

## ACOP 2026 Summary of Changes

### **Chapter 02 Fair Housing**

- *Section 2-I.A. OVERVIEW* – HACM policy revised to state compliance with all applicable federal, state, and local nondiscrimination laws and ordinances. Additional references added regarding HUD Equal Access, VAWA 2022, and HACM annual fair housing certification in the PHA Plan.
- *Section 2-I.B. NONDISCRIMINATION* – Clarified that harassment includes sexual harassment and harassment based on sex, gender identity, sexual orientation, and other protected characteristics.
- *Section 2-I.C. DISCRIMINATION COMPLAINTS* – Updated to allow oral or written complaints; HACM must investigate within 10 business days, attempt resolution, and inform complainants of HUD FHEO filing rights.
- *Section 2-I.C. VAWA Complaint Procedure* – New procedure established for VAWA-related complaints, including intake, investigation, and documentation requirements.
- *Section 2-II.A. OVERVIEW* – Applicant and Tenant Notification of Reasonable Accommodation Rights – Requires HACM to proactively notify applicants and tenants of accommodation rights at intake, reexamination, and adverse actions.
- *Section 2-II.E. REASONABLE ACCOMMODATION RESPONSE* – Approval/Denial of Requested Accommodation – Requires written response within 10 business days, with extensions permitted during documented interactive process.
- *Section 2-II.F. PROGRAM ACCESSIBILITY* – Program Accessibility for Persons with Hearing or Vision Impairments – Recognizes electronic/digital formats as auxiliary aids under Section 504.
- *Section 2-III.A. OVERVIEW* – Limited English Proficiency (LEP) – Updated to reflect English as official language emphasis and streamlined LEP framework.
- *Section 2-III.B. ORAL INTERPRETATION* – HACM Policy – Communications generally conducted in English with use of interpreters, AI tools, advocates, and machine translation permitted; children may not serve as interpreters.
- *Sections 2-III.C WRITTEN TRANSLATION and 2-III.D IMPLEMENTATION PLAN* – Removed prior formal LEP translation/implementation framework.

### **Chapter 03 Eligibility**

- *Section 3-I.C. Assignment of the Unit* – Family Breakup and Custody Considerations – Added school stability as a factor in determining household retention of assistance.
- *Section 3-I.F. Joint Custody and Dependent Designation* – Revised dependent definition to include 50% residency or primary financial support.
- *Section 3-I.J. Absence of Entire Family* – Added reasonable accommodation consideration for guest-stay limitations.
- *Section 3-I.L. Absence of Entire Family* – Temporary Absence Standard – Reduced allowable absence from 90 days to 60 days.
- *Section 3-II.B. Eligibility Criteria* – Admission of Non-Income Eligible Families – Clarified

that non-income-eligible families will not be admitted above 80% AMI.

- *Section 3-II.C. Citizenship/Eligible Immigration Status Requirements* – Added documentation requirements for citizenship/national status verification.
- *Section 3-II.E. Penalties for Failing to Consent* – Revocation of Consent – Revocation of consent results in denial or termination of assistance.
- *Section 3-III.D. Family Self-Sufficiency Participation* – Clarified FSS noncompliance is not sole basis for denial.
- *Section 3-III.F. Consideration of Circumstances* – Evidence Standards – Arrest records alone may not establish ineligibility; may trigger further investigation.
- *Section 3-III.F. Consideration of Circumstances* – Expanded Mitigating Factors – Includes VAWA protections, disability-related behavior, rehabilitation, and time since offense.

## **Chapter 04 Applications**

- *Section 4-I.D. Placement on the Waiting List* – Eligible for Placement on the Waiting List – Updated notice language to “application accepted for processing.”
- *Section 4-III.B. Selection Method and Local Preferences* – Local Preferences – Added Emergency VAWA Transfer Preference and HCV Abatement Preference.
- *Section 4-III.D. Eligibility Determination Process* – Verification of Information – Requires missing identity documentation within 10 business days.
- *Section 4-III.D. Eligibility Determination Process* – Language Assistance – Adds AI tools, advocates, bilingual staff, and translation services.
- *Section 4-III.E. Final Eligibility Determination* – Violence Against Women Act (VAWA) Reference Update – Updated reference to 2023 VAWA reauthorization.

