



HOMES FOR GOOD BOARD OF COMMISSIONERS MEETING

Wednesday, June 28th, 2023

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AGENDA

Homes for Good Housing Agency

BOARD OF COMMISSIONERS

Location of the meeting:

Homes for Good Administrative Building
100 W 13th Avenue
Eugene, OR 97405



Zoom

This meeting will be conducted in person with option to join via public video call and conference line (see details below).

Wednesday, June 28th, 2023, at 1:30pm

The June 28th, 2023, Homes for Good Board of Commissioners meeting will be held at the Homes for Good Administrative Building. It will also be available via a public video call with dial-in capacity. The public has the option to participate in person or by joining via video call or conference line.

Join Zoom Meeting:

<https://us02web.zoom.us/j/88069630164>

1. PUBLIC COMMENTS

Maximum time 20 minutes: Speakers will be taken in the order in which they sign up and will be limited to 3-minutes per public comments. If the number wishing to testify exceeds 10 speakers, then additional speakers may be allowed if the chair determines that time permits or may be taken at a later time.

2. COMMISSIONERS' RESPONSE TO PUBLIC COMMENTS AND/OR OTHER ISSUES AND REMONSTRANCE (2 min. limit per commissioner)

3. ADJUSTMENTS TO THE AGENDA

4. COMMISSIONERS' BUSINESS

5. EMERGENCY BUSINESS

6. EXECUTIVE SESSION

7. ADMINISTRATION

- A. Executive Director Report
- B. Resident Services Event Calendar

8. CONSENT AGENDA

- A. Approval of May 31st, 2023, Board Meeting Minutes

9. ORDER 23-28-06-01H

In the Matter of Approving the Submission of the PHA FY 2024 Annual Plan
(Mira Miller, Compliance & Data Analyst) (Estimated 10 minutes)

10. ORDER 23-28-06-02H

In the Matter of Approving Contracts 23-P-0024 [Early Design Scope] & 23-P-0025 [Architectural Services] for Ollie Court
(Matt Salazar, Project Developer) (Estimated 10 minutes)

11. ORDER 23-28-06-03H

In the Matter of Authorizing the Transfer of Property at 375 Iowa Street in Eugene Oregon to Sponsors, Inc.
(Steve Ochs, Real Estate Development Director) (Estimated 15 minutes)

12. ORDER 23-28-06-04H

In the Matter of Approving the Submission of the PHA FY2024 Move to Work Supplement Plan
(Beth Ochs, Rent Assistance Director) (Estimated 15 minutes)

13. PRESENTATION I

Energy Services Division Overview
(Esteban Montero Chacon, Energy Services Director) (Estimated 15 minutes)

14. OTHER BUSINESS

Adjourn.

Eugene's Juneteenth Celebration was held in Alton Baker Park on Sunday June 18th and for the third year in a row Homes for Good was a sponsor. The event was well organized and fun thanks to one of our amazing employees, Jazzmen Vega-Heath, who helped lead the event production. This year our Energy Service Division tabled at the event in an effort to assist the BIPOC community with home weatherization services. A special thanks to Esteban Montero Chacon, Lacey LaCrosse, and Sam Simonett for staffing the table. I was able to attend as well and a highlight for me was to hear from 4J School Board Elect Rick Hamilton and Bethel School Board Elect Drae Charles about their vision for how school districts can better serve BIPOC students.



Lacey Lacosse & Sam Simonett at the Eugene Juneteenth Celebration representing the Homes for Good Energy Services Division

As of Tuesday, June 20th we have 10 days to complete and submit our audit opinion and financial statements to HUD. The Finance Team is working hard to answer a significant number of questions comparing FY 21 adjusted financials and FY 22 unadjusted financials. This has proven challenging because historically our Finance Director was responsible for these tasks. We are nearing completion of the program compliance portion of the audit with the Housing Choice Voucher program and Public Housing program being the two primary focuses of this portion of the audit. We are meeting with the Berman Hopkins team twice weekly to make sure we are delivering on their requests in a timely manner and problem solving the financial reconciliation between FY 21 and FY 22. The audit is scheduled to be complete and submitted to HUD by June 30th.

In June of 2021, the Homes for Good Board approved Year 1 of the Strategic Equity Plan (SEP). We are in the final stages of drafting Year 2 of the Strategic Equity Plan for review and deliberation by the new Homes for Good Board in the July Board meeting. On May 18th Board members Larissa Ennis, Michelle Thurston, Justin Sandoval, and Joel Iboa met with members of the Equity Strategy Team (EST) and provided input for us to consider for Year 2 of the SEP. On June 22nd we have another joint meeting between Board members and the EST then we will finalize the SEP for the July Board meeting.

