

Inconsistent Administration of Project-Based Section 8 Utility Allowances Threatens Low-Income Families

*A Study by the Housing Preservation Project and the
Sargent Shriver National Center on Poverty Law
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Contrary to HUD's responsibilities under federal statutes and regulations, the Section 8 Renewal Policy Guide Book, which governs rent adjustments for most project-based Section 8 projects, provides no guidance on updating tenant utility allowances. This study of the policies regarding utility allowance adjustments of agencies administering project based Section 8 contracts indicates that, as the result of this lack of guidance and of conflicting direction from HUD area offices, there is a wide disparity among Section 8 contract administrators in their utility allowance requirements. It is likely that a substantial number of residents of housing with project-based Section 8 contracts are paying more than the statutory 30% of adjusted income for gross rent as the result of utility allowances not keeping up with utility cost increases. HUD's continuing failure to correct this situation constitutes a serious violation of federal statutes as well as a violation of the equal protection clause of the U.S. Constitution.

Background:

The United States Housing Act provides that residents of project-based Section 8 housing are to generally pay 30% of adjusted income for housing.¹ HUD's regulations implementing the statute recognize that the 30% of income payment must include a reasonable allowance for utilities paid for by the tenants.² HUD is responsible for determining the amount of the utility allowance.³ The regulations for each of the project-based Section 8 programs require that project owners submit an analysis of utility allowances when requesting a rent increase. Regulations also require project owners to submit an analysis and request a utility allowance adjustment when rate changes would result in a 10% increase in the most recently approved allowance schedule.⁴ Regular adjustments to the utility allowances are economically important to Section 8 project residents, over half of whom nationally have incomes of less than \$10,000.⁵

However, HUD's Section 8 Renewal Guide Book, which governs rent setting upon contract renewals and rent adjustments for multi-year contracts under the Multifamily Assisted Housing Reform and Affordability Act of 1997 (MAHRAA) does not set out any requirements that owners submit utility analyses when requesting contract renewals or annual rent adjustments or when rates increase by at least 10%. HUD Form 9625, the worksheet for Operating Cost Adjustment Factor (OCAF) rent adjustments, does not mention utility allowances or gross rents. In contrast to OCAF rent adjustments, the Guide Book at Section 4-3 provides that budget based revisions are to be guided by Chapter 7 of HUD handbook 4350.1, which clearly requires utility analyses with each rent adjustment request. The Guide Book therefore appears to direct owners seeking OCAF rent adjustments to disregard the regulations which governed the projects' original terms with respect to utility analyses. Proposed amendments to the Guide Book do not address these problems.

The Guide Book thus provides different instructions regarding owners' updating of the adequacy of utility allowances depending on whether the owner uses OCAF or budget-based adjustments. There is no rational basis for this distinction. There is also no rational basis for the difference between the Guide Book's treatment of utility allowances with OCAF rent adjustments and the requirements of the Section 8 regulations cited above. The failure of the Guide Book to require regular utility allowance analyses by owners who rely on OCAF rent adjustments is, on its face, a violation of the equal protection provisions of the U.S. Constitution and of the statutory limitation of rents to 30% of income.⁶

A related issue is that a federal statute⁷ requires that tenants be notified and provided an opportunity to comment on proposed rent increases. However HUD has taken the position that no tenant comments are required with OCAF rent adjustments.⁸ While tenants may not typically have reason to comment on OCAF rent adjustments, they may have reason to comment on the utility allowance analyses that ought to accompany all rent adjustments. HUD's current policy violates the statute.

The Study:

Given these shortcomings in the Guide Book's treatment of utility allowances, the Housing Preservation Project (HPP) and the Sargent Shriver National Center on Poverty Law (Shriver Center) researched HUD's Section 8 contract administrators and the projects they cover.⁹ Over the summer of 2010, the organizations searched the contract administrators' websites for explicit instructions on OCAF rent increases indicating: 1) that any request for an OCAF rent adjustment must be accompanied by a utility analysis; 2) that one must also be submitted any time utility rates increase by at least 10%; and 3) that tenants must be notified and given a 30 day period to comment on any rent adjustment request, including OCAF rent adjustments. In the absence of explicit instructions, the HPP and the Shriver Center followed up with personal inquiries into the contract administrators' utility allowance and tenant comment policies. We examined the policies of all 47 contract administrators¹⁰, covering 15,485 properties.¹¹ The results are summarized in the table below and set out in detail in the attached tables.

