U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention of:
Public Housing Agencies
Public Housing Directors
Regional Public Housing Directors

Notice PIH 2026-15

Issued: May 14, 2026

Expires: This notice remains in effect until amended, superseded, or rescinded.

Amends: Notice PIH 2024-38

Cross References: Notice PIH 2023-27/H 2023-10

Subject: Public Housing Agency Compliance Deadline for Sections 102 and 104 of the Housing Opportunity Through Modernization Act (HOTMA) and Alternative HUD-50058 Reporting Instructions

I. PURPOSE

This notice announces that, starting on January 1, 2027, HUD will enforce compliance with sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) for all public housing agencies (PHAs), except PHAs who participate in the Moving to Work (MTW) demonstration and PHAs who currently exclusively use the HUD Family Reporting Software (FRS). Accordingly, for PHAs subject to this compliance deadline, all Form HUD-50058 transactions with an effective date of January 1, 2027, and later must be HOTMA-compliant. For PHAs in the MTW demonstration ("MTW PHAs") and PHAs currently exclusively using FRS ("FRS PHAs"), HUD will enforce compliance with sections 102 and 104 of HOTMA once HUD completes certain systems modifications, as described in sections V and VI.

This notice partially supersedes Notice PIH 2024-38 by providing guidance on when HUD will enforce full compliance with the provisions of sections 102 and 104 of HOTMA. The compliance deadline of July 1, 2025, for the HOTMA provisions identified in Notice PIH 2024-38 is not altered by this notice. See appendix A for a summary of compliance requirements.

II. BACKGROUND

HOTMA was signed into law on July 29, 2016 (P. L. 114-201). The final rule implementing sections 102 and 104 of HOTMA (88 FR 9600) became effective January 1, 2024. HUD initially provided, in the HOTMA Section 102 and 104 Implementation Guidance (Notice PIH 2023-27/H 2023-10), that PHAs could set a compliance date between January 1, 2024, and January 1, 2025, based on when the PHA's software could submit to the Housing Information Portal (HIP).

Due to IT development delays, HUD subsequently announced in Notice PIH 2024-38 that it would not enforce full PHA compliance by January 1, 2025. Instead, HUD enforced compliance with only a select list of HOTMA provisions that PHAs were required to implement starting July 1, 2025. The list of HOTMA provisions were identified on the basis of what PHAs could successfully implement and report to HUD via the Inventory Management System/Public and Indian Housing (PIH) Information Center (IMS/PIC). HUD indicated that it would issue further guidance on the deadline to comply with the outstanding provisions of sections 102 and 104 of HOTMA.

III. APPLICABILITY

This notice applies to PHAs administering PIH programs (Housing Choice Voucher [HCV], Project-Based Voucher [PBV], Moderate Rehabilitation, Moderate Rehabilitation Single Room Occupancy, and Public Housing), including MTW PHAs.

IV. PHA COMPLIANCE WITH HOTMA SECTIONS 102 AND 104 BY JANUARY 1, 2027

Starting on January 1, 2027, HUD will enforce compliance with all provisions of sections 102 and 104 of HOTMA for all PHAs except MTW PHAs and PHAs who are currently exclusively using FRS. For PHAs subject to this compliance deadline, all HUD-50058 transactions with an effective date on or after January 1, 2027, must reflect HOTMA requirements. This means that PHAs who begin annual reexaminations 120 days prior to the effective date of the reexamination will need to begin using HOTMA policies to collect and verify family income beginning in September 2026.

PHAs required to comply with sections 102 and 104 of HOTMA starting January 1, 2027, will be able to report HOTMA-compliant information to HUD in one of two ways, as described below.

A. HOTMA Compliance Using 2024 Form HUD-50058

HUD is currently updating IMS/PIC to allow submission of the "2024" version of Form HUD-50058.[1] The 2024 HUD-50058 reflects HOTMA requirements, so PHAs will be able to submit HOTMA-compliant information using this version of the form. PHAs should work with their software vendors to ensure that their system is compatible with the submission criteria for the 2024 HUD-50058.

