

HUD-VASH Operating Requirements 2024 Update

August 21, 2024





Webinar Housekeeping

- Today's webinar is targeted for PHAs administering the HUD-VASH program but is also for VA staff and HUD Field Office staff
- The webinar will last approximately 2 hours
- Due to the number of attendees, all participants are muted
- This webinar is being recorded. We plan to make this recording available within a few weeks



Webinar Housekeeping

- Please enter any questions into the chat/Q&A feature, and we will try to address as many as possible at the end of the webinar
- If you have a question that is not answered during today's webinar, please email vash@hud.gov
- Questions will help inform forthcoming FAQ documents and trainings



Welcome and Introductions

- Courtney Herring – HUD, Housing Program Specialist
- Molly Allen – HUD, Senior Housing Program Specialist and HUD-VASH National Program Lead
- Meghan Deal – VA, HUD-VASH National Director



Webinar Agenda

- Overview of Frequently Used Acronyms
- HUD-VASH Introduction and Background
- Operating Requirements Introduction
- Highlighting Significant Updates
- Overview of the Notice
- Resources and Contact Information
- Questions (as time allows)



Frequently Used Acronyms

- **DSP:** Designated Service Provider
- **EPS:** Exception Payment Standard
- **FMR:** Fair Market Rents
- **HAP:** Housing Assistance Payment
- **HCV:** Housing Choice Voucher
- **HQS:** Housing Quality Standards
- **HUD:** U.S. Department of Housing and Urban Development
- **HUD-VASH:** Housing and Urban Development – Veteran Affairs Supportive Housing
- **MTW:** Moving to Work
- **PBV:** Project Based Voucher
- **PHA:** Public Housing Agency
- **RFTA:** Request for Tenancy Approval
- **SEMAP:** Section Eight Management Assessment Program (SEMAP)
- **VA:** U.S. Department of Veterans Affairs
- **VAMC:** Veterans Affairs Medical Center



HCV Background

- Housing Choice Vouchers (HCV) enable low-income individuals and families to afford market rate units by providing a rental subsidy.
- The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.
- Voucher holders generally contribute between 30-40 percent of their monthly income towards rent and the subsidy covers the remaining balance.
- Housing Choice Vouchers are administered locally by public housing agencies (PHAs). The PHAs receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program.



HUD-VASH Background

- The HUD-Veterans Affairs Supportive Housing (HUD-VASH) program is a special purpose voucher program administered in partnership between HUD and the U.S. Department of Veterans Affairs (VA)
- HUD-VASH enables homeless veterans and their families to use a voucher to access safe, affordable housing while also receiving an array of VA services
- HUD-VASH vouchers are administered locally by public housing agencies (PHAs)
- VA provides the referrals and case management and supportive services for participating veterans through VA medical facilities (using VA or contract staff), or through other VA designated service providers (DSPs) – generally referred to as “VA” or “VA Medical Center” (VAMC)



HUD-VASH Background

- Each year, since 2008, HUD and VA have collaboratively awarded HUD-VASH vouchers based on current geographic need and public housing authority (PHA) administrative capacity.
- Since 2017, the allocation process for awarding HUD-VASH vouchers has allowed PHAs to self-identify their interest in the program. HUD publishes an annual HUD-VASH Registration of Interest Notice containing detailed instructions that PHAs must follow if they are interested in receiving a portion of the available HUD-VASH vouchers.
- Over 112,000 HUD-VASH vouchers have been awarded to PHA/VAMC partnerships to date. VA funds approximately 4500 staff and contractors to provide case management and supportive services to HUD-VASH Veterans.
- Over 730 PHAs nationwide administer HUD-VASH vouchers in partnership with 139 VAMCs. There is at least one PHA currently administering HUD-VASH in each of the 50 states, in the District of Columbia, Puerto Rico and Guam. A full list of HUD-VASH awards by PHA is located on the [HUD-VASH website](#).



