

On-Site Insights

NAHMA'S NEWSLETTER FOR CERTIFIED AFFORDABLE HOUSING PROFESSIONALS

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When Can Adult Children Move Into HUD Senior Housing | BY JENNIFER JONES

PROPERTY MANAGEMENT | OCCUPANCY

Affordable housing professionals might encounter a sensitive question: Can an elderly resident's adult child move in or stay in Department of Housing and Urban Development (HUD) senior housing? The answer is not always a simple yes or no, depending on the HUD regulations and compliance procedures that govern the type of housing program that covers the community. Providing the wrong answer can result in violations, loss of eligibility or even displacement of qualified seniors.

Gwen Volk, president of Gwen Volk INFOCUS Inc., provides answers in a webinar titled "Can My Kid Move In? Understanding Rules for Adult Children in HUD Elderly Housing," provided in October for SAHMA.

The webinar covers Section 202/8 and 202 Project Assistance Contracts (PAC), Section 202 Project Rental Assistance Contract (PRAC) and Section 8 Elder-



LOGAN WEAVER/UNSPLASH

ly-Designated Properties. Each program has its own requirements for what constitutes a household, residential eligibility, and continued occupancy.

HUD elderly housing programs exist to assist seniors and, in some cases, people with disabilities. Allowing adult children without proper oversight can

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NATIONAL AFFORDABLE HOUSING MANAGEMENT ASSOCIATION
is the leading voice for the affordable housing management industry, advocating for developing, managing and preserving quality affordable multifamily housing.

undermine program intent, create compliance risks and block access for eligible applicants. Understanding the rules creates fairness, protects the property and avoids costly mistakes. Volk recommends referring to the [HUD Handbook 4350.3 REV-1](#), specifically chapters 3, 5, and 7, for guidance and best practices.

Adult children aren't automatically allowed to move in with their parent who resides in HUD's supportive housing for the elderly (202 PRAC) projects. The owner/agent can approve the child moving in at initial occupancy, but only within the compliance boundaries spelled out in the HUD Handbook. Everything—approvals, relationships and roles—needs to

be documented.

The handbook also makes clear the difference between household members and live-in aides. A household member can include adult children, if

approved. They must be on the lease, their income must be counted, and they have residential rights if the qualifying resident dies. But if the qualifying resident leaves for a reason other than death, the additional household mem-

ber's right to stay and/or the amount of rent they must pay, if they can remain, varies among programs. An adult child can also serve as a live-in aid if they qualify according to HUD's regulations. A live-in aide provides care for the resident. They are not on the lease, their income is not counted, and they have no right to remain after the resident vacates the unit. Live-in aides also can't bring their own family members to live in the unit without permission.

At initial occupancy, adult children may be included at move-in if disclosed on the application. They are screened and documented. Their presence does not displace an eligible elderly applicant, preserving units for elderly households and preventing younger adults from staying after the elderly parent dies, thereby preventing access for qualified seniors. In some programs, the adult child can stay and pay rent based on income once the elderly resident leaves for a reason other than death. In other programs, they must pay contract rent; in others, they do not have a right to remain, even though they may be on the lease.

If an adult child wants to be added after move-in, it requires the owner/agent's approval and compliance screening. In the PRAC program, an adult child can move in only after initial occupancy if they are a live-in aid. In the 202/8 and 202 PAC programs, an adult child can move in only after initial occupancy to provide essential



ADULT CHILDREN AREN'T AUTOMATICALLY allowed to move in with their parent who resides in HUD's supportive housing for the elderly (202 PRAC) projects. The owner/agent can approve the child moving in at initial occupancy, but only within the compliance boundaries spelled out in the HUD Handbook.