PHAs may begin submitting the 2024 HUD-50058 as soon as they are able to and their software allows. If PHAs cannot submit the 2024 HUD-50058 by the compliance deadline, PHAs must follow the guidance in section IV.B.

B. HOTMA Compliance Using 2020 Form HUD-50058 and Alternative Reporting Instructions

HUD is making several changes to the IMS/PIC system to allow it to accept HOTMA-compliant reporting while PHAs continue to use the "2020 version" of

[1] The "2020 version" of Form HUD-50058 was approved by the Office of Management and Budget (OMB) on June 30, 2020. The "2024 version" of the form was approved on September 27, 2023 (OMB control number 2577-0083). The Form HUD-50058 module in IMS/PIC currently reflects the layout of the 2020 version of the form.

Form HUD-50058. PHAs unable to convert their software to the 2024 HUD-50058 with enough time to process January 1, 2027, effective transactions must submit HOTMA-compliant data using the alternative instructions in appendix B, once software vendors or PHAs that build their own HUD-50058 software make the compatible changes in their software. These instructions provide guidance on how HUD will validate and review HOTMA-compliant HUD-50058 submissions in IMS/PIC using the 2020 HUD-50058. HUD strongly encourages PHAs to consult with their software vendors prior to submitting HOTMA-compliant data.

These alternative instructions are temporary until PHAs can transition to the 2024 HUD-50058. HUD will issue additional guidance in the future on the transition from the use of these alternative instructions.

V. MTW AGENCY COMPLIANCE WITH HOTMA 102 AND 104

A. Initial MTW Agencies

HUD is exploring options to allow the initial MTW PHAs (who use Form HUD-50058 MTW) to submit HOTMA-compliant information to IMS/PIC, which may take the form of alternative instructions on the HUD-50058 MTW. HUD will issue further guidance on the deadline for the initial MTW PHAs to comply with provisions of Sections 102 and 104 that are applicable to them[2] and submit HOTMA-compliant information to IMS/PIC.

B. MTW Expansion Agencies

Alongside the current effort to update IMS/PIC to accept submission of the 2024 HUD-50058, HUD is updating IMS/PIC to allow MTW Expansion PHAs to submit the 2024 version of Form HUD-50058 MTW Expansion. This update will also require compatible updates to PHA or vendor software. When the timeline for completion of this development is known, HUD will issue further guidance on the deadline for MTW Expansion PHAs to comply with the provisions of sections 102 and 104 that apply to them. HUD will provide updates on the progress of IMS/PIC system development and will issue guidance on when MTW Expansion PHAs are able to submit 2024 MTWEX 50058s to IMS/PIC.

VI. FRS PHA COMPLIANCE WITH HOTMA 102 AND 104

For PHAs exclusively using FRS as of the date of the publication of this notice, HUD will replace the current FRS with a web-based application that can create the 2024 HUD-50058 for subsequent submission to IMS/PIC. HUD will issue further guidance on the deadline for FRS PHAs to comply with all provisions of sections 102 and 104.

[2] See section 4 of Notice PIH 2023-27 regarding the application of sections 102 and 104 of HOTMA to MTW PHAs.

VII. CONTACT

Email questions about this notice to HOTMAQuestions@hud.gov.