HUD-VASH Authorization

- HUD-VASH vouchers are authorized under section 8(o)(19) of the US Housing Act of 1937, as modified by the requirements in The 2008 Consolidated Appropriations Act (Pub. L. 110-161). All Congressional Appropriations Acts since 2008 have continued to authorize this program - most recently the Appropriations Act of 2024 (Public Law 118-42), enacted on March 9, 2024
- Generally, the HUD-VASH program is administered by PHAs in accordance with regular HCV and PBV program requirements ([24 CFR Section 982](#) and [983](#) respectively). This means that unless otherwise noted, regular HCV program requirements apply
- However, the authorizing language allows HUD to waive or specify alternative requirements for any provision of any statute or regulation affecting the HCV program to effectively deliver and administer HUD-VASH voucher assistance



Operating Requirements Background

- HUD waivers and alternative requirements, that differ from regular program requirements, are established in the HUD-VASH Operating Requirements
- The HUD-VASH Operating Requirements were originally published in the Federal Register on May 6, 2008. Subsequent updates were made on March 23, 2012, September 27, 2021, and now **August 13, 2024**
- The current version of the Operating Requirements will remain in effect until the HUD-VASH program is no longer authorized by Congress or the authorization requirements change through a new Federal Register (FR) Notice
- The Operating Requirements apply to all PHAs that administer HUD-VASH vouchers, including those that have not received an allocation of HUD-VASH vouchers, but administer these vouchers as a receiving PHA under the portability feature of the HCV program



Operating Requirements Background

- This update to the Operating Requirements is effective now (as of publication 8/13/2024)
- The HUD-VASH Operating Requirements are comprised of both requirements and flexibilities (“musts” and “mays”)
- PHAs do not need to update their PHA Administrative Plan to implement requirements (“musts”)
- PHAs do need to update their PHA Administrative Plan to implement optional flexibilities (“mays”)
- PHAs may also seek individual HUD-VASH waivers through the regular Field Office waiver process. These variations to the program should be noted in the PHA Administrative Plan



Significant Changes in this Update

- Exclusion of VA disability income for purposes of program eligibility
- Requirement to go up to 80% AMI for program eligibility
- Allowing zero-HAP HUD-VASH families to live in HUD-VASH PBV units where there are on-site HUD-VASH VA services
- Allowing for noncompetitive selection of HUD-VASH PBV projects on the site of a VA facility
- In addition to setting a HUD-VASH payment standard up to 120%, allowing PHAs to approve Exception Payment Standards as reasonable Accommodations up to 140%
- Allowing PHAs to set a separate minimum rent (or zero minimum rent) specifically for HUD-VASH families



Categories of Special Rules for HUD–VASH Vouchers Under Operating Requirements

- Family Eligibility, Selection, and Documentation
- Income and Asset Eligibility
- Initial Search Term of the HCV
- Initial Lease Term
- Eligible Housing
- Mobility and Portability
- Case Management and Supportive Services
- Termination of Assistance
- Turnover of HUD–VASH Vouchers
- Moving to Work (MTW) Agencies
- HUD-VASH PBV
- SEMAP
- Reallocation of HUD-VASH
- Inspections
- Exception Payment Standards
- Special Housing Types
- Minimum Rents



A. Family Eligibility, Selection, and Documentation

- HUD-VASH eligible families consist of homeless veterans and their families. By agreeing to administer the HUD-VASH program, the PHA is relinquishing its authority to determine the eligibility of families in accordance with regular HCV program rules and PHA policies with the exceptions of 1) income eligibility and 2) lifetime sex offender status
 - *Note that lifetime sex offender status is based on state law
- When HUD-VASH applicants or recipients include veterans with disabilities or family members with disabilities, HUD's reasonable accommodation requirements apply
- When adding a family member after the HUD-VASH family is admitted to the program, the rules of 24 CFR 982.551(h)(2) apply. Other than the birth, adoption or court-awarded custody of a child, the PHA must approve additional family members and **may** apply its regular screening criteria in doing so