COMPARISON OF LIVE-IN AID AND ADULT CHILD IN 202/8 AND 202 PRAC PROJECTS

	202/8	202 PRAC
Admission to household after initial occupancy:		
Live-in aide	Yes	Yes
Adult child	Yes – if needed for essential care of family member	Yes - Only if performing function of live-in aide
Income counted:		
Live-in aide	No	No
Adult child	Yes	No
Counted as member of family:		
Live-in aide	No	No
Adult child	Yes	No
Right to remain in unit: (See paragraphs 7-4.D and 3-6.E.3 for lease addendum requirements.)		
Live-in aide	No	No
Adult child	No	No

HUD HANDBOOK 4350.3 REV

care to the parent, or as a qualified live-in aide. But regardless of their status as a caregiver who is on the lease and whose income is counted or as a live-in aide, they have no right to remain in the unit after the qualifying resident moves out or dies.

Suppose the child is acting as a live-in aide? In that case, they must meet HUD's definition of a live-in aide: they must be essential to the resident's care, not obligated to support the resident financially, and have no residual rights or ability to add household members.

By contrast, a live-in aide's income is not counted toward the household, and they must vacate the unit when the resident leaves. For programs such as 202 PRAC, an adult child added later as a live-in aide must also vacate the unit upon the elderly resident's departure or death.

In a HUD section elderly project that is not a 202, adult children can move in with the parent or be added later, and if the parent leaves or dies, they can remain and pay rent based on income.

Best practices for affordable housing professionals include documenting approvals, relationships, and roles. The proper forms and agreements should be used, and informal arrangements should be avoided. Owners/agents should carefully evaluate requests, especially late-stage changes that may signal an intent to remain rather than to provide care, to protect the elderly resident from those who may want to take advantage of them.

Some common scenarios professionals can look out for include an adult child who moves in without approval, which creates a compliance violation;

a live-in aide who refuses to vacate, which could require the management to initiate an eviction if necessary; and when adding a family member as a live-in aide after occupancy, which requires medical documentation that an aide is needed.

Sometimes aides, especially relatives, request to become household members when the elderly resident's health starts to decline. HUD permits denial of the request if the application is inconsistent with the program's purpose. It may be approved, but it requires a formal written request, screening and income verification, and the timing and intent of the request must align with compliance standards. **OSI**

Jennifer Jones is the senior director of communications and public relations for NAHMA.

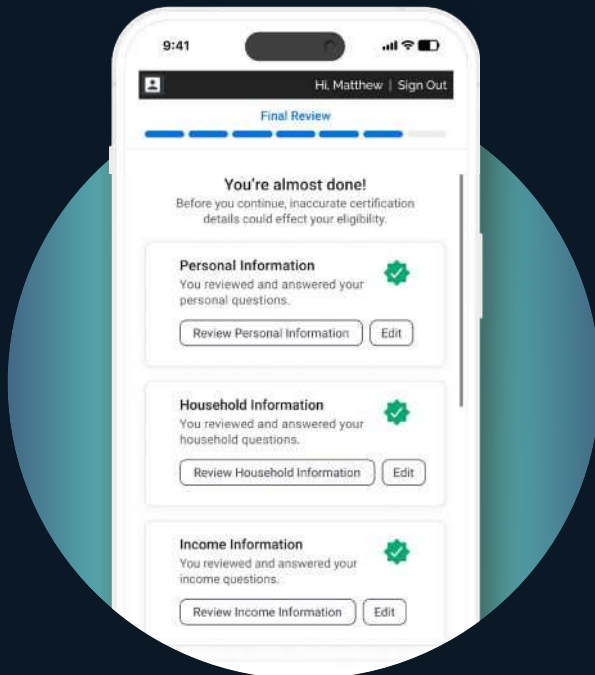
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REALPAGE

Invest in Your Professional Future

ASSOCIATION NEWS | EDUCATION: LEADERSHIP

It's the perfect time to invest in your career and gift yourself the opportunity to strengthen your leadership skills. Register for the National Affordable Housing Management Association's [NAHMA Emerging Leaders Learning Series](#) (NELLS) manager-level course. Sessions begin Feb. 5, 2026. *NELLSManager* was designed exclusively for first-line staff, including property managers, leasing managers, maintenance managers and compliance specialists. [Register](#) today; the course is limited to five to 15 participants.

