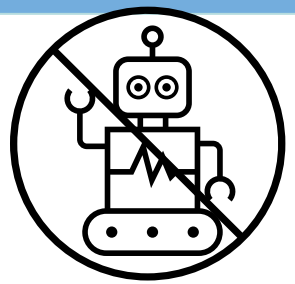
Housing Choice Vouchers (HCV) Made Simple: Access, Eligibility & Reasonable Accommodations

Liz Stewart & Jim Yates

June 16, 2026

Agenda

- Welcome & Introductions
- HCV Eligibility
- Reasonable Accommodations
- Outreach & Application
- Screening, Verification and Appeals
- Waiting List Procedures
- Q&A

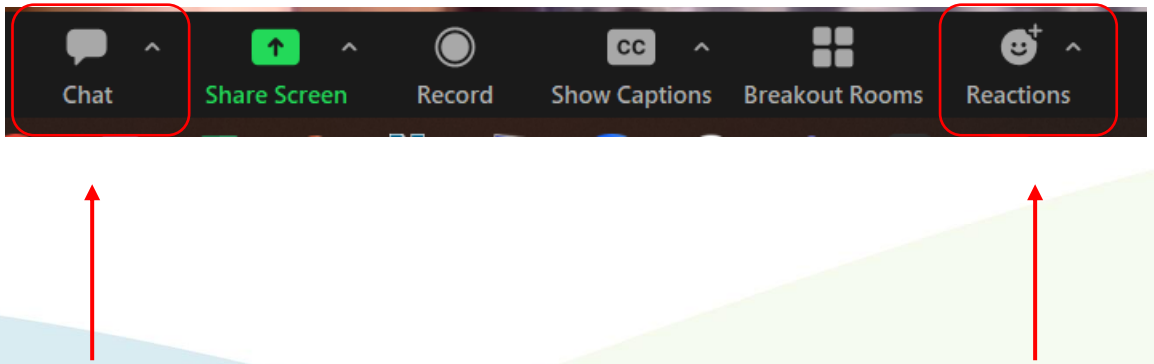


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- If you have a question or comment, feel free to use the Chat function (Bottom of the Screen) or “Raise your hand” (Reactions at bottom of screen)



Introductions

- Office of Mental Health Substance Abuse Services (OMHSAS)
- Lauren MacWithey
- Technical Assistance Collaborative (TAC):
- Liz Stewart
- Jim Yates

Please introduce yourself in the chat:

- **Name**
- **Agency**
- **Title and Role**

HCV Made Simple Series

Session Name	Date/Time
Session 1: Foundations of the HCV Program	Tuesday, June 2, 2026 10:00-11:30 AM ET
★ Session 2: Access, Eligibility, and Reasonable Accommodations	Tuesday, June 16, 2026 10:00-11:30 AM ET
Session 3: From Voucher Issuance to Leasing	Tuesday July 14, 2026 10:00-11:30 AM ET
Session 4: Housing Retention and Cross-System Collaboration	Tuesday July 28, 2026 10:00-11:30 AM ET

HCV Eligibility

- Applicants must meet the following eligibility requirements to qualify for the HCV program.
  - A family's annual income and family size determines eligibility under the program. Generally, families must be extremely low-income (at or below 30% AMI) or very low-income (at or below 50% AMI) to qualify based on HUD income limits.
  - Applicants must be a U.S. citizen or eligible non-citizen as defined by HUD.
    - Families in which at least one member is a U.S. citizen or has eligible immigration status may be eligible for pro-rated assistance.
  - The head of the household must have a valid Social Security number.
  - Some crimes may make an applicant ineligible, See HCV Guidebook Chapter on Eligibility Determination and Denial of Assistance to learn more.

