

**HOTMA TSP Requirements**  
**TSPs Must Be Updated No Later Than 5/31/2024**

**TSP REQUIREMENTS HH 4350.3 PRE-HOTMA (WITH NOTES)**

**1. Project Eligibility Requirements:**

- a. Project-specific Eligibility requirements (see Chapter 3, Section 2);
- b. Citizenship Eligibility requirements (see Chapter 3, Section 1); and
- c. Social Security Number Disclosure requirements (see Chapter 3, Section 1). **Modified with HOTMA See HSG Notice 2023-10 J.6**
  - i. Change the penalty for “failure to disclose” to termination of assistance (except for PRAC) instead of termination of tenancy.
  - ii. Change acceptable documentation.

*Change to SSN Documentation Requirements*

*If the applicant cannot provide any of the above, the owner/agent may accept 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. When none of the other accepted methods is available and if verifying an individual’s SSN using this method, the owner/agent must document why the other SSN documentation was not available. If the resident’s SSN becomes verified in EIV, then no further verification is required. If the resident’s SSN fails the SSA identity match, then the owner/agent 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 of the individual and the SSN of the individual, along with other identifying information of the individual. The resident family’s assistance must be terminated if they fail to provide the required documentation.*

- iii. Change to exceptions for TRACS v 2.0.3.A – add exception for fosters.
- d. Asset Cap – Section 8 Only (including PBRA RAD and 202/8) **New with HOTMA See HSG Notice 2023-10 Attachment A**
  - i. After MI, Non-enforcement,
  - i. After MI, Limited Enforcement including the amount of time that an owner/agent will delay the initiation of termination or eviction proceedings for families who do not demonstrate eligibility;
  - i. After MI, Enforcement including the amount of time that an owner/agent will delay the initiation of termination proceedings for ineligible families
  - ii. After MI, exceptions to Enforcement or Limited Enforcement Policies (if applicable)
- e. Real Property Rule – Section 8 Only (including PBRA RAD and 202/8) **New with HOTMA See HSG Notice 2023-10 Attachment A**
  - i. After MI, Non-enforcement,
  - ii. After MI, Limited Enforcement including the amount of time that an owner/agent will delay the initiation of termination or eviction proceedings for families who do not demonstrate eligibility;
  - iii. After MI, Enforcement including the amount of time that an owner/agent will delay the initiation of termination proceedings for ineligible families
  - iv. After MI, exceptions to Enforcement or Limited Enforcement Policies (if applicable)
- f. Eligibility Of Students (see Chapter 3, Sections 1 and 3).
  - (1) Student Financial Assistance (Section 8 and Non-Section 8) **Modified for HOTMA See HSG Notice 2023-10 G.16** Note: HUD’s HOTMA language does not include special consideration for vulnerable youth as provided in the Final Rule - [Eligibility of Independent Students for Assisted Housing Under Section 8 of the U.S. Housing Act of 1937; Additional Supplementary Guidance](#) provided in 2016.

**2. Occupancy Standards** (see Chapter 3, Section 2).

**3. Income Limits** (see Chapter 3, Section 1).

- a. Income Targeting – Section 8 only

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4. **Procedures For Accepting Applications And Selecting From The Waiting List:**
  - a. Procedures for accepting applications and pre-applications (see Chapter 4, Section 3);
  - b. Procedures for applying preferences (including income-targeting in Section 8 properties) (see Chapter 4, Sections 1 and 4); Be sure to include:
  - c. Policy For Opening And Closing The Waiting List for the property (see Chapter 4, Section 3).
5. **Applicant screening criteria** (see Chapter 4, Sections 1 and 4);
  - a. Required drug-related or criminal activity criteria including State lifetime sex offender registration in all states where applicant household members have resided or using a database that checks against all state registries, e.g., the Dru Sjodin National Sex Offender Database.
  - b. Procedures For Using The EIV Existing Tenant Search;
  - c. Other allowable screening criteria;
6. **Procedures For Rejecting Ineligible Applicants** (see Chapter 4, Section 1).
7. **Unit Transfer Policies**, including selection of in-place residents versus applicants from the waiting list when vacancies occur (see Chapter 7, Section 3).
  - a. Unit Transfer Preference.
  - b. RAM Transfer Preference.
  - c. VAWA Emergency Transfer – Internal Transfer.
  - d. Preference for someone who no longer needs accessibility features of a unit.
  - e. In some cases, Split Household Preference
8. **Fair Housing, Section 504** and other relevant civil rights laws and statutes (see Chapter 2, Section 3).
  - a. Policies for applying Violence Against Women Act (VAWA) protections