Benjamin Hobbs
Assistant Secretary
for Public and Indian Housing

APPENDIX A: SUMMARY OF COMPLIANCE REQUIREMENTS

Provisions	Relevant Public Housing Agencies (PHAs)	Required Compliance Date
Ceasing enrollment into Earned Income Disregard	All PHAs	January 1, 2024
Use of HUD-9886-A	All PHAs	No later than February 1, 2025
Income exclusions, as described in Notice PIH 2024-38	All PHAs	No later than July 1, 2025
Definitions specified in Notice PIH 2024-38	All PHAs	No later than July 1, 2025
De minimis errors	All PHAs	No later than July 1, 2025
All other provisions of sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)	PHAs that are neither Moving to Work (MTW) PHAs nor PHAs using the HUD Family Reporting Software (FRS)	January 1, 2027
	Initial MTW PHAs	To be communicated by HUD
	MTW Expansion PHAs	To be communicated by HUD
	FRS PHAs	To be communicated by HUD

APPENDIX B: INSTRUCTIONS FOR HOTMA-COMPLIANT REPORTING USING THE 2020 FORM HUD-50058

I. INTRODUCTION

This appendix outlines validation changes made in the Inventory Management System/Public and Indian Housing (PIH) Information Center (IMS/PIC), and it provides alternative instructions for the preparation of HOTMA-compliant submissions of the 2020 HUD-50058 for non-Moving to Work (MTW), non-Family Reporting Software (FRS) PHAs in compliance with the Housing Opportunity Through Modernization Act of 2016 (HOTMA) as defined in this Notice.

II. WARNING MESSAGES TO BE EXPECTED

HUD modified seven error messages to prevent fatal errors from being generated in IMS/PIC for specific HOTMA-related questions. Instead of receiving fatal errors for submitting HOTMA-compliant responses, public housing agencies (PHAs) will receive a warning message if they submit a value that triggers the error. A warning message does not necessarily indicate the submission is incorrect and will not result in rejection of the flagged data. The table below provides the list of fatal errors that have been converted to warnings. (Note that other fatal errors remain unchanged, so PHAs could receive fatal errors for questions that are unaffected by this change. In such cases, the form will not be accepted.)

Error Number	Relevant HUD-50058 Field	Error Message
4306	6g	If Total Anticipated Income is a positive value, then Total Cash Value of Assets must be non-zero.
4316[3]	6i	Imputed Income should be zero when Total Cash Value of Assets is less than or equal to $5,000.
4318	6i	Imputed Income should be the product of Passbook Rate and Total Cash Value of Assets.
4320	6j	Final Asset Income should be the larger of 6g or 6i.
4362	8f	Medical/Disability Threshold must be the product of 7i and 0.03.
4408	8p	Elderly/Disability Allowance must equal 400 if the family has an elderly and/or disabled head/spouse/co-head.
4418	8r	Allowance per Dependent must equal 480.

III. HUD-50058 SECTIONS WITH ALTERNATIVE INSTRUCTIONS

Alternative instructions are provided below for the following sections of Form HUD-50058. Any section not listed here does not require alternative instructions.

- Section 2: Action
- Section 6: Assets

[3] Error 4316 has been converted to a warning for reasons unrelated to the content of the error message. It should not be inferred from this conversion that imputed asset income may be non-zero when net family assets are below $5,000.

- Section 7: Income
- Section 8: Expected Income Per Year

IV. SECTION 2: ACTION

Notice PIH 2023-27/H 2023-10, revision 3, section I.5 of Attachment I describes instructions that PHAs will use to file "non-interim reexamination transactions" on the 2024 HUD-50058 when a full interim reexamination is not permitted.

When using these alternative instructions, PHAs should continue to use Action Type 3 (Interim Reexamination) when filing mid-cycle updates that do not constitute a full interim reexamination.

Field 2s (PHA use only): Enter "HOTMA" in this field.

- Entering this code will signal that the submitted HUD-50058 is utilizing these alternative instructions.
- If the PHA currently uses field 2s for another purpose and another "PHA use only" field is available, enter the "HOTMA" response in the vacant "PHA use only" field.
- In the rare circumstance in which a PHA is already using all five "PHA use only" fields (fields 2q, 2r, 2s, 2t, and 2u), you may ignore this instruction.

V. SECTION 6: ASSETS

HOTMA introduces significant changes to the definition of net family assets and how income derived from assets is calculated. See Notice PIH 2023-27/H 2023-10, Attachment F, for HOTMA implementation guidance related to the calculation of net family assets and the calculation of income derived from assets.

