to admit or deny admissions to these individuals. PHAs must balance the safety of the families they serve with potential barriers to vulnerable populations. PHAs also must ensure that they use their discretion in a manner that is consistent with regulations for the specific program, as well as fair housing and civil rights laws. For example, in a manner consistent with the PHA's policies, procedures and practices under the regulations for the public housing program at 24 CFR 960.203(d), consideration shall be given to the time, nature, and extent of the applicant's conduct (including the seriousness of the offense), and consideration may also be given to other factors which might indicate a reasonable probability of favorable future conduct.

It is important for PHAs to understand the damage that denial of admission can have on a family and that discretionary admissions policies can be a barrier for vulnerable populations, including people experiencing homelessness, and can result in discrimination against protected classes. PHAs wishing to serve more people experiencing homelessness may consider reviewing their discretionary policies to determine what changes can be made to remove barriers. For example, to increase access for vulnerable populations and to avoid potential fair housing liability, PHAs should, in a manner consistent with the PHA's policies, procedures and practices under 24 CFR 960.203(b):

- Conduct an individualized assessment of each applicant's case that considers relevant mitigating information instead of automatically denying them based on conviction history
- Eliminate policies that deny assistance to all individuals with past evictions for any type of criminal activity
- Eliminate policies that deny assistance to all individuals on probation or parole
- For drug-related criminal activity, consider whether the household member is participating in or has successfully completed a drug rehabilitation program, or has otherwise been rehabilitated successfully

²⁷ 24 CFR § 982.553(a)(1)(i), 24 CFR § 982.553(a)(1)(ii)(A), 24 CFR § 982.553(a)(1)(ii)(B), and 24 CFR § 982.553(a)(3) for HCV, and 24 CFR § 960.204(a)(1), 24 CFR § 960.204(a)(2)(i), 24 CFR § 960.204(a)(2)(ii), and 24 CFR § 960.204(b) for Public Housing

²⁸ 42 USC 13661(b), 24 CFR § 960.204(a)(2) (public housing), and 24 CFR § 982.553(a)(1)(ii) (HCV).

- Ensure applicants are notified that in accordance with Section 504 of the Rehabilitation Act (24 CFR Part 8), the Fair Housing Act (24 CFR Part 100) and the Americans with Disabilities Act (28 CFR Part 35), people with disabilities may be eligible for reasonable accommodations.

The following best practices are also recommended to PHAs that seek to avoid fair housing liability when screening applicants or tenants:

- Reduce the look-back period for criminal convictions considered during the screening process based on when the conduct occurred and/or the type of conduct
- Screen only for the mandatory requirements (described above)
- Eliminate “one-strike” policies for individuals with a criminal record
- Limit denials related to current illegal drug use by redefining “current use” to mean no more than the previous three months prior to the application date.
- Have a written criminal background screening policy that is compliant with federal, state, and local nondiscrimination laws and made available to all applicants
- Avoid the use of third-party screening companies that utilize algorithms that may contain racial or other prohibited bias in their design, have not been shown to reliably predict risk, may produce inaccurate information about the applicant, or make the decision for the housing provider (rather than providing information to the housing provider to make its own determination).
- Before making an adverse decision related to an applicant’s or tenant’s criminal involvement, provide the applicant or tenant with the criminal record, indicate which specific part of the record may form the basis of an adverse decision, and give the applicant or tenant the opportunity to dispute the information, correct inaccurate information, the relevancy of the record, and/ or explain extenuating circumstances related to that record.²⁹

b) Program Termination and Eviction Policies: A PHA’s discretionary termination policies play an important role in ensuring that once homeless families are housed, they remain housed and can help break the cycle of homelessness that many families experience. Careful consideration is required while developing and enforcing termination policies, as termination of assistance and eviction may imminently or immediately lead to future episodes of homelessness and should be avoided if possible. PHAs may also want to look to their CoC partners and other partnering organizations to determine what role other service providers can play in eviction prevention, particularly in providing supportive services that may help prevent or address specific issues that may put a family at risk of termination.

