

PUBLIC MEETING NOTICE

**CHIPPEWA COUNTY HOUSING AUTHORITY (CCHA)
MONDAY, JANUARY 26, 2026 AT 3:30 P.M.
THE MEETING WILL BE HELD IN ROOM 016, CHIPPEWA COUNTY COURTHOUSE
711 N. BRIDGE ST., CHIPPEWA FALLS, WI**

1. Confirmation of Meeting Notice
2. Call to order
3. Roll Call
4. Approve the Agenda
5. Members of the Public Wishing to be Heard
6. Consent Agenda
(Unless separation of an item is requested, all will be adopted in one motion)
 1. Approval of the Minutes of December 15, 2025 Meeting
7. Reports:
 1. Update on Strength, Weakness, Opportunities and Threats (SWOT) Analysis Planning from Garret Zastoupil, PhD
 2. Update on 738 Maple St. Chippewa Falls
 3. Update on 2026 CDBG Grant Application
 4. Update on HUD Notices
8. Business Items:
 1. Discuss and Approve the Financial Reports for October, November and December 2025
 2. Discuss and Approve the March 31, 2025 Audit
 3. Discuss and Act on the safety of CCHA staff.
 4. Discuss the future Executive Director evaluation tool.
 5. Discuss and Approve the workflow of the Employee Grievance Policy.
9. Agenda Items for Future Consideration
10. Schedule next meeting date – February 23, 2026
11. Adjournment

Cc: County Media, County Board Chairman, County Clerk and County Administrator

Persons needing additional accommodations should contact Richelle Rizzo at 715-726-7933.



Equal Opportunity

This Institution is an Equal Opportunity Employer and Housing Provider

Attachment to the Agenda of January 26, 2026 Meeting
Chippewa County Housing Authority (CCHA) Commission Meeting

Reports:

- 1. Update on Strength, Weakness, Opportunities, Threats (SWOT) Analysis Planning** – Garret Zastoupil, will collect feedback from the board.
- 2. Update on 738 Maple St** – On December 29, 2025, Rizzo was notified by our real estate agent that a pipe had broken inside the property and the basement was flooded. Rizzo contacted the insurance company and maintenance contacted a contractor. The buyer is still interested in purchasing the home and we will reschedule closing once the repairs are completed.
- 3. Update on 2026 CDBG Grant Application** – Application was submitted on December 17, 2025.
- 4. Update on HUD Notices** – CCHA has received notices regarding criminal activity, immigration status, and shortfall. A copy of the notices is included in the meeting packet.

Business Items:

- 1. Approval of the Financial Reports for October, November and December 2025** – The October, November and December financials will be distributed at the meeting.
- 2. Discuss and Approve the March 31, 2025 Audit** – The CCHA audit for FYE 2025 was completed on December 11, 2025. A copy of the audit report will be distributed at the meeting.
- 3. Discuss and Act on the safety of CCHA staff** – Discuss next steps to increase the safety of the staff.
- 4. Discuss the future Executive Director evaluation tool** – The commission will discuss the evaluation tool and who is on the small committee.
- 5. Discuss and Approve the workflow of the Employee Grievance Policy** – The commission will create a workflow for this policy.

**PUBLIC MEETING MINUTES
CHIPPEWA COUNTY HOUSING AUTHORITY
MONDAY, DECEMBER 15, 2025, AT 3:30 P.M.
ROOM 016 OF THE CHIPPEWA COUNTY COURTHOUSE**

1. CALL TO ORDER

Guthman called the meeting to order at 3:30 p.m.

2. ROLL CALL

Members present: Guthman, Artz, Rosenow. Hennick arrived at 3:45 p.m.

Members absent: Davis

Others present: Rizzo

3. APPROVAL OF THE AGENDA

Rosenow and Artz made a motion to approve the meeting agenda. Motion carried with all present voting aye.

4. MEMBERS OF THE PUBLIC WISHING TO BE HEARD

None

5. CONSENT AGENDA

Artz and Rosenow made a motion to approve the minutes of October 27, 2025, and November 10, 2025, meetings. Motion carried with all present voting aye.

6. REPORTS

1. Update on 738 Maple St. Chippewa Falls: Rizzo reported that the CCHA loan committee has approved a downpayment assistance loan in the amount of \$73,500 (\$18,375 in HOME funds, \$18,375 in HCRI funds, and \$36,750 in regional CDBG funds) with a closing date of January 16, 2026.