A. Family Eligibility, Selection, and Documentation

- Eligibility determination and veteran selection is done by the VA
- PHAs are not authorized to maintain a waiting list or apply local preferences for the HUD-VASH program
- VA refers HUD-VASH eligible families to the PHA for the issuance of a HUD-VASH voucher or identification of a PBV unit that is exclusively made available to HUD-VASH families
 - If a HUD-VASH-eligible family is referred and there is an available PBV unit that is not exclusively made available to HUD-VASH families, the PHA may also offer to refer the family to the owner for occupancy of that unit if allowable under the selection policy applicable to that project, and the owner and PHA may amend the PBV HAP contract to designate the PBV unit as a HUD-VASH PBV unit



A. Family Eligibility, Selection, and Documentation

- PHAs as DSPs - The VA may approve a PHA with unleased HUD-VASH vouchers as a DSP for the purposes of veteran selection and intake. This PHA-specific DSP authority allows a PHA to issue a HUD-VASH voucher to a veteran without a referral from the VA
- Materials and application may be found on the VA site at https://www.va.gov/homeless/HUD-VASH_Designated-Service-Providers.asp
- Note that PHAs as DSPs is distinct from the regular DSP designation and process. Materials related to DSPs generally may be found on the VA site at https://www.va.gov/HOMELESS/HUD-VASH_CCM-DSP.asp



A. Family Eligibility, Selection, and Documentation

- PHAs must follow the SSN verification hierarchy to verify identity
- PHAs must use available flexibilities in accordance with the [HOTMA Income and Assets Final Rule](#) (further detailed in [PIH Notice 2023-27](#)) to accept self-certification of SSN and at least one third-party document, such as a bank statement, utility or cell phone bill, or benefit letter that contains the name of the individual in the absence of other documentation
- In the case of the homeless veteran, the PHA **must** accept the Certificate of Release or Discharge from Active Duty (DD 214) or the VA-verified Application for Health Benefits(10-10EZ) as verification of SSN if these forms are available



B. Income and Asset Eligibility

- The PHA must determine income eligibility for HUD-VASH families in accordance with 24 CFR 982.201
- Income targeting requirements do not apply for HUD-VASH families
- PHAs **must** serve all income eligible veterans, including low-income veterans (up to 80% AMI) in HUD-VASH



B. Income and Asset Eligibility

- VA service-connected disability benefits are **excluded** for purposes of determining income eligibility but included for purposes of calculating the total tenant payment (TTP), housing assistance payment, and family share



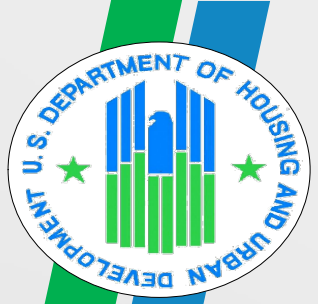
B. Income and Asset Eligibility

- For now, PHAs must manually calculate income eligibility excluding VA service-connected disability benefits
- The HUD-50058 will reflect the annual income and adjusted income including the VA service-connected disability amounts because these must still be included for rent calculation
- HUD will update when guidance changes



B. Income and Asset Eligibility

- PHAs may not deny admission to a family with zero income
- When the veteran family reports that they have zero income, the PHA must accept a self-certification of zero income
- PHAs must accept a self-certification by the family that the family's total assets are equal to or less than \$50,000 at new admission – PHAs may accept a self-certification upon recertification
- When PHAs begin implementing the asset limitation from HOTMA, PHAs must not enforce the asset limitation for HUD-VASH families at reexamination



C. Initial Search Term of the HCV

- HUD-VASH vouchers must have an initial search term of at least 120 days. Any extensions, suspensions, and progress reports will remain under the policies in the PHA's administrative plan but will apply after the minimum 120-day initial search term
- This applies to the search term at both initial issuance and moves with assistance



D. Initial Lease Term

- Initial leases for tenant-based HUD-VASH may be less than 12 months
- PHAs do not need to provide determination that the shorter term would improve housing opportunities or that it is a prevailing market practice



E. Eligible Housing

- HUD-VASH assistance is allowed on the grounds of a VA medical facility for both HCV tenant-based vouchers for HUD-VASH families and all PBV units made exclusively available for HUD-VASH families