While these alternative instructions are used, HUD will only use responses to the following fields from Section 6 (Assets) from the HUD-50058:

- 6f. Column total, Cash value of asset
- 6g. Column total, Anticipated income
- 6j. Final asset income

While field 6e (Anticipated income) is not currently submitted to IMS/PIC, alternative instructions are being provided since it factors into the calculation of assets in other fields.

Field 6e (Anticipated income): For each asset, enter the actual income produced by the asset during the 12-month period under examination, OR, when actual asset income cannot be calculated and imputed asset income must be calculated for the family, enter the estimated imputed income for that asset for the 12-month period under examination.

- *Exception:* If the PHA chooses to accept self-certification of net family assets, the PHA will not enter information about particular assets in the years in which the family self-certifies their assets. Information will instead be entered in fields 6f, 6g, and 6h, as noted below.
- If the total cash value of net family assets (field 6f) exceeds $52,787 in calendar year 2026 (a value that is annually adjusted for inflation and specified on HUD User), and the actual asset income for a particular asset cannot be calculated, instead enter the imputed asset income for that particular asset. Imputed asset income is the product of the net cash value of that asset and the HUD-specified passbook savings rate (available on HUD User; in calendar year 2026, it is 0.4 percent).
- If the total cash value of net family assets (field 6f) does not exceed $52,787 in calendar year 2026 (a value that is annually adjusted for inflation and specified on HUD User), the PHA should not calculate imputed asset income.
- In no circumstance should actual income derived from an asset and imputed income derived from that asset both be calculated. When actual asset income can be calculated, the PHA must enter actual asset income. Actual asset income may equal $0.

Field 6f (Column total, Cash value of asset): Enter the total cash value of net family assets.

- *Exception:* If the PHA chooses to accept self-certification of net family assets, the PHA is not required to collect from the family an estimate of the total value of net family assets in the years in which the family self-certifies their assets. If the PHA does not collect that estimate, the PHA may enter "0" as the response. The PHA may alternatively request from the family an estimate of the total value of net family assets and enter that value in field 6f. PHAs that accept self-certification must obtain third-party verification of net family assets every three years. (See Notice PIH 2023-27/H 2023-10, Attachment F, section F.7, for guidance on self-certification of net family assets.)

Field 6g (Column total, Anticipated income): Provide the total amount of household income derived from assets.

- Since field 6e will include either actual asset income or imputed asset income, this column total will include all asset income and will be equivalent to final asset income (field 6j). PHAs should report the same value in field 6g and field 6j.
- Error code 4306 will display as a warning when field 6f is $0 and field 6g is a positive amount. You may ignore this when the family self-certifies their assets and no estimate of the total cash value of net family assets is collected, or when the total cash value of net family assets is $0 but there is actual income from assets to report.

Field 6h (Passbook rate): Enter zero.

- HUD will not utilize responses to this field.
- This field will not be used for any sort of calculation, under the alternative instructions. (Instead, as noted above, if PHAs are required to calculate imputed asset income, they will utilize the correct HUD-specified passbook rate when determining imputed asset income and entering on fields 6e and 6g.)

Field 6i (Imputed asset income): Enter zero.

- HUD will not utilize responses to this field. To be clear, entering zero in accordance with these alternative instructions does not signify that the PHA has determined that imputed asset income for the family is zero.
- Error code 4318 will display as a warning when field 6f exceeds $5,000 and field 6i is $0. You may ignore this warning.
- This field will not be used for any sort of calculation, under the alternative instructions.

Field 6j (Final asset income): Provide the total amount of household income derived from assets.

- This should equal field 6g. This should include the total value of actual income from assets and, if any imputed income had to be calculated, the value of imputed income.