2. Update on 2026 CDBG Grant Application: Rizzo stated that she did receive a 24-hour extension from the state to submit Chippewa County's application by 6:00 p.m. on December 10, 2025. She also stated that she presented the resolution to the Executive Committee on 12/2/2025, the committee agreed to pass the resolution onto the County Board of Supervisors for the 12/9/2025 meeting. Rizzo would also host a CDBG public hearing during that meeting. The publication for that public hearing was published on 11/25/2025 in the Chippewa Herald. Rizzo reported that due to weather, the 12/9/2025 meeting was rescheduled for 12/16/2025 at 6:00 p.m. Rizzo also reported that she contacted the state and received a week extension with a due date of 12/17/2025.

3. Updates on RLF Small City Discontinuation: Rizzo reported that she held a Teams meeting with all small city municipalities on November 25, 2025, to discuss the items that CCHA will be handling and the municipalities responsibilities after the funds are returned. Rizzo stated that the CCHA staff is working on pulling paper files, re-recording 30-year mortgages, updating homeowners' insurance and working on the financials.

4. Updates on Housing Choice Voucher Shortfall: Rizzo report that CCHA has received the award letter for the shortfall application that she submitted in July. The letter stated that CCHA will be provided with additional shortfall funds to support the actual HAP needs, subject to availability.

5. Public Hearing Notice: Rizzo stated she will be holding a public hearing to discuss the housing authority's five-year plan on Monday, January 12, 2026 at 3:30 p.m. in Room 005 of the Chippewa County Courthouse. This public hearing was published in the Chippewa Herald on 11/26/2025.

6. Update on Yardi Financial Reports: Rizzo reported that Yardi has not yet imported the carryover balances from QuickBooks into Yardi which is delaying our Fiscal Manager from pulling the fiscal reports for October and November. Rizzo stated that this is in the final stages of testing and that the Fiscal Manager will verify the data within the next two weeks. The financials for October, November, and December will be reviewed in the January meeting.

7. BUSINESS ITEMS

1. Review and Approve the Civil Rights Certification for Annual Certification: Artz and Rosenow made a motion to approve the civil rights certification as printed. Motion carried with all present voting aye.

2. Resolution 2025-09 Revisions to the Bylaws: Rosenow and Hennick made a motion to approve the revisions to the Bylaws with the change of 5 days to 2 days on page 5, article 4 in the first paragraph. Motion carried with all present voting aye.

3. Discuss Strategic Planning: There was discussion about scheduling a meeting for a future date that would involve the board and all staff to address strategic planning. There was a suggestion that a Strength, Weakness, Opportunities and Threats (SWOT) analysis might be included in this meeting. It was also suggested that Rizzo contact Garret Zastoupil, PhD, Community Development Educator with UW-Extension to inquire if he would be available to lead strategic planning for CCHA's board and staff sometime this spring. The board also requested that Rizzo stay up to date with the local and regional homeless councils.

4. Discuss and Approve Insurance, Ethics and Harassment Policy Changes: Artz and Rosenow made a motion to approve the policies with a note on the Ethics and Harassment policies stating that CCHA has adopted the following county policy. Motion carried with all present voting aye.

5. The Commission will convene, upon passage of the proper motion, in close session pursuant to Wisconsin State Statute 19.85 (1) (c) Considering employment, promotion, compensation or performance evaluation data of any public employee over which the government body has jurisdiction or exercises responsibility; to review six-month performance evaluation of the Executive Director. The commission will reconvene to open session and continue with the agenda.

a) Motion by Artz and Hennick.

b) Roll Call Vote: Hennick (Aye), Rosenow (Aye), Artz (Aye), and Guthman (Aye) with the Commission going into closed session at 4:33 p.m.

Artz and Hennick made a motion to return to open session. Motion carried with all present voting aye.

Return to open session at 5:33 p.m.

8. AGENDA ITEMS FOR FUTURE CONSIDERATION

Guthman called for agenda items for future consideration. Discuss the Employee Grievance Policy.

9. SCHEDULE NEXT MEETING DATE

All agreed to schedule the next meeting for January 26, 2026.

10. ADJOURNMENT

Artz and Hennick made a motion to adjourn at 5:37 p.m. Motion carried with all present voting aye.

Respectfully Submitted,

Richelle Rizzo
Executive Director/Secretary to the Commission

Certified:

Pam Guthman
Commission Chair

Date

Richelle Rizzo

From: HUD Office of Public and Indian Housing <updates@pih.hud.gov>
Sent: Tuesday, November 25, 2025 3:44 PM
To: Richelle Rizzo
Subject: Message from Secretary Turner: Criminal Screening Responsibilities of PHAs and Owners

This is the first time you received an email from this sender (updates@pih.hud.gov). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Secured by Check Point



OFFICE OF PUBLIC & INDIAN HOUSING

November 25, 2025

PIH Grantees,

Please see the following letter from Secretary Turner ([download](#)):



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
THE SECRETARY**

November 25, 2025

Dear Public Housing Authorities and Owners:

The Trump administration is taking bold, critical steps to restore law and order in our communities and usher in a golden age for American prosperity. For America to prosper, our citizens must be safe and not in constant fear of being a victim of crime. President Trump is utilizing all available authorities and resources across the Federal government to reduce crime and keep our citizens safe. Here at the U.S. Department of Housing and Urban Development (HUD), we are taking inventory of our programs to ensure we are doing our part.

