

## Exhibit 11-1

### Veterans Affairs Supportive Housing (VASH) Voucher Program

Rental assistance for homeless veterans is authorized under Section 8(o)(19) of the United States Housing Act of 1937. HUD-VASH is authorized pursuant to Division K, Title II of the Consolidated Appropriations Act, 2008 (Public Law 110-161) enacted on December 26, 2007. The HUD-VASH program combines rental assistance with case management and clinical services for homeless veterans.

#### 1. Voucher Increments

AHFC received VASH vouchers in the following increments. These vouchers are governed by the rules set forth in the *Federal Register*<sup>1</sup>.

- May 6, 2008, HUD funded 35 VASH vouchers.
- [September 1, 2009](#), HUD funded 35 additional VASH vouchers.
- [June 1, 2010](#), HUD funded 25 additional VASH vouchers.
- July 28, 2011, HUD funded 25 additional VASH vouchers.
- [January 1, 2012](#), HUD funded 25 additional VASH vouchers.
- [April 1, 2012](#), HUD funded 50 additional VASH vouchers.
- [September 1, 2013](#), HUD funded 15 additional VASH vouchers.
- [January 1, 2015](#), HUD funded 20 additional VASH vouchers.
- [May 1, 2015](#), HUD funded 17 additional VASH vouchers.
- [June 1, 2016](#), HUD funded 24 additional VASH vouchers.
- April 1, 2018, HUD funded 15 additional VASH vouchers.
- [November 1, 2018](#), HUD funded 22 additional VASH vouchers.
- [January 13, 2020](#), HUD funded 7 additional VASH vouchers.
- [January 1, 2021](#), HUD funded 17 additional VASH vouchers.
- [January 1, 2022](#), HUD funded 22 additional VASH vouchers.

#### HUD Guidance<sup>2</sup>

HUD-VASH vouchers under this part are administered in accordance with the HCV tenant-based rental assistance regulations set forth at 24 CFR part 982. Unless expressly noted below<sup>2</sup>, all regulatory requirements and HUD directives regarding the HCV TBV and PBV programs are applicable to HUD-VASH vouchers, including the use of all HUD-required contracts and other forms. The

<sup>1</sup> *Federal Register*, [May 6, 2008](#), titled: "Section 8 Housing Choice Vouchers: Implementation of the HUD-VA Supportive Housing Program."

- Updated with *Federal Register*, [March 23, 2012](#), and titled, "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-VA Supportive Housing Program."

<sup>2</sup> *Federal Register*, [September 27, 2021](#), "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."

PHA's local discretionary policies adopted in the PHA's written administrative plan apply to HUD-VASH vouchers unless such local policy conflicts with the requirements of the HUD-VASH vouchers outlined below.

## 2. Special Provisions

### 2.A Moving to Work Agencies

#### HUD Guidance

HUD-VASH vouchers may be administered in accordance with flexibilities approved under PHA's Standard MTW Agreement or MTW Operations Notice with approval from HUD's Housing Choice Voucher office. PHAs must submit a request through their local field office to operate HUD-VASH in accordance with approved MTW flexibilities. Requests will be approved provided the flexibilities to [sic] "do" not conflict with the stated HUD-VASH program requirements. However, these vouchers are never eligible for MTW fungibility. HUD-VASH vouchers must be reported in the IMS/PIC system on either the regular HUD-50058 or HUD- MTW 50058 for vouchers under the agency's MTW Agreement.

### 2.B Project-Based Assistance<sup>3</sup>

Project-based voucher assistance can be made available with HUD-VASH vouchers. See the Project-Based Vouchers chapter in this Plan.

### 2.C Section 8 Management Assessment Program (SEMAP)

#### HUD Guidance<sup>4</sup>

HUD-VASH vouchers will remain excluded from the SEMAP leasing indicator. Therefore, 24 CFR 985.3(n)(1)(i) and (ii) are still waived. During a HUD-VASH PHA's calendar year, the prorated budget authority available for HUD-VASH vouchers and the units associated with that budget authority will be excluded from the denominators for both units leased, and dollars expended.

