

## Contents

|                                                                                                                           |    |
|---------------------------------------------------------------------------------------------------------------------------|----|
| Attachment 1: Revision of Existing PHA Plan Elements .....                                                                | 2  |
| Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions ..                                  | 2  |
| Reasonable Accommodations Utility Allowance Adjustment .....                                                              | 2  |
| Homeless Set Aside Preference.....                                                                                        | 2  |
| Financial Resources.....                                                                                                  | 2  |
| Rent Determination.....                                                                                                   | 2  |
| Operation and Management .....                                                                                            | 3  |
| Program Definitions.....                                                                                                  | 3  |
| Administrative Fees .....                                                                                                 | 3  |
| Data and System Improvements.....                                                                                         | 3  |
| HOTMA.....                                                                                                                | 3  |
| NSPIRE .....                                                                                                              | 4  |
| Landlord Engagement Activities.....                                                                                       | 5  |
| Project Based Vouchers.....                                                                                               | 5  |
| Emergency Housing Vouchers .....                                                                                          | 5  |
| Inspection Process.....                                                                                                   | 5  |
| Informal Review and Hearing Procedures .....                                                                              | 6  |
| Violence Against Women's Act (VAWA).....                                                                                  | 6  |
| Criminal Background Screening.....                                                                                        | 6  |
| Attachment 2: Five Year Plan Progress Updates .....                                                                       | 8  |
| Goal 1: Increase affordable housing opportunities for low, very low-, and extremely low-income families. ....             | 8  |
| Goal 2: Ensure an ongoing inventory of decent, safe, and affordable housing that supports strong, viable communities..... | 9  |
| Goal 3: Strengthen Virginia Housing's ability to provide affordable housing. ....                                         | 9  |
| Goal 4: Promote self-sufficiency and stabilize families. ....                                                             | 11 |
| Attachment 3: RAB Comments.....                                                                                           | 13 |

## Attachment 1: Revision of Existing PHA Plan Elements

### Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

#### Reasonable Accommodations Utility Allowance Adjustment

Virginia Housing added additional information regarding the reasonable accommodation process for requesting an adjustment to the utility allowance amount due to an accommodation request within its Administrative plan. The revisions include the process for requesting utility allowance adjustments as a reasonable accommodation for individuals with disabilities, verification methods, and a sample calculation allowance for an adjustment due to medical equipment.

#### Homeless Set Aside Preference

Virginia Housing revised its policy to confirm and put into historical perspective the Homeless set aside preference for the 78 Housing Choice Vouchers (funded through the Consolidated Appropriations Act of 2022, P.L. 11-103) that were utilized in FY 2023. This funding provided an additional allocation of incremental Housing Choice Vouchers that rolled into Virginia Housing's annual renewal after the first year, as outlined in Notice PIH 2022-29. This preference was provided for families experiencing certain conditions, such as experiencing homelessness, being at risk of homelessness, or fleeing domestic violence. Qualifying families receive absolute priority until all 78 vouchers were issued, after which priority resumes only when a voucher becomes available.

#### Financial Resources

HUD has provided notice to Virginia Housing of the following CY2026 renewal funding for the HCV Program:

Housing Choice Voucher Program HAP: \$105,867,640

Mainstream Vouchers HAP: \$2,800,850

#### Rent Determination

Virginia Housing provided an update to its administrative plan that it will adopt the use of Small Area Fair Market Rents (SAFMRs) in metropolitan areas where HUD's mandatory adoption of SAFMRs is required.

## Operation and Management

### Program Definitions

Virginia Housing updated its policy to provide additional details about eligibility and requirement to report changes in the family's household make up.

The revision added to the definition of family the requirement that, "families must identify all members at application and report any changes in household composition."

### Administrative Fees

Virginia Housing updated its policy to remove the use of all types of administrative fees for Stability Vouchers. This includes additional administrative funding for the following categories:

1. Housing search assistance.
2. Holding fees for units where the fee is required by the owner after a tenant's application has been accepted but before the lease signing.
3. Security deposit assistance.
4. Utility deposit assistance/utility arrears.
5. Owner recruitment and outreach for SVs.
6. Owner incentive and/or retention payments.

Moving expenses (including move-in fees and deposits).

Virginia Housing does not offer any additional administrative fees for this type of special purpose voucher or any type of housing choice voucher.

