GEORGIA DEPARTMENT *of* COMMUNITY AFFAIRS

Four Habits for Policy Implementation

Samanta Carvalho

Homeownership Development & Preservation Division Director

Georgia Department of Community Affairs



1. Track



2. Test

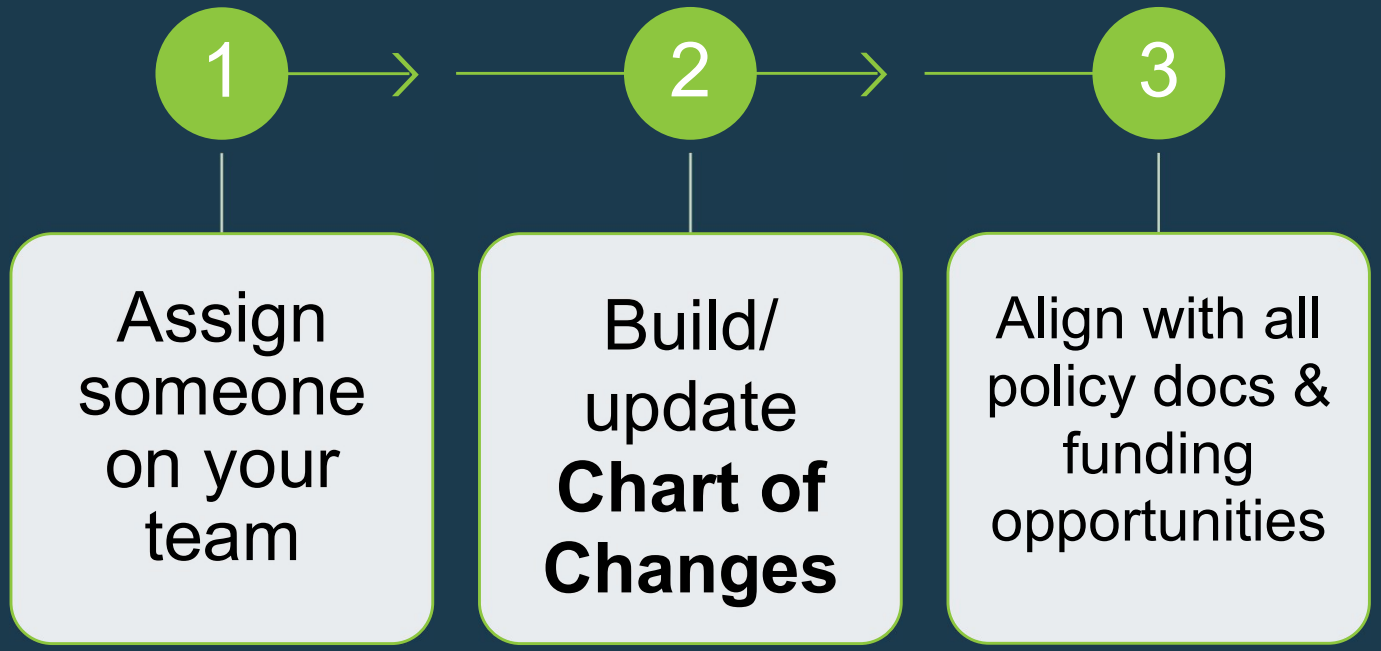


3. Borrow



4. Evaluate

Track regulatory changes



Sample Tracker for Tracking HOME 2025 Final Rule Changes:

2025 HOME Final Rule & Related Regulatory Changes

Change	Source	Status	Effective / Compliance Date	Description
CHDO requirement revisions	2025 HOME Final Rule	**Final / Effective**	Effective Apr 20, 2025	Revisions to CHDO certification, set-aside, and operating requirements.
New approach to HOME rents	2025 HOME Final Rule	**Final / Effective**	Effective Apr 20, 2025	Changes how maximum HOME rents are calculated and set, replacing prior rent-setting methodology.
Simplified requirements for small-scale rental projects	2025 HOME Final Rule	**Final / Effective**	Effective Apr 20, 2025	Reduces administrative burden for smaller rental developments, easing underwriting and compliance monitoring steps.
Simplified Community Land Trust (CLT) provisions	2025 HOME Final Rule	**Final / Effective**	Effective Apr 20, 2025	Streamlines and clarifies how HOME funds may be used with CLTs, reducing prior structural complexity.
New tenant protections on owner termination of tenancy	2025 HOME Final Rule	**Indefinitely delayed**	Was Oct 30, 2025 → Apr 30, 2026 **Indefinitely delayed by rule on Apr 29, 2026**	Restricts the circumstances under which owners of HOME-assisted rental housing may terminate a tenancy. No effective date currently on the books.
10% bonus to max per-unit HOME subsidy limit for energy-efficient properties	2025 HOME Final Rule	**Indefinitely delayed**	Was Oct 30, 2025 → Apr 30, 2026 **Indefinitely delayed by same Apr 29, 2026 rule**	Would allow a higher per-unit subsidy limit for properties meeting specified energy efficiency standards. May require further rulemaking before it can take effect.
Property standards/inspections aligned to NSPIRE	NSPIRE Final Rule + HUD's Apr 14, 2026 HOME/HTF Implementation Notice	**Effective now / phased compliance**	**Full compliance required by Apr 14, 2027 — for BOTH HOME and HTF**	Shifts inspections from jurisdiction-specific local codes to NSPIRE (24 CFR 5.703 standards only — HUD's scoring/weighting does not apply).
Energy efficiency standards for new construction	Final Determination under EISA §481 / HOME Statute §109	**Final / Effective** Compliance date has passed	**Applies to projects with a PJ/HTF grantee funding commitment on/after Nov 28, 2024**	New construction must meet 2021 IECC or ASHRAE 90.1-2019 (or an approved alternate compliance path) to qualify as HOME/HTF affordable housing. **Unlike most other HUD programs, HUD has explicitly declined to extend this date for HOME/HTF — it is binding now.**
HOTMA income/asset requirement implementation	HOTMA Final Rule (cross-program)	**Delayed**	**Extended to January 1, 2027** (Federal Register notice published Dec 30, 2025)	Applies across HOME, HTF, HOPWA, CDBG, ESG, and CoC. **Early adoption allowed**



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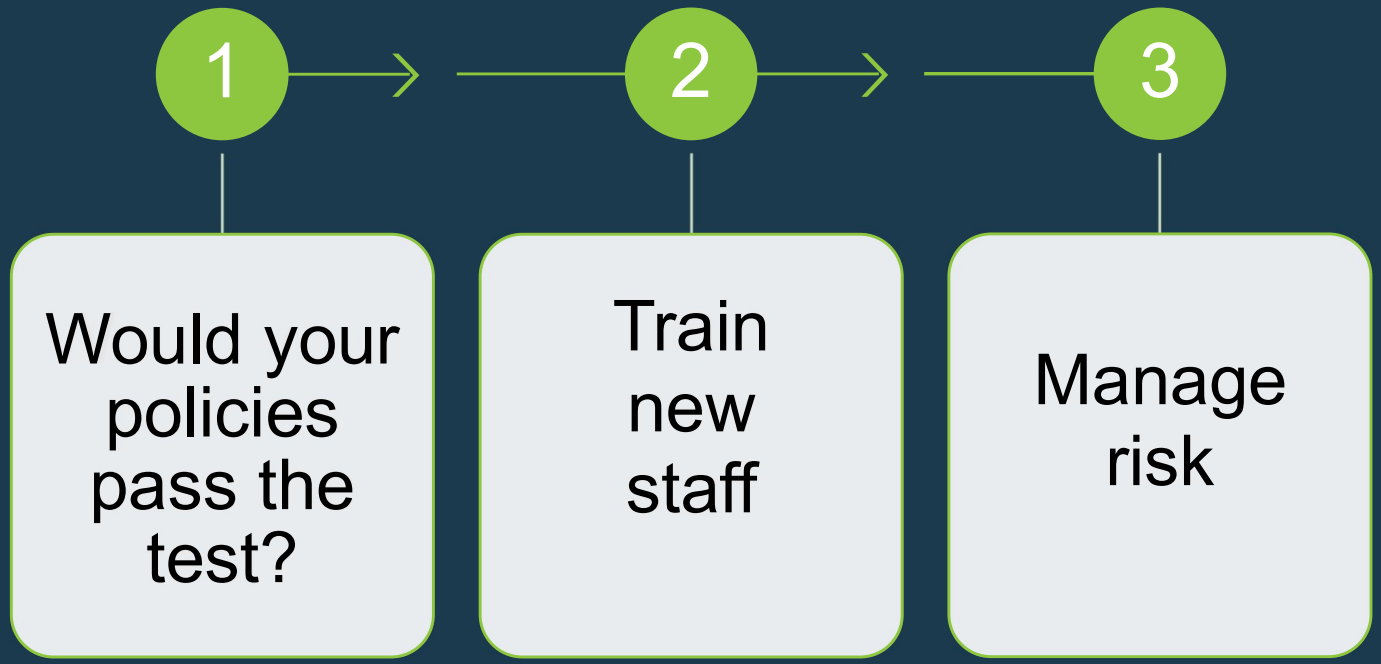