<sup>3</sup> Additional guidance available in PIH Notice 2009-11 issued March 16, 2009, titled, "Project-Basing HUD-Veterans Affairs Supportive Housing Vouchers."

- Updated with PIH Notice 2010-23 issued June 25, 2010, titled, "Project-Basing HUD-Veterans Affairs Supportive Housing Vouchers."
- Updated with PIH Notice 2011-50 issued September 15, 2011, titled, "Project-Basing HUD-Veterans Affairs Supportive Housing Vouchers."
- Updated with PIH Notice 2015-10 issued June 12, 2015, titled, "Project-Basing HUD-Veterans Affairs Supportive Housing Vouchers."

<sup>4</sup> *Federal Register*, September 27, 2021, "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."

## 2.D Reporting Requirements<sup>5</sup>

### HUD Guidance

A new code (VASH) has been established for use on line 2n of the Family Report (form HUD-50058), which provides for an indication if the family participates in "other special programs." This code must remain on the HUD-50058 for the duration of the HUD-VASH family's participation in the program. The PHA that administers the HUD-VASH voucher on behalf of the family (initial or receiving PHA under portability) must enter and maintain this code on the HUD-50058.

## 2.E Reasonable Accommodation<sup>6</sup>

### HUD Guidance

Civil rights requirements cannot be waived. The HUD-VASH program is administered in accordance with applicable civil rights and fair housing requirements. These include applicable authorities under 24 CFR 5.105(a) and 24 CFR 982.53 including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act, the Americans with Disabilities Act, and HUD's Equal Access Rule.

## 3. Family Eligibility and Selection

### HUD Guidance

HUD-VASH eligible families are homeless veterans and their families. The December 17, 2007, Explanatory Statement for the 2008 Appropriation Act provides, "The Appropriations Committees expect that these vouchers will be made available to all homeless veterans, including recently returning veterans' (153 Cong. Rec. H16514 (daily ed., Dec. 17, 2007)). HUD, through its undersigned Secretary, finds the following waivers necessary to effectively administer and deliver the program to all veterans in accordance with Congressional intent.

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<sup>5</sup> PIH Notice 2008-37 issued October 14, 2008, titled, "Reporting Requirements for the HUD-Veterans Affairs Supportive Housing Program."

- Updated with PIH Notice 2010-12 issued April 13, 2010, titled, "Reporting Requirements for the HUD-Veterans Affairs Supportive Housing Program."
- Updated with PIH Notice 2011-53 issued September 20, 2011, titled, "Reporting and Portability Requirements for the HUD-Veterans Affairs Supportive Housing (VASH) Program."

<sup>6</sup> See 24 CFR 5.105(a); See also, U.S. Department of Housing and Urban Development, Fair Housing Rights and Obligations, [www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/fair\\_housing\\_rights\\_and\\_obligations](http://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_rights_and_obligations).

Section 8(o)(19) of the United States Housing Act of 1937 (USHA of 1937), which requires homeless veterans to have chronic mental illnesses or chronic substance use disorders with required treatment of these disorders as a condition of receipt of HUD-VASH assistance, is waived.

### 3.A Waiting List and Referrals

#### HUD Guidance

The VAMC will refer HUD-VASH eligible families to the PHA for the issuance of vouchers. Written documentation of these referrals must be maintained in the tenant file at the PHA. Therefore, the PHA will not have the authority to maintain a waiting list or apply local preferences for HUD-VASH vouchers.

1. Accordingly, section 8(o)(6)(A) of the USHA of 1937, 42 U.S.C. 1437f(o)(6)(A), in regard to preferences, has been waived to provide for the effective administration of the program.
2. In addition, 24 CFR 982.202, 982.204, and 982.207, relating to applicant selection from the waiting list and local preferences, are also waived.
3. Sections 982.203, 982.205, and 982.206 regarding special admissions, cross-listing of the waiting list, and opening and closing the waiting list do not apply to the HUD-VASH program.

#### AHFC Policy

AHFC has an expedited procedure for eligible families that have had a VASH voucher expire within 90 days of the new referral.