²⁹ PHAs are required to undertake these actions when proposing denial or termination per 24 CFR § 982.553(d) and 24 CFR § 960.204(c).

A key consideration for PHAs when establishing and revising termination policies is to understand that federal law and HUD regulations provide specific instances where a PHA must terminate assistance or evict a family and provide the PHA with broad discretion to consider individual family circumstances. The termination standards for both the Public Housing and HCV Programs are different from the prescribed admissions standards in that they allow, but do not require termination for certain activities.³⁰ In certain instances, PHAs have discretion when determining whether or not to terminate program assistance and are allowed to consider relevant circumstances surrounding the activities.³¹ Further, HUD does not require PHAs to adopt rules that require automatic termination any time a household member engages in criminal activity, and having such rules may violate laws such as the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and VAWA.³²

All discretionary admission and program termination policies must be applied to all applicants and participants broadly. In other words, a PHA may not have a certain set of admission/termination policies that apply specifically to a certain population, such as the homeless population, which are different than the admission/termination policies for all other applicants and participants, unless there is express legal authority to do so (e.g., HUD-VASH program).

PHAs must also comply with the protections for victims/ survivors of domestic violence, dating violence, sexual assault, or stalking under VAWA and HUD's VAWA rule. For example, 24 CFR 5.2005(c) states that an incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking will not be construed as a serious or repeated violation of the lease by the victim/survivor or threatened victim of the domestic violence, dating violence, sexual assault, or stalking, or as good cause to terminate the assistance, tenancy or occupancy rights of the victim or threatened victim. Additionally, 24 CFR 5.2005(b) prohibits a tenant from being denied admission, evicted, or have their assistance terminated solely because of criminal activity relating to domestic violence, dating violence, sexual assault, or stalking, if they are the victim and a household member or guest engaged in the criminal activity.

c) Consideration of Circumstances Regarding Admissions and

Terminations/Evictions: PHAs should carefully consider the circumstances in which any conduct has occurred. For instance, defining criminal activity to focus on activities that pose threats to the safety and security of other residents can help ensure compliance with fair housing and civil rights requirements. The Public Housing regulations at 24 CFR 960.203(a) and 24 CFR 966.4(l)(5)(vii)(B) and the HCV program regulation at 24 CFR 982.552(c)(2) indicate that individual consideration of factors may be a basis for a PHA's decision to admit or refrain from terminating assistance. For example, a PHA

³⁰ Sept. 24, 1999, Memorandum from Gail W. Laster, General Counsel, to William C. Apgar, Assistant Secretary of Housing/Federal Housing Commissioner, and Harold Lucas, Assistant Secretary for Public and Indian Housing, on "Medical use of marijuana in public housing" [Laster Memorandum]

³¹ HUD regulations outline the limited instances where denial of admission or termination of assistance is required in the public housing, Housing Choice Voucher programs. See 24 CFR Part 5, subpart I; Part 960, subpart B; Part 966, subpart A; Part 982, subpart L.

³² 24 CFR § 966.4(l) for Public Housing and 24 CFR § 982.55 for HCV.

may establish a policy for the HCV program to consider all relevant circumstances such as the seriousness of the case, the extent of participation or culpability of individual family members, mitigating circumstances related to the disability of a family member, and the effects of denial or termination of assistance on other family members who were not involved in the action before denying admission or terminating assistance to a family.³³

In public housing, in the event of receipt of unfavorable information about an applicant, consideration must be given to the time, nature, and extent of the applicant's conduct (including the seriousness of the offense).³⁴ Consideration should be given to factors which might indicate a reasonable probability of favorable future conduct, including evidence of rehabilitation, and the applicant's willingness to participate in social services.³⁵

The PHA may impose, as a condition of admittance or continued assistance for other family members, a requirement that family members who participated in or were culpable for the action will not reside in the unit. The PHA may permit the other members of a participant family to receive or continue receiving assistance, once the conditions have been met.³⁶ PHAs are prohibited from denying admission or terminating assistance based on the fact that a family has experienced homelessness in the past or at the time of admission.

