

## Appendix B | Summary of Revisions to the Admissions & Continued Occupancy Policy (ACOP)

Indicates policy has been added

~~Indicates policy has been removed~~

### Housing Opportunity Through Modernization Act of 2016 (HOTMA)

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law and made numerous changes to statutes governing HUD programs. Title I of HOTMA contains 14 different sections that impact the Public Housing and Section 8 programs, implementing broad changes to income and assets in Sections 102 and 104 of HOTMA and Public Housing program over-income provisions in Section 103. The Final Rule was officially published in the Federal Register on February 14, 2023. On September 29, 2023, HUD issued notice PIH 2023-27, which provided guidance to PHAs on the implementation of the program changes described in the Final Rule.

Opportunity Home will implement the following HOTMA policies on January 1, 2025.

### Discrimination Complaints

#### **Reason for Changes to 2.1.C Discrimination Complaints, addition of section 2.1.D Complaints under the Equal Access Final Rule [Notice PIH 2014-20], and 2.1.E VAWA Complaint Processing [Notice FHEO 2023-01]**

The following policy updates are to align Opportunity Home's discrimination complaint policies with the HUD Respondent Obligations in Fair Housing Investigations Interactive Diagram, Equal Access Final Rule [Notice PIH 2014-20] and Notice FHEO 2023-01.

#### ~~(6)~~2.1.C **Discrimination Complaints**

- (1) General Housing Discrimination Complaints
  - (a) If an applicant or tenant family believes that any family member has been discriminated against by Opportunity Home, the family should advise Opportunity Home.
  - (b) Opportunity Home should make every reasonable attempt to determine whether the applicant or tenant family's assertions have merit and take any warranted corrective action.

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- (d) Opportunity Home will attempt to remedy all discrimination complaints made against Opportunity Home.
- (e) Applicants or participants who believe that they have been subject to unlawful discrimination may notify Opportunity Home either verbally or in writing.
- (f) Within 10 business days of receiving the complaint, Opportunity Home will investigate and attempt to remedy discrimination complaints made against Opportunity Home. Opportunity Home will also advise the family of their right to file a fair housing complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The fair housing poster, posted in conspicuous and accessible locations in Opportunity Home lobbies, will reference how to file a complaint with FHEO. Opportunity Home will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).
- (g) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions.

#### **2.1.D Complaints under the Equal Access Final Rule [Notice PIH 2014-20]**

- (1) Notice PIH 2014-20 requires an articulated complaint process for allegations of discrimination under the Equal Access Final rule. The Equal Access Final Rule requires that Opportunity Home provides equal access regardless of marital status, gender identity, or sexual orientation. Opportunity Home will be informed on these obligations by the HUD Field Office or FHEO when an Equal Access complaint investigation begins.

- (a) Applicants or tenant families who believe that they have been subject to unlawful discrimination based on marital status, gender identity, or sexual orientation under the Equal Access Rule may notify Opportunity Home either orally or in writing.
- (b) Within 10 business days of receiving the complaint, Opportunity Home will provide a written notice to those alleged to have violated the rule. Opportunity Home will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

- (c) Opportunity Home will attempt to remedy discrimination complaints made against Opportunity Home and will conduct an investigation into all allegations of discrimination.
- (d) Within 10 business days following the conclusion of Opportunity Home's investigation, Opportunity Home will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.
- (e) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

### **2.1.E VAWA Complaint Processing [Notice FHEO 2023-01]**

- (1) A complainant may, not later than one year after an alleged VAWA violation has occurred or terminated, file a complaint with FHEO alleging such violation. If there is a violation that began prior to a year before the complaint is filed, but it continues into the one-year time period, HUD will accept the complaint. FHEO will investigate the complaint if it is timely and FHEO otherwise has jurisdiction. If a complaint is filed more than one year after the alleged violation occurred or terminated, FHEO may, but is not required to, investigate the allegations under the additional authority and procedures described in FHEO 2023-01.
- (2) Complaints do not need to allege a violation of the Fair Housing Act for FHEO to accept and investigate the complaint.

- (a) Applicants or tenant families who wish to file a VAWA complaint against Opportunity Home may notify Opportunity Home either orally or in writing.
- (b) Opportunity Home will advise the family of their right to file a VAWA complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). Opportunity Home will inform the family that no later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO's online complaint form via mail, email, or telephone.
- (c) Opportunity Home will attempt to remedy complaints made against Opportunity Home and will conduct an investigation into all allegations of discrimination.