The study found substantial variance in the treatment of utility allowances among HUD's Section 8 contract administrators. Some explicitly require utility analyses with every OCAF adjustment (eg. Southwest Housing Compliance Corporation).¹² However it appears that at least 12 contract administrators with 4,530 properties do not require a utility analysis with each request for an OCAF rent increase.¹³ Several contract administrators that were contacted directly were adamant that HUD does not require utility analyses with OCAF adjustment requests. A Michigan Multifamily Asset Managers (MMAM) staff member stated that MMAM interprets the absence of reference to OCAF utility allowance analyses in HUD Handbook 4350.1, as not requiring such analyses at contract renewal or rent adjustment. Members of the National Council of State Housing Agencies report that HUD area offices provide conflicting direction to contract administrators regarding utility allowance adjustments in conjunction with OCAF rent adjustments. So HUD offices are directly responsible for much of this disparity, and all of the disparity is attributable to HUD's failure to address the issue in the Guide Book. Seven contract administrators with 2,324 properties do not require utility analyses and requests for utility allowance adjustments with a 10% utility rate increase. These include the West Virginia and Wisconsin administrators, which do require analyses with each OCAF adjustment. Unless contract administrators clearly require owners to submit these adjustment requests it is highly likely that significant rate increases will result in residents paying more than the statutory 30% of income for gross rents.

The problem is exacerbated by the fact that, in violation of a federal statute¹⁴ which requires that tenants be notified and provided an opportunity to comment on any owner requests for rent increases, 26 contract administrators with 10,430 properties do not provide a tenant right to comment on owners' requests for OCAF adjustments. When contacted directly, a California Affordable Housing Initiatives (CAHI) staff member stated that the San Francisco HUD office had directed CAHI to require tenant comment for budget-based, but not OCAF adjustments. HUD's draft Guide Book revisions also explicitly provide that no tenant comments are necessary for OCAF rent adjustments.

Summary Table

	No UA analysis with each rent request:	No UA Adjustment with 10% rate increase:	No right to Tenant Comment:
# of Agencies	12	7	26
# of Properties	4,530	2,324	10,430

Because there are no provisions for utility allowance analyses or adjustments set out in the Guide Book, it seems clear that HUD does not require utility analyses and utility allowance adjustments with OCAF rent increases on the approximately 2,700 properties with contracts which HUD administers directly.¹⁵ Thus a substantial proportion of the Section 8 properties in the country operate without clear requirements that utility allowances be regularly reviewed and updated. A recent case in Texas illustrates the potential serious adverse effects on residents. In 2009, the Texas Tenants Union found that utility allowances at the Village of Kaufman Section 8 project had not been adjusted since the late 1990s. When HUD finally approved new allowances in 2009, those for 2-bedroom units increased from \$47/month to \$155/month. It was clear in that case that for at least the past several years, these residents, with extremely low income, had been paying about \$100 per month more than the statutory 30% of income.¹⁶

We believe that HUD must correct this problem by clearly providing in the Guide Book that owners must submit a utility analysis with each rent adjustment, whether by OCAF or budget-based and whenever utility rate increases would result in a utility allowance increase of at least 10%. The Guide Book must also comply with federal law and require that residents have notice of, and a right to comment on, all rent adjustments. Failure to make these corrections will result in HUD's continued violation of the central affordability guarantee of the United States Housing Act and the equal protection provision of the United States Constitution, to the financial detriment of thousands of low-income tenants.

If you have questions, please call Jack Cann at HPP, 651-642-0102 or Katherine Walz at the Shriver Center at 312- 368-2679.

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¹ 42 U.S.C. § 1437a(a)(1).

² 24 C.F.R. §§ 5.628(a) (total tenant payment is generally 30% of income); 5.634(a) (tenant rent to owner is total tenant payment minus utility allowance).

³ 24 C.F.R. § 5.603(b), definition of "utility allowance": "...an amount equal to the estimate...of the monthly cost of the reasonable consumption [of tenant-paid utilities] by an energy conservative household of modest circumstance..." Given this definition, it is inevitable that some tenants paying their own utilities will pay more than 30% of income, even with a reasonable and current utility allowance, and some will pay less, depending on actual utility usage.

⁴ 24 C.F.R. §§ 880.610 (new construction, incorporated into rehabilitation by 881.601 and HFA Set-aside by 883.701); 886.126 (loan management); 886.326 (disposition).