In both the HCV and Public Housing Programs, in determining whether to deny admission or terminate assistance for illegal use of drugs or alcohol abuse by a household member who is no longer engaged in such behavior, the PHA should consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully.³⁷

Further, for both the HCV and Public Housing Programs, PIH Notice 2015-19 states that PHAs may consider all circumstances relevant to the admission or eviction decision, including but not limited to:

- The seriousness of the offending action
- The effect that eviction of the entire household would have on family members not involved in the criminal activity
- The extent to which the leaseholder has taken all steps to prevent or mitigate the criminal activity.

Before a PHA denies admission to an applicant or terminates the assistance of a participant based on the criminal conviction of a household member or guest, consistent with their policies, PHAs should conduct an individualized assessment to determine whether denial of admission or termination is mandatory under the circumstances, or in

³³ 24 CFR § 982.552(c)(2)(i) for HCV

³⁴ 24 CFR § 960.203(d)

³⁵ 24 CFR § 960.203(d)

³⁶ 24 CFR § 982.552(c)(2)(ii) for HCV and § 960.203(c)(3)(i) for Public Housing

³⁷ 24 CFR § 960.203(d)

cases where it is permissive, whether the criminal activity will threaten others' health, safety, or right to peaceful enjoyment of the premises. A record of an arrest alone may not be the basis for a denial of admission or termination of assistance, though PHAs may make an adverse decision based on the conduct underlying the arrest if the conduct indicates that the individual is not suitable for tenancy and the PHA has sufficient evidence other than the arrest itself that the individual engaged in the conduct. Although conviction records are more reliable evidence that an individual engaged in certain criminal conduct, PHAs must still make a determination that a specific individual's criminal conviction record will threaten the health, safety, or right to peaceful enjoyment of the premises using the criteria above. Additionally, a PHA may not deny admission or terminate assistance for this criminal activity if it directly relates to VAWA violence/ abuse and the tenant or certain affiliated individuals of the tenant is the victim/ survivor or threatened victim.³⁸ Except in cases in which an informal hearing is not required³⁹, PHAs must give applicants or participants a hearing or review of the circumstances prior to any determination being made.⁴⁰

For both the HCV and Public Housing Programs, the PHA decision regarding denial of admission or termination of assistance is subject to reasonable accommodation requirements in accordance with Section 504 of the Rehabilitation Act of 1973, the Fair Housing Act, Title II of the Americans with Disabilities Act, and their implementing regulations at 24 CFR Part 8, 24 CFR Part 100, and 28 CFR Part 35, respectively. Because the PHA may not necessarily be aware of a person's disability, all denial of admission and termination correspondence should include information about the right to request a reasonable accommodation and how to request a reasonable accommodation. The PHA must also provide a Notice of Occupancy Rights Under the Violence Against Women Act with each denial and termination.⁴¹

HUD encourages PHAs to review their termination and eviction policies considering their discretionary authority. PHAs should review these policies in light of the guidance provided in [PIH Notice 2015-19](#) on the use of arrest records and protections for the due process rights of applicants and participants as well as [HUD OGC's 2016 guidance](#). HUD recommends that PHAs work with homeless service providers to establish discretionary termination and eviction policies best suited to the community and to develop partnerships that can implement effective eviction prevention strategies. HUD encourages PHAs to review the [2022 Criminal Records Memo](#) for tips and best practices for establishing policies that comply with fair housing and civil rights laws.