## **Chapter 05 Occupancy**

- Grammatical changes

## **Chapter 06 Income**

- *Section 6-I.C. Determining Annual Income* – Anticipating Annual Income – Clarified use of EIV and tenant documentation for wage projection.
- *Section 6-I.NO. Periodic Payments* – Alimony and Child Support – Expanded procedures for verification, averaging payments, and treatment of lump sums.
- *Section 6-II.D. Medical Expenses* – Health and Medical Care Expense Deduction – Requires redaction of all personal medical information; prohibits inclusion in tenant files.
- *Section 6-II.E. Disability Assistance Expenses* – Eligible Auxiliary Apparatus – Expanded list of eligible devices and equipment.
- *Section 6-II.E. Disability Assistance Expenses* – Eligible Attendant Care – Clarified eligible care includes ADLs and 24-hour support services.
- *Section 6-I.GH. Periodic Payments* – Alimony and Child Support Income Calculation Procedures – Detailed verification hierarchy and treatment of irregular payments.

## **Chapter 07 Verification (Part A)**

- *Section 7-I.A. Family Consent to Release of Information* – Added EIV consent and distribution procedures.
- *Section 7-I.A. Penalties for Failing to Consent* – Revocation results in denial or termination.
- *Section 7-I.C. Streamlined Income Determinations* – Clarifies Safe Harbor usage and exceptions..
- *Section 7-I.E. Costs of Verification* – HACM may cover verification costs when required.
- *Section 7-II.H. Verification of Preference Status* – Added verification for VAWA and HCV preferences.
- *Section 7-III.D. Alimony and Child Support Verification* – Established hierarchy of verification sources.
- *Section 7-III.C. Periodic Payments* – EIV security procedures required.
- *Section 7-III.E. Assets Disposed of for Less Than Fair Market Value* – Self-certification permitted.
- *Section 7-III.J. Student Financial Assistance* – Verification of educational assistance sources required.
- *Section 7-IV.B. Medical Expense Documentation* – Requires removal of PII and compliance with privacy laws.

## **Chapter 07 Verification (Part B)**

- *Section 7-I.F. Level 4 Verification* – EIV Security Procedures – Reinforces secure handling of EIV data.
- *Section 7-I.H. Oral Third-Party Verification* – Allows self-certification if verification not returned within 10 business days.
- *Section 7-I.H. Imputed Assets* – Allows self-certification for disposed assets.
- *Section 7-II.G. Citizenship or Eligible Immigration Status* – Requires supporting documentation for citizenship claims.

## **Chapter 08 Leasing**

- *Section 8-I.F. Payments Under the Lease* – Rent Payments – Late Fees and Nonpayment – Reduced nonpayment notice period from 30 days to 14 days.
- Added 14-day Notice to Vacate after rent default on the 5th day of the month.
- Payment within notice period prevents eviction filing.

## **Chapter 09 Reexaminations (Part A)**

- *Section 9-I.F. Effective Dates* – Removed discretionary language allowing early scheduling of annual reexaminations and alternate effective date provisions.
- *Section 9-III.B. Changes in Family and Household Composition* – Added requirement to report changes within 10 business days.

## **Chapter 09 Reexaminations (Part B)**

- *Section 9-III.B. Changes in Family and Household Composition* – Reporting Requirement – Reinforces 10-business-day reporting rule.

## **Chapter 10 Pets**

- *Section 10-I.B. Approval of Assistance Animals* – Added requirement for verification of disability-related need for unique/non-traditional animals.

## **Chapter 11 Community Service**

- Grammatical changes

## **Chapter 12 Transfers**

- *Section 12-I.B. Emergency Transfers* – Added requirement that VAWA-related emergency transfers be processed upon receipt of complete request and absence of conflicting information.
- Added confidentiality requirement prohibiting disclosure of victim location.
- *Section 12-IV.B. Transfer List* – Added HCV Abatement-Affected Families as priority transfer category.

## **Chapter 13 Lease Terminations**

- *Section 13-III.B. Mandatory Lease Provisions* – Removed prohibition on using arrest records as sole basis for termination (applies throughout section).
- *Section 13-III.C. Other Authorized Reasons for Termination* – Added firearm/weapons compliance requirement; unlawful possession constitutes material lease violation.
- *Section 13-III.E. Criteria for Deciding to Terminate Tenancy* – Added authority to obtain and review police reports related to arrests.

## **Chapter 14 Grievances**

- *Section 14-I.B. Informal Hearing Process* – Added language assistance via AI tools, interpreters, and machine translation; advocates permitted.
- *Section 14-III.G. Remote Hearings* – Added same language assistance standards for remote grievance hearings.

## **Chapter 15 Program Integrity**

- Grammatical changes

## **Chapter 16 Program Administration**

- *Section 16-III.B. Repayment Policy* – Established structured repayment schedules based on debt amount.
- Added hardship flexibility based on income, expenses, cause of debt, and payment history.
- Standardized repayment agreement framework.