(d) Within 10 business days following the conclusion of Opportunity Home's investigation, Opportunity Home will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.

(e) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

## **Family Consent to Release of Information (HUD-9886-A)**

### **Reason for Changes to 3.2.D and 7.1.A Family Consent to Release of Information [24 CFR 5.232] and Penalties for Failing to Consent [24 CFR 5.232]**

Sections 3.2.D and 7.1.A were updated with new HOTMA requirements regarding the Authorization for Release of Information, form HUD-9886-A. The revised section provides information on penalties for failing to sign the release of financial information to Opportunity Home.

#### **3.2.D Family Consent to Release of Information [24 CFR 5.232]**

- (1) HUD requires each adult family member, and the head of household, spouse, or cohead, regardless of age, to sign form HUD-9886, Authorization for the Release of Information Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. The consent form remains effective until the family is denied assistance, assistance is terminated, or the family provides written notification to revoke consent.
- (2) Opportunity Home must deny admission to the program if any member of the applicant family fails to sign and submit consent forms which allow Opportunity Home to obtain information that Opportunity Home has determined is necessary in administration of the public housing program [24 CFR 960.259(a) and (b) and 24 CFR 5.232(a)].
- (3) However, this does not apply if the applicant or participant, or any member of their family, revokes their consent with respect to the ability of Opportunity Home to access financial records from financial institutions, unless Opportunity Home establishes a policy that revocation of consent to access financial records will result in denial or termination of assistance or admission [24 CFR 5.232(c)].

(A) Opportunity Home has established a policy that the family's revocation of consent to allow Opportunity Home to access records from financial institutions will result in denial of admission.

## 7.1 General Verification Requirements

### 7.1.A Family Consent to Release of Information [24 CFR 982.516 and 982.551, 24 CFR 5.230]

- (1) The family must supply any information that Opportunity Home or HUD determines is necessary to the administration of the program and must consent to Opportunity Home verification of that information [24 CFR 982.551].
- (2) **Consent Forms**
  - (a) ~~It is required that a~~ All adult applicants and participants sign form HUD-9886-A, Authorization for Release of Information. All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886-A at admission.
  - (b) The purpose of form HUD-9886-A is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form.
  - (b) HUD and Opportunity Home may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members.
  - (c) Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).
  - ~~(d) Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.~~
  - (d) Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886-A be signed only once. On or after January 1, 2024 (regardless of Opportunity Home's HOTMA compliance date),



current program participants must sign and submit a new Form HUD-9886-A at their next interim or annual reexamination.

(e) This form will only be signed once and will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to Opportunity Home to revoke consent. Another Form HUD-9886-A will not be submitted to Opportunity Home except under the following circumstances:

(i) When any person 18 years or older becomes a member of the family;

(ii) When a current member of the family turns 18; or

(iii) As required by HUD or Opportunity Home in administrative instructions.

(f) Opportunity Home has the discretion to establish policies around when family members must sign consent forms when they turn 18. Opportunity Home must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

(i) Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886-A at the family's next annual or interim reexamination, whichever is earlier.

**(3) Penalties for Failing to Consent [24 CFR 5.232]**

(a) If any family member who is required to sign a consent form fails to do so, Opportunity Home will deny admission to applicants and terminate the lease of tenants. The family may request a hearing in accordance with Opportunity Home's grievance procedures.

(b) The family may request an informal review (applicants) or informal hearing (participants) in accordance with Opportunity Home procedures. However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of Opportunity Home to access financial records from financial institutions, unless Opportunity Home establishes a policy that revocation of consent to access

financial records will result in denial or termination of assistance or admission [24 CFR 5.232(c)].

(c) Opportunity Home may not process interim or annual reexaminations of income without the family's executed consent forms.

- (i) Revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with Opportunity Home policy.
- (ii) For a family to revoke their consent, the family must provide written notice to Opportunity Home.
- (iii) Opportunity Home will send the family a notice acknowledging receipt of the request and explaining that revocation of consent. Opportunity Home will notify their local HUD office of the written notice.

## **Use of Other Programs' Income Determinations**

### **Reason for Addition of 7.1.B Use of Other Programs' Income Determinations [24 CFR 5.609(c)(3) and Notice PIH 2023-27]**

Section 7.1.B was updated to include new HOTMA requirements regarding the use of Safe Harbor determinations. Opportunity Home has opted out of the use of other programs' income determinations.