- 13. Moving On Strategies:** Moving On (sometimes called Moving Up, Move Up, Move On, or FLOW) enables individuals and families who are able and want to move on from PSH. PSH generally targets the most vulnerable individuals and families and combines affordable housing with intensive supportive services. PSH is not time-limited, but over time, some program participants reach a point where they no longer need or want

³⁸ 24 CFR § 5.2005(b)(2)

³⁹ 24 CFR § 982.555(b)

⁴⁰ 24 CFR § 982.555(a)

⁴¹ 24 CFR § 5.2005(a)(2)

intensive services. However, in most cases the need for financial housing assistance remains a prohibitive barrier to leaving PSH. Moving On helps tenants overcome these barriers by providing an affordable housing option and short-term services and resources that support program participants during and shortly after their move to a greater level of independence.

PHAs play a fundamental role in Moving On, providing access to affordable housing through PHA programs that enable program participants to move on as tenants, which allows more individuals and families to access the housing options best suited for their situations. Moving On efforts include a broad range of options based on local context, needs, and resources. This frees up units and intensive services that can then be offered to the most vulnerable people experiencing homelessness. Moving On provides optimal outcomes for current PSH program participants, as well as the entire homeless system, as it supports growth, independence, and choice for current program participants. For more information, see the following resource, developed by a HUD funded TA Provider: [PHA Moving On How-To Guide](#).

- 14. Service Providers as a Resource in Continued Occupancy:** Social service providers, homeless service providers, and other community programs are important resources in ensuring housing stability, including compliance with program and family obligations and other program requirements, for homeless individuals and families newly admitted to the program.

Many PHAs develop either formal or informal relationships with local community organizations, including public and nonprofit homeless service providers as well as city or county departments of health and human services and mental health, to help provide services to people experiencing homelessness. These agencies can help families to retain their assistance by offering supportive services (see Section 15 of this Notice for a discussion of PBV and supportive services), food assistance, basic education, employment and vocational training, transportation assistance, financial planning, life skills classes, substance abuse services, mental and physical health care, and parenting and childcare services. PHAs may establish working relationships or consider entering into service agreements with the service providers to provide greater access to services for tenants. The PHA may consider making available an empty office space or community space for the service provider to offer voluntary services to the residents.

- 15. Project-Based Vouchers:** The PBV program offers a flexible tool PHAs can use to meet the affordable housing needs of their local community, including providing the opportunity to partner with homeless service providers and other program partners to offer permanent affordable housing and access to supportive services to individuals and families who are experiencing homelessness. In particular, PHAs may use PBVs in units specifically made available to house individuals and families experiencing homelessness, pair PBV units with voluntary supportive services and establish waiting list preferences in the PHA Administrative Plan to ensure families experiencing homelessness are assisted as quickly as possible in PBV units. A PHA's use of PBVs is subject to the PBV

program rules,⁴² which include certain flexibilities that may facilitate PBV use for individuals and families experiencing homelessness.

•**Program Cap:** PBV program requirements generally limit the number of units that PHAs may project-base to up to 20 percent of their Consolidated Annual Contributions Contract (ACC) authorized units. However, PHAs may project-base an additional 10 percent of their ACC authorized units above this program limit, provided these units fall into one of the eligible exception categories outlined in [PIH Notice 2017-21](#), Attachment D.

- a) **Units Made Available to House Individuals and Families Experiencing Homelessness:** An exception is made for units specifically made available to house individuals and families who meet the definition of homeless under Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3. While all PBVs may house homeless individuals and families, units contracted pursuant to this program cap exception category are specifically for homeless individuals and families.
- b) **Units Made Available to House Veterans:** An exception is made for units specifically made available to house veterans, which could include veterans experiencing homelessness.
- c) **Units Providing Supportive Services:** An exception is made for units specifically made available to persons with disabilities or elderly, which could include persons with disabilities or elderly that were experiencing homelessness.
- d) **Units Located in a Census Tract with a Poverty Rate of 20 percent or less:** An exception is made for unit located in a census tract with a poverty rate of 20 percent or less. In addition to increasing the number of units a PHA may project-base, this exception may use to increase family choice for individuals and families experiencing homelessness.
- e) **Units Made Available to Foster Youth Utilizing FUP FYI Awards:** An exception is made for units specifically made available to foster youth eligible for a FUP or FYI voucher award, which could include foster youth experiencing homelessness.