### 3.B Screening

#### HUD Guidance

The VAMC will screen all families in accordance with its screening criteria. 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.

1. Specifically, under the HUD-VASH program, PHAs will not have the authority to screen potentially eligible families or deny assistance for any grounds permitted under 24 CFR 982.552 (broad denial for violations of HCV program requirements) and 982.553 (specific denial for criminals and alcohol abusers), with one exception.
2. PHAs will still be required to prohibit admission if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program. However, unless the family member that is subject to lifetime registration under a state sex offender registration program is the homeless veteran (which would result in denial of admission for the family), the remaining family members may be served if the family agrees to remove the sex offender from its family composition.

3. Accordingly, the Department is exercising its authority to waive 42 U.S.C. 1437d(s); 42 U.S.C. 13661(a), (b), and (c); and 24 CFR Sections 982.552 and 982.553, with the exception of 982.553(a)(2)(i), which requires denial of admission to certain registered sex offenders.

#### **AHFC Policy**

AHFC will screen<sup>7</sup> VASH referrals for the following:

1. Eligible income – must meet income limits for very low income families (50 percent of area median income).
2. Criminal History<sup>8</sup> – no adult family member may be subject to a lifetime registration requirement on a sex offender registry.
3. Citizenship – at least one family member must have eligible citizenship status.

### **3.C Social Security Number and Date of Birth Verification**

#### **HUD Guidance**

In regard to verifying Social Security numbers (SSNs) for homeless veterans and their family members, an original document issued by a federal or state government agency, which contains the name of the individual and the SSN of the individual along with other identifying information of the individual, is acceptable in accordance with 24 CFR part 5.216(g).

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 and cannot require the veteran to provide a SSN card. These documents must also be accepted for proof-of-age purposes in lieu of birth certificates or other PHA-required documentation.

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<sup>7</sup> AHFC asked HUD for permission to require VASH applicants owing money to AHFC to sign a payment agreement prior to receipt of a VASH voucher. [Letter dated October 5, 2010 from Milan Ozdinec](#), Deputy Assistant Secretary for Public Housing and Voucher Programs. “AHFC cannot deny admission or require a repayment agreement if a member of the referred household owes money to the AHFC.”

<sup>8</sup> AHFC asked HUD for permission to deny eligibility to any person subject to a sex offender registry requirement. [Letter dated November 10, 2008 from Milan Ozdinec](#), HUD Deputy Assistant Secretary for Public Housing and Voucher Programs. “HUD’s intent in establishing alternative requirements for the HUD-VASH program was to serve the full range of homeless veterans. Therefore, the Department will not permit you to implement this alternative requirement (all individuals subject to a registration requirement) as it would further restrict the admission of homeless veterans and conflict with the intent of the HUD-VASH Program.”

Please note that veterans are also issued photo identification cards by the VA. If such identification is required by the PHA, these cards must be accepted by the PHA in lieu of another type of government-issued photo identification. These cards may also be used to verify SSNs and date of birth.

### 3.D Adding a Household Member After Admission

#### HUD Regulation – 24 CFR 982.551(h)(2)

Use and occupancy of unit. The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly inform the PHA of the birth, adoption or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit. No other person [i.e., nobody but members of the assisted family] may reside in the unit (except for a foster child or live-in aide as provided in paragraph (h)(4) of this section).

#### HUD Guidance

When adding a family member after the HUD-VASH family has been admitted to the program, the rules of § 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.

### 3.E Case Management Requirements<sup>9</sup>

#### HUD Guidance

The VAMC or DSP's responsibilities include:

- (1) The screening of homeless veterans to determine whether they meet the HUD-VASH program participation criteria established by the VA national office;
- (2) assisting veterans with the PHA application and assisting the veteran family with obtaining needed PHA documentation to ensure rapid voucher issuance;
- (3) referrals of homeless veterans to the PHA;
- (4) providing case management and supportive services to potential HUD-VASH program participants, as needed, prior to PHA issuance of rental vouchers;
- (5) providing housing search assistance to HUD-VASH participants with rental vouchers;
- (6) 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

<sup>9</sup> *Federal Register*, September 27, 2021, "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."