HUD, along with Public Housing Authorities (PHAs) and private owners of project-based rental assistance, has an obligation to ensure that we are providing decent, safe, and affordable housing to the millions of American families we serve. PHAs and owners must take all steps necessary to meet that obligation, including:

1. Screening for criminal history prior to admission into HUD-assisted housing;
2. Monitoring of assisted households to remove individuals that pose a threat to the safety and peaceful enjoyment of their units; and
3. Deploying resources to ensure the ongoing safety of such properties through physical security features and/or contracted safety services.

Unfortunately, past HUD guidance has created confusion about this obligation and has outright discouraged the use of such tools cited above to ensure the safety of HUD-assisted households.

To correct this, reduce confusion, and help our partners meet their obligations, HUD has rescinded: (1) Notice 2015-19, "Guidance for Public Housing Agencies (PHAs) and Owners of Federally-Assisted Housing on Excluding the Use of Arrest Records in Housing Decisions"; (2) a 2016 memo from HUD's Office of General Counsel on "Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions"; and (3) a 2022 memo from HUD's Office of Fair Housing and Equal Opportunity on "Implementation of the Office of General Counsel's Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions" on background screening. Together these guidance documents had a chilling effect on the use of some information to screen for suitability for and termination of tenancy. That will no longer be the case.

PHAs and owners are reminded of the mandatory screening requirements and optional screening policies available to them to meet their obligation to provide safe housing. These include:

Mandatory Denial of Admission:

HUD regulations require that prospective individuals must not be admitted to HUD programs if an individual:

- a. has been previously evicted from Federally-assisted housing within the past three years for drug-related criminal activity (24 CFR 960.204(a)(1), 24 CFR 982.553(a)(1)(i));¹
- b. is currently engaged in the illegal use of drugs or if such drug use reasonably would cause a threat to the safety of the individuals living in a property (24 CFR 960.204(a)(2), 24 CFR 982.553(a)(1)(ii)(A)-(B));
- c. has been convicted of producing methamphetamine in Federally-assisted housing (24 CFR 960.204(a)(3), 24 CFR 982.553(a)(1)(ii)(C));
- d. is subject to a lifetime sex offender list (24 CFR 960.204(a)(4), 24 CFR 982.553(a)(2)(i)); or
- e. has a history of alcohol abuse that a responsible entity reasonably believes threatens the health, safety or right to peaceful enjoyment of the property (24 CFR 960.204(b), 24 CFR 982.553(a)(2)(ii)(C)(3)).

Permissive Screening for Denial of Assistance

PHAs and owners have broad discretion to screen for suitability of tenancy or program participation for all relevant circumstances, including a history of criminal activity which would adversely affect the health, safety, and peaceful enjoyment of the property (24 CFR 960.203(c), 24 CFR 982.307(a), 24 CFR 982.553(a)(2)(ii)(A)).

Termination of Assistance for Criminal Behavior

PHAs must proactively ensure the safety of the families they serve. This means PHAs should continuously monitor for criminal activity and take steps to immediately act if information is found that could result in a termination of tenancy. PHAs and owners must also establish standards that allow for the termination of assistance for households if individuals within the households:

- a. engage in illegal drug use or have a pattern of drug use that threatens the health, safety or peaceful enjoyment of the property (24 CFR 966.4(l)(5)(i)(B), 24 CFR 982.553(b)(1)(i));
- b. have been convicted of production of methamphetamine in Federally-assisted housing (24 CFR 966.4(l)(5)(i)(A), 24 CFR 982.553(b)(1)(ii));²
- c. are engaging in drug-related criminal activity (24 CFR 966.4(l)(5)(i)(B), 24 CFR 982.553(b)(1)(iii);
- d. are engaged in violent criminal behavior (24 CFR 966.4(l)(5)(ii)(A), 24 CFR 982.553(b)(2)); or
- e. are abusing alcohol (24 CFR 966.4(l)(5)(vi), 24 CFR 982.553(b)(3)).

¹ PHAs and owners have the authority to admit such individuals if the individual has completed a drug rehabilitation program approved by the PHA or the circumstances that caused the eviction no longer exist.

² PHAs must immediately terminate tenancy or assistance for a family if the PHA determines that any member of the household has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.

As noted in Notice PIH 1996-16, "One Strike and You're Out' Screening and Eviction Guidelines for Public Housing Agencies," an essential element of a "One Strike" policy is to strictly enforce these lease provisions against all violators in a fair, uniform manner.