• **Project Cap:** The project cap for the PBV program generally provides that PHAs may not provide project-based assistance to more than the greater of 25 units or 25 percent of the of units in a project as outlined in [PIH Notice 2017-21](#), Attachment E. However, certain units are excepted or not subject to the cap as explained in Notice PIH 2017-21 Attachment E and F. These exceptions may increase access to PBVs for individuals and families experiencing homelessness:

⁴² 24 CFR Part 983 and provisions implemented at 82 FR 5458 (Jan. 18, 2017), 82 FR 32461 (Jul. 14, 2017)

- a) **Units exclusively serving elderly families:** A PHA is not limited with respect to the number of units in a project it can make available to elderly families. While it is not necessary that an entire project or building within the project be made available for the exclusive use of elderly families, a PHA may project-base 100 percent of the units in such project. This may increase opportunities for elderly families experiencing homelessness.
- b) **Units housing households eligible for supportive services:** Dwelling units that are exclusively made available to “households eligible for supportive services” that are made available to the assisted residents of the project are excepted from the project cap.

To implement the exception, the PHA must include in its Administrative Plan the type of services offered to families and the extent to which such services will be provided. For the exception to apply to a unit, the project must make supportive services available to all assisted families in the project, and the family must be eligible for one or more of the services. A PHA may not require supportive services as a condition of living in an excepted unit.⁴³ While the supportive services do not need to be provided by the owner or onsite, services must be reasonably available to the families receiving PBV assistance in the project and designed to help the families in the project achieve self-sufficiency or live in the community as independently as possible.

PBV projects that offer supportive services, including supportive services offered as part of a project cap exception, are an important form of PSH that combines affordable housing assistance with voluntary supportive services. PHAs and owners are encouraged to offer supportive services in connection with all PBV units, even where no project cap exception is used. The PHA or owner may enter into an MOU or other such agreement with a homeless services provider or other program partner to provide these supportive services, which may be designed to assist individuals and families with building independent living and tenancy skills, connect to community-based and culturally specific health care, treatment, or job service, and address chronic health problems, mental illness, or trauma.

HUD encourages PHAs to consider how the structure of their supportive services package may best support individuals and families that experienced homelessness maintain their PBV tenancy. In the case of a family that chooses to participate in the supportive services, as described by the PHA in the Administrative Plan, and successfully completes the supportive services objective, as defined by the PHA in its Administrative Plan, the unit will continue to be an excepted unit under this category for as long as the family resides in the unit.

⁴³ There are two exceptions to this. First, certain projects with HAP contract effective dates prior to April 18, 2017, are subject to rules on PBV's housing families participating in supportive services. See Notice PIH 2017-21 Att. E § 6 for information. Second, PBV units using HUD-VASH vouchers are subject to requirements on participation in case management. See 86 FR 53207 (Sept. 27, 2021) for information.

- c) **Units in a census tract with a poverty rate of 20 percent or less:** Another strategy for increasing the number of units available to individuals and families experiencing homelessness is to locate units in a project within a census tract with a poverty rate of 20 percent. Such units are subject to a higher (40%) cap. This strategy also increases family choice.

16. PBV Waiting List Administration and Preferences: The PHA may use a separate waiting list for admission to PBV units in individual projects or buildings (or for sets of such units), use a single waiting list for the PHA's entire PBV program, merge the PBV waiting list with a waiting list for another tenant-based or project-based housing program, or may use the same waiting list for both tenant-based and PBV assistance.⁴⁴ If the PHA chooses to use a separate waiting list for admission to PBV units, the PHA must offer to place applicants who are listed on the waiting list for tenant-based assistance on the waiting list for PBV in accordance with 24 CFR 983.251(c)(2). The PHA must select families from the waiting list in accordance with the PHA's Administrative Plan.

