RBD HOTMA Implementation Checklist
Multifamily Housing Occupancy

Please note that this list may change at any time as HUD releases additional guidance related to HOTMA.

As a service to our customers, we have compiled a list of tasks, we have identified, necessary for the complete and successful implementation of changed introduced in the HOTMA Final Rule.

Please note that this is not an official list endorsed by the Department of Housing & Urban Development (HUD), but rather our interpretation of instruction provided by HUD to industry stakeholders.

☐ Review EIV TSP Discretionary Policies Workbook to assist in making decisions about Discretionary Policies. These decisions need to be made before beginning the process to update policies, update/create forms and start training. This Workbook is available on our HOTMA Resources Page:

☐ Train Compliance Teams– all programs.

☐ Train Site Staff Responsible for Communicating with Residents and Creating Certifications – all programs.

☐ Obtain Updated Forms from HUD – all programs. *Owner/agents cannot obtain these forms until they go through HUD's forms approval process. Owner/agents will be notified by HUD when these new forms are available. Currently, HUD guidance indicates that these new forms do not have to be implemented until TRACS v 2.0.3.A is implemented on site.*
   o 9887/9887A (when HUD releases) – all programs;
   o Lease (when HUD releases) – all programs;
   o FACT Sheet – How Your Rent is Determined (when HUD releases) – all programs;
   o VAWA Addendum (when HUD releases) – all programs;
   o New Race & Ethnicity Form (when HUD releases) – all programs.

☐ Update File Checklists. *Owner/agents cannot complete file checklist updates until new HUD forms are approved. Owner/agents will be notified by HUD when these new forms are available. Currently, HUD guidance indicates that these new forms do not have to be implemented until TRACS v 2.0.3.A is implemented on site.*
   o MI;
   o IC;
   o AR;
   o IR.

☐ *Update Acknowledgement of Receipt of Forms to remove 9887 at each AR once new 9887 is available – all programs. Also note that the form must be provided no later than the finale eligibility interview. *Previous to release of the new form, OAs are required to collect executed versions of the form at MI/IC and at AR.*

☐ *Create or update Days to Report Change Policy – all programs
   o Include explanation of IR Effective Dates – all programs; *May want to amend the House Rules instead of having a separate policy*
   o Currently, HUD's guidance is to include this information in the TSP which is required no later than 5/31/2024 – all programs.

☐ *Update TSP to Include Changes and Discretionary Policies – all programs. Please see our EIV TSP Discretionary Policies Workbook to assist in making decisions about Discretionary Policies. This Workbook is available on our HOTMA Resources Page:
   o Update Consent/Verification 9887 – all programs;
   o Streamlining Verification – all programs *(not a HOTMA change)*;
   o New verification hierarchy (including description of Means-tested Verification if owner/agent plans to implement) - all programs;
   o Days to Report a Change – all programs *(not a HOTMA change)*;
   o Financial Hardship for Medical Expense & Disability Expense – all programs;
   o Childcare Hardship Exemption – all programs;
   o Phase-in Relief – all programs;

- o De minimus Errors – specifically when resident overpaid – all programs;
- o Reporting changes Between Recertification – all programs;
- o Fosters – all programs;
- o Asset Restrictions including exceptions – Section 8 only including 202/8 & PBRA RAD;
- o Edit Student Financial assistance exclusions – all programs;
- o Changes to SSN Disclosure Requirements – all programs.

❑ *Create Notice of TSP Update for applicants on the waiting list – all programs; *Not required to notify applicants unless you add a preference but it is recommended that you advise applicants that there has been a change. OAs need not provide the new TSP, but should make it available upon request – hard copy or electronic. Review the EIV TSP Discretionary Policies Workbook to assist in making decisions about Discretionary Policies. This Workbook is available on our HOTMA Resources Page.*

❑ Revise Pre-Application & Application including Application Used at IR – all programs. *As far as we know, the Assistance Payment for 2024 and 2025 certifications created before site software is updated will be calculated using current Pre-HOTMA rules. If any HOTMA provisions are implemented, owner/agents must make a Note To File (NTF).*

❑ Revise Applicant Notice to Meet/Top of Waiting List – all programs.

❑ *Update Rental History Questionnaire to include questions about Medical Expenses & Disability Assistance Expenses for continuation of Expense Phase-in (2026 and 2027 unless dates are changed by HUD) – all programs. *This is only necessary if the owner/agent will allow Phase-in Relief to continue at MI.*

❑ *Create Notice for New HUD Lease in compliance with HH 4350.3 Paragraph 6-12 – all programs.

❑ *Update EIV Policy to include. *For Certifications/Recertifications effective after new site software is implemented – do not implement before new site software is implemented*
- o Owner/agents may, but are not required to, review EIV Income Reports at IR – all programs (optional);
- o Use of EIV to verify employment and unemployment income– all programs;
- o Use of the New Hires Report at AR unless OA is using Means-tested Verification – all programs;
- o Change to requirements to review New Hires Report quarterly if OA will disregard earned income increases except at AR – all programs.