Summary of Alternative Instructions and Relevant Error Codes in Section 6		
Relevant HUD-50058 Field	**Error Code(s)**	**Alternative Instructions**
6e. Anticipated income	N/A	For each asset, enter the actual income produced by the asset during the 12-month period under examination, OR, when actual asset income cannot be calculated and imputed asset income must be calculated for the family, enter the estimated imputed income for that asset for the 12-month period under examination.
6f. Column total, Cash value of asset	N/A	Enter the total cash value of net family assets.
6g. Column total, Anticipated income	4306	Provide the total amount of household income derived from assets. Since field 6e will include either actual asset income or imputed asset income, this column total will include all asset income and will be equivalent to final asset income (field 6j). In some circumstances, field 6f will equal $0 and field 6g will be a positive amount.
6h. Passbook rate	N/A	Enter zero. This field will not be used for any calculations. Instead, see alternative instructions for 6e.

Summary of Alternative Instructions and Relevant Error Codes in Section 6		
Relevant HUD-50058 Field	**Error Code(s)**	**Alternative Instructions**
6i. Imputed asset income	4316 4318	Enter zero. This field will not be used for any calculations. Instead, see alternative instructions for 6e.
6j. Final asset income	4320	This should be equivalent to the response in field 6g. The calculation for this field should include the total value of actual income from assets, and, if any imputed income had to be calculated, the value of the imputed income.

Example 1
The Adams family has $20,000 in non-necessary personal property, all of which is held in a savings account. They also own a vacant plot of land worth $10,000. They have no other assets. They receive $100 per year in savings account interest. The PHA is unable to calculate the actual income earned for the property owned by the family because the property neither generates any income nor could an income amount be computed as a matter of interest or dividend earnings.

- **Field 6f:** Since the combined total value of all non-necessary items of personal property ($20,000) does not exceed $52,787 in 2026, it is excluded from net family assets. The total value of net family assets is $10,000, so the PHA enters "$10,000" in field 6f.
- Because net family assets do not exceed $52,787 in 2026, the PHA does not calculate imputed asset income for the Adams family.
- **Fields 6g and 6j:** The total actual income from assets is $100, and no imputed asset income is calculated, so the PHA enters "$100" in fields 6g and 6j.

Example 2
The Burton family has $65,000 in a savings account, $20,000 in stocks, and a recreational vehicle worth $5,000. They receive $100 per year in interest in the savings account. The stocks do not pay any dividends, so the actual income is $0. They have no other assets.

- **Field 6f:** Since the combined total value of all non-necessary items of personal property exceeds $52,787 in 2026, all non-necessary personal property is included in net family assets. The total value of net family assets is "$90,000" in field 6f.
- Because net family assets exceed $52,787 in 2026, the PHA must impute asset income for any asset for which actual asset income cannot be calculated. The PHA can calculate actual asset income for the savings account ($100) and the stocks ($0). The PHA cannot calculate actual returns on the recreational vehicle, so they impute asset income on that specific asset by multiplying the cash value of that vehicle, $5,000, by the current passbook savings rate of 0.4 percent. Total imputed asset income on the recreational vehicle will be $20.
- **Fields 6g and 6j:** The PHA enters the sum of total actual income from assets ($100) and total imputed asset income ($20), "$120," in fields 6g and 6j.

Example 3
The Carter family self-certifies that they have net family assets under $52,787 in 2026. The Carters report they receive $100 per year in actual asset income.

- **Field 6f:** The total value of net family assets may be entered as "$0" in field 6f.
- **Fields 6g and 6j:** The PHA does not calculate imputed asset income for the Carters. The total actual income from assets is $100, so the PHA enters "$100" in fields 6g and 6j.

VI. SECTION 7: INCOME

See Notice PIH 2023-27/H 2023-10, Attachment J, section J.4, for guidance on Safe Harbor income verification, and Notice PIH 2024-38 footnote 8 for previously provided instructions on how PHAs may implement this provision in IMS/PIC. PHAs have discretion whether to accept Safe Harbor income determinations. If the PHA chooses to do so, they will provide the information in the following table.

