

# Portability Training Q&A

1. Can the RHA refuse to accept a portability request if the porting family has less than 60 or 30 days remaining on the voucher search time?
  - a. **Panelist response:** No. If there are not set number of days left on the initial voucher term, the RHA cannot refuse to assist an incoming family.
2. What if the 52665 and 50058 are received after the 10-day window?
  - a. **Panelist response:** The IHA is not required to honor any initial billings received after the billing deadline. The IHA may notify the RHA in writing that it will not honor any billings received if the allotted timeframe has passed. The RHA can be required to absorb the family.
3. Are there any restrictions or exceptions on extending a voucher for a tenant who needs specific accommodations for a disability and they're having difficulty finding a home?
  - a. **Panelist response:** The Initial Housing Authority and/or Receiving Housing Authority should allow, as a reasonable accommodation if the family meets the criteria, additional time to search for a unit. Remember, we want the family to have as less burden as possible but still maintain compliance with the program requirements. As a reasonable accommodation, you can extend the search time for the family if they prove that they have been searching and they need to be accommodated reasonably.
4. Port-in Packet 50058 does not have data of the date entered the waiting list, the ZIP code at admission, and homeless are not at admission: can we have or can we get the agency to have this information when sending the Port Packet?
  - a. **Panelist response:** The IHA can be contacted to provide this information.
5. Can the IHA issue a future-dated voucher? If so, is the RHA required to issue any paperwork or brief the family before that date?
  - a. **Panelist response:** No, vouchers should never be dated in the future. They should always be dated when you are issuing the family a voucher.
6. If a portability family transfers within the Receiving Housing Authority's jurisdiction, when is the billing deadline for the transfer?
  - a. **Panelist response:** The billing must be submitted no later than 10 business days of the effective date of the change.



7. What happens when a regular billing for an interim is not received during the correct time? Is the RHA forced to absorb or can the IHA deny the billing charge until the following month?
  - a. **Panelist response:** If the RHA fails to send the billing within the 10-business day timeframe, the IHA is not responsible for paying any increase in the monthly billing amount incurred prior to the notification. If the change results in a decrease, the IHA may offset future monthly payments until the difference is recouped.
  
8. If the IHA honors a late billing at any time, can the IHA refuse to accept a late billing in the future?
  - a. **Panelist response:** The IHA should first try to resolve the issue with the RHA in writing. If no resolution is made, the RHA may seek assistance from their local PIH field office.
  
9. Is the IVT report required with the EIV request?
  - a. **Panelist response:** No.
  
10. Several RHAs do not submit the updated 52665 after the family has been recertified; should the IHA continue to submit payments to the RHA if the recertification is expired? Or should the IHA wait until the RHA has submitted an updated 52665?
  - a. **Panelist response:** Yes. The IHA must continue paying the RHA based on the last form HUD – 52665 and form HUD – 50058 received until otherwise instructed by HUD.
  
11. What are all the required documents that the IHA must provide to the RHA?
  - a. **Panelist response:** The IHA must provide a copy of the current **voucher issued** to the family. The form HUD – 52665, the form HUD – 50058, the EIV report and updated income verifications.
  
12. Will you be speaking on EHV portability for when an RHA does not have an EHV program and the benefits of absorbing or billing? Are EHV's able to be ported?
  - a. **Panelist response:** Yes, emergency housing vouchers can be ported. If the RHA does not have an EHV Program, the voucher should be administered with PHA policies and regular HCV requirements. The decision to bill or absorb should follow normal HCV portability guidelines for your PHA if the PHA has an EHV Program.
  
13. Can you report a port in VMS that has a payment on hold?
  - a. **Panelist response:** HAP expenses and leased vouchers are only counted after the HAP has been paid, so if a voucher is on hold pending a copy of the lease



and/or contract, the PHA would not report this in VMS until after the required documents are received and the HAP is paid. Once the HAP is paid to the owner and the payment is no longer on hold, the PHA will complete a Prior Month Correction for the month(s) in which that voucher leased up and updated the HAP the months in which the HAP was paid from the previous month(s).