(7) maintaining records and providing information for evaluation purposes, as required by HUD and the VA.

As a condition of HCV rental assistance, both tenant-based assistance and PBV, a HUD-VASH eligible veteran must receive the case management services noted above, as needed, directly from or arranged by, the VAMC or DSP. The VAMC or DSP, in consultation with the veteran, is responsible for determining if case management is required and if the case management requirement is satisfied.

If a veteran no longer requires case management, but maintains their HUD-VASH voucher assistance, the VAMC or DSP will maintain contact with the veteran family to provide support and planning assistance with the recertification and re-inspection process. The VAMC or DSP case manager will remain available to provide support to the veteran family, as needed.

#### **4. Income Eligibility**

##### **HUD Guidance**

The PHA must determine income eligibility for HUD-VASH families in accordance with 24 CFR 982.201. Income targeting requirements of section 16(b) of the USHA of 1937, as well as 24 CFR 982.201(b)(2), do not apply for HUD-VASH families so that participating PHAs can effectively serve the eligible population specified in the 2008 Appropriation Act; that is, homeless veterans, who may be at a variety of income levels.

##### **HUD Regulation – 24 CFR 982.201**

When applicant is eligible: In general. The PHA may admit only eligible families to the program. To be eligible, an applicant must be a “family;” must be income-eligible in accordance with paragraph (b) of this section and 24 CFR part 5, subpart F; and must be a citizen or a noncitizen who has eligible immigration status as determined in accordance with 24 CFR part 5, subpart E. If the applicant is a victim of domestic violence, dating violence, or stalking, 24 CFR part 5, subpart L, applies.

##### **AHFC Policy**

Under Moving to Work Activity 2014-1 Reasonable Rent and Family Self-Sufficiency Initiative approved by AHFC’s Board of Directors with Resolution 2013-11 on February 27, 2013, VASH vouchers are part of AHFC’s Set Aside program and subject to a streamlined income calculation.

## 5. Initial Search Term

### HUD Guidance

HUD-VASH vouchers must have an initial search term of at least 120 days. Therefore, §982.303(a), which states that the initial search term must be at least 60 days, shall not apply, since the initial term must be 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.

See the Applicant, Participant, and Owner Briefing exhibit for briefing materials. See the Issuance and Shopping exhibit for the voucher term and extensions.

## 6. Leasing

### 6.A HQS Initial Inspections

#### HUD Guidance<sup>10</sup>

To expedite the leasing process for tenant-based HUD-VASH, PHAs may pre-inspect available units that veterans may be interested in leasing to maintain a pool of eligible units. If a HUD-VASH family selects a unit that passed a HQS inspection (without intervening occupancy) within 45 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. As required by 24 CFR 982.353(e), a PHA is prohibited from directly or indirectly reducing the family's opportunity to select among all available units. All regulatory requirements pertaining to HQS found at 24 CFR 982.401 apply to HUD-VASH.

### 6.B Initial Lease Term

#### HUD Guidance

Under the HCV program, voucher participants must enter into an initial lease with the owner for one year, unless a shorter term would improve housing opportunities for the tenant and the shorter term is a prevailing market practice. To provide a greater range of housing opportunities for HUD-VASH voucher holders, initial leases may be less than 12 months; therefore, both section 8(o)(7)(A) of the USHA of 1937, 42 U.S.C. 1437f(o)(7)(A), and 24 CFR 982.309(a)(2)(ii) are waived.

<sup>10</sup> *Federal Register*, September 27, 2021, "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."



## 6.C Special Housing Types

### HUD Guidance<sup>11</sup>

Special housing types can be particularly useful to HUD-VASH clients, as it can increase the availability of housing, and for some veterans, can be a better housing environment than a single-family unit. As such, 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 for these housing types can be found at 24 CFR part 982, subpart M.

Consistent with the regulations, HUD-VASH PBV can never be applied to shared housing.

## 6.D Ineligible Housing

### HUD Guidance

HUD-VASH families will be permitted to live on the grounds of a VAMC in units owned by the VA. Therefore, 24 CFR 982.352(a)(5), which prohibits units on the grounds of a medical, mental, or similar public or private institution, is waived for that purpose only.