### Data and System Improvements

Virginia Housing began laying the foundation of improvements to the waiting list process by launching an online applicant portal to streamline access and enable future waitlist integration across local housing agencies. To do so, the agency upgraded its Elite software system, including purchase of the following web portals; 1) Web App, 2) Applicant Portal and 3) Resident Portal. The Applicant Portal and Resident Portal are currently in the testing phase and are anticipated to go-live in early 2026.

### HOTMA

On September 18, 2024, HUD announced PHAs would not be required to comply with HOTMA Sections 102 and 104 income and asset provisions by January 1, 2025, except for the Earned Income Disregard. On December 17, 2024, HUD further clarified that PHAs must comply with the HUD-9886-A requirements by February 1, 2025. Lastly, HUD mandated

Income exclusions, updated HUD definitions, and processing of de minimis errors, must be implemented by July 1, 2025.

Virginia Housing made revisions to the Administrative Plan to reflect current and pending HOTMA requirements. As of July 1, 2025, the following items have been implemented:

| <b>Provision</b>                                              | <b>Required Compliance Date</b> |
|---------------------------------------------------------------|---------------------------------|
| Ceasing enrollment into Earned Income Disregard (EID)         | January 1, 2024                 |
| Use of HUD-9886-A (Release of Information/Privacy Act Notice) | February 1, 2025                |
| Income Exclusions                                             | July 1, 2025                    |
| Definitions                                                   | July 1, 2025                    |
| De Minimis Errors (errors in calculation over \$30)           | July 1, 2025                    |

Full implementation of HOTMA Sections 102 and 104 still depends on HUD releasing HOTMA-compliant HUD-50058 forms in the new Housing Information Portal (HIP). Because HOTMA-compliant reexaminations cannot be successfully submitted to IMS/PIC, HUD advises PHAs not to begin conducting reexaminations under HOTMA rules without further information on when the HOTMA-compliant HUD-50058 in HIP will be available. At the time of the Annual Plan, no updates or guidance has been provided.

## NSPIRE

HUD provided notice on September 10, 2025, of the decision to extend the NSPIRE-V compliance deadline from October 1, 2025, to February 1, 2027. This extension is intended to give PHAs additional time to implement the requirements effectively.

HUD has also delayed enforcement of new affirmative requirements under NSPIRE until October 1, 2026. This means scoring for these requirements will not begin until that date for Public Housing and Multifamily Housing inspections.

Virginia Housing previously implemented all carbon monoxide requirements and enhanced smoke detector requirements prior to the deadline of December 2024.

## Landlord Engagement Activities

Virginia Housing previously allocated funding for landlord repair grants from its REACH Virginia funding pool (*an initiative that invests Virginia Housing's revenues into innovative homeownership, rental, and outreach programs*). The grant program was originally anticipated to launch in January 2025 but was placed on hold and will be re-evaluated for implementation in the future. The grant will eventually assist landlords with micro grants to cover repairs up to \$500 to bring their units up to HQS compliance, with a goal of retaining landlords and maintaining the supply of HCV-eligible units.

In 2025, Virginia Housing created a landlord education toolkit, which was posted to the Virginia Housing website. The toolkit is intended to help LHAs engage and market to landlords.

## Project Based Vouchers

To further address the housing needs within Virginia Housing's (VH) jurisdiction, Virginia Housing continued implementation of the new PBV program in 2025. In April four projects were recommended to the Board of Commissioners and conditionally approved: Northway Family, Kingsridge II, Kingsridge III, and Quarry Station. Projects were notified of the conditional approval, and the HCVP team is currently proceeding with coordination of HAP contracts with owners, unit inspections, and income qualification of resident households. HAP contracts have been executed for 43 PBV units.

## Emergency Housing Vouchers

In this fiscal year, Virginia Housing plans to implement actions to support households currently assisted through the Emergency Housing Voucher (EHV) program, transition to other vouchers subsidies. HUD's Notice PIH 2025-19 provided guidance for PHAs on the process of transitioning EHV households to other HCV subsidies by the end of 2026. This will be accomplished by leveraging available voucher availability and transitioning families into its special purpose and regular voucher allocations. Virginia Housing submitted and received a EHV waiver from HUD that allows all EHV families to be placed on the HCV waiting list without submitting a new application, nor requiring public notice of the waitlist opening or closing.