The safety of the families we serve is paramount to establish Federally-assisted housing as a platform for self-sufficiency and economic independence. I strongly recommend that local PHAs review existing policies and take advantage of all available tools to improve safety for communities and residents.

In addition to reviewing and revising your existing policies, all housing authorities and owners should publicly display and advertise for use the HUD Office of Inspector General (OIG) Hotline: 1-800-347-3735. The Hotline is the primary means to submit allegations of fraud, waste, abuse, mismanagement, illegal aliens, crime, or Whistleblower related matters within HUD and HUD funded programs to the OIG. All residents, staff, and management should also be directed to call 911 or local law enforcement if they are experiencing or have knowledge of health and safety emergency or witnessing an active crime involving gang, drug activity, sex trafficking, illegal aliens, or other violent crimes at HUD properties.

We at HUD stand ready to work and partner with you to make America safe again.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Scott Turner', with a stylized flourish at the end.

E. Scott Turner
Secretary

We hope you enjoy receiving these messages from HUD's Office of Public and Indian Housing (PIH). If you are not part of our listserv and would like to receive our monthly PIH Newsletter, please [subscribe](#).

Public Housing Agency contact information is retrieved from HUD's Public Housing Information Center (PIC).

If your agency's contact information is out of date, please update PIC with the correct contact information.

We update our email lists from PIC twice a month, so you should see your change reflected after two weeks.

Thank you for furthering HUD's mission in the communities you serve.



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

PRINCIPAL DEPUTY ASSISTANT SECRETARY
FOR PUBLIC AND INDIAN HOUSING

Dear Executive Director,

On February 19, 2025, President Trump issued Executive Order 14218, *Ending Taxpayer Subsidization of Open Borders*, which directs HUD to ensure that taxpayer-funded benefits exclude any ineligible alien. Secretary Turner and I take very seriously our obligation to ensure that taxpayer funding only goes to supporting American citizens and other eligible households. That is why I am writing to you today to remind you of your obligation to take the necessary steps to ensure that assistance only goes to eligible individuals.

As you know, eligibility for federal housing assistance is limited to U.S. citizens and noncitizens who have eligible immigration status. Section 214 of the Housing and Community Development Act of 1980 prohibits HUD from making financial assistance available to ineligible noncitizens.

To ensure that ineligible individuals are not assisted, Public Housing Agencies (PHAs) are required to document and verify the citizenship or eligible immigration status of individuals prior to admission to the Public Housing or Housing Choice Voucher program, and to prorate assistance for any households where ineligible noncitizens reside.¹ PHAs also must notify the Department of Homeland Security (DHS) of anyone the PHA knows is not lawfully present in the United States.

This letter serves to remind you of the current steps that PHAs must take to verify citizenship and immigration status. HUD strongly encourages PHAs to require that families provide proof of citizenship by such means as birth certificates, naturalization certificates, passports, or other documentation. Further, I want to remind you of the requirement to obtain and document Social Security Numbers (SSNs), which is vital to verifying the identity of assisted family members. This letter also reminds PHAs that they must run the Enterprise Income Verification System (EIV) Identity Verification Report monthly and correct deficiencies within 30 calendar days when the report indicates that tenants' identities cannot be confirmed.

If your PHA has any pending verifications on the Immigration Report, HUD expects you to complete verification immediately and update all applicable records. HUD is developing a new report in EIV to provide better insight for PHAs about the necessary verifications for such families and will begin following up with all PHAs with any pending verifications or other discrepancies imminently.

PHAs may be subject to sanctions for failure to use EIV's Identity Verification and Immigration Reports as directed. Noncompliance with SSN disclosure and verification requirements can also lead to assessment of disallowed costs. This letter also reminds you of the current requirements related to calculating prorated assistance for mixed-status households.

¹ HUD is currently working on a rule that would align regulations with the statutory language in Section 214. HUD anticipates that rule to be published in the next 45 days.

PHA Requirements for All Applicants

Documentation of Citizenship or Eligible Immigration Status

The citizenship or eligible immigration status of each family member, regardless of age, must be determined prior to admission to the Public Housing or Housing Choice Voucher program. Likewise, citizenship or eligible immigration status must be determined prior to adding any individual to an existing assisted household. Once citizenship or immigration status documents have been submitted and verified for an individual, such documentation will not need to be collected again.

U.S. citizens or U.S. nationals (or the parent/guardian for family members under age 18) must sign a declaration of their status, under penalty of perjury. PHAs may adopt policies requiring additional documentation to verify U.S. citizenship. HUD strongly encourages PHAs to require that families provide proof of citizenship by such means as birth certificates, naturalization certificates, passports, or other documentation.