## 7. Mobility and Portability

### HUD Guidance

HUD-VASH participant families may reside only in those jurisdictional areas that are accessible to case management services as determined by the partnering VAMC or DSP. Since the VAMC will be identifying homeless veterans eligible to participate in the HUD-VASH program, section 8(r)(1)(B)(i) of the USHA of 1937, 42 U.S.C. 1437f(r)(1)(B)(i), which restricts portability in cases where the family did not reside in the jurisdiction of the PHA at the time of application for HCV assistance, and 24 CFR 982.353(a), (b), and (c), which affects where a family can lease a unit with HCV assistance, do not apply.

### 7.A Portability Moves Within Same Catchment Area (or Area of Operation) Where Case Management Is Provided by the Initial PHA's Partnering VAMC or DSP

#### HUD Guidance

If the family initially leases up, or moves, under portability provisions, but the initial PHA's partnering VAMC or DSP will still be able to provide the necessary case management services due to the family's proximity to the partnering VAMC

<sup>11</sup> *Federal Register*, September 27, 2021, "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."

or DSP, the receiving PHA must process the move in accordance with the portability procedures of 24 CFR 982.355. However, since the initial PHA must maintain records on all HUD-VASH families receiving case management services from its partnering VAMC or DSP, receiving PHAs without a HUD-VASH program must bill the initial PHA. Therefore, 24 CFR 982.355(d), which gives the receiving PHA the option to absorb the family into its own HCV program or bill the initial PHA, is not applicable.

**7.B Portability Moves Within Same Catchment Area Where Both PHAs Have Received HUD-VASH Vouchers**

**HUD Guidance**

The receiving PHA may bill the initial PHA or absorb the family into its own HUD-VASH program if the VAMC or DSP providing the initial case management agrees to the absorption by the receiving PHA and the transfer of case management. The absorption will also entail the availability of a HUD-VASH voucher and case management provision by the receiving PHA's partnering VAMC or DSP.

**7.C Portability Moves Where Receiving PHA Is Beyond Catchment Area**

**HUD Guidance**

If a family wants to move to another jurisdiction where it will not be possible for the initial PHA's partnering VAMC or DSP to provide case management services, the VAMC or DSP must first determine that the HUD-VASH family could be served by another VAMC or DSP that is participating in this program, and the receiving PHA must have a HUD-VASH voucher available for this family. In these cases, the family must be absorbed by the receiving PHA either as a new admission (upon initial participation in the HUD-VASH program) or as a portability move-in (after an initial leasing in the initial PHA's jurisdiction). Upon absorption, the initial PHA's HUD-VASH voucher will be available to lease to a new HUD-VASH eligible family, as determined by the partnering VAMC or DSP, and the absorbed family will count toward the number of HUD-VASH slots awarded to the receiving PHA.

**7.D Portability Moves Where Receiving PHA Is Beyond Catchment Area for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking**

**HUD Guidance**

Veterans who request to port beyond the catchment area of the VAMC or DSP where they are receiving case management to protect the health or safety of a person who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believes him- or herself to be threatened with imminent harm from further violence by remaining in the

dwelling unit (or any family member has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's move or request to move), may port prior to receiving approval from the receiving VAMC or DSP. The initial PHA must follow its emergency transfer plan as described in 24 CFR 5.2005(e). PHAs may require verbal self-certification or a written request from a participant seeking a move beyond the catchment area of the VAMC or DSP.

The verbal self-certification or written request must include either, a statement expressing why the participant reasonably believes that there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under the PHA; or a statement that the tenant was a sexual assault victim and that sexual assault occurred on the premises during the 90-day period preceding the participant's request for the move. The veteran escaping violence must be admitted to the VAMC or DSP's caseload. The participant must still port to a PHA that has a HUD-VASH program; if the receiving PHA does not have a HUD-VASH voucher available to lease, they may bill the initial PHA until a HUD-VASH voucher is available, at which point the porting veteran must be absorbed into the receiving PHA's program.