On June 14th we had our second Board Finance Committee meeting. We have continued to develop budget variance reports and have edited them into a much more readable format with narrative to describe any variances +/- 10%. We reviewed budget variance reports for the Central Office Cost Center, the Housing Choice Voucher Program, and the Public Housing Portfolio. In our meetings we have also talked about how to provide financial training to the broader Board and what specific reports should be provided to the Board on a regular basis. The goal will be to provide training and begin providing financial reports in Fall of 2023.

RESIDENT SERVICES VOLUNTEER OPPORTUNITIES

If a board member is interested in attending any of the following events, please reach out to Executive Support Coordinator, Jasmine Leary. Most of the ongoing events are held various times of the month at different properties.

Ongoing Events

- ❖ Extra Helpings with Food for Lane County
- ❖ Bing
- ❖ Crafts
- ❖ Summer Lunch Distribution
- ❖ Coffee & Doughnuts
- ❖ Kids Club
- ❖ Karaoke
- ❖ Resident Meetings

Special Events | June 2023

- ❖ Legion Cottage BBQ
Tuesday, June 27th
3:00 p.m. – 4:30 p.m.

Special Events | July 2023

- ❖ Lindeborg Summer Social
Tuesday, July 11th
10:30 a.m. – 11:30 a.m.
- ❖ Lindeborg Senior Grocery
Tuesday, July 18th
9:30 a.m. – 11:00 a.m.
- ❖ McKenzie Village & Parkview Senior Grocery
Wednesday, July 19th
1:00 p.m. – 4:00 p.m.
- ❖ Abbie Lane Ice Cream Social
Thursday, July 20th
5:00 p.m. – 6:00 p.m.
- ❖ Village Oaks Ice Cream Social
Friday, July 21st
5:00 p.m. – 6:00 p.m.
- ❖ Sheldon Village Ice Cream Social
Wednesday, July 26th
5:00 p.m. – 6:00 p.m.
- ❖ Willakenzie Ice Cream Social
Thursday, July 27th
5:00 p.m. – 6:00 p.m.

Special Events | August 2023

- ❖ Community Night Out
Thursday, August 3rd
3:30 p.m. – 6:30 p.m.

MINUTES

Homes for Good Housing Agency

BOARD OF COMMISSIONERS



Wednesday, May 31st, 2023, at 1:30 p.m.

Homes for Good conducted the May 31st, 2023, meeting in person at the Homes for Good administrative building and via a public video call with dial-in capacity. The public was able to join the call, give public comments, and listen to the call.

CALL TO ORDER

Board Members Present

Char Reavis

Heather Buch

Michelle Thurston

Justin Sandoval

Pat Farr

Kirk Strohman

Chloe Tirabasso

Larissa Ennis

Joel Iboa

Board Members Absent

None

Quorum Met

1. PUBLIC COMMENT

None

2. COMMISSIONERS' RESPONSE TO PUBLIC COMMENTS AND/OR OTHER ISSUES AND REMONSTRANCE

None

3. ADJUSTMENTS TO THE AGENDA

ORDER 23-31-05-02H: In the Matter of Updating the Administrative Plan – New Project Based Voucher Community & Local Preferences will have modifications to the board order. Those modifications will be outlined in the following minutes and the uploaded board order to the Homes for Good website.

4. COMMISSIONERS' BUSINESS

None

5. EMERGENCY BUSINESS

None

6. ADMINISTRATION

A. Executive Director Report

Jacob Fox discussed Homes for Good sponsoring and attending the Centro Latino Americano, Downtown Language and Huerto de la Familia Gala. These are culturally specific organization serving primarily the Latino community. The event specifically highlighted the merging of all three organizations into La Plaza de Comunidad. Homes for Good looks forward to growing the ongoing partnership with La Plaza de Comunidad.

The Fiscal Year 2022 audit is ongoing. Due to program size, Public Housing has been included in the audit testing. It is common for a new audit firm to dive deeper into programmatic testing than a firm that has worked with the same organization for several years.

Some audit materials requested are from the 1980s and 1990s. Some files may have been lost in the transition from the former Homes for Good Administrative Building Day Island location to the current West 13th location. This shouldn't pose an issue but does provide some delays in providing the requested information.

Brandy McPherson, the Finance Manager, has been asked to compare the Fiscal Year 2022 adjusted financials to the Fiscal Year 2022 unadjusted financials. There has been difficulty understanding how the former Finance Director accounted for and allocated funds. There aren't currently any concerns, but it does provide some delays in providing the requested information.