NELLSManager focuses on three

The virtual course is a blended program that combines the benefits of cohort learning with executive coaching. In addition to three group sessions, each participant will have two one-on-one coaching sessions to tailor program content to their specific requirements. All sessions are conducted using the Zoom videoconferencing platform. Group sessions are 90 minutes, except for Session I, which is 120 minutes to include program orientation. All group sessions begin at 2 p.m. Eastern.

The orientation and first session for *NELLSManager* are scheduled for

programs designed to meet you where you are in your professional development: the original *NELLSExecutive* and the *NELLSManager*. The *NELLSExecutive* program focuses on issues relevant to senior organizational managers and leaders, typically at the director, regional, officer levels and above. The 2026 *NELLSExecutive* course will begin in August, with registration available starting in April.

Completing a NELSLS course will earn an individual five continuing education units (CEUs) toward their annual requirement of six CEUs to maintain their [NAHP or NAHP-e credentials](#). Additionally, completing a NELSLS course will earn an individual a complimentary two-year NAHMA Associate membership. To successfully complete a NELSLS course, and earn the five CEUs and free Associate membership, an individual must attend all three Zoom webinar classes and

“NELLSMANAGER FOCUSES ON THREE DIMENSIONS: leading yourself, leading teams, and providing business leadership. Through group sessions and individual coaching, each participant will learn how to best enhance their personal leadership competencies by developing the professional habits and skills necessary to achieve desired outcomes.”

dimensions: leading yourself, leading teams, and providing business leadership. Through group sessions and individual coaching, each participant will learn how to best enhance their personal leadership competencies by developing the professional habits and skills necessary to achieve desired outcomes. The topics covered in the manager-level course include developing a manager mindset, personal management style, handling difficult conversations and delivering feedback, setting priorities, strategic communication, managing change, and resource management.

Feb. 5. Session two will take place on Feb. 26, and the final session is set for March 19. The two 60-minute one-on-one coaching sessions will be scheduled individually with each participant. The registration deadline is Jan. 9. Class size is limited to five-15 participants, and registration is on a first-come, first-served basis. Tuition is \$1,250 per person.

NAHMA, in cooperation with course facilitator Brenda Harrington, founder of Adaptive Leadership Strategies LLC, created the NAHMA Emerging Leaders Learning Series course family to include two virtual

both one-on-one coaching sessions. At the end of the course, if a student has attended all five sessions, they will earn a completion certificate noting the five hours of CEUs earned. Students cannot earn any CEUs for less than full attendance.

Brenda Harrington, PCC, is a Certified Executive Coach and former property management executive. She works with clients across a variety of industry sectors to help develop the professional competencies required for effective 21st-century leadership. To learn more, please visit www.adaptive-leadershipstrategies.com. **OSI**

2026 NAHMA DRUG-FREE KIDS CALENDAR



ORDER YOURS TODAY!

**The winners have been chosen!
The cover art selected!**

It's time to order your 2026 NAHMA Drug-Free Kids Calendars—at the same affordable price as last year! Just \$5.50 each! The \$5.50 calendar cost is a Department of Housing and Urban Development and

Department of Agriculture allowable project expense.

Also, place your order by Nov. 14, 2025, and enter the NAHMA Lucky Draw for free prizes!

NAHMA Lucky Draw Prizes!

- 3 Free NAHMA Meeting Registrations (Value: \$630-\$900 each)
- 5 digital copies of A Practical Guide to Tax Credit Management (Value: \$35 each)
- 5 American Express Gift Cards (Value: \$100 each)

Drawing will be held on Dec. 12, 2025

Calendars make great holiday gifts for your properties, community event giveaways and colleagues. This year's theme, "The Power is Mine: Taking Responsibility for Our Choices" is illustrated through the unique poster art created by children, seniors and adults with special needs living in affordable housing. Support the drug-free message today. Send in the order form at right without delay. Or, download order form at www.nahma.org.

2026 NAHMA DRUG-FREE KIDS CALENDAR ORDER FORM

Order by Nov. 14, 2025, and enter the NAHMA Lucky Draw!