3. Borrow



4. Evaluate

Use the HUD CPD Monitoring Handbook



HUD CPD Monitoring Handbook:
https://www.hud.gov/hudclips/handbooks/cpd-6509-2

Sample Question:
HOME Homeownership and Occupancy Status

F. OWNERSHIP AND OCCUPANCY STATUS

NOT REVIEWED DURING MONITORING – Check all that apply:

☐ Policies and Procedures NOT REVIEWED, and/or

☐ Project files NOT REVIEWED

21.

Does the PJ have policies and procedures to comprehensively implement this requirement? [24 CFR 92.504(a)]	Did the PJ determine that the property was held in *one of the following eligible forms of homeownership*?
	• Fee simple
	• 99-year ground lease
	• 40-year ground lease for housing located in insular areas
	• 50-year ground lease for housing located on Indian land or a Community Land Trust
	• Ground lease equal to the applicable period of affordability for manufactured housing
	• Inherited property – NOTE: PJ may assist the owner-occupant of an inherited property with multiple owners as long as the owner-occupant
	  ○ Is low-income,
	  ○ Occupies unit as principal residence, and
	  ○ Pays all costs associated with ownership and maintenance
	• Life estate
	• Inter vivos trust – NOTE: PJ may assist if all beneficiaries of the trust qualify as low-income and occupy the unit as principal residence
	• Beneficiary deed
	(Note: A copy of the deed alone is not sufficient. A title search or a recent review of recorded ownership information should have been conducted.)
	[24 CFR 92.2 and 24 CFR 92.254(c)]		

☐ Yes ☐ No	File #1:	☐ Yes ☐ No	Form of ownership: Click or tap here to enter text.
	File #2:	☐ Yes ☐ No	Form of ownership: Click or tap here to enter text.
	File #3:	☐ Yes ☐ No	Form of ownership: Click or tap here to enter text.
	File #4:	☐ Yes ☐ No	Form of ownership: Click or tap here to enter text.
	File #5:	☐ Yes ☐ No	Form of ownership: Click or tap here to enter text.
Describe Basis for Conclusion: Click or tap here to enter text.			



1. Track



2. Test



3. Borrow



4. Evaluate



Borrow Good Policies from Peers

1. Ask for P&P, forms & **Advice**
2. **Adapt** Don't copy-paste
3. **Reciprocate** Offer your own good policies



1. Track



2. Test



3. Borrow



4. Evaluate



Evaluate how your policies will work in the real world

1. Convene an Advisory Group
2. Pre-test for readability and usability
3. Build a continuous feedback loop

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Questions?

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