#### **7.1.B Use of Other Programs Income Determinations [24 CFR 5.609(c)(3) and Notice PIH 2023-27]**

- (1) Opportunity Home may, but are not required to, determine a family's annual income, including income from assets, prior to the application of any deductions, based on income determinations made within the previous 12-month period, using income determinations from means-tested federal public assistance programs. Opportunity Home is not required to accept or use determinations of income from other federal means-tested forms of assistance. If Opportunity Home adopts a policy to accept this type of verification, Opportunity Home must establish in policy when they will accept Safe Harbor income determinations and from which programs. Opportunity Home must also create policies that outline the course of action when families present multiple verifications from the same or different acceptable Safe Harbor programs.



**(2) Means-tested federal public assistance programs include:**

- (a) Temporary Assistance for Needy Families (TANF) (42 U.S.C. 601, et seq.);
- (b) Medicaid (42 U.S.C. 1396 et seq.);
- (c) Supplemental Nutrition Assistance Program (SNAP) (42 U.S.C. 2011 et seq.);
- (d) Earned Income Tax Credit (EITC) (26 U.S.C. 32);
- (e) Low-Income Housing Credit (LIHTC) program (26 U.S.C. 42);
- (f) Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC) (42 U.S.C. 1786);
- (g) Supplemental Security Income (SSI) (42 U.S.C. 1381 et seq.);
- (h) Other programs administered by the HUD Secretary;
- (i) Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding; and
- (l) Other federal benefit determinations made in other forms of means-tested federal public assistance that the Secretary determines to have comparable reliability and announces through the Federal Register.

**(3) If Opportunity Home elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, then they must obtain the income information by means of a third-party verification. The third-party verification must state the family size, must be for the entire family, and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, Opportunity Home will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR 5.618. The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by Opportunity Home:**

- (a) Income determination effective date;
- (b) Income determination effective date;
- (c) Program administrator's signature date;



- (d) Family's signature date;
- (e) Report effective date; or
- (f) Other report-specific dates that verify the income determination date.
- (4) The only information that Opportunity Home is permitted to use to determine income under this method is the total income determination made by the federal means-tested program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information must not be considered by Opportunity Home. Opportunity Home is not permitted to mix and match Safe Harbor income determinations and other income verifications.
- (5) If Opportunity Home is unable to obtain Safe Harbor documentation or if the family disputes the other program's income determination, Opportunity Home must calculate the family's annual income using traditional methods as outlined in Notice PIH 2023-27 and this chapter.
- (6) If Opportunity Home uses a Safe Harbor determination to determine the family's income, the family is obligated to report changes in income that meet Opportunity Home's reporting requirement and occur after the effective date of the transaction.
- (7) The amounts of unreimbursed reasonable attendant care expenses and child-care expenses deducted from a family's annual income, except for when a family is approved for a child-care expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. Opportunity Home is therefore required to obtain third-party verification of the applicable employment income and cap the respective expense deductions accordingly.
- (8) Opportunity Home will not accept verification from other federal assistance programs. All income will be verified in accordance with the requirements of HUD's verification hierarchy and Opportunity Home policies in this chapter.

## **EIV Income and IVT Reports**

### **Reason for Addition of 7.1.C EIV Income and IVT Reports**



Section 7.1.C includes new HOTMA requirements that allow Opportunity Home to determine when Enterprise Income Verification (EIV) and Income Verification Tool (IVT) reports are required for income verification.

### 7.1.C **Level 5 and 6 Verification: Up-Front Income Verification (UIV)**

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#### (b) ***EIV Income and IVT Reports***

(i) Opportunity Home is required to obtain an EIV Income and IVT report for each family any time Opportunity Home conducts an annual reexamination. However, Opportunity Home is not required to use the EIV Income and IVT reports: The data shown on income and income-validation tool (IVT) reports is updated quarterly. Data may be between three and six months old at the time reports are generated.

(A) At annual reexamination if Opportunity Home used Safe Harbor verification from another means-test federal assistance program to determine the family's income; or

(B) During any interim reexaminations.

(ii) The EIV Income and IVT Reports are also not available for program applicants at admission.

(iii) When required to use the EIV Income Report, in order for the report to be considered current, Opportunity Home Must pull the report within 120 days of the effective date of the annual reexamination.