Reasonable Accommodation

Reasonable Accommodation (RA) basics

- Important to understand the Reasonable Accommodation provisions in the Fair Housing Act and Section 504 of the Rehab Act of 1973.
- PHAs are obligated to make reasonable changes in policies and procedures to ensure equal participation.
- Person with a disability (including Chronically Homeless) have a right to request a RA.
- PHAs are required to inform public and establish a process to receive a RA request and to decide whether it is reasonable.
- PHA will typically ask that the RA be requesting in writing.
- The RA must be requested by the person with a disability.

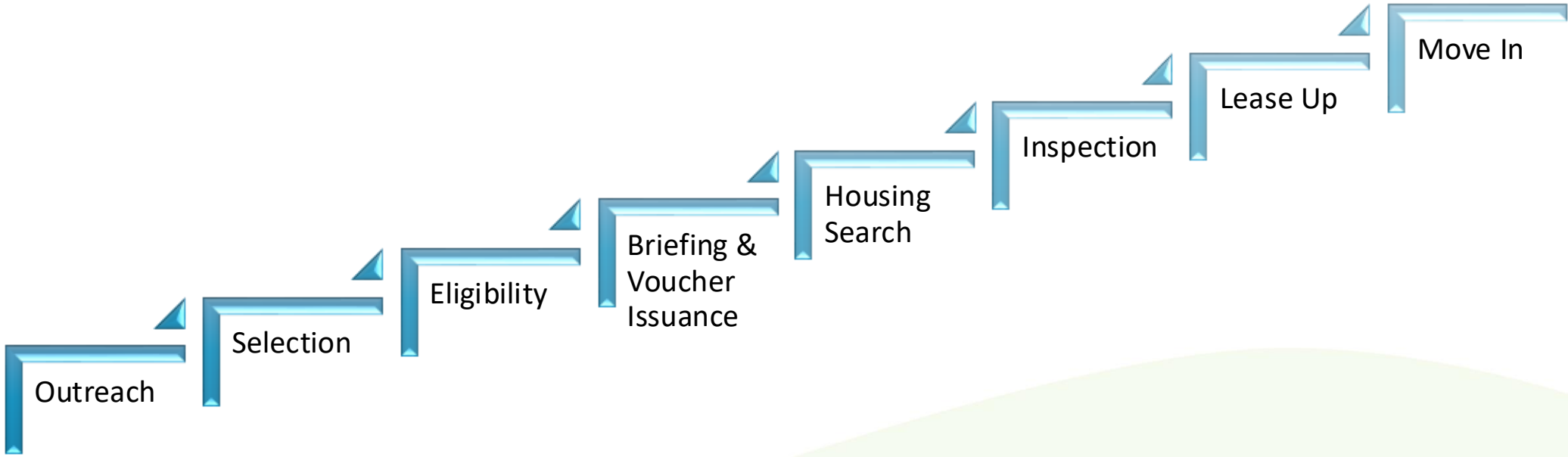
Reasonable Accommodation

- Supporting the RA request
- RA must relate to the person's disability.
- The RA request should include the:
  - Specific accommodation that is being requested;
  - Reason that the accommodation is being requested;
  - How the accommodation is related to the person's disability.
- It also may be helpful to attach any written documentation from an advocate/provider.
- PHA may respond in writing or schedule a meeting to discuss further.
- Some PHAs may be unsure of their responsibility under Fair Housing or understand the flexibility that they have.

Resources

- TAC's *Section 8 Made Simple* Guidebook- Chapter 3
- State or Local Fair Housing or Legal Aid staff
- HUD/ Dept. of Justice's Joint Statement on Reasonable Accommodation (2004)
- FAQ: Examples of RA

Key Phases: Outreach to Move-in



Every Housing Choice Voucher applicant or participant with a disability is allowed to request a reasonable accommodation regarding a public housing agency's policies.

KNOWLEDGE CHECK

- True or False: To be eligible for HCV, families must be extremely low-income (at or below 30% AMI) or very low-income (at or below 50% AMI).
- True or False: Reasonable accommodation requests do not necessarily need to be related to a person's disability.

