

MEMO

To: Board of Commissioners
From: Karen Brunner and Frank Alexander
Date: May 6, 2026
Re: **Administrative Plan Updates**

Background

The Administrative Plan for the Housing Choice Voucher Program (Admin Plan) contains policies that explain how Boulder Housing Partners administers the Housing Choice Voucher Program. It is divided into 20 chapters and updated annually.

Revisions and changes are first presented to the Board of Commissioners and then released for public review. The public review period must be at least 45 days and provide an opportunity for the public to comment. Following the public review period, public comments are reviewed for incorporation, and the Admin Plan is brought back to the Board for adoption.

Given that the document is timely and subject to change, the Board's prior direction to staff about interim changes has been to bring the Board any substantive changes as they come up, and to hold administrative changes for annual approval. In our quest to make policies and rules easier to understand, there are minor wording updates and changes throughout the plan.

Analysis

The table below explains the contents of each chapter and highlights the changes which fall into one of two categories:

1. Recent HUD policy changes published through Notice or Federal Regulations.
2. MTW Activity changes and/or policy clarification by staff.

Important changes to note:

1. Inspection protocol for BHP units: HUD created a new inspection protocol called NSPIRE – the National Standards for the Physical Inspection of Real Estate. This protocol will eventually apply to all HUD-funded housing programs. HUD delayed the implementation for the Housing Choice Voucher Program until February 2027 (from the original date of October 1, 2024, and subsequent extension of October 1, 2025). BHP has been using these standards for all BHP units since mid-2025. BHP's current protocol includes inspecting every unit to this standard on an annual basis. The annual inspection conducted during preventive maintenance inspections at each property will be used to satisfy the requirements for the HCV program. This new protocol will increase the physical standards of our units while eliminating the redundancy of multiple inspections for different programs.

2. Project-Based Voucher (PBV) wait list: with the increase in the number of PBV units at BHP properties, we will implement one wait list for all PBV sites. Preferences will apply based on the units and which services are offered at each site. The list will be maintained by a cross-departmental team (one member of HCV and one member of the PM team). Applicants will be processed for all program requirements at the specific site. This will increase efficiency, promote consistency, and reduce the time it takes to process an application.
3. Insufficient funding policy: the current policy states that families with the least amount of housing assistance payments will be terminated first. If this policy were ever needed to be implemented, this method could result in the termination of many families with little savings. Policy has been updated to include households in tiers based on their income and then last on, first off principle. The first tier is households with incomes above 50% of the area median income. Tier two is households with income between 30 and 49% of area median income. Households that include elderly or disabled family members would be excluded.

Chapter Description	HUD required changes	MTW Activity/Staff changes
Chapter 1: Overview of the Program and Plan – describes the overall program including purpose, intent and use of the plan	No changes	No changes
Chapter 2: Fair Housing and Equal Opportunity – explains the requirements for PHAs regarding civil rights and affirmatively furthering fair housing	HUD has halted enforcement of the Equal Access to Housing Regardless of Sexual Orientation or Gender Identity Final rule. Executive Order revoked the provision to enhance access to persons with limited English proficiency. All references to both have been removed from the Admin Plan.	No changes
Chapter 3: Eligibility – details requirements for a household to be eligible for housing	HUD required language in regard to citizenship status.	Minor wording changes
Chapter 4: Applicants, Wait Lists and Tenant Selection – explains how applications are accepted, wait lists and lottery managed, and the	No changes	Change from owner held lists for PBVs, to one single PBV wait list held by the PHA; removal of outdated preference language.