Eligible noncitizens (or the parent/guardian for family members under age 18) also must sign a declaration of their status, under penalty of perjury. Eligible noncitizens who are 62 years of age or older must additionally provide proof of their age. Eligible noncitizens under 62 years of age must provide supporting documentation of their immigration status and sign a verification consent form. Supporting documentation consists of documentation accepted by the U.S. Citizenship and Immigration Services (USCIS)—for example, a Form I-551 U.S. Permanent Resident Card.

Family members who do not sign a declaration of their status or provide the required supporting documentation will be considered ineligible for housing assistance. The head of household must sign a statement listing all family members who do not claim to be citizens, nationals, or eligible immigrants, or whose status cannot be confirmed.

Verification of Immigration Status

PHAs must verify eligible immigration status through USCIS. The primary method for verifying eligible immigration status is USCIS's automated system, [Systematic Alien Verification for Entitlements \(SAVE\)](#). PHAs must enroll in SAVE, following instructions on HUD's [EIV webpage](#). Access to SAVE is granted to specific PHA employees, so PHAs are responsible for ensuring they maintain uninterrupted access to SAVE. HUD is actively engaging USCIS to establish protocols to monitor PHA access to ensure that PHAs maintain access to complete their obligations. PHAs may e-mail SAVE.help@uscis.dhs.gov for any issues with SAVE access.

The SAVE system provides the applicant's current immigration status or naturalized, acquired, or U.S.-born United States citizenship information. The PHA must determine whether the applicant's status makes them eligible for assistance consistent with Section 214. PHAs must retain documentation of SAVE verification in tenant files. Appendix A provides a crosswalk of SAVE responses and eligibility for HUD assistance under Section 214.

If SAVE cannot confirm an individual's eligible immigration status, or if the response in SAVE verifies an immigration status that is not eligible for assistance under a Section 214 covered program, then the PHA must submit a request for secondary or additional verification to USCIS

within 10 days of receiving the initial results. The PHA must scan and upload information to USCIS as needed or required to obtain a verification response.

If the secondary or additional verification fails, the PHA must notify the family and inform them of their right to file an appeal with USCIS. If the family wants to exercise their right to file an appeal with USCIS, they must submit a written request to USCIS within 30 days of the notification. USCIS will render a decision to the family and forward a copy to the PHA.

Assistance must be denied when primary and secondary verification do not verify eligible immigration status and the family does not pursue a USCIS appeal or informal hearing rights, or decisions are rendered against the family through a USCIS appeal or informal hearing.

The PHA must not delay, deny, reduce, or terminate assistance because of a delay in the process of determining eligible status, unless the family causes the delay. While the PHA may not admit any individual prior to receiving required documentation, the PHA may elect to provide prorated assistance to the family prior to completing the verification process.

Prorated Assistance for Mixed-Status Families

If one or more members of a family elect not to contend eligible immigration status, and other members of the family establish their citizenship or eligible immigration status, the family may be eligible for continued assistance, temporary deferral of termination of assistance, or prorated assistance. Prorated assistance means the family will receive only a portion of the subsidy for which a fully eligible family would qualify. PHAs must calculate the proration based on the number of members who are citizens or who have eligible immigration status.

HUD regulation requires that if the PHA determines that a family has knowingly permitted an ineligible noncitizen (other than any ineligible noncitizen listed on the lease) to permanently reside in the unit, then the family's lease must be terminated, and the family may not be readmitted for a period of 24 months.

Requirement to Report Individuals Not Lawfully Present in the United States

Section 404 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) requires HUD and PHAs to notify DHS of any individual that HUD or the PHA knows is not lawfully present in the United States.

When reviewing applicants for assistance, if a PHA formally makes a finding of fact or conclusion of law, supported by a determination from DHS or the Executive Office of Immigration Review (e.g., a Final Order of Deportation), that an individual is not lawfully present in the United States, then the PHA must provide to DHS a report of the person's name, address, and other identifying information that the PHA has. Note that a SAVE response of no service record or verification of an immigration status that makes the individual ineligible for housing assistance is not a finding of fact or conclusion of law that the individual is not lawfully present. At least four times annually, PHAs must provide such information to DHS. If a PHA has knowledge of an individual who is not lawfully present in the United States, they must provide a report to DHS within 45 days after the close of the appropriate calendar year quarter, by sending an e-mail to benefitgrantingletters@uscis.dhs.gov.

Social Security Numbers and Alternate IDs

PHAs must require applicants to disclose and document Social Security Numbers (SSNs) of all family members except ineligible noncitizens, as a condition of admission and continued assistance. Likewise, adding new household members to a family first requires SSN disclosure. When adding a child under age 6 who does not yet have an SSN, the family must disclose and document the SSN for the child within 90 days of their addition to the household.