14. A PHA will not accept a port-in with less than 60 days left; sometimes, the family has no extensions remaining. Does an extension have to be granted?
  - a. **Panelist response:** The RHA cannot refuse any incoming family, including if there is not a set number of days left on the initial voucher. As a reasonable accommodation and in accordance with PHA policy, an extension can be granted.
  
15. What if an RHA notifies you of fraud that goes way back and pays you back; what is the best way to handle this in VMS, especially if this goes beyond the time frame that VMS will allow you to make the change?
  - a. **Panelist response:** Contact your local PIH Field Office for assistance.
  
16. Since the Initial Housing Authority does not EOP when the RHA absorbs, does the IHA leave it as a type 5 until the tenant leaves the RHA's jurisdiction? Then, both housing authorities do an EOP?
  - a. **Panelist response:** Yes, the IHA will maintain the transaction type 5 if the family does not return to the IHA. The transaction type 5 should be the last action completed in the system for the IHA. If the RHA absorbs the family, a transaction type 6 will be processed and submitted by the RHA if the family's participation in the program has ended.
  
17. When issuing a voucher to a tenant porting in, do I use the bedroom size that's on the voucher?
  - a. **Panelist response:** No, the receiving housing authority's subsidy standards determines the family's voucher size.
  
18. How does the MTW Program impact the portability process?
  - a. **Panelist response:** Regular portability requirements are applicable to moving to work (MTW) agencies, unless the MTW agency has approved activities that specifically states otherwise. The portability policy for MTW agencies will apply.
  
19. Can you review the special programs information? Are FUP and Non-Elderly Disabled allowed to port if the Receiving Housing Authority doesn't have that program?



- a. **Panelist response:** Yes, FUP and Non-Elderly Disabled voucher holders are allowed to port even if the receiving housing authority does not administer those programs. There are some nuances that are specific to those programs, but regular HCV portability rules apply.
20. What if the Receiving Housing Authority granted an extension beyond the original amount of time from the Initial Housing Authority, and now the family is no longer going to the RHA's jurisdiction but back to the Initial Housing Authority. Does the Initial Housing Authority have to honor the amount of time on the voucher they received from the Receiving Housing Authority?
- a. **Panelist response:** No, any voucher extensions granted by the receiving housing authority do not apply upon the family's return to the initial housing authority.
21. If we received the HUD 52665 and the voucher has a future issuance date, do we deny it until they correct the form?"
- a. **Panelist response:** No, a porting family cannot be denied for this reason. Contact should be made to the initial housing authority for a corrected voucher.
22. If the Initial Housing Authority accidentally processes an EOP instead of a port-out (so they process a Type 6 instead of a Type 5), what steps need to be taken to correct this, and who is responsible for making the corrections?"
- a. **Panelist response:** The IHA should submit a VOID to the EOP and resubmit the 50058 as a type 5.
23. Can a Receiving Housing Authority refuse port-ins from an Initial Housing Authority that has issues with very late billings (months or years later)? Do we need HUD approval?
- a. **Panelist response:** No, the receiving housing authority cannot refuse to assist an incoming family. Attempts to resolve the late billings should be made in writing. If no resolution is made the local HUD field office should be contacted for assistance.
24. Does current information mean 'current since last annual certification'?
- a. **Panelist response:** Yes.
25. In PIC, how will a ported family show up? Are they going to show up as on the IHA side or the RHA side?
- a. **Panelist response:** The last action type should be a transaction 5, portability move - out from the initial housing authority.