KNOWLEDGE CHECK

- True or False: To be eligible for HCV, families must be extremely low-income (at or below 30% AMI) or very low-income (at or below 50% AMI). True
- True or False: Reasonable accommodation requests do not necessarily need to be related to a person's disability. FALSE

HCV Eligibility-Outreach and Application Process

- PHAs use a range of outreach strategies
- Develop an understanding of whether the PHA is accepting applications
- Potential to partner with the PHA on outreach to be given notice of when application will be accepted
- No standard application, varies by PHA
- A HCV application will request information about:
  - Household composition
  - Income and Assets
  - Disability Status
  - Other information needed to determine eligibility

HCV Eligibility-Outreach and Application Process

- Several ways for PHA to accept applications:
  - Designate one day to distribute/accept applications
  - Distribute applications to local agencies and applicants for a short period of time and require submission of the completed application by a certain date
  - Accept application on an ongoing basis
- Possible Changes to the Application Process as a Reasonable Accommodation
  - Allow additional time for a person with a disability to submit the application
  - Allow application to be dropped off by friend, family member, service provider
  - Conduct a home or shelter visit to allow an applicant to complete the application
  - Request that a person (i.e. case manager) be copied on all PHA correspondences

HCV Eligibility- Verification

- At some point, the PHA will require the applicant to provide documentation to verify information on the application
- Third Party verification usually required
  - Documentation must come from another, independent party
  - Eligibility: Income, household composition (age and SS#s of all members), citizenship status, student status, disability status (if applicable) and other criteria required by the PHA (i.e. residency)
  - Usually requires that documentation to be recent (within 60 days)
- Reasonable Accommodation: Can request extra time to gather necessary documentation
- Challenging process to verify this information
- Failure to gather documentation will result in determination of ineligibility

HCV Eligibility- Screening Process

- PHAs have the authority to screen applicants for:
  - Tenant History
  - Owner References
  - Credit History and
  - Criminal Activity
- A discretionary policy not mandated by law
- Must screen all applicants uniformly based upon the criteria set
- Screening policies and procedures outlined in the Admin Plan

HCV Eligibility — Screening Process

- Only two cases requiring permanent prohibition of admission into HCV program without exception:
  - A family member has conviction of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally-assisted housing and
  - A family member is subject to a lifetime registration requirement under a State sex offender registration program

HCV Eligibility — Screening Process

- A PHA must prohibit admission to the HCV program for three years (from date of eviction) if a household member has been evicted from federally assisted housing for drug-related criminal activity.
  - However, the PHA may waive this prohibition if it determines that the member has successfully completed a supervised drug rehabilitation program approved by the PHA, or that the circumstances leading to the eviction no longer exist (for example if the household member responsible for the drug-related criminal activity is no longer part of the household).
- A PHA must prohibit admission if it determines that a household member is currently illegally using a controlled substance or such household member's illegal use (or pattern of illegal use) of a controlled substance, or abuse (or pattern of abuse) of alcohol, is determined by the PHA to interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents.
  - The PHA may consider whether such household member has taken steps to rehabilitate or has been rehabilitated and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol.

HCV Eligibility-Screening Process

Policy Considerations- Screening for Criminal Activity

- Allow applicants to address and present mitigating circumstances regarding criminal backgrounds prior to admissions decisions.
- Adopt look back periods that limit what criminal conduct is considered during the screening process based upon when the conduct occurred and/or the type of conduct.
- Adopt admission policies that name specific factors to be considered in evaluating the criminal record.

  Ex. If the applicant is now in recovery from an addiction, whether the applicant was under the influence or alcohol or illegal drugs at the time of the offense

HCV Eligibility-Screening Process

Reasonable Accommodation (RA)

- PHAs are obligated to modify their screening policies to accommodate a person with disabilities.
- RA can ask a PHA to disregard specific criminal history in light of mitigating circumstances related to the disability.

HCV Eligibility- Appeals

- PHAs are required to have a formal process for appeals.
- Described in the HCV Admin Plan
- Allows applicant to present mitigating circumstances that cause PHA to reverse decision.
- PHA must put in writing and the reasons for denial and provide information on the appeal process.