## Inspection Process

### *Centralization of Inspections*

Virginia Housing contracted with a third-party vendor to manage inspection activities beginning on April 1, 2025. The centralization of inspections aimed to improve the efficiency and effectiveness of inspections, ensuring that required corrections are made promptly. The

new process was piloted in April 2025, with a full rollout to all local housing agencies in July 2025. The initiative focuses on lessening the time required for both initial and secondary inspections, performing additional quality control (QC) and compliance inspections, and proactively informing landlords about the upcoming NSPIRE requirements scheduled for implementation in 2027.

The housing authority may initiate biennial inspections in FY2026.

#### *Abatements*

The agency clarified its policy on voucher issuance during HAP abatements within the administrative plan. If a unit fails re-inspection with no approved extension, the abatement takes effect on the 1st of the following month. The family will receive a voucher to move on that same date and may choose to remain in the unit if the inspection passes prior to the abatement termination date.

### **Informal Review and Hearing Procedures**

Virginia Housing updated its policy regarding recording and access to informal hearings for applicants and participants. Virginia Housing will record all informal hearings completed virtually. Upon written request, the applicant or participant will be provided with a copy of the recording at no cost.

Virginia Housing updated its policy to include VAWA Denials to list of categories for informal hearings.

### **Violence Against Women's Act (VAWA)**

Virginia Housing updated its policy to new links and updated forms with new expiration dates provided by HUD in reference to VAWA protections. The updates reflect the newest HUD links and latest version(s) of the form.

### **Criminal Background Screening**

Effective as of 1/1/2026, Virginia Housing is in the process of reviewing its criminal background screening criteria in line with HUD's guidance. Virginia Housing is in the process of requesting model policies and will implement these changes in our next revision that are in line with the rescission of the following notices:

- Notice 2015-19 – Guidance for PHAs and Owners of Federally-Assisted Housing on Excluding the Use of Arrest Records in Housing Decisions.
- 2016 Office of General Counsel Memo – Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions;

- 2022 Office of Fair Housing and Equal Opportunity Memo – Implementation of the Office of General Counsel’s Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions.

## Attachment 2: Five Year Plan Progress Updates

### Goal 1: Increase affordable housing opportunities for low, very low-, and extremely low- income families.

| Objectives                                                                                                                                                                                                                                                                                                                    | Progress                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Apply for additional rental vouchers if funding is available, with particular emphasis on special purpose vouchers for families experiencing homelessness, veterans, youth aging out of foster care, families with special needs (disabled/elderly), and those at greatest risk of homelessness or experiencing homelessness. | In August 2024, Virginia Housing applied for and secured 25 new HUD-VASH vouchers to serve homeless veterans in 2025.<br><br>Virginia Housing responded to the HUD-VASH registration of interest in September 2025 and requested new HUD-VASH vouchers to serve homeless veterans in 2026.                                                                             |
| Maintain a leasing rate as high as funding and HUD parameters will allow to maximize voucher utilization by low-, very low-, and extremely low-income families.                                                                                                                                                               | Virginia Housing has maintained a high leasing rate, currently at 87.93% (as of July 2025) and above the national average.                                                                                                                                                                                                                                             |
| Continue to provide voucher assistance to those identified as part of the DOJ Olmstead Settlement Agreement.                                                                                                                                                                                                                  | Virginia Housing continues to provide voucher assistance to specially targeted households under the DOJ Olmstead Settlement Agreement. Currently there are 127 vouchers allocated for Virginia Housing.                                                                                                                                                                |
| Implement a Project-based Voucher (PBV) program, which will include an additional set aside for special populations.                                                                                                                                                                                                          | In 2025, Virginia Housing implemented its PBV program. During the program year the Senior Program Compliance Officer (PCO) conducted individual meetings with each property, hosted open houses for current tenants, managed tenant selection guidance, and coordinated unit inspections. As of December 1, 2025, Virginia Housing now has 43 PBVs under HAP contract. |