(iv) The EIV Income Report may be used to verify and calculate income at annual reexamination if the family self-certifies that the amount is accurate and representative of current income. The family must be provided with the information in EIV.

(ii) Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine a family's annual income, Opportunity Home will obtain EIV income and IVT reports for all annual ~~and interim~~ reexaminations for all families. Reports will be generated as part of the regular reexamination process.



- ~~(iii) Opportunity Home will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.~~
- ~~(iii) Income and IVT reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV. Income and IVT reports will be compared to family-provided information as part of the annual reexamination process.~~
- ~~(iv) Income and IVT reports may be used in the calculation of annual income, as described in Chapter 6.1.C.~~
- ~~(v) Income reports may also be used to meet the regulatory requirement for third-party verification, as described above.~~
- ~~(vi) Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Section 6.1.C. and in this chapter.~~
- ~~(vii) Family expense summaries will be used in interim reexaminations for families who report zero income.~~
- ~~(iviii) Income and IVT reports, and family expense summaries, will be retained in participant files with the applicable annual or interim reexamination documents (if applicable) for the duration of the family's participation..~~
- ~~(vix) When Opportunity Home determines through EIV reports and third party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.~~

## **EIV + Self-Certification**

### **Reason for the Change to 7.1.F EIV + Self-Certification**

Section 7.1.F includes language that allows Opportunity Home to accept EIV and a family's self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

#### **7.1.F EIV + Self-Certification**

- ~~(1) EIV may be used as written third-party verification and may be used to calculate income if the family agrees with the information in EIV and~~



self-certifies that the amount is accurate and representative of current income.

(2) When calculating income using this method, Opportunity Home may use its discretion to determine which method of calculation is reasonable: the last four quarters combined or an average of any number of quarters. The family must be provided with the information from EIV.

(3) At annual reexamination, if Opportunity Home is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, Opportunity Home will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

(5) Opportunity Home will use an average of the last two quarters of income listed in EIV to determine income from employment. Opportunity Home will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income.

(6) If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, Opportunity Home will use written third-party verification from the source.

(7) Opportunity Home will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

## **Self-Certification of Net Family Assets**

### **Reason for the Addition of 7.3.F Net Family Assets Equal to or Less than \$50,000**

Section 7.3.F adds new HOTMA requirements that allows Opportunity Home to accept self-certification from a family for certification of real property ownership and net assets totaling \$50,000 or less. Opportunity Home has opted to accept self-certification for both cases.

#### **7.3.F Net Family Assets**

##### **Assets Totaling \$50,000 or Less**

(1) At admission and reexamination, for families with net assets totaling \$50,000 or less (adjusted annually), Opportunity Home may, but is not required to, accept the family's self-certification that the family's



assets do not exceed \$50,000 without taking any additional steps to verify the accuracy of the declaration.

- (2) The declaration must include the amount of income the family expects to receive from assets which must be included in the family's income. This includes declaring income from checking and savings accounts which, although excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not exceed \$50,000), may generate asset income.
- (3) Opportunity Home must clarify during the self-certification process which assets are included/excluded from net family assets.
- (4) If Opportunity Home chooses to accept self-certification, Opportunity Home is required to obtain third-party verification of all assets, regardless of the amount, at least once every three years.
- (5) When net family assets have a total value over \$50,000, Opportunity Home may not rely on the family's self-certification.

  - (a) Third-party verification of assets is required when net family assets exceed \$50,000, adjusted annually by HUD.
  - (b) When verification of assets is required, Opportunity Home is required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts.
- (6) For families with net assets totaling \$50,000 or less, Opportunity Home will accept a family's self-certification of the value of their assets and anticipated asset income.

  - (a) The family's declaration must show each asset and the amount of income expected from that asset.
  - (b) All family members 18 years of age and older must sign the family's declaration.
  - (c) Opportunity Home reserves the right to require additional verification in situations where the accuracy of the declaration is in question.
- (7) Any income the family expects to receive from assets will be included in the family's annual income.
- (8) Families will be required to provide third-party verification of net family assets every three years.
- (9) When verification is required in determining the value of checking or savings accounts, Opportunity Home will use the current balance.