⁵ Picture of Subsidized Households, 2008, at: <http://www.huduser.org/portal/picture2008/index.html>.

⁶ 42 U.S.C. §§ 1437a(a)(1).

⁷ 12 U.S.C. § 1715z-1b(b)(1).

⁸ This is HUD's current position as related by staff from California Affordable Housing Initiatives. It is also the position set out in changes in the Guide Book recently proposed by HUD.

⁹ <http://www.hud.gov/offices/hsg/mfh/rfp/state/rfpassignmentlist.pdf>

¹⁰ There are actually slightly fewer contract administrators. The Bremerton Housing Authority Contract Management Services administers contracts in a large number of areas, in conjunction with other entities. Policies differ among the areas administered to the table of Study Results treats several Bremerton contracts separately.

¹¹ The websites of four administrators provided no information on utility allowance requirements and there was no response to repeated attempts to contact the agencies directly. See notes 10-13 on attached table. In addition, we were unable to contact a fifth agency, but inferred from its website that utility analyses were not required for OCAF rent increases. See note 4 on attached table.

¹² See <http://www.shccnet.org/adjustments/utility-allowance.asp>.

¹³ The Bremerton Housing Authority contracts in Arizona, Utah and Washington are included in this group; in these areas owners are required to update utility analyses every three years.

¹⁴ 12 U.S.C. § 1715z-1b(b)(1).

¹⁵ Estimate is based on subtracting projects administered by others from total projects covered by Section 8 contracts from data at <http://www.hud.gov/offices/hsg/mfh/exp/mfhdiscl.cfm>.

¹⁶ The Kaufman example illustrates the potential magnitude of economic injury to low income residents resulting from a failure to regularly update utility allowances. Of course, not all such failures will be as long-term and as dramatic as in Kaufman. Some owners may regularly update utility allowances even if not required to do so and sometime utility rates actually go down. But, given the very large number of projects operating without proper guidance, it seems virtually certain that the statutory rent limit is often violated, and that the overall economic injury to low-income residents is very substantial.

STUDY RESULTS

See notes in last column and below table

Performance-Based Contract Administrators	States	Number of Properties Administered	UA with each rent request?	UA with 10% rate increase?	Tenant right to comment?	Notes
Arizona Public Housing Agency	Arizona	113	no	no	no	
Housing Authority of the City of Bremerton	Utah, Washington	473	no	?	no	1,2,3
Jefferson County Assisted Housing Corp	Alabama, Connecticut, Mississippi	969	no	no	no	
Missouri Housing Development Commission	Missouri	368	no	no	no	
Rhode Island Housing and Mortgage Finance Agency	Rhode Island	177	no	no	no	
Colorado Housing Finance Agency	Colorado	272	no	?	yes	4
California Affordable Housing Initiatives, Inc (CAHI)	California (all other areas)	543	no	yes	no	
Indiana Housing & Community Development Authority	Indiana	410	no	yes	no	
Michigan State Housing Development Authority	Michigan	412	no	yes	no	
North Carolina Housing Finance Agency	North Carolina	611	no	yes	no	
South Dakota Housing Development Authority	South Dakota	125	no	no	no	
Cheyenne Housing Authority	Wyoming	57	no	yes	yes	
North Dakota Housing Finance Agency	North Dakota	128	yes	yes	yes	
Maryland Dept of Housing and Community Development	Maryland	289	yes	yes	no	
Housing Authority of the City of Bremerton, Nebraska	Nebraska	182	yes	?	?	5,6
West Virginia Housing Development Fund	West Virginia	124	yes	no	yes	
Wisconsin Housing and Economic Development Authority	Wisconsin	448	yes	no	yes	
Division of Housing and Community Renewal/New York State Housing Trust Fund Corp (DHCR/HTFC)	New York	993	yes	yes	no	
Iowa Finance Authority	Iowa	237	yes	yes	no	
Kansas Housing Resources Corp	Kansas	262	yes	yes	no	
Kentucky Housing Corp	Kentucky	382	yes	yes	no	
Los Angeles LOMOD Corp/Bremerton Housing Authority CMS	California (near Los Angeles)	748	yes	yes	no	7
Louisiana Housing Finance Agency	Louisiana	172	yes	yes	no	
Maine State Housing Authority	Maine	120	yes	yes	no	
Massachusetts Housing Finance Agency	Massachusetts	488	yes	yes	no	
New Hampshire Housing Finance Authority	New Hampshire	101	yes	yes	no	
New Jersey Housing and Mortgage Finance Agency	New Jersey	299	yes	yes	no	
North Tampa Housing Development Corp, Inc	Florida	456	yes	yes	no	
Oklahoma Housing Finance Agency	Oklahoma	197	yes	yes	no	8
Pennsylvania Housing Finance Agency (PA Multifamily Asset Managers)	Pennsylvania	571	yes	yes	no	
Southwest Housing Compliance Corp	Arkansas, Texas	874	yes	yes	no	