PHAs must obtain SSN documentation, keep a copy in the household file, record the SSN on line 3n of the form HUD-50058, and transmit the HUD-50058 to HUD.

HUD uses the SSN (along with name and date of birth) to validate a person's identity, obtain employment and income information via computer matching programs with other federal sources, and ensure duplicate assistance is not being paid. HUD uses the EIV Identity Verification report to verify identities. SSNs are validated against the Social Security Administration's (SSA) database. EIV will report the status of the identity verification process, and PHAs must take action to correct the record for anyone whose identity verification fails. If the verification fails and SSA reports that the SSN is not found in their records, the PHA must request the original SSN card and confirm the number. For continued SSN verification failures, PHAs must notify HUD, OIG, or other law enforcement agencies.

PHAs must run the EIV Identity Verification Report monthly and correct deficiencies within 30 calendar days when the report indicates that tenants' identities cannot be confirmed.

In very limited circumstances, PHAs will use an alternate ID (generated by the IMS-PIC Tenant ID Management module) for an individual instead of an SSN:

- Individuals not subject to the SSN disclosure requirement (born on or before 1/31/1948, whose initial eligibility determination was begun before 1/31/2010) (24 CFR 5.216(e)). They could permanently use an alternate ID as their unique identifier.
- Individuals under 6 who do not have an SSN when added to the household (e.g., newborn). They will use an alternate ID for 90-180 days while the SSN is being obtained from SSA (see 24 CFR 5.216(e)(2)(ii), Notice PIH 2018-24). Once the SSN is provided, the PHA will replace the alternate ID with the SSN.
- Individuals who do not contend eligible immigration status and do not disclose an SSN (24 CFR 5.216(a), 5.508).
- Individuals flagged on an Invalid Tenant ID Report or Possible Duplicate Tenant Report in IMS/PIC. Individuals could be flagged due to a tenant or PHA data entry error, SSA record error, or possible duplicate personal data with an individual at another PHA. The PHA may assign them an alternate ID temporarily while the issue is resolved. PHAs must expeditiously resolve these issues, and once SSN documentation is received, PHAs must replace alternate IDs in IMS/PIC within 30 calendar days.

HUD monitors each PHA's Identity Verification Report. PHAs may be subject to sanctions for failure to use EIV's Identity Verification Report as directed. Noncompliance with SSN disclosure and verification requirements can also lead to assessment of disallowed costs.

PHAs will utilize the EIV Immigration Report monthly to monitor their own compliance with immigration verification requirements. The Immigration Report summarizes what the PHA has reported to HUD regarding the citizenship status of each individual in their programs (i.e., how many are citizens, eligible noncitizens, ineligible noncitizens, or pending verification). It also identifies how many individuals have an IMS-PIC-generated alternate ID rather than an SSN. PHAs should use the Immigration Report to ensure they are updating records for individuals whose immigration status was initially pending verification, replacing alternate IDs with SSNs, and confirming compliance with proration requirements for mixed families.

If your PHA has any pending verifications on the Immigration Report, HUD expects you to complete verification immediately and update all applicable records. HUD will begin following up with all PHAs with any pending verifications imminently.

Sincerely,



Benjamin R. Hobbs
Principal Deputy Assistant Secretary
Office of Public and Indian Housing

Resources

Refer to the following resources for additional details on the requirements to document and verify citizenship, eligible immigration status, and Social Security numbers:

- Federal Regulation:
 - [24 CFR Part 5 Subpart B – Disclosure and Verification of Social Security Numbers and Employer Identification Numbers; Procedures for Obtaining Income Information](#)
 - [24 CFR Part 5 Subpart E – Restrictions on Assistance to Noncitizens](#)
- [Public Housing Occupancy Guidebook – Eligibility Determination and Denial of Assistance](#)
- [Housing Choice Voucher Program Guidebook – Eligibility Determination and Denial of Assistance](#)
- [65 FR 58301, “Responsibility of Certain Entities to Notify the Immigration and Naturalization Service of Any Alien Who the Entity ‘Knows’ is Not Lawfully Present in the United States”](#)
- [PIH Enterprise Income Verification \(EIV\) System webpage](#)
- [Notice PIH 2018-24, “Verification of Social Security Numbers \(SSNs\), Social Security \(SS\) and Supplemental Security Income \(SSI\) Benefits; and Effective Use of the Enterprise Income Verification \(EIV\) System’s Identity Verification Report”](#)
- [Notice PIH 2023-27, “Implementation Guidance: Sections 102 and 104 of the Housing Opportunity through Modernization Act of 2016 \(HOTMA\),” Attachment J](#)

Appendix A: Crosswalk of SAVE System Responses² and Section 214 Eligibility for HUD Assistance³