❑ *Create and distribute to appropriate staff an updated list of Income Inclusions And Exclusions – all programs.

❑ * Create and distribute to appropriate staff an updated Treatment of Asset (Inclusions And Exclusions) – all programs.

❑ * Create and distribute to appropriate staff an updated list of Allowed Health & Medical Care Expenses– all programs.

❑ *Revise Rejection to include information about Asset Restrictions - Section 8 only including 202/8 & PBRA RAD.

❑ *Create Self-Certification of Assets if implementing Streamlined Verification of Assets (or update existing form). *Remember that the Asset Value Threshold can change each year. Prior to 2024=$5,000 2024=$50,000 /2025=$51,600/2026=$52,787.*
- o Distribute to staff for use on any certification effective 2018 or later if owner/agent implemented when announced.

❑ *Create Self-Certification of Income if implementing Streamlined Certification for Fixed Income Families (or update existing form) – all programs.
- o Distribute to staff for use on any certification effective 2018 or later if owner/agent implemented when announced.

❑ *Update Student Self-certification S8.

❑ *Update Student Self-certification Non-S8.

❑ *Update Student Verification Forms (if applicable) – all programs.

- ❑ *Create and distribute (as applicable) Notice advising students of change to treatment of student assistance in excess of tuition and mandatory fees – all programs.
- ❑ *Create and distribute (if applicable) Notice to Students Living with Parents – Income in Excess of Tuition Exclusion No Longer Applies – Section 8 only including 202/8 & PBRA RAD.
- ❑ *Create Notice or FACT Sheet explaining new Asset Restrictions - Section 8 only including 202/8 & PBRA RAD.
- ❑ *Create Termination Notice – Asset Restrictions – Section 8 only including 202/8 & PBRA RAD.
    - o *Self-Certification – Real Property Rule Exemption- Section 8 only
    - o *We encourage owner/agent to advise existing assisted Section 8 residents if they will no longer be eligible for S8 assistance if the owner/agent will be Enforcing S8Asset Restrictions or Implementing Limited Enforcement of S8Asset Restrictions. If the owner/agent will not be Enforcing S8 Asset Restrictions or Implementing Limited Enforcement of S8Asset Restrictions the following Notices are not necessary.*
    - o *1st Notice – Asset Restrictions Request to Meet - Section 8 only;
    - o *2nd Notice – Asset Restrictions Request to Meet- Section 8 only;
    - o *Notice – Termination of Assistance – Asset Restrictions - Section 8 only;
- ❑ *Create Notice/Handout (Fact Sheet) explaining changes to Deductions – all programs. *Please note that the changes to deductions will not be implemented until site software is updated. Site software (2.0.3.A) we do not anticipate that site software will be available to all sites as of 1/1/2025. The Assistance Payment for 2025 certifications created before site software is updated will be calculated using current Pre-HOTMA rules. HUD has not yet provided guidance explaining whether or not those 2025 certifications will be corrected.*
- ❑ *Develop Hardship Exemption Policy (Childcare Hardship Exemption/Financial Hardship Exemption/Medical & Disability Phase-in Relief) – all programs. *Originally, HUD stated that the Childcare Hardship Exemption and the Financial Hardship Exemption were optional. In July 2024, HUD reversed that verbal guidance and now indicates that development of these Hardship Exemptions is mandatory and must be described in the TSP.*
    - o *Hardship Request;
    - o *Hardship Request – Notice Approve;
    - o *Hardship Request – Notice Deny;
    - o *Hardship Request – Notice Appeal Final Decision;
    - o *Hardship Request – Notice Request Meeting/Additional Information;
    - o *Notice – End of Hardship Exemption.
- ❑ *Create Notice – IR – No IR Required – Income Change Less Than 10% or Change Reported Within 3 Months of AR – all programs.
- ❑ Create a package, using some of the forms noted above, to advise current residents of changes – all programs.
- ❑ Update Move-in Package to included updated lease when available – all programs.
- ❑ *Update AR Questionnaire if owner/agent uses AR Questionnaire – all programs.
- ❑ *Update IR Questionnaire if owner/agent use IR Questionnaire – all programs
- ❑ When available – update site software to version compatible with HOTMA (TRACS 2.0.3.A). *It does not appear that site software (2.0.3.A) will be available to all sites as of 1/1/2025. The Assistance Payment for 2025 certifications created before site software is updated will be calculated using current Pre-HOTMA rules. HUD has not yet provided guidance explaining whether or not those 2025 certifications will be corrected.*
- ❑ Implement New TSP – all programs.
- ❑ Implement New EIV Policies – all programs.
- ❑ Implement Any HOTMA Changes that have not already been implemented – all programs.
- ❑ Continue as usual – HOTMA implementation is complete.