Performance-Based Contract Administrators	States	Number of Properties Administered	UA with each rent request?	UA with 10% rate increase?	Tenant right to comment?	Notes
Washoe Affordable Housing Corp	Nevada	40	yes	yes	no	
Alaska Housing Finance Corp	Alaska	21	yes	yes	yes	
Assisted Housing Services Corp	Ohio	975	yes	yes	yes	
Delaware State Housing Authority	Delaware	59	yes	yes	yes	
Georgia HAP Administrators, Inc	Georgia, Illinois	868	yes	yes	yes	
Idaho Housing and Finance Association	Idaho	64	yes	yes	yes	
Minnesota Housing Finance Agency	Minnesota	350	yes	yes	yes	
New Mexico Mortgage Finance Agency	New Mexico	91	yes	yes	yes	
Oregon Housing and Community Services	Oregon	276	yes	yes	yes	9
South Carolina State Housing Finance and Development Authority	South Carolina	271	yes	yes	yes	
Tennessee Housing Development Authority	Tennessee	401	yes	yes	yes	
Vermont State Housing Authority	Vermont	62	yes	yes	yes	
Puerto Rico Housing Finance Authority (PRHFA)	Puerto Rico	159	?	?	?	10
Montana Dept of Housing	Montana	96	?	?	?	11
District of Columbia Housing Authority	Washington, DC	90	?	?	?	12
Hawaii Public Housing Authority, Bremerton Housing Authority CMS	Hawaii	61	?	?	?	13,14

Notes

- For purposes of analyzing UA policies, the Hawaii, Los Angeles, and Nebraska divisions of Bremerton Housing Authority have been treated as independent agencies because their UA regulations differ in at least one category, from those of the Bremerton Housing Authority.
- Utah: 101, Washington: 372
- Bremerton Housing Authority did not provide a clear answer to the question of utility analyses when there is a 10% rate increase.
- Unable to obtain confirmation, however the OCAF worksheet that can be found on the CHFA website does not include reference to utility allowances, indicating that a utility analysis is not required for OCAF rent adjustment requests. Unable to find information on 10% increase question.
- HUD awarded CMS of Bremerton the Performance- Based Contract Administrator contract for Nebraska. A utility analysis is required every year in Nebraska. (www.bremertonhousing.org)
- No specific information for Bremerton Housing Authority, Nebraska for the final three categories.
- LOMOD is in partnership with CMS of Bremerton. (<http://lomod.org/>)
- 186 on the OHFA website.
- 189 on the OHCS website.
- Unable to reach the agency.
- Unable to reach the agency
- Unable to reach the agency.
- Unable to reach the agency.
- Unable to reach the agency.
- The Contract Management Services (CMS) division of Bremerton Housing Authority subcontracted with the Hawaii Public Housing Authority to assume the Performance- Based Contract Administrator services for the State of Hawaii. (www.bremertonhousing.org)