## Goal 2: Ensure an ongoing inventory of decent, safe, and affordable housing that supports strong, viable communities.

| Objectives                                                                                                                    | Progress                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ensure compliance with Housing Quality Standards and NSPIRE and maintain the highest possible SEMAP score (“high performer”). | Virginia Housing’s most recent SEMAP score was “High Performer” for FYE 6/30/25.                                                                                                                                                                                                                                                                                                                                     |
| Ensure all necessary staff, including those at local housing agencies, are trained on NSPIRE prior to implementation.         | <p>Full NSPIRE implementation has been delayed until February 1, 2027.</p> <p>Virginia Housing previously implemented carbon monoxide requirements and all smoke detector requirements in line with HOTMA requirements. Virginia Housing has made the necessary changes to the Administrative Plan in FY 2025.</p> <p>In July 2025, Virginia Housing fully transitioned all inspections to a third-party vendor.</p> |
| Maintain and encourage landlord use of a statewide online rental listing service.                                             | Virginia Housing continues to use the website <a href="http://VirginiaHousingSearch.com">VirginiaHousingSearch.com</a> , which allows property owners to list their available rental units.                                                                                                                                                                                                                          |
| Increase the number of landlords participating in the Housing Choice Voucher program.                                         | In 2025, Virginia Housing compiled a landlord education toolkit, which was posted to the Virginia Housing website. The toolkit is intended to help LHAs engage with landlords.                                                                                                                                                                                                                                       |

## Goal 3: Strengthen Virginia Housing’s ability to provide affordable housing.

| Objectives                                                                                                    | Progress                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Develop and facilitate training programs on administration of the HCV Program for the local housing agencies. | Virginia Housing expanded training efforts by launching a partner training portal, hosting regular virtual and in-person training sessions, and becoming a Nan McKay national training center. |

|                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                           | <p>During this calendar year, Virginia Housing has offered the following trainings:</p> <ul style="list-style-type: none"> <li>• Fair Housing &amp; Reasonable Accommodation (March 18-19, August 13-14)</li> <li>• HCV Specialist not updated for HOTMA (April 7-11)</li> <li>• Supervision and Management (April 29-May 1)</li> <li>• Effective Interviewing for Program Integrity (May 13-14, September 9-10)</li> <li>• HCV Violence Against Women Act (VAWA) Training (May 28)</li> <li>• HCV &amp; PH Combo Rent Calculation (June 16-18, October 7-9)</li> <li>• HCV Program Management</li> <li>• HCV Specialist with HOTMA Updates (July 14-18, September 29-Oct 3)</li> </ul> <p>Virginia Housing provides Lunch and Learn opportunities for LHAs.</p> <p>Virginia Housing is also developing training processes for key chapters of the Administrative Plan, to help all LHAs to promote consistency and enhance compliance. These resources are designed to improve staff understanding of proper procedures, reinforce documentation requirements, and reduce errors. Key chapters that are in revision include: Eligibility (Chapter 3), Waiting List (Chapter 4), Briefing and Voucher Issuance (Chapter 5), Assets and Income (Chapter 6), Verifications (Chapter 7), and Reexaminations (Chapter 11). Final drafts have been completed. Chapters 3, 4 and 5 have been released for Management Approval.</p> |
| Ensure all necessary staff, including those at local housing agencies, are trained on changes brought about by the Housing Opportunity Through Modernization Act of 2016 (HOTMA) prior to implementation. | The deadline for PHA compliance with HOTMA policy changes has been delayed. Virginia Housing has previously updated the Administrative Plan to prepare for these changes when the implementation deadline is finalized.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                              | Virginia Housing has offered training to LHAs with updated curriculum that has incorporated HOTMA updates, such as the <i>HCV Specialist with HOTMA Updates</i> session that was offered July 14-18, 2025 and September 29-October 3, 2025. The HCV team also hosted an annual training session with all LHAs outlining all administrative plan changes in January and May 2025. These updated trainings will continue to be offered in the future.                                         |
| Update policies and procedures to ensure compliance with HUD regulations.                                                    | Virginia Housing's administrative plan has been updated to reflect changes as part of the Emergency Housing Voucher conversion process, HUD-approved waiver, and annual changes.                                                                                                                                                                                                                                                                                                            |
| Research and implement an operating model that ensures consistency, flexibility and effective operations of the HCV Program. | Virginia Housing continues to collect and analyze data on effective operating models.                                                                                                                                                                                                                                                                                                                                                                                                       |
| Engage in opportunities that improve the experience of households participating in Virginia Housing's HCV Program.           | Virginia Housing launched an online applicant portal to streamline access and to make the application process easier for families statewide. To do so, the agency upgraded its software system, including purchase of the Web App, Applicant Portal and Resident Portal. The Web App is currently live but not actively being used as no waiting lists are currently open. The Applicant Portal and Resident Portal are currently being built and are anticipated to be used in early 2026. |