26. I understood you say that if an RHA does not send an updated 50058/52665 at recertification, then the IHA should wait to continue paying until they do so?
- Panelist response:** The IHA must continue paying the RHA based on the last form HUD – 52665 and form HUD – 50058 received until otherwise instructed by HUD.
27. Can a family keep transferring to different PHAs to get additional time, and is there a time limit on those extensions?
- Panelist response:** The family can port to different jurisdictions if search time remains on the voucher. Extensions provided by the receiving housing authority are only valid for the family’s search in that jurisdiction. If the initial housing authority’s voucher has expired and no extension was granted, the initial housing authority can close out the record.
28. If you have a tenant coming in with a 2-bedroom port but then would be considered underhoused, must we issue a voucher that has considered the correct size per regulation and admin plan?
- Panelist response:** Yes. The PHA’s policy on subsidy standards would apply.
29. If an Initial Housing Authority sends an email stating that they are allowing their voucher holder to have X unit size due to a reasonable accommodation when they are ported in, can this be accepted or does the Receiving Housing Authority need an official document from the Initial Housing Authority?
- Panelist response:** The email should be maintained in the file for compliance. It is best practice to request all documents and/or correspondence that relate to the need and the official approval.
30. Can a porting individual decide that they no longer want to port after they have started searching? What are the consequences?
- Panelist response:** Yes, at any time, families can decide they no longer want to port. The family may pose a risk of running out of search time.
31. Can you review how a PHA should fill out numbers 10 and 11 on a 52665 Form?
- Panelist response:** Line 10 is completed by the Initial Housing Authority, and the housing agency will put their ongoing admin fee. Line 11 would be 80% of the ongoing admin fee. So, you would take line 10 times 80% and that’s the amount for line 11.
32. When do we process PIC showing that a tenant has ported out? Do we wait until they are housed at the RHA or as soon as they have vacated their housing in the IHA?



- a. **Panelist response:** The transaction type 5, portability move out should be processed as soon as the family is determined eligible, and all required forms have been submitted to the receiving housing authority.
33. If the IHA voucher issuance is greater than the RHA, would the RHA use the voucher expiration date of the IHA including the 30-day allowance?
- a. **Panelist response:** The RHA must provide the family with a 30-day extension following the expiration of the voucher issued by the IHA.
34. When does the initial billing begin for the Receiving Housing Authority?
- a. **Panelist response:** The initial billing submission must be received by the initial housing authority no later than 90 days after the expiration date of the initial housing authority's voucher.
35. What's the regulation that states 120 days is the maximum amount of time permitted to be issued on a voucher?
- a. **Panelist response:** There is no regulation on the maximum amount of time permitted to a family to search, the search term allowed may not be indefinite.
36. Is it a HUD violation if you do not issue a voucher to a port-in?
- a. **Panelist response:** Yes, the Receiving Housing Authority must issue a voucher to the family once they port in.
37. Once the IHA has sent the paperwork to the RHA, if the family has changes in their income or household composition, whose responsibility is it to update those changes?
- a. **Panelist response:** Changes in income or household composition is usually reported to the initial housing authority. Under certain circumstances the receiving housing authority will need to determine income eligibility for applicant families. The initial housing authority should always provide the current income and information regarding household composition.
38. If the Receiving Housing Authority is absorbing, should they be doing a Type 5 or a Type 6?
- a. **Panelist response:** The receiving housing authority must process a transaction type 4, portability mov- in.
39. What is the ruling on admitting an applicant who is over-income?
- a. **Panelist response:** An applicant family must be income eligible in the area where they initially lease a unit. The porting family must meet the applicable income limits of the receiving housing authority's jurisdiction.



40. Can an IHA deny the change for composition if the family is moving to an RHA with a smaller bedroom size policy (i.e., will they get a bigger bedroom at the RHA if they add more family members)?
- a. **Panelist response:** The initial housing authority must follow PHA policy on change in family composition.
41. Is it a HUD violation if you do not issue a voucher for a port in within 2 weeks?
- a. **Panelist response:** HUD expects the receiving housing authority to issue the family a voucher within 2 weeks.