F. Mobility and Portability

- An eligible family issued a HUD-VASH voucher must receive case management services provided by the partnering VA. Therefore, special mobility and portability procedures must be established. HUD-VASH participant families may reside only in those jurisdictional areas that are accessible to case management services as determined by the VA
- Since the VA will be identifying homeless veterans eligible to participate in the HUD-VASH program, portability must not be restricted in cases where the family did not reside in the jurisdiction of the PHA at the time of application for HCV assistance
- A family that moves under the portability procedures must not be subject to rescreening by the receiving PHA
- Separate portability rules apply depending on whether the veteran is still required to participate in case management. If the veteran has graduated from case management, regular portability applies



F. Mobility and Portability

- **Portability of HUD-VASH:**
 - Moves within initial VA catchment area
 - Receiving PHA has HUD-VASH program – may bill or absorb
 - Receiving PHA doesn't have HUD-VASH program – must bill
 - Moves beyond initial VA catchment area
 - Receiving PHA must have HUD-VASH program and must absorb
 - VA must first determine that the HUD-VASH family could be served by another VA medical facility that is participating in this program, and the receiving PHA must have a HUD-VASH voucher available for this family
 - Moves due to domestic violence, dating violence, sexual assault, or stalking
 - The initial PHA must follow its emergency transfer plan as described in 24 CFR 5.2005(e)



G. Case Management and Supportive Services

- **HUD-VASH Case Management Requirements**
 - Specific case management responsibilities of the VA include-
 - The screening of homeless veterans to determine whether they meet the HUD-VASH program participation criteria established by the VA national office;
 - assisting veterans with the PHA application and assisting the veteran family with obtaining needed PHA documentation to ensure rapid voucher issuance;
 - referrals of homeless veterans to the PHA;
 - providing case management and supportive services to potential HUD-VASH program participants, as needed, prior to PHA issuance of rental vouchers;
 - providing housing search assistance to HUD-VASH participants with rental vouchers;
 - identifying the social service and medical needs of HUD-VASH participants and providing, or ensuring the provision of, regular ongoing case management, outpatient health services, hospitalization, and other supportive services, as needed, throughout this initiative; and
 - maintaining records and providing information for evaluation purposes, as required by HUD and the VA



G. Case Management and Supportive Services

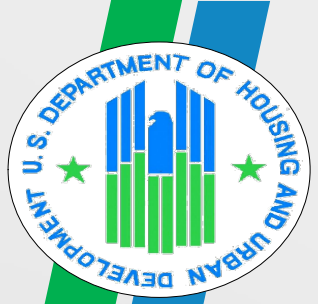
- As a condition of HUD-VASH rental assistance, a HUD-VASH veteran must receive the required case management services, **as needed**, directly from or arranged by, the VA.
- The VA, in consultation with the veteran, is exclusively responsible for determining if/when case management is required and if/when the requirement is satisfied
- If a veteran no longer requires HUD-VASH case management, but maintains their HUD-VASH voucher assistance, the VA will maintain contact with the veteran family to provide support and assistance



H. Termination of Assistance

Termination of Assistance:

- Failure to participate in required case management - If the VA has determined that a veteran is not participating in required case management, without good cause, the PHA must terminate the family from the HUD-VASH program
 - The PHA may offer the family continued assistance through one of its regular vouchers or a regular PBV unit
 - A VA determination that the veteran does not require or no longer requires case management is not grounds for termination of voucher or PBV assistance
- Eviction- PHAs **may** terminate a family evicted from housing assisted under the program for a serious violation of the lease, but they are not required to do so. Prior to terminating HUD-VASH participants, HUD strongly encourages PHAs to exercise their discretion and work with the VA case manager in an effort to avoid termination



H. Termination of Assistance

Termination of Assistance:

- Family Breakup - Generally, in the case of a family break-up, the HUD-VASH assistance must stay with the HUD-VASH veteran
 - In the case of domestic violence, dating violence, sexual assault, or stalking, in which the HUD-VASH veteran is the perpetrator, the victim must continue to be assisted. Upon termination of the perpetrator's HUD-VASH voucher, the victim must be given a regular HCV if one is available, and the perpetrator's HUD-VASH voucher must be used to serve another eligible veteran family
 - If a regular HCV is not available for the victim, the perpetrator must be terminated from assistance, and the victim will continue to utilize the HUD-VASH voucher



I. Turnover of HUD–VASH Vouchers

- HUD-VASH vouchers remain HUD-VASH upon turnover and must be used to house another veteran referred by the VA



J. MTW Agencies

- HUD-VASH vouchers may be administered in accordance with flexibilities approved under a PHA's Standard MTW Agreement or MTW Operations Notice with approval from HUD's HCV office
- HUD-VASH vouchers are never eligible for MTW fungibility. However, MTW agencies may use their MTW funding for HUD-VASH vouchers



K. HUD-VASH PBV

- Project Cap: All units exclusively made available to HUD-VASH families in a PBV project are exempted from the PBV income-mixing requirements (project cap)
- Program Cap: HUD-VASH units made available under a competitive PIH notice for HUD-VASH PBV units (“HUD-VASH PBV set-aside”) are excluded from the PBV percentage limitation (program cap)
 - Generally, a PHA may project-base up to 20% of its authorized HCV units. The PHA may also project-base an additional 10% of its authorized HCVs for units that meet certain criteria (HUD-VASH may be included in this additional 10%)



K. HUD-VASH PBV

- **Termination from PBV due to failure to participate in case management:**
 - If the PHA has a policy to allow the veteran to receive a regular HCV or PBV unit, the PHA may: substitute the family's unit on the PBV HAP contract for another unit, remove the unit from the PBV HAP contract so the family may remain with tenant-based assistance, or change the unit's status in the PBV HAP contract from HUD-VASH to a regular PBV unit
 - If the PHA does not have a policy to allow the veteran to receive a regular HCV or PBV, then upon notification by the VA of the family's failure to participate in VA-required case management, the PHA must provide the family a reasonable period (as established by the PHA) to vacate the unit
 - If the family fails to vacate the unit, the owner may evict the family. If the owner does not evict the family, the PHA must remove the unit from the HAP contract or amend the HAP contract to substitute a different unit
- **Voluntary Moves from PBV:**
 - If a HUD-VASH family is eligible to move from its PBV unit and there is no HUD-VASH tenant-based voucher available, the PHA may require a family that still requires case management to wait for a HUD-VASH tenant-based voucher for a period not to exceed 180 days
 - If a HUD-VASH tenant-based voucher is still not available after that period of time, the family must be allowed to move using its HUD-VASH voucher as tenant-based assistance. The PHA may either amend the PBV HAP contract to replace the assistance in the PBV unit with one of its regular vouchers or the PHA and owner may agree to temporarily remove the unit from the HAP contract



K. HUD-VASH PBV

- **Cases of a wrong-size PBV unit or a PBV unit with accessibility features that the family no longer requires**
 - The PHA must notify the family and the owner within 30 days of the PHA's determination.
 - The PHA's offer of continued housing assistance (that must be made within 60 days of the PHA's determination) must be in the form of either a HUD-VASH tenant-based voucher or another HUD-VASH PBV unit. If no HUD-VASH assistance is available for the PHA to offer within 60 days of the PHA's determination, the PHA must remove the wrong-sized or accessible unit from the HAP contract to make HUD-VASH voucher assistance available to issue the family a tenant-based HUD-VASH voucher.
- Because only homeless veterans may be referred for occupancy of a HUD-VASH PBV unit, only occupied units whose occupants are families already receiving tenant-based HUD-VASH assistance may be added to a PBV HAP contract as units exclusively made available to HUD-VASH families