#### **7.E Portability Moves When Case Management is No Longer Required**

##### **HUD Guidance**

If the family no longer requires case management, there are no portability restrictions. PHAs must follow the regulatory requirements for portability found at 24 CFR 982.355. When completing the HUD-50058, the family will continue to be coded "VASH" on line 2n unless the family has been moved to a regular voucher, in which case the code in 2n would be left blank.

#### **8. Exception Payment Standards**

##### **HUD Guidance<sup>12</sup>**

Many housing markets with a high need for HUD-VASH are very competitive with a shortage of affordable rental units. In addition, landlords may be reluctant to rent to homeless individuals due to poor credit history or other issues. To assist HUD-VASH participants in finding affordable housing, especially in competitive markets, HUD is waiving 24 CFR 982.503(a)(3) to allow a PHA to establish a HUD-VASH exception payment standard. Without this waiver, a PHA is required to establish a single payment standard amount for each unit size. Additionally, 982.503(b)(iii) is waived so that PHAs may go up to, but no

<sup>12</sup> *Federal Register*, September 27, 2021, "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."

higher than 120 percent of the published metropolitan area-wide FMRs or Small Area FMRs (based on which FMRs the PHA is applying) specifically for HUD-VASH families. A PHA that wants to establish a HUD-VASH exception payment standard over 120 percent must still request a waiver from HUD through the regular waiver process outlined in notice PIH 2018-16, or any successor notices. Exception payment standards implemented by the PHA under this Section also apply in determining rents for PBV projects with units exclusively made available to HUD-VASH families (see 24 CFR 983.301).

## 9. Family Break-Up

### HUD Guidance<sup>12</sup>

Generally, in the case of a family break-up, the HUD-VASH assistance must stay with the HUD-VASH veteran. However, 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 due to the perpetrator's acts of domestic violence, dating violence, sexual assault, or stalking, 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.

## 10. Termination of Assistance

### HUD Guidance<sup>13</sup>

As detailed above, HUD-VASH voucher assistance is contingent upon participation in case management, as required by the VAMC or DSP. If the VAMC or DSP 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. However, a VAMC or DSP determination that the veteran does not require or no longer requires case management is not grounds for termination of voucher or PBV assistance. In such case, and at its option, the PHA may offer the family continued assistance through one of its regular vouchers, to free up the HUD-VASH voucher for another eligible family referred by the VAMC or DSP. If the PHA has no voucher to offer, the family will retain its HUD-VASH voucher, or PBV unit, until such time as the PHA has an available voucher for the family. If the family no longer requires case management, there are no portability restrictions. Normal portability rules apply.

<sup>13</sup> *Federal Register*, September 27, 2021, "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."

Second, 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. As such, the regulation at 24 CFR 982.552((b)(2) is amended to state, “The PHA may terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease.” Prior to terminating HUD-VASH participants, HUD strongly encourages PHAs to exercise their discretion under 24 CFR 982.552(c)(2) and consider all relevant circumstances of the specific case, as well as including the role of the case manager and the impact that ongoing case management services can have on mitigating the conditions that led to the potential termination, prior to determining whether to terminate assistance. PHAs also must grant reasonable accommodations for persons with disabilities in accordance with 24 CFR part 8. In addition, a HUD-VASH participant family must not be terminated after admission, for a circumstance or activity that occurred before admission and was known to the PHA but could not be considered at the time of admission due to the HUD- VASH Operating Requirements. The PHA can only terminate the family’s assistance for program violations that occur after the family’s admission to the voucher program.

## 11. Turnover of HUD-VASH Vouchers

### HUD Guidance

In accordance with the Appropriations Act, upon turnover, HUD-VASH vouchers must be issued to eligible families as identified by the VAMC or DSP, as noted above.

## 12. Abbreviations

1. **CBOC** - Community-Based Outpatient Clinic
2. **DSP** - Designated Service Provider
3. **HUD** - U.S. Department of Housing and Urban Development
4. **VAMC** - Veterans Affairs Medical Center
5. **VASH** - Veterans Affairs Supportive Housing

## Numbered Memo

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