The PHA may also adopt a different set of admissions preferences for each separate waiting list and may do so in consultation with the CoC and other community partners. The preferences offered by a PHA depend on local housing needs and may include a preference for housing that is intended for a particular population or for families who qualify for voluntary services, including disability-specific services, offered in conjunction with the housing. In the case of PBV units under a project cap exception, PHAs must give preference to families qualifying for the units. Assisted families who receive housing because of a preference for families who qualify for services can receive voluntary services from a service provider of their choosing or choose not to participate in services at all.⁴⁵


A PHA that wishes to partner with a homeless service provider to project-base vouchers may consider creating a separate waiting list for the project and may offer a preference for individuals or families who are homeless, individuals or families who qualify for voluntary services, including disability-related services, offered in conjunction with assisted units at the project, or individuals or families referred through the local CE System. Any such preference must be consistent with the PHA plan and all applicable Federal nondiscrimination and civil rights statutes and requirements.

17. Paperwork Reduction Act: The information collection requirements contained in this document have been submitted to the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0083. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

⁴⁴ 24 CFR § 983.251(c)(2)-(4)

⁴⁵ See 82 FR 5458, 5469-5471 (Jan. 18, 2017) for information on preferences for families who qualify for voluntary services and PIH Notice 2017-21 Appx. II for information on PBV preferences generally.

18. Information Contact: Inquiries about this Notice should be directed to publichousingpolicyquestions@hud.gov for Public Housing, vouchernotice@hud.gov for Housing Choice Vouchers, and SNAPSinfo@hud.gov for CPD.



Richard J. Monocchio
Principal Deputy Assistant Secretary
For Public and Indian Housing



Claudette Fernandez
General Deputy Assistant Secretary
For Community Planning and
Development

SLHA HCV Administrative Plan – **Emergency Winter Housing Pilot Program**

Chapter 5 Applying for Admission

5.6 Special Programs Application

SLHA administers several special programs that have program specific admissions requirements. The applicants for these programs are admitted through referrals and ~~do~~ **may** not follow the regular application process. The specific requirements of each program are found in the chapter that covers those programs. The programs are as follows:

- Project-Based Vouchers (PBV) (Chapter 31)
- Veterans Affairs Supportive Housing Program (VASH) (Chapter 32)
- **Mainstream Vouchers (Mainstream) (Chapter 37)**

Chapter 6 Waiting List and Applicant Selection

6.1 Overview

It is SLHA's objective to ensure that applicants are placed in the proper order on the waiting list and selected from the waiting list for admissions in accordance with its policies. This chapter explains how SLHA will place applicants on the waiting list and how the waiting list is maintained. In addition, this chapter explains local preferences, defines the eligibility criteria for the preferences and explains SLHA's system of applying the preferences. This chapter also explains how applicants are selected for project-based vouchers and special programs that are funded by HUD for specific target populations.

6.4 Waiting List Preferences [24 CFR 982.207]

SLHA has established a preference system for admission to its HCV assistance programs. SLHA uses the following local preference system:

- In-place families in units converted to PBV assistance
- Families who are involuntarily displaced by natural disaster or government action
- Disabled persons or families with a disabled member as defined in this Plan
- Victims of domestic violence
- Families who are homeless in accordance with the definition provided in this Plan
- Non-elderly persons with disabilities transitioning out of an institutional or segregated setting or at serious risk on institutionalization
- At risk of becoming homeless
- **Mainstream Voucher Referral**

6.4.8 Mainstream Voucher Referral

To qualify for this preference, an applicant must be referred to SLHA by the St. Louis City Department of Human Services, the St. Louis City Continuum of Care, or its designated service provider.