**NEW HOTMA TSP REQUIREMENTS**

1. **Verification Modified for HOTMA See HSG Notice 2023-10 Attachment J**
  - a. Means-tested verification including what to do if multiple means-tested documents are provided and
  - b. New verification hierarchy
2. **Streamlined Determination of Fixed Income Modified for HOTMA Now mandatory See HSG Notice 2023 B.3**
3. **Streamlined Verification of Assets Modified for HOTMA See HSG Notice 2023 F.7**
  - a. Whether OA Will Accept A Family's Self-Certification Of Net Family Assets Equal To Or Less Than \$50,000 At Admission and/or At Recertification
  - b. While not required, suggested to include information that the passbook rates and Asset Thresholds may change
4. **Streamlined Certification Not New but Now a TSP Requirement See HSG Notice 2023 I.8**
5. **How OA Will Repay Or Credit When The Family Was Overcharged New with HOTMA See HSG Notice 2023-10 B.4 & I.7**
  - a. When caused by owner/agent error, change is retroactive to the Effective Date of the action the error was made, regardless of the dollar amount associated with the error.
  - b. When the resident overpaid because the resident failed to report in a timely manner, a retroactive rent decrease may not be applied by the owner/agent prior to the later of the first of the month following:
    - (1) The date of the change leading to the interim reexamination of family income; or
    - (2) The effective date of the family's most recent previous interim or annual reexamination (or initial examination if that was the family's last examination).
6. **Hardship Exemptions Modified for HOTMA See HSG Notice 2023-10 C.4 & C.5**
  - a. Definition Of Changes In Circumstances That Are Required For The Family To Be Eligible For The Health And Medical Care Expense And Reasonable Attendant Care & Auxiliary Apparatus Expense Hardship Exemption (Financial Hardship Exemption/General Relief);

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- b. Whether Extensions Of The 90-Day Financial Hardship Exemption Period (General Relief) Are Allowable, And The Maximum Number Of 90-Day Extensions Families May Receive (If Establishing A Maximum Policy);
  - c. Whether or not owner/agents will continue Phase-in for a new admissions – when the family is receiving the phased-in relief at their current assisted housing at the time that the family is admitted to their current unit;
  - d. Definition Of Changes In Circumstances That Are Required For The Family To Be Eligible For The Childcare Hardship Exemption;
  - e. Whether Extensions Of The 90-Day Childcare Hardship Exemption Period Are Allowable, And The Maximum Number Of 90-Day Extensions Families May Receive (If Establishing A Maximum Policy);
7. **Consent 9887/9887A** –
- a. Impact of failure to sign and revoking consent; **Modified for HOTMA See HSG Notice 2023-10 J.1 and J.2**
  - b. Timeframe for signature when a member turns 18.
8. **Interim Recertification Modified for HOTMA**
- a. When to report a change.
    - a. Income changes;
    - b. Family composition changes;
    - c. Other changes.
  - b. Timely Reporting Requirements.
  - c. Percentage threshold the owner/agent will use for conducting Interim Recertification for decreases in a family’s Annual Adjusted Income – may not be greater than 10% and may not be a dollar amount.
  - d. Whether or not the owner/agent will create an IR if a family reports an increase in Annual Adjusted Income (AAI) within three months of their next Annual Recertification Effective Date.
  - e. Earned and unearned income increases.
    - i. No IR will be created for an earned income increase unless an AAI decrease has been submitted since the last AR
    - ii. Whether the OA will create an IR for an earned income increase after an IR for an Annual Adjusted Income decrease.