SAVE Response	Section 214 Eligibility Status
<ul style="list-style-type: none"> • United States Citizen; • Lawful Permanent Resident (LPR) – Employment Authorized; • Lawful Permanent Resident (LPR) – Employment Authorized Indefinitely; • Conditional Resident – Employment Authorized; • Conditional Resident; • Conditional Entrant – Employment Authorized Indefinitely; • Parolee; • Parolee Indefinite – Not Employment Authorized; • Parolee Indefinite – Temporary Employee Authorized; • Parolee Expires – Not Employment Authorized; • Parolee Expires – Temporary Employment Authorized; • Refugee – Employment Authorized; • Refugee – Employment Authorized – Indefinite; • Asylee – Employment Authorized; • Asylee – Employment Authorized – Indefinite; • Family Unity -Temporary Employment Authorized; • Non-Immigrant Employment Authorized – Indefinite; <ul style="list-style-type: none"> ○ Non-immigrants who are citizens of either the Federated States of Micronesia, the 	Eligible for HUD Assistance

² **These SAVE verification responses indicate Section 214 eligibility or ineligibility.** SAVE recommends that agencies also consider any Class of Admission (COA) code provided, in conjunction with the SAVE status response and immigration document presented, for further information about the individual's immigration status. PHAs should consult the guidance and manuals SAVE provides on understanding SAVE verification responses.

³ HUD assistance is defined as rental assistance in the public housing or housing choice voucher programs.

SAVE Response	Section 214 Eligibility Status
<p>Republic of the Marshall Islands, or Palau.</p> <ul style="list-style-type: none"> • Cuban/Haitian Entrant; • No Status – Granted Withholding of Removal – Employment Authorized Indefinitely; • Violence Against Women Act (VAWA) – Self-Petitioner – Temporary Employment Authorized; • VAWA Self-Petitioner; and • VAWA Self-Petitioner – Not Employment Authorized. 	
<ul style="list-style-type: none"> • Non-Immigrant • Non-Immigrant – Temporary Employment Authorized; • Non-Immigrant – Temporary Employment Authorized – Indefinite; • Non-Immigrant – Not Employment Authorized; • Non-Immigrant – Employment Authorized CNMI Only; • Student Status Temporary Authorized; • If Principal – Temporary Employment Authorized; • If Principal or Spouse – Temporary Employment Authorized; • Temporary Resident – Temporary Employment Authorized; • Deferred Action for Childhood Arrivals (DACA) – Employment Authorized; • Temporary Protected Status (TPS) – Employment Authorized; • Application Pending (Form I-589 Asylum); • Application Pending (Form I-485 Adjustment of Status) – Temporary Employment Authorized; • Application Pending; 	<p>Ineligible for HUD Assistance</p>

SAVE Response	Section 214 Eligibility Status
<ul style="list-style-type: none"> • Application Pending – Temporary Employment Authorization; • Application Pending – Not Temporary Employment Authorization; • Deferred Action Status (DAS); • Deferred Action Status (DAS) – Not Employment Authorized; • Deferred Enforced Departure (DED); and • No Status; • No Status – Released on an Order of Supervision – Temporary Employment Authorized; • No Status – Employment Authorized Indefinitely; and • No Status Temporary Employment Authorized. 	
<ul style="list-style-type: none"> • Immigration Enumerator Required – Resubmit with Additional Information; • Institute Additional Verification; • Institute Third Level Verification; • No Record Found with SSA – Resubmit with Additional Information; • Temporary Employment Authorized; • Resubmit Doc; • Verification in Process; • Continue to Process; • Unable to Process; • Null; • Expired Document; • Document Appears to be Altered; and • Document Appears to be Counterfeit. 	<p>More information is required to classify the individual's immigration status, following up with DHS and/or the individual may be necessary</p>

Richelle Rizzo

From: HCV-Updates <HCV-Updates@hud.gov>
Sent: Monday, December 22, 2025 3:50 PM
To: Richelle Rizzo
Subject: An Important Note on PHA Budget Management in 2026 for WI248

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Secured by Check Point

December 22, 2025

Dear Executive Director,

Thank you for your continued partnership in administering the Housing Choice Voucher (HCV) program, especially as the program has navigated historic levels of funding shortfalls. As I wrote to you back in June, it is critically important that you prudently manage your HCV program budget and now I am writing to emphasize that this remains an essential responsibility of PHAs as we head into 2026.

While rent inflation has been historically high over recent years, it has moderated significantly nationally. Unfortunately, HUD has not seen corresponding moderation in national HCV program costs, and many PHAs are now on pace to see significant funding shortfalls again in 2026. **PHAs must take measures now to reduce program costs** to ensure that expenditures do not exceed their anticipated 2026 funding.