  - (a) In determining the anticipated income from an interest-bearing



checking or savings account when verification is required and the rate of return is known, Opportunity Home will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

### **Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2)]**

- (1) Opportunity Home must determine whether a family has present ownership in real property that is suitable for occupancy for purposes of determining whether a family is compliant with the asset limitations.
- (2) At admission and reexamination, Opportunity Home may accept a self-certification from the family that the family does not have any present ownership in any real property that is suitable for occupancy.
  - (a) If the family declares they have present ownership in real property, Opportunity Home must obtain third-party verification.
- (3) Both at admission and reexamination, Opportunity Home will accept self-certification from the family that the family does not have any present ownership in any real property.
- (4) The certification must:
  - (a) State that the family does not have any present ownership interest in any real property;
  - (b) Be signed by all family members 18 years of age and older.
- (7) Opportunity Home reserves the right to require additional verification in situations where the accuracy of the declaration is in question.
- (8) If the family declares they have a present ownership in real property, Opportunity Home will obtain third-party verification of the following factors:
  - (a) Whether the family has the legal right to reside in the property; and
  - (b) Whether the family has effective legal authority to sell the property; and
  - (c) Whether the property is suitable for occupancy by the family as a residence.
- (9) In cases where a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, Opportunity Home will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.



## **Nonrecurring Income**

### **Reason for the Addition of 7.3.E Nonrecurring Income**

Section 7.3.E adds new HOTMA requirements that allow Opportunity Home to accept self-certification from a family for nonrecurring income. Opportunity Home has opted to accept self-certification of this form of payment.

#### **7.3.E Nonrecurring Income**

(1) Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income.

(2) Opportunity Home may accept a self-certification from the family stating that the income will not be repeated in the coming year.

(a) Opportunity Home will accept self-certification from the family stating that income will not be repeated in the coming year.

(b) Opportunity Home may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.

## **Third-Party Verification of Social Security Numbers**

### **Reason for Change to 7.2.B Social Security Numbers**

Section 7.2.B was updated to include language that allows Opportunity Home to accept third-party verification of an applicant or participant's Social Security Number (SSN) when all other attempts to obtain that information have been unsuccessful.

#### **7.2.B Social Security Numbers [24 CFR 5.216 and Notice PIH ~~2023-27~~ 2018-24]**

(1) The family must provide documentation of a valid Social Security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include existing residents who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

(2) Note that an individual who previously declared to have eligible immigration status may not change their declaration for the purpose of avoiding compliance with the SSN disclosure and documentation

requirements or penalties associated with noncompliance with these requirements. Nor may the head of household opt to remove a household member from the family composition for this purpose.

- (23) Opportunity Home must accept the following documentation as acceptable evidence of the social security number:
- (a) An original SSN card issued by the Social Security Administration (SSA)
  - (b) An original SSA-issued document, which contains the name and SSN of the individual
  - (c) An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual
- (34) While Opportunity Home must attempt to gather third-party verification of SSNs prior to admission as listed above, Opportunity Home also has the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if Opportunity Home has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, Opportunity Home must document why the other SSN documentation was not available.
- (5) If the tenant's SSN becomes verified in EIV, then no further verification is required. If the tenant's SSN fails the SSA identity match, then Opportunity Home 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's assistance must be terminated if they fail to provide the required documentation.

(a) Opportunity Home will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.



## **Other Permitted Reasons for Denial of Admission**

### **Reason for Change to 3.3.D Other Permitted Reasons for Denial**

Section 3.3.D was updated to allow Opportunity Home to consider the reason for termination of applicant families that have been terminated from federally assisted housing in the last three years when evaluating applicant admission.

### **3.3.DE Other Permitted Reasons for Denial Of Admission**

- (1) HUD permits, but does not require Opportunity Home to deny admission for the reasons discussed in this section.

- (2) In making its decision to deny assistance, Opportunity Home will consider the factors discussed in Section 3.3.F. Upon consideration of such factors, Opportunity Home may, on a case-by-case basis, decide not to deny assistance.

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- (4) **Previous Behavior [960.203(c) and (d) and PH Occ GB, p. 48]**

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- (d) Opportunity Home will deny admission to an applicant family if Opportunity Home determines that the family:
  - (i) Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing programs;
  - (ii) Owes rent or other amounts to Opportunity Home in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family enters into a repayment agreement upon admission.
  - (iii) Includes any family member that has been evicted from federally-assisted housing in the last three years.

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(g) Opportunity Home may deny admission based on the termination reason for family members who have been terminated from federally-assisted housing in the last three years.