Homes for Good owns a small parcel of land on River Road. Neighbors to the land have reached out to use the area for a community garden. The plans for the land are not yet determined, but there will be thoughtful consideration for its use. Homes for Good would need to ensure safeguards are in place for the protection of the Agency and those utilizing the property should it be turned into a communal space.

Discussion Themes

- Missing signs on parcel of land in Florence
- River Road property specifications

B. Quarter 2 Excellence Awards

- Rent Assistance Supervisor, **Nat Dybens** presented the Excellence Award to **Ciera Snow**
- Rent Assistance Division Director, **Beth Ochs** presented the Excellence Award to **Sandy Young**

7. CONSENT AGENDA

A. Approval of April 26th, 2023, Board Meeting Minutes

Vote Tabulations

Motion: **Michelle Thurston**

Second: **Chloe Tirabasso**

Discussion: *None*

Ayes: **Char Reavis, Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Tirabasso, Larissa Ennis, Joel Iboa, Pat Farr**

Abstain: *None*

Excused: *None*

The May 31st, 2023, Consent Agenda was passed [9/0/0]

PRESENTATIONS:

8. PRESENTATION: FY24 HUD PHA Annual Plan Process Overview

Compliance & Data Analyst, Mira Miller presenting

Overview

Each year there is a required process when reviewing and updating the HUD PHA Annual Plan. These events are opportunities for the public and the Resident Advisory Board to provide feedback. The timeline for that process is outlined below:

- Public Comment Period Opened: May 5th
- Public Hearing: June 16th
- MTW Hearing: June 16th

Discussion Themes

None

No action needed.

9. ORDER 23-31-05-01H: In the Matter of Updating the Administrative Plan – Temporary Local Preference in Response to Oregon’s Emergency Declaration due to Homelessness

Rent Assistance Director, Beth Ochs presenting

Overview

In response to the Governor Kotek’s Emergency Declaration due to Homelessness (January 10th, 2023 – January 2024), the local Multi-Agency Coordination Group (MAC) have collaborated to create a limited duration local preference called the All-In preference.

The All-In preference allows the provision of housing and shelter to homeless families with the Housing Choice Voucher (HCV/Section 8) waitlist. Entities that are interested, can provide a proposal via Lane County, and enter into an MOU from Homes for Good. For applicants that self-declare as homeless when they joined the Housing Choice Voucher waitlist and are referred from a local preference partner under the All-In Local Preference, those referrals will be placed higher on the waitlist in alignment with the policies of the Administrative Plan.

The funds provided from All-In via Lane County, can assist with application fees and security deposits..

There are opportunities to extend this funding if the state of emergency is renewed by Governor Kotek. This preference is a joint effort to house and shelter homeless families.

Discussion Themes

- Order of prioritization
- Data collected in the process – historically marginalized groups
- Rural support
- Future exploration of funding opportunities and grants
- Waitlist, wait times
- Variety of community partnerships & local preference

- Impact of funding delays from partners

Vote Tabulations

Motion: **Larissa Ennis**

Second: **Michelle Thurston**

Discussion: *None*

Ayes: **Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Tirabasso, Larissa Ennis, Joel Iboa, Pat Farr**

Abstain: *None*

Excused: Char Reavis

ORDER 23-31-05-01H was approved [9/0/1]

10. ORDER 23-31-05-02H: In the Matter of Updating the Administrative Plan – New Project Based Voucher Community & Local Preferences

Rent Assistance Director, Beth Ochs presenting

Overview

Homes for Good would like to add Shorepines at Munsel Creek to the list of Project Based Voucher communities and to Veteran’s Affairs Supportive Housing [VASH] for one-bedroom residences.

Additionally, Homes for Good would like to enter into an Memorandum of Understanding [MOU] with the Three Rivers Casino as a local preference partner in support of the tribal communities in Florence, Oregon. Three Rivers as an organization offers employee preferences to members of the tribal communities and their immediate family members. The MOU would allow for a more culturally specific local preference partner for three-bedroom residences at Shorepines at Munsel Creek.

Homes for Good would like to add a homeless preference for three-bedroom residences at Shorepines at Munsel Creek and Ketanji Court. Including the three-bedroom residence especially for Ketanji Court. Historically numerous applications would be received for residency at Ketnaji Court, but only a small percentage met the requirements. In changing the qualifications for the three-bedroom residences, more applicants will have an opportunity to qualify and be housed.

The Local Preference Partners for the homeless preference are Secretary of State, Three Rivers, HeadStart and Oregon Department of Human Services [ODHS]. MOUs should be completed in one to two weeks.