order applicants are selected		
Chapter 5: Briefings and Voucher Issuance – includes requirements for briefings and occupancy standards	HUD required updated wording re: LEP, updated VAWA forms	Minor wording changes
Chapter 6: Income and Subsidy Determinations – defines annual income and how subsidy is calculated	HUD clarification on when child support/alimony payments are not being made	Exclusion of income from assets when total net assets are less than the HUD-published threshold, updated income and rent tiered chart with 2026 numbers.
Chapter 7: Verifications – explains acceptable forms of verification for all factors that determine eligibility	HUD clarification on release of EIV reports; requirements for verifying eligible immigration status; exhibit added to clarify eligible immigration status	Minor wording changes.
Chapter 8A: Housing Quality Standards and Rent Reasonableness – explains requirements for units to pass both tests prior to paying assistance	Requirement added for carbon monoxide and smoke detectors.	Minor wording changes.
Chapter 8B: NSPIRE and Rent Reasonableness – explains requirements for units to pass both tests prior to paying assistance	No changes	BHP has elected to implement NSPIRE standards on BHP owned unit prior to HUD’s implementation date of 2.1.2027.
Chapter 9: General Leasing Process – covers lease up process from submission of Request for Tenancy Approval to execution of Housing Assistance Payment Contract	No changes	Minor wording changes.
Chapter 10: Moving with Continued Assistance – explains how and where a household can move while	No changes.	Minor wording changes.

continuing to receive housing assistance		
Chapter 11: Income Reexaminations – explains policies regarding regularly scheduled and interim exams	No changes.	Minor wording changes.
Chapter 12: Termination of Tenancy and Assistance – describes policies on optional and mandatory terminations	HUD no longer allows PHAs to use arrest records as a basis for denial	Updated insufficient funding policy regarding termination of households.
Chapter 13: Owners – discusses the roles and relationship between PHA and owners/landlords and HAP contracts	No changes.	Minor wording changes.
Chapter 14: Program Integrity – covers policies designed to prevent, detect, investigate, and resolve instances of program abuse or fraud	Updated Audit reference and limit.	No changes.
Chapter 15: Special Housing Types – includes policies on single room occupancy, shared housing, congregate housing, group homes, manufactured homes, cooperative housing and home ownership	Update use of exception payment standard for Shared Housing situations.	No changes.
Chapter 16: Program Administration – covers program standards, informal reviews and hearings, debts owed to the PHA, the MTW plan and report, insufficient funding and the Violence Against Women Act	Clarification around exception payment standards due to reasonable accommodation; updated guidance on medical/disability records which are not to be maintained by the PHA; updated VAWA definitions and forms.	Minor wording changes.
Chapter 17: Project Based Vouchers – describes HUD	No changes.	Updated wait list process to be one wait list for all PBV

rules and BHP polices regarding vouchers that have been project based		units, held by the PHA (not the owner); updated PBV development information exhibits.
Chapter 18: Rental Assistance Demonstration – covers the public housing properties that were converted to vouchers under the RAD program	HUD update around revised RAD notice	Updated wait list process to be one wait list for all PBV units, held by the PHA (not the owner); updated PBV development information exhibits.
Chapter 19: Emergency Housing Vouchers	No changes	Removed all references to applicants and new admissions, as these vouchers are not allowed to be re-issued after 9.30.2023. Updated funding categories, as all but one has sunset.
Chapter 20: Special Purpose Vouchers	No changes.	No changes.

A red-lined copy of the Admin Plan has been sent electronically.

Next Steps:

Subject to Board approval of the changes, the documents will be posted for public review on our website no later than May 8, 2026. The required posting is for 45 days. These changes will be presented to the Tenant-Based Resident Advisory Board on May 12, 2026. A public hearing will be held on Wednesday, May 20, 2026, at 4 p.m. Information regarding these changes will be posted to our website and posted in a public notice in the Daily Camera. Comments can be submitted via email to hcv@boulderhousing.org or via phone at 720-564-4630. Comments from the Commissioners are always welcome.

Following the 45-day period, the document will be returned to the Board for final adoption at the July 2026 meeting.

Action requested

This is the Board’s first reading of the Housing Choice Voucher Administrative Plan. The action requested is to authorize the release of the document for public comment with final adoption by the Board at the July 2026 meeting.