Performance-Based Contract Administrators	Homepage URL	Comments
Alaska Housing Finance Corp	http://www.ahfc.state.ak.us/home/index.cfm	Email from agency staff member.
Arizona Public Housing Agency	http://www.azhousing.gov/ShowPage.aspx?ID=149&CID=16	Phone call with agency staff member. UA analysis required every three years. Tenant comment required for budget-based, but not OCAF adjustments.
Assisted Housing Services Corp	http://www.ahscOhio.org/index.htm	Website.
California Affordable Housing Initiatives, Inc (CAHI)	http://www.cahi-oakland.org/Index.htm	Phone call with agency staff member. A UA analysis is required for each budget-based rent request, but is optional for OCAF. The agency requires tenant comment for budget-based but not OCAF, per guidance from the San Francisco HUD office.
Cheyenne Housing Authority	No website	Phone call with agency staff member. The agency requires each property to annually verify that tenants are not paying more than 30% of their income for rent and utilities. For budget-based rent adjustments, owners are required to submit documentation if line items have increased by 5% or more, which can include utilities.
Colorado Housing Finance Agency	http://www.chfainfo.com/	Indication of agency utility analysis policy for OCAF rent adjustment requests on website. Unable to find information on 10% increase question. Tenant comment policy found on website. Unable to obtain confirmation from agency.
Delaware State Housing Authority	http://www.destatehousing.com/default.shtml	Phone call with staff member. Staff member stated that the required annual utility analysis covers 10% changes in utility rates.
District of Columbia Housing Authority	http://www.dchousing.org/default.asp	Unable to find information on website or obtain confirmation from agency.
Division of Housing and Community Renewal/New York State Housing Trust Fund Corp (DHCR/HTFC)	http://www.dhcr.state.ny.us/Programs/Section8ProjectBased/ , http://www.pbcanv.com/	Website, and phone call with staff member. Tenant notice only required for budget-based adjustments.
Georgia HAP Administrators, Inc	http://www.ghaca.org/	Phone call with staff member.
Hawaii Public Housing Authority	Part of City of Bremerton/CMS	Unable to find information on website or obtain confirmation from agency.
Housing Authority of the City of Bremerton	http://www.contractmgmt.org/	Website and phone call with staff member. A UA analysis is required every three years. The agency's policy regarding the 10% rate increase is unclear. According to staff member, HUD Handbook regulations indicate that tenants need only be notified about OCAF adjustments if there is a decrease in the UA.
Idaho Housing and Finance Association	http://www.ihfa.org/	Website and email from staff member.
Indiana Housing & Community Development Authority	http://www.in.gov/hcda/	Email from staff member. Tenant right to comment for budget-based.
Iowa Finance Authority	http://www.iowafinanceauthority.gov/	Website and email from staff member. Tenant right to comment for budget-based, and when there is a decrease in the UA for OCAF adjustments.
Jefferson County Assisted Housing Corp	http://www.jeffcohousing.com/	Phone call with staff member. JeffCo requests that owners submit a UA analysis with an OCAF rent adjustment, but the owners are not required to do so because the HUD guidebook doesn't require it. This also applies for the 10% increase in the utility rate. If owners submit a UA analysis, JeffCo will make changes based on utility rates, but owner are not required to submit such an analysis. The HUD guidebook requires tenant notice for budget-based rent adjustments, but not OCAF.
Kansas Housing Resources Corp	http://www.kshousingcorp.org/	Phone call with staff member. Staff member stated that the required annual utility analysis covers 10% changes in utility rates. Tenant right to comment only if total tenant payment increases.
Kentucky Housing Corp	http://www.kyhousing.org/	Website. Tenant right to comment for budget-based.
Los Angeles LOMOD Corp/Bremerton Housing Authority CMS	http://lomod.org/	Phone call from staff member. Agency requires a "recommendation with support" with regard to UA's for all types of rent adjustments. Staff member stated that the required annual utility analysis covers 10% changes in utility rates. Per guidance from the HUD HQ, the agency only requires tenant right to comment for budget-based adjustments.
Louisiana Housing Finance Agency	http://www.ihfa.state.la.us/index.php	Website and email from staff member. Tenant right to comment for budget-based adjustments.
Maine State Housing Authority	http://www.mainehousing.org/	Website and phone call with staff member. Tenants only receive notice if the total tenant payment increases.
Maryland Dept of Housing and Community Development	http://www.mdhousing.org/Website/Default.aspx	Phone call from staff member. Agency requires a utility allowance analysis on an annual basis with contract requests for both OCAF and budget-based. Staff person stated that the agency's HUD officers (offices in D.C. and Baltimore) decided that because area vendors' utility rates had been inflated for a few years, the utility allowance now has to change if there is any change in the utility rate at all (even if it is a change of \$1). Staff person said that according to HUD regulations, tenant notice for OCAF rent adjustments is not required unless the tenant self pay changes.
Massachusetts Housing Finance Agency	https://www.masshousing.com/portal/server.pt?open=514&objID=240&parentname=CommunityPage&parentid=5&mode=2&in_hi_userid=2&cached=true	Phone call with staff member. Tenant right to comment for budget-based adjustments, and for OCAF adjustments only if the total tenant payment changes.
Michigan State Housing Development Authority	www.mmam.net	Phone call with staff member. The agency interprets the absence of reference to OCAF UA requirements in 4350.1 as not requiring it at contract renewal or rent adjustments. Tenant notice only provided when the UA decreases.
Minnesota Housing Finance Agency	http://www.mnhousing.gov/index.aspx	Website.
Missouri Housing Development Commission	http://www.mhdc.com/	Email from staff member. Tenant right to comment only if the tenant's portion of the rent increases. Per instruction from HUD, staff member states that it is the owner's responsibility to review the current UA and determine if an increase is needed. Agency doesn't automatically check utility rates; this must be monitored and requested by the owner/agent.
Montana Dept of Housing	http://housing.mt.gov/default.aspx	Unable to find information on website or obtain confirmation from agency.