MODIFICATION I:

Three Rivers and Homes for Good are including the one-bedroom residence at Shorepines at Munsel Creek as part of the MOU.

MODIFICATION II:

Homes for Good is including the one-bedroom residence at Shorepines at Munsel Creek as part of the homelessness local preference

Discussion Themes

None

Vote Tabulations

Motion: **Michelle Thurston**

Second: **Joel Iboa**

Discussion: *None*

Ayes: **Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Tirabasso, Larissa Ennis, Joel Iboa, Pat Farr**

Abstain: *None*

Excused: Char Reavis

ORDER 23-31-05-02H was approved [9/0/1]

11. ORDER 23-31-05-03H: In the Matter of Approving the FY23 Public Housing Admissions & Continued Occupancy [ACOP] Update to Include Housing & Urban Development [HUD] Housing Opportunity Through Modernization Act of 2016 [HOTMA] Over Income Provisions

Compliance & Data Analyst, Mira Miller presenting

Overview

In 2016 HUD began making changes to ensure the appropriate use of the Public Housing program. As part of these revisions per HUD, Homes for Good is required to update the ACOP by June 14th, 2023.

The change is to require households that have exceeded 120% of area median income for two full years, to begin paying HUD determined fair market rent.

The alternative option is to terminate the lease for residents at that two-year period, but Homes for Good would prefer to maintain the least at the HUD determined fair market rent, to allow residents time to transition into different housing.

Discussion Themes

- Public Housing rent increases
- Federal regulations comparison to state regulations

Vote Tabulations

Motion: **Michelle Thurston**

Second: **Chloe Tirabasso**

Discussion: *None*

Ayes: **Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Tirabasso, Larissa Ennis, Joel Iboa, Pat Farr**

Abstain: *None*

Excused: Char Reavis

ORDER 23-31-05-03H was approved [9/0/1]

**12. ORDER 23-31-05-04H: In the Matter of Approving Contract 23-C-0023
[Construction Management/General Contractor Services] for the Lazy Days
Mobile Home Park Rebuild at 52511 McKenzie River Highway Near Blue River,
Oregon**

Real Estate Development Director, Steve Ochs presenting

Homes for Good is requesting to enter in contract with Meili Construction for the Lazy Days rebuild. In 2022 a CM/GC solicitation was run, and two companies responded. Both respondents, Essex and Meili have previously conducted construction projects in the Blue River area.

Normally, Homes for Good receives more responses, but several companies viewed the location as a deterrent to submitting proposals.

There have been delays to the project commencement due to the Department of Housing and Urban Development required environmental review process. This process has since been complete and work can begin.

Meili Construction will begin site work in early June 2023 and ultimately place 20 modular homes and 10 park model homes.

MODIFICATION I:

The units to be used have been rendered defective and in lieu of using the modular homes, OHCS has committed to provide \$2.7 million (\$135,00 per unit) for Homes for Good to purchase new modular homes. OHCS will continue working with Homes for Good throughout this process. It is likely a solicitation will need to be ran to purchase the new modular homes.

Overview

- Clarification on OHCS funding
- Estimated timeline & delays
- Impact to residents displaced/unhoused due to the wildfires
- CM/GC guaranteed maximum price
- Applicable wage rates for the contract

Discussion Themes

None

Vote Tabulations

Motion: **Larissa Ennis**

Second: **Michelle Thurston**

Discussion: *None*

Ayes: **Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Tirabasso, Larissa Ennis, Joel Iboa, Pat Farr**

Abstain: *None*

Excused: Char Reavis

ORDER 23-31-05-04H was approved [9/0/1]

13. OTHER BUSINESS

None

Meeting adjourned at 2:43 p.m.

Minutes Taken By: Jasmine Leary



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/28/2023

AGENDA TITLE: In the Matter of Approving the Submission of the PHA FY 2024 Annual Plan

DEPARTMENT: Executive

CONTACT : Mira Miller

EXT: 682-2588

PRESENTER: Mira Miller

EXT: 682-2588

ESTIMATED TIME : 10 min

- ORDER/RESOLUTION**
- PUBLIC HEARING/ORDINANCE**
- DISCUSSION OR PRESENTATION (NO ACTION)**
- APPOINTMENTS**
- REPORT**
- PUBLIC COMMENT ANTICIPATED**

Approval Signature

EXECUTIVE DIRECTOR:

A handwritten signature in black ink, appearing to be "Mira Miller", is written over a horizontal line.