Although PHAs will not know their full 2026 housing assistance payments (HAP) funding allocation until Congress passes a full year appropriations bill, the decisions made now will heavily influence whether your PHA will be in shortfall. To help your PHA plan, HUD has provided in the attachment below your PHA's estimated 2026 inflation factor and our calculation of your per unit cost inflation for the prior six months. HUD also encourages PHAs to use the two year projection tool to assist with understanding their potential shortfall in 2026. Your agency should immediately take steps to stay within your projected annual funding allocation, and not rely on excess HAP reserves to fund your program.

HUD's tools to address funding shortfalls in 2026 are limited, and HUD cannot guarantee that funding will be available to your PHA to resolve any shortfall. HUD is currently assessing its 2026 shortfall funding eligibility criteria, and potentially will consider whether the PHA has continued or newly implemented cost-savings measures after receipt of this letter. Additionally, HUD is considering establishing a policy, once there is a full year appropriations bill, that would take into account the number of previous shortfall awards a PHA has received in determining eligibility, prioritization, and/or the amount of any 2026 shortfall award.

To avoid terminations of assistance, we are recommending all PHAs implement cost savings measures, including, but not limited to:

- Cease issuance of new vouchers (with the exception of HUD-VASH participants and newly awarded

Foster Youth to Independence (FYI) vouchers)

- Pause entering into new project-based voucher agreements and commitments (with the exception of public housing repositioning efforts)
 - o HUD strongly encourages PHAs to consider the most cost-effective methods of responsibly repositioning, including the Section 18 program
- Reduce payment standards, including ending the use of any approved exception payment and remain within the basic range except for reasonable accommodations as necessary
- Assess rent reasonableness policies and procedures to ensure compliance with statutory and regulatory requirements
- Adopt other cost savings measures in [PIH Notice 2025-28](#), “Cost-Savings Measures in the Housing Choice Voucher (HCV) and Project-based Voucher program.”

All PHAs that received shortfall awards in 2025 are currently considered to be at-risk of a funding shortfall in 2026, and must continue to adhere to the Action Plan created with the Shortfall Prevention Team. This means that your PHA **may not issue vouchers** except in the very limited circumstances allowable under the Action Plan, and also must continue to implement cost-savings measures. PHAs that do not continue adherence to their Action Plan may be ineligible for shortfall funds in 2026.

HUD is making available technical assistance throughout 2026 to help PHAs plan for prudent budget management. Please email shortfallinquiries@hud.gov to request assistance. Thank you for everything that you and your staff do to serve your community.

Respectfully,



Benjamin Hobbs
Principal Deputy Assistant Secretary
Office of Public and Indian Housing

Attachment: Program Estimates for 2026

This attachment provides various program estimates that may be helpful for PHAs in estimating their overall HAP funding eligibility for 2026. HUD cautions that these are only estimates. As a reminder, PHAs will not learn their 2026 funding levels until after Congress passes a final full year appropriations bill.

In the annual appropriations act, Congress directs HUD how to calculate HAP renewal eligibility, and these factors are subject to change. Typically, however, the appropriations act requires HUD to rebenchmark HAP renewal formula eligibility based on validated Voucher Management System (VMS) leasing and cost data for the prior CY (January 1 – December 31). HUD then applies a renewal funding inflation factor (RFIF) to each PHA's prior year expenditures, along with any proration factor and funding offset. For further details please see [PIH Notice 2025-13](#) pages 4-6.

Each year HUD publishes final Renewal Funding Inflation Factors after the appropriations act is finalized. The RFIFs reflect the amount of inflation estimated for your per unit costs in 2026. Until the RFIFs are published, they are subject to change. However, HUD has estimated what your PHA's RFIF will be in 2026:

PHA RFIF: 5.29%

Each PHA reports leasing and housing assistance payments (HAP) into VMS monthly, and from those data HUD estimates what the per unit cost (PUC) is for your HCV program. The amount of change in the PUC over recent months can be an indicator of whether your HAP expenses are aligned with estimated inflation or are increasing at a pace higher than inflation. HUD has examined your PHA's per unit cost trend based on VMS data reported on March and September 2025 and annualized that average monthly PUC growth for comparison purposes. If your PUC trend is higher than your RFIF above, your PHA is likely at high-risk of funding shortfall in 2026. While the RFIF is not yet final, it is not appealable. HUD strongly recommends immediate cost-savings measures if your per unit cost inflation exceeds the RFIF or if there are other good reasons to believe that your PHA faces elevated shortfall risks in 2026. In addition, if you believe that HUD's estimated PUC trend is incorrect, please review your reported monthly HAP and Unit Months Leased (UML) in VMS and make any necessary corrections.

PHA Projected Annualized PUC growth: 15.35%