K. HUD-VASH PBV

- PHAs do not need any additional authorization from HUD HQ to use HUD-VASH vouchers as PBVs
- PHAs must consult with the partnering VA medical facility to ensure approval of the project. PHAs and the partnering VA medical facility are expected to communicate regarding the PBV planning and development
- PHAs may project-base HUD-VASH vouchers in projects alongside other PBV units and may execute a single HAP contract covering both the HUD-VASH PBVs and the other PBVs.
 - Note that the contract rents may not be different based on whether the unit is a HUD-VASH PBV unit or a non-HUD-VASH PBV unit
- In the description of units in Exhibit A of the HAP contract, PHAs must indicate the number of units that will be exclusively made available to HUD-VASH families
- A PHA and owner may agree to amend a PBV HAP contract to re-designate a unit as HUD-VASH/ regular PBV



K. HUD-VASH PBV

- Generally, PBV proposal and/or project selection for HUD-VASH must follow all regular proposal and/or project selection regulations
- However, PHAs may noncompetitively select one or more PBV projects with units made exclusively available to HUD-VASH families on the site of a VA facility. The method of project selection must comply with all other requirements under 24 CFR 983.51
- PHAs may consult with their partnering VA medical facility about the option for using PBVs in conjunction with the VA's Enhanced-Use Lease (EUL) Program



K. HUD-VASH PBV

- If a PBV project is either on the grounds of a VA facility or there are HUD-VASH supportive services provided on-site at the project, the PHA may opt to select a unit occupied by a “zero-HAP” HUD-VASH eligible family or admit a “zero-HAP” HUD-VASH family to a unit if such unit is made exclusively available to HUD-VASH families
 - During any period that the family's TTP falls below the gross rent, normal PBV requirements apply
- Alternatively, PHAs and owners also have the option of removing the unit in which the zero HAP family resides from the HAP contract



L. SEMAP

- HUD-VASH vouchers remain excluded from the SEMAP leasing indicator.



M. Reallocation of HUD-VASH

- PHAs must follow the process detailed in Notice PIH 2022-25: Voluntary Reallocation or Recapture of HUD-VASH or any superseding notice



N. Inspections

- PHAs may use pre-inspections for HUD-VASH
- If a HUD-VASH family selects a unit that passed a HQS inspection (without intervening occupancy) within 90 days of the date of the Request for Tenancy Approval (form HUD-52517), the unit may be approved as long as it meets all other conditions under 24 CFR 982.305



O. Exception Payment Standards

- HUD-VASH Program PS: PHAs may go up to, but no higher than 120 percent of the published metropolitan area-wide Fair Market Rents (FMRs) or Small Area FMRs (based on the PHA's applicable FMR) specifically for their HUD-VASH program
 - A PHA that wants to establish a HUD-VASH exception payment standard over 120 percent, as allowed by 24 CFR 982.503(d)(4), must still request approval from HUD through the process outlined in notice PIH 2018-16, or any successor notices
- Reasonable Accommodation EPS: HUD-VASH PHAs may also establish an exception payment standard up to 140 percent of the published FMR or Small Area FMR (based on which FMR the PHA is applying) only to be applied if required as a reasonable accommodation in accordance with 24 CFR part 8 for a family that includes a person with a disability



P. Special Housing Types

- PHAs must permit HUD-VASH clients to use the following special housing types for tenant-based HUD-VASH assistance, regardless of whether these types are permitted in their administrative plan for other families: single room occupancy (SRO); congregate housing; group home; shared housing; and cooperative housing
- Regulations found at 982 Subpart M apply



Q. Minimum Rents

- PHAs may choose to charge a lower minimum rent (including a minimum rent of \$0) specifically for their HUD-VASH program regardless of the minimum rent policies established in their administrative plan for other HCV families



HUD-VASH Resources

HUD Website: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/vash

VA Website: <https://www.va.gov/homeless/hud-vash.asp>

HUD-VASH Operating Requirements FR Notice Direct Link:

<https://www.federalregister.gov/documents/2024/08/13/2024-17957/section-8-housing-choice-vouchers-revised-implementation-of-the-hud-veterans-affairs-supportive>



Questions, Comments, Concerns, Suggestions?

Please contact us at: VASH@hud.gov