Chapter 37 Mainstream Voucher

37.1 Overview

The Emergency Winter Housing Pilot Program (EWHPP) is designed to provide safe and stable housing for unhoused families during the harsh winter months, with a particular focus on those with members facing disabilities or chronic medical conditions. This pilot program leverages the flexibility offered by HUD's Mainstream Housing Choice Vouchers to provide critical housing assistance to eligible families facing homelessness. The program is a collaborative effort between the St. Louis Housing Authority (SLHA), the St.

Louis City Department of Human Services (DHS), the St. Louis Continuum of Care, and other community partners.

37.2 Program Goals

The EWHPP aims to achieve the following goals:

- Provide safe and stable housing for unhoused families with members who have disabilities or chronic medical conditions during the winter months.
- Improve health outcomes for vulnerable individuals by mitigating the risks associated with homelessness and extreme weather conditions.
- Reduce reliance on emergency medical services and institutional care by providing timely housing assistance and supportive services.
- Promote long-term well-being and self-sufficiency by connecting families with resources and support networks.

37.3 Target Population

The EWHPP prioritizes assisting non-elderly persons with disabilities (aged 18-61) who are:

- Transitioning out of institutional or segregated settings
- At serious risk of institutionalization
- Homeless
- At risk of becoming homeless

37.4 Eligibility Criteria

To be eligible for the EWHPP, households must meet the following criteria:

- Include at least one member meeting the target population criteria
- Be referred by DHS
- Meet all general HCV program eligibility requirements (income limits, citizenship/eligible immigration status, etc.)

37.5 Program Administration

SLHA will administer the EWHPP in accordance with HUD guidance and the following policies:

- Adopt a preference system for Mainstream Voucher applicants that prioritizes referrals from qualifying partners.
- At its discretion, SLHA may utilize a separate waiting list for the program to expedite housing assistance for this vulnerable population.
- If a separate waitlist is utilized, SLHA will maintain clear and up-to-date information on its website regarding waiting list status, application procedures, and any preference criteria in effect.

37.6 HUD Guidance

The EWHPP is implemented in accordance with the following HUD guidance:

- PIH Notice 2024-30
- PIH Notice 2024-17
- PIH Notice 2023-13

EXECUTIVE DIRECTOR REPORT

MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Executive Director

Date: January 15, 2025

Subject: Executive Director Report

As we embark on a new year, I am pleased to share a recap of recent successes and ongoing initiatives across the agency. This memo highlights our collective commitment to resident well-being, community building, and program excellence. For more detailed information, please refer to the accompanying Monthly Activity Report.

A Brighter Future for Clinton-Peabody

Exciting news! The redevelopment of Clinton-Peabody is moving forward with the award of \$6.5 million in housing tax credits. This funding will enable the construction of 89 new housing units, with 44 reserved for current Clinton-Peabody residents. This transformative project, a collaboration between SLHA and POAH, will preserve affordable housing, while providing modern amenities and a vibrant community for residents. Construction is anticipated to begin in late 2025/early 2026. You can learn more information about the award on [Fox 2 News](#), [KMOV 4](#), [Construction Forum](#), and [St. Louis Construction News & Review](#).

Spreading Holiday Cheer and Cultivating Community Connections

This past holiday season was truly special at SLHA! We embraced a dynamic approach to resident engagement, filling our affordable housing communities with festive cheer and strengthening bonds among residents, staff, and community partners across our portfolio. SLHA partnered with the City of St. Louis Office of Violence Prevention, Washington University Medical Center Redevelopment Corporation, Salvation Army, SLHA Tenant Association Boards (TABs), local churches, and community organizations to bring festive cheer and valuable resources to 11 SLHA communities. Hundreds of toys, holiday baskets, and gift cards were distributed and countless volunteer hours were dedicated to supporting SLHA families.

