



Housing Consultants of America

HOTMA IMPLEMENTATION CHECKLIST

A practical readiness tool for affordable housing teams

Use this checklist to organize your property's HOTMA implementation work. Because applicability and effective dates can vary by HUD program and agency direction, confirm current HUD guidance, your contract administrator or PHA requirements, and any program-specific instructions before changing policies, forms, calculations, or software.

1. Leadership & Implementation Planning

- Identify which HOTMA provisions apply to each housing program and property in your portfolio.
- Assign an implementation lead and define responsibilities for compliance, operations, training, and software.
- Confirm the applicable implementation/effective dates and maintain documentation supporting your timeline.
- Create a written implementation plan with milestones, owners, and completion dates.

2. Policies, Plans & Procedures

- Review and update occupancy, admissions, recertification, interim, verification, and asset policies as applicable.
- Review the Tenant Selection Plan, ACOP, Administrative Plan, EIV procedures, and other program documents when applicable.
- Update written procedures for income, assets, deductions, exclusions, hardship provisions, and interim changes.
- Establish version control so staff know which policy and form is currently approved for use.

3. Forms, Notices & Resident Communication

- Inventory certifications, questionnaires, verification forms, notices, worksheets, and resident-facing documents.
- Replace or revise outdated forms only when authorized and appropriate for the program.
- Prepare resident communications explaining relevant process or documentation changes in plain language.
- Retain required notices and implementation records in an organized location for future reviews.

4. Income, Assets & Deductions

- Train staff on current HOTMA definitions of income, assets, exclusions, and applicable deductions.
- Review procedures for asset verification, imputed income, self-certification, and thresholds where applicable.
- Confirm treatment of student earned income, adoption assistance, retirement accounts, trusts, and other special income/asset categories.
- Build a quality-control review into calculations before certifications are finalized.

5. Interim & Annual Recertification Workflows

- Update workflows for annual and interim recertifications based on the requirements applicable to your program.
- Define when residents must report changes and when management must process an interim adjustment.

- Review how earned and unearned income changes are handled under the applicable HOTMA rules.
- Document exceptions, hardship situations, and management decisions consistently.

6. Software & System Readiness

- Confirm your property-management/compliance software is configured for the HOTMA rules currently applicable to your program.
- Test calculations, certifications, notices, and data interfaces before relying on system automation.
- Document software updates and vendor guidance and retain evidence of testing.
- Create a manual escalation process for cases where system calculations appear inconsistent with program requirements.

7. Staff Training & Quality Control

- Provide role-specific HOTMA training to property managers, compliance staff, leasing staff, and supervisors.
- Use sample files and scenarios to test staff understanding before full implementation.
- Conduct second-level reviews of early HOTMA certifications to identify recurring errors quickly.
- Schedule refresher training when HUD guidance, software, or internal procedures change.

8. File Review & Audit Readiness

- Perform targeted file reviews after implementation to verify the new procedures are being applied consistently.
- Confirm documentation supports eligibility, income, assets, deductions, rent calculations, and required notices.
- Track deficiencies, corrective actions, responsible parties, and completion dates.
- Keep implementation guidance, training records, policies, testing results, and quality-control documentation audit-ready.

FINAL READINESS CHECK

■ Policies updated ■ Staff trained ■ Software tested ■ QC completed

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Disclaimer: This checklist is a general educational resource and is not legal advice. HOTMA implementation requirements, timing, and applicability may vary by HUD program and subsequent guidance. Always verify current requirements with HUD and the applicable administering or monitoring agency.