YES, I would like to order 2026 Drug-Free Kids Calendars and show my ongoing support of drug-free and safe community housing. If I order by Nov. 14, 2025, I will be entered into the NAHMA Lucky Draw for the prizes listed.
* **Please print clearly. All fields required. Incomplete forms will not be processed.**

Name: _____

Apt. Complex: _____

Shipping Address (no P.O. Boxes): _____

City: _____ State: _____ ZIP: _____

Phone: _____ Fax: _____

Email: _____

Management Company: _____

Name of AHMA: _____

Number of Calendars: _____ **x \$5.50* (+ 6% sales tax if in Virginia) = \$ _____**
The \$5.50 calendar cost is a Dept. of Housing & Urban Development and Dept. of Agriculture allowable project expense.

Shipping & Handling Fees:

1-49 calendars ordered, \$3 per calendar = \$ _____

50-99 calendars ordered, \$55 per order = \$ _____

100-500 calendars, \$78 per order = \$ _____

501 or more calendars, \$100 per order = \$ _____

Total Order (Number of Calendars Total + S&H Fee Total) \$ _____

PAYMENT INFORMATION (Orders For Less Than 100 Must Be Prepaid)

Please check one:

Check or Money Order Enclosed (Made payable to NAHMA)

VISA Master Card American Express

Card Number: _____

Expiration Date: _____ Security Code: _____

Name on Card: _____

Authorization Signature: _____

Submit the order form to NAHMA by mail, fax or email.

By mail:

NAHMA Calendar Order Form

400 N. Columbus St., Suite 203

Alexandria, VA 22314

By fax: 703-683-8634

By email: paulette.washington@nahma.org

Order forms can be downloaded at www.nahma.org. Please allow 3-4 weeks for delivery.

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IN BRIEF

HUD PUBLISHES LETTER ON SCREENING CRIMINAL RESPONSIBILITIES

The Office of Multifamily Housing Programs announced that the Department of Housing and Urban Development secretary published a letter on screening criminal responsibilities.

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. 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. 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.

Click to view the [Screening Criminal Responsibilities Letter](#).

NSPIRE COMPLIANCE EXTENSION

In September, HUD issued a notice in the [Federal Register](#) that extends the compliance date for HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) final rule for the Housing Choice Voucher (HCV), Project-Based Voucher (PBV), and Section 8 Moderate Rehabilitation (Mod Rehab) programs through Jan. 31, 2027. HUD is taking this action to provide Public Housing Agencies (PHAs) with additional time to implement HUD's NSPIRE standards and the change to the definition of Housing Quality Standards (HQS). This is the third extension of this compliance date.

PHAs subject to 24 CFR parts 882, 982, and 983 are not required to comply with the following changes to these parts in the NSPIRE final rule until Feb. 1, 2027. All other changes are in effect as required by the NSPIRE and HOTMA voucher final rules.

All PHAs that have implemented NSPIRE but have not yet notified HUD should notify HUD of the date they transitioned to NSPIRE. In addition, PHAs that have not implemented NSPIRE

should notify HUD of the date they plan to implement NSPIRE. These notifications are to be sent via email to NSPIREV_Alternatelnspc-tion@hud.gov with a courtesy copy to their field office representative. The email's subject line should read "Notification of NSPIRE Implementation, [PHA code]," and the body of the email should include the PHA name, PHA code, and the date the PHA implemented NSPIRE or plans to implement NSPIRE (the date shall be no later than Feb. 1, 2027). Regardless of implementation date, PHAs are reminded that the NSPIRE standards for installing carbon monoxide devices and smoke alarms still apply as they implement statutory mandates under the Consolidated Appropriations Act, 2021 and 2023, respectively. More information regarding carbon monoxide devices and smoke alarms can be found in the forthcoming PIH notice.

HUD extends the compliance date for the changes made to 24 CFR parts 882, 982, and 983 listed in the DATES section of this notice to Feb. 1, 2027, at which time PHAs subject to these parts must comply with the NSPIRE final rule. Until Feb. 1, 2027, PHAs may choose to comply with the provisions of these parts as amended by the NSPIRE final rule that existed before Oct. 1, 2023.