Summary of Alternative Instructions and Relevant Error Codes in Section 7		
Relevant HUD-50058 Field	**Error Code**	**Alternative Instructions**
7a. Family member name/number	N/A	Enter the Head of Household's information.
7b. Income code	N/A	Enter "N = Other nonwage sources."
7d. Dollars per year	N/A	Enter the annual income from the other program's determination.
7f. Income after exclusions	N/A	
7g. Column total	N/A	
7i. Total annual income	N/A	

VII. SECTION 8: EXPECTED INCOME PER YEAR

See Notice PIH 2023-27/H 2023-10, Attachment C, for HOTMA implementation guidance related to deductions and expenses.

Field 8e (Total permissible deductions): Enter the total dollar amount of all permissive deductions for the family. This may be entered for all program types.

- Per 24 CFR 5.611(b)(1), PHAs may choose to provide additional permissive deductions from annual income for families in the Housing Choice Voucher (HCV) (tenant-based and project-based) and Section 8 moderate rehabilitation programs, in addition to families in Public Housing.

Field 8f (*Medical/disability threshold*): Enter the appropriate value, depending on the threshold applicable to the family this year. This may be 5 percent, 7.5 percent, or 10 percent of annual income.[4]

[4] In instances when the first transaction for the family following HOTMA compliance is a non-interim update, the applicable medical/disability threshold for the family remains at 3 percent. The PHA will apply the 5 percent threshold at the family's first interim or annual reexamination following the date the PHA begins compliance.

- You may skip this field if the family is not potentially eligible for a deduction for the sum of unreimbursed health and medical care expenses or unreimbursed reasonable attendant care and auxiliary apparatus expenses.
- Families eligible for the phased-in hardship relief threshold will use 5 percent of annual income at their first annual or interim reexamination once the PHA begins full compliance with HOTMA sections 102 and 104. Families on phased-in hardship relief will use 7.5 percent of annual income in the second 12-month period of the phased-in relief.
- Families receiving general hardship relief will use 5 percent of annual income.
- Eligible families will generally use 10 percent of annual income.
- Error code 4362 will display as a warning when field 8f does not equal the product of field 7i and 3 percent. You may ignore this warning.

Field 8p (*Elderly/disability allowance*): Enter the appropriate inflation-adjusted amount for the calendar year in which the 50058 transaction's effective date occurs, at new admission, annual and interim reexaminations, or any transaction after an annual or interim reexamination in that calendar year.

- PHAs can find the inflation-adjusted amounts on HUD User.
- Error 4408 will display when field 8p does not equal $400. You may ignore this warning upon confirmation that the Elderly/Disabled Family allowance is adjusted for inflation and calculated correctly.

Field 8r (Allowance per dependent): Enter the appropriate inflation-adjusted amount for the calendar year in which the HUD-50058 transaction's effective date occurs, at new admission, annual and interim reexaminations, or any transaction after an annual or interim reexamination in that calendar year.

- PHAs can find the inflation-adjusted amounts on HUD User.
- Error code 4418 will display when field 8r does not equal $480. You may ignore this warning upon confirmation that the dependent deduction is adjusted for inflation and calculated correctly.

Example: For income examinations in 2026, the dependent deduction is $500. PHAs will enter $500 in field 8r. The calculation for the dependent allowance should appear as follows for a family with two dependents. The submission will generate a warning that the allowance per dependent must equal 480, but the submission will be accepted by HUD.

Example Responses for Alternative Instructions Regarding Allowance per Dependent	
Relevant HUD-50058 Field	**Example Response**
8q. Number of dependents (people under 18, with disability, or full-time student. Do not count head of household, spouse, co-head, foster child/adult, or live-in aide.)	2
8r. Allowance per dependent (default = $480)	**500**
8s. Total dependent allowance	1,000