Beyond the festivities, we're investing in the future of our young residents. Our Resident Opportunities and Self-Sufficiency (ROSS) team is collaborating with Ready Readers to launch "Neighborhood Reading Captains". Starting in February, resident leaders at LaSalle Park, Clinton-Peabody, and West Pine will not only connect families with valuable reading resources, but also ignite a passion for learning in our youth. This initiative has a twofold impact: it fosters a love of literacy that will empower our children for academic success, while also providing meaningful employment opportunities for SLHA adults, contributing to the financial well-being of their families.

These initiatives showcase our dedication to building strong, supportive communities where residents of all ages can thrive. By fostering connections and collaborating with community partners, we are creating a vibrant and enriching environment for the families we serve.

Opening Doors to Opportunity and Stability with Vouchers

The HCV program continues to thrive, achieving an outstanding 99% voucher utilization rate and 96.7% inspection completion rate.

Responding to the urgent need for safe and affordable housing in our community, SLHA is working to maximize the reach and impact of our Mainstream Voucher program. With a concerning increase in unhoused families in St. Louis, particularly those with members who have disabilities, we are committed to utilizing these vouchers to provide critical housing assistance.

By collaborating with local service providers, we are ensuring that vulnerable families facing homelessness have access to stable housing and the support they need. This targeted approach not only aligns with regional efforts (described [here](#)) to combat homelessness and HUD guidance ([PIH Notice 2023-13](#), [PIH Notice 2024-17](#), and [PIH Notice 2024-30](#)), but also reflects our deep commitment to the well-being of all St. Louis residents.

Maximizing Public Housing Occupancy

We are pleased to report that 22 sites have achieved an occupancy rate of 90% or higher, with 60% scoring 95% or higher. We remain focused on reactivating vacant units across our portfolio, utilizing funding from the City of St. Louis Community Development Administration, the HUD Housing-Related Hazards grant, and capital funds to ensure safe and comfortable homes for our residents.

New Year Brings Updates from HUD

Budget Decrease: The (CY) 2025 Public Housing Operating Subsidy Obligations for January, February, March, and two days in April was released at a 2.5% proration decrease, with interim levels at 95% for the first quarter of this year. As the federal government transitions into the new administration and Congress continues budget discussions, SLHA has transitioned to a more conservative fiscal approach to manage potential fluctuations in federal funding levels across its major programs.

New Eviction Requirements: SLHA is updating its policies and procedures to ensure full compliance with new HUD guidance requiring a 30-day notice before initiating eviction proceedings for non-payment of rent in assisted housing. This standardized approach replaces varying state and local laws, providing greater consistency and protection for tenants. Additional information can be found at [FR-6387-F-02](#).

NEW HCV Payment Standards: On January 1, 2025, new HCV payment standards went into effect as required by [Federal Register Notice FR-6426-N-01](#) and [PIH Notice 2024-34](#). SAFMRs allow for payment standards to be established that more accurately reflect the local market. This can be helpful in providing voucher holders greater access to low-poverty and/or high-opportunity neighborhoods. SLHA has completed updating its policies and procedures to ensure full compliance with the new payment standards.

New Income & Asset Standards: The Housing Opportunity Through Modernization Act of 2016 (HOTMA) will become effective July 1, 2025. HOTMA introduces a range of reforms and modifications to existing housing policies, impacting areas such as income calculation, eligibility determination, administrative processes, and program administration in an effort to

simplify and streamline these processes, reduce administrative burdens, and promote consistency in standards across housing programs. Additional information is available at [HOTMA Resources](#). SLHA has completed updating its policies and procedures to ensure full compliance with HOTMA requirements.

New HCV Inspection Standards: In accordance with [PIH Notice 2024-39](#), SLHA will be transitioning to NSPIRE (National Standards for the Physical Inspection of Real Estate) for Housing Choice Voucher (HCV) inspections on October 1, 2025. NSPIRE is a new inspection protocol developed to ensure rental properties meet consistent, high-quality standards for safety and livability. NSPIRE replaces the current Housing Quality Standards (HQS) to streamline the inspection process and better align it with modern housing standards to improve the quality of housing available through the HCV program.