Performance-Based Contract Administrators	Homepage URL	Comments
New Hampshire Housing Finance Authority	http://www.nhhfa.org/ , http://www.nhhfa.org/bp_sec8.cfm	Email from staff member. Tenant right to comment for budget-based adjustments for projects that are not 100% Section 8.
New Jersey Housing and Mortgage Finance Agency	http://www.state.nj.us/dca/hmfa/index.shtml	Phone call with staff member. Tenant notification only required for budget-based adjustments.
New Mexico Mortgage Finance Agency	http://www.housingnm.org/	Phone call with staff member.
North Carolina Housing Finance Agency	http://www.nchfa.com/index.aspx	Email from staff member. UA analysis is not required for OCAF, but owners may request a UA change when they request an OCAF rent increase. Tenant notification and comments are only required for budget-based adjustments.
North Dakota Housing Finance Agency	http://www.ndhfa.org/	Email from staff member. Staff member stated that the required annual utility analysis covers 10% changes in utility rates.
North Tampa Housing Development Corp, Inc	http://www.nthdc.org/	Website. Staff member stated that the required annual utility analysis covers 10% changes in utility rates. Tenant right to comment only for budget based adjustments.
Oklahoma Housing Finance Agency	http://www.ohfa.org/housingdev/CA20051.htm	Email from staff member. Tenant right to comment only for budget based adjustments.
Oregon Housing and Community Services	http://www.ohcs.oregon.gov/ , http://www.ohcs.oregon.gov/OHCS/HCA_SectionMain.shtml	Email from staff member. Staff member noted that although tenant notice/comment are currently required for both budget-based and OCAF adjustments, HUD may be moving back toward only requiring notice/comments for budget-based.
Pennsylvania Housing Finance Agency (PA Multifamily Asset Managers)	http://www.phfa.org/developers/section8/section8ca.aspx , http://www.pamam.net/PMAM/	Website and phone call with staff member. Tenant right to comment for budget-based adjustments, and for UA decreases.
Puerto Rico Housing Finance Authority (PRHFA)	http://www.gdb-pur.com/subsidiaries/housing-finance-authority.html	Unable to find information on website or obtain confirmation from agency.
Rhode Island Housing and Mortgage Finance Agency	http://www.rhodeislandhousing.org/	Email from staff member. Owners can, but are not required, to complete an annual analysis to determine if an adjustment is needed. With regard to the 10% rate increase, it is up to the owners to analyze and submit a request for an adjustment. Tenant notice required only for budget-based adjustments.
South Carolina State Housing Finance and Development Authority	http://www.schousing.com/index.asp?n=38&p=5&s=38	Website.
South Dakota Housing Development Authority	http://www.sdhda.org/content.asp?secd=150&Parentid=141	Website implies that UA analysis is not required with OCAF adjustments.
Southwest Housing Compliance Corp	http://www.shccnet.org/	Website.
Tennessee Housing Development Authority	http://www.thda.org/s8ca/cacover.html	Email from staff member. According to the staff member, the HUD Handbook 4350.1, Ch.7 requires UA analysis with rent adjustments, Sections 3, 7-24, require a HUD-approved increase when utility rates increase by at least 10%, and the Handbook also requires tenant notice. These requirements apply to both budget-based and OCAF adjustments.
Vermont State Housing Authority	http://www.vsha.org/	Phone call with staff member. Owners must submit utility bills to PHA, which determines rent increases.
Washoe Affordable Housing Corp	http://www.wahc.info/index.php	Website and email from staff member. Tenant notice is only required for budget-based adjustments.
West Virginia Housing Development Fund	https://www.wvhdf.com/section8/section8.cfm	Phone call with staff member.
Wisconsin Housing and Economic Development Authority	http://www.wheda.com/root/	Website and phone call with staff member.