#### Goal 4: Promote self-sufficiency and stabilize families.

| Objectives                                                                                                                                | Progress                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Research and explore services to encourage residents to achieve economic self-sufficiency.                                                | Virginia Housing has not yet started on this objective.                                                                                                                                    |
| Research and explore a Moving On program to assist formally homeless households move on from Permanent Supportive Housing (PSH) programs. | Virginia Housing leadership has continued to engage local CoCs within the geographic service area to build relationships, understand their priorities, and identify households suited to a |

|  |                                                                                                                                                                                                                                                                                                                                                    |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>potential Moving On program, and in 2025 the agency developed a roadmap for a future program.</p> <p>Prior to implementing a Moving On program Virginia Housing will assess voucher availability and demonstrate local need to justify a Moving On program.</p> <p>Corresponding updates will be made to the Administrative Plan as needed.</p> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Attachment 3: RAB Comments

The comments below summarize feedback from the Resident Advisory Board meeting held on 1/14/2026. Additional comments will be added (if applicable) after the Resident Advisory Board meeting on 1/28/2026.

- Participants overall expressed satisfaction with communication and respect from inspectors during unit visits.

*PHA Response: Virginia Housing will continue to work with its third-party inspection vendor, internal staff and local housing agencies to provide accountability and enhanced customer services to participants within the Housing Choice Voucher Program.*

- Some RAB members suggested that Virginia Housing consider training or resources for elderly individuals to help them navigate the new portals for applicants and residents.

*PHA Response: Virginia Housing will review the RAB members' recommendations, given that the agency is not yet prepared to decide on specific actions regarding implementation and communication strategy for the HCV program's new web-based portals.*

- Participants requested follow up on the feedback regarding the current recertification process and ways to improve it.

*PHA Response: Virginia Housing is reviewing all comments received to assess where adjustments can be made to streamline the process, improve communication, and enhance the overall participant experience. This review includes evaluating documentation requirements, processing timelines, and ways to provide clearer guidance and support to households as they complete their annual recertification. As part of our follow-up, we will identify feasible improvements and share updates with the RAB once the review is complete.*

- Some RAB members requested that Virginia Housing ensure that alternative methods for submitting information are available for those who may struggle with technology.

*PHA Response: Virginia Housing will review the RAB members' recommendations, given that the agency is not yet prepared to decide on specific actions regarding implementation and communication strategy for the new web-based portals and additional use of technology. Currently, participants can submit recertification, income changes and paperwork via email or at a local housing agency office. Alternative methods are provided for individuals that request additional assistance.*

- Several RAB members requested additional touchpoints to get together and discuss HCV updates throughout the year.

*PHA Response: Virginia Housing will review additional opportunities within the next fiscal year to receive input and provide touchpoints between RAB members and Virginia Housing staff.*

- During the discussion of payments standards, one RAB member mentioned their tenant portion increasing. The group discussed that Virginia Housing is financially solvent (not in shortfall) and is making strategic financial decisions to keep current participants housed.

*PHA Response: Virginia Housing has completed a comprehensive review of its current payment standard data for the Housing Choice Voucher (HCV) Program. This review was conducted to ensure ongoing alignment with prevailing market trends and rental conditions within our jurisdiction.*

*Based on the analysis of recent rental market data, including changes reflected in the most current Fair Market Rents (FMRs), Small Area Fair Market Rents (SAFMRs) in HUD mandates areas, and local market indicators, the agency has confirmed that its payment standards remain consistent with HUD requirements and continue to support voucher holders' ability to secure and maintain suitable housing.*

*Virginia Housing will continue to monitor market conditions closely and will make adjustments to payment standards annually to promote affordability, maintain program integrity, and ensure that families have access to a range of safe and quality housing options.*

- Members requested a copy of FY 2026 payment standards.

*PHA Response: Virginia Housing provided a copy of the FY 2026 payment standards to all RAB members via email on January 20, 2026.*