Knowledge Check

- When **must** a PHA permanently prohibit admission into HCV program for an applicant household (check all that apply):
  - The family currently owes rent or other amounts to the PHA
  - A family member is subject to a lifetime registration requirement under a State sex offender registration program
  - A family member has recently be arrested for criminal activity
  - A family member has conviction of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally-assisted housing

Wait List Processes

- Waiting List Processes outlined in HCV Admin Plan
- Applications are only accepted when the wait list is open.
- Wait list are often very large and have long wait times.
- Methods to add applicants to the wait list:
  - Chronological
  - Randomly Ordered or Lottery Process
- PHAs will close their wait list once they determine there are a sufficient number of applicants.
- When the list is closed, PHAs can grant some exceptions such as: people displaced by fire, flood, natural disaster or other federal action.
- PHAs often **update** the list by sending notices to wait list households requiring them to reply with update information.
  - *Tip: Applicants and their case managers should work together to update the PHA if they have moved or have a change in their contact information to receive notifications and keep spot on waitlist.*

Reasonable Accommodation Example

An applicant requests that a case manager/service provider is named as a point of contact on the application so they are notified of any wait list update required

Preferences

- Preferences affect the order in which families on the waiting list receive assistance.
- PHAs have discretion to establish local preference(s). Must be documented in the PHA Plan and the HCV Admin Plan.
- Types of Preferences include:
  - People who work in or are residence of a specific locality (i.e. residency preference)
  - People who are homeless or are living in an institution
  - People who reside in substandard housing
  - People with disabilities
- PHAs may not establish a preference for people with a specific type of disability.
- PHAs must give public notice when opening the waiting list but may open the waiting list only for certain preferences and is not required to close the waiting list.

Preferences

- PHAs also have the discretion to establish a limited preference of HCVs for specific populations as well.
  - HUD has incentivized establishing preferences for certain target populations in Mainstream Vouchers (e.g. adopting a preference for those transitioning out of institutional or other segregated settings.
- The preference may be limited to a certain number of applicants
  - e.g., once 50 families have been served under the preference, the preference expires OR the PHA may state that the preference remains for up to 50 families at a time.
- PHAs can weight and layer preferences using points.
  - e.g. Residency preference=1 points, homeless preference=3 points, existing an institutional setting=3 points
- If a PHA has several preferences and weighted/layered ranking system- may be more difficult to predict when a voucher may be available.

Preferences

When implementing a new preference or revising an existing preference for certain target populations, partners can help inform PHAs by providing information on:

- Services and resources available to the population in the geographic area served by the PHA
- Capacity of partners serving a specific target population and ability to provide:
  - Outreach and Referrals
  - Assistance with application process
  - Transition services, tenancy support and other services

Referral Partner Considerations

- There is no limit to the number of agencies a PHA may partner with for referrals and supportive services.
- Key elements to consider in the development of any partnership include:

Establish key points of contact	Meet regularly and as often as needed
Engage in level setting	Enter in Memorandum of Understanding (MOU) or other written protocol
Define roles and responsibilities	Set goals and review progress

Poll: Do you have an established MOU with a PHA in your local area?

Recent Regulatory Guidance Impacting Waiting Lists & Preferences

- Notice PIH 2024-30: Statutory and Regulatory Waivers for Mainstream Vouchers
- HUD Notice PIH 2023-13, CPD 2023-05: Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher Programs

KNOWLEDGE CHECK

- True or False: A PHA can limit a preference to a certain number of applicants.
- True or False: A person with a cognitive disability may request that a case manager or representative also receive waiting list notifications to help ensure timely responses.
- True or False: A PHA is required to give any applicant regardless of disability status additional time to respond to waiting list notices as a reasonable accommodation.

HCV Resources

- HCV Guidebook
- HCV Landlord Resources
- HCV Tenant Resources
- HCV Dashboard

Questions and Discussion