HUD CORRECTS HOTMA ERRORS

In early December HUD published a notice in the *Federal Register* correcting technical errors the department found in reviewing HUD's May 7, 2024, [Housing Opportunity Through Modernization Act of 2016 \(HOTMA\) Voucher Final Rule](#). The rule modified requirements for and clarified existing regulatory language in the Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) programs made by HOTMA. HUD published a correction on May 28, 2024, that addressed five errors in the HOTMA Voucher Final Rule. In reviewing the rule and its correction, HUD identified additional errors and provisions with unclear language. The notice corrects the errors and clarifies regulatory requirements. The amended rule is effective as of Jan. 7, 2026.

To read the article, visit [HUD Corrects HOTMA Final Rule Regarding HCV and PBV Programs](#).

Article courtesy of [Novogradac](#).

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Life Experiences Lead Harrison Where She Needs To Be

By Jennifer Jones

NAME: Ophelia Harrison, FHC, CPO

COMPANY: AMCS

POSITION: Manager, Haven Oaks Apartments

“**WHEN I FIRST GOT HERE, you didn’t see kids outside. They were too scared,” she said. “I wanted the kids to be kids outside. If the children are happy, the parents will do what they have to do to improve their situation.”**

Ophelia Harrison likes to say she is the “temporary” manager at Haven Oaks Apartments—even though she has been there for 11 years come February.

“I’ve been with AMCS for 18 years. I came from conventional,” she said. “Jamie [Kerr, AMCS president] asked me to go over to Haven Oaks until he found someone to manage the property. Our joke is me always asking him when he is going to find someone.”

The lack of a timely replacement has worked in Harrison’s favor, who says she enjoys working in the affordable world better.

“Affordable is the total opposite of conventional. I like the challenge,” Harrison said. “Affordable is nonstop. There is always something to do. I’m a paperwork girl.”

Harrison’s experiences before joining AMCS have been invaluable at Haven Oaks, a multifamily community in Summerville, S.C. She previously worked as a grant writer and event planner for a nonprofit organization. She has a computer science background and is a former teacher, both of which she uses through community programs such as a homework club and a class that helps residents with job applications. Additionally, she earned a bachelor’s degree in business administration and a master’s degree in computer technology.

“My career path got me ready for Haven Oaks. Everything I’ve learned prepared me for Haven Oaks,” she said. “I think I will retire here. It’s become my life. It’s like my second child. I’m proud of what Haven Oaks has come from and what it is today.”

Harrison said the apartment community was known as the worst property when she took over its management due to crime and

violence. She has worked to change that reputation and said Kerr has been supportive by trusting Harrison’s decisions.

“Jamie really backed me. I’ve brought friends here to do programs. I changed everything about Haven Oaks,” Harrison said. “He always supported me. All he said was, ‘Don’t get out of hand.’ As long as it was for the community, he let me try new things.”

Harrison said it’s the children at the community who motivate her.

“When I first got here, you didn’t see kids outside. They were too scared,” she said. “I wanted the kids to be kids outside. If the children are happy, the parents will do what they have to do to improve their situation.”

Harrison said she understands her residents. She, too, was a single mother who lived in subsidized housing. In fact, it is because of her daughter that Harrison found her way to Haven Oaks. The pair moved from Spartanburg, where her child was attending a school for blind and deaf students, to Charleston so that her daughter could receive the medical attention she needed at MUSC Health University Medical Center.

“Doctors told me she wouldn’t live past 5,” Harrison said of her daughter, Caneiceeah. “She just turned 34, and she’s doing great.”

It was Harrison’s grandparents who helped shape her into the person she is today.

“My grandfather raised us to believe we could survive without anyone, and to do honest work,” she said. “My grandmother taught me to care for the people around me. She always said, as long as you treat people right, you will be treated right. She also said that you aren’t in this world by yourself, so you need to act like it. **OSI**

—Jennifer Jones