DATE: 06.20.2023

LEGAL STAFF :

DATE:

MANAGEMENT STAFF: *Wakan Alferes*

DATE: 6/14/23



HOMES FOR GOOD MEMORANDUM

TO: Homes for Good Board of Commissioners
FROM: Mira Miller, Compliance & Data Analyst
TITLE: In the Matter of Approving the Submission of the PHA FY2024 Annual Plan
DATE: June 28th, 2023

MOTION:

It is moved that the order be adopted approving the submission of the Public Housing Agency (PHA) Annual Plan for the fiscal year beginning October 1, 2023.

DISCUSSION:

A. Issue

The Annual Agency Plan requires Board approval and certification that the Agency has complied with the applicable requirements listed on the certification form.

B. Background

The Agency is required by Section 511 of the Quality Housing and Work Responsibility Act of 1998 (and ensuing HUD requirements) to submit an Annual Plan to HUD. This year the Agency is required to submit an Annual Plan covering FY 2024, which begins October 1, 2023, and ends September 30, 2024.

As in previous years, the focus of the Plans is to identify the programs and services provided under the Public Housing (PH) and Section 8 Tenant Based Assistance Programs and to allow public access and comment on those programs and services. The Work Responsibility Act requires that housing authorities work with their Public Housing Resident Advisory Boards (RAB) on the planning and development of the Plans. In order to meet this requirement, the Agency began meeting with the RAB in February 2023.

The Agency is submitting the Plan to the Homes for Good Board of Commissioners for deliberation and if approved the Plan will be electronically submission to HUD no later than July 18, 2023.

C. Analysis

Homes for Good continues to maintain high performer status with HUD and has complied with applicable Annual Plan requirements for high performers.



D. Furtherance of the Strategic Equity Plan

This year's PHA Annual Plan also includes a Moving to Work (MTW) Supplement that is intended to create flexibilities and efficiencies that allow Homes for Good staff to engage with our stakeholders and customers at a deeper level and create staff capacity to pursue Strategic Equity Plan goals.

E. Alternatives & Other Options

This is a required HUD submission by July 18 each year. The next board meeting is scheduled for after that deadline. If this plan is not approved, then Homes for Good will be out of compliance with HUD requirements until an FY24 PHA Annual Plan is approved and submitted.

F. Timing & Implementation

A copy of the PHA Certifications of Compliance with PHA Plans and Related Regulations form must be filled out and signed by the Chair.

Upon approval by the Board, the Executive Director will direct staff to submit the Annual Plan to HUD.

G. Recommendation

Approval of the proposed motion.

H. Follow Up

None.

I. Attachments

- Certification of Compliance with PHA Plans and Related Regulations
- Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan, signed by the Eugene city manager
- PHA Annual Plan Small Book
- HUD PHA Annual Plan Certification Form

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ___ Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning _____, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

PHA Name

PHA Number/HA Code

_____ Annual PHA Plan for Fiscal Year 20_____

_____ 5-Year PHA Plan for Fiscal Years 20_____ - 20_____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director

Name Board Chairman

Signature

Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Sarah Medary, the City Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal year **2024** of the **Homes for Good Housing Agency** is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Eugene
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The PHA Annual Plan preserves affordable housing in a way that is consistent with the goals of the 2020-2025 Eugene-Springfield Consolidated Plan.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official: Sarah Medary	Title: City Manager
Signature: <u>Matt Rodrigues, AIC for SM</u> <small>Matt Rodrigues, AIC for SM (Jun 9, 2023 10:52 PDT)</small>	Date: 06/09/2023

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

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ANNUAL PLAN FOR FISCAL YEAR 2024



541-682-3755



www.homesforgood.org



100 West 13th Avenue, Eugene, OR 97401



100 West 13th Avenue, Eugene, OR 97401 • PH 541-682-3755 • FAX 541-682-3411



Homes. People. Partnerships. Good. www.homesforgood.org

Homes for Good PHA Annual Plan Notice of 45-Day Comment Period and Public Hearing

Homes for Good Housing Agency is updating its PHA Annual Plan. This plan guides the planning and implementation of federal programs under the jurisdiction of the Department of Housing and Urban Development for the period beginning October 1, 2023. The federal programs related to housing and other needs for low-income persons covered by the Agency Plans include, but are not limited to, Capital Fund, Section 8 and Public Housing Admission policies, Self Sufficiency, and Resident participation.

The public examination and comment period begins May 5, 2023 and ends June 20, 2023. There will be a public hearing on June 16, 2023 at 1:30 p.m. at the Homes for Good Service Center first floor at 100 West 13th Avenue Eugene, OR 97401 and via Zoom.

Topic: Homes for Good PHA Annual Plan Public Hearing
Time: June 16, 2023 at 01:30 PM Pacific Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/88069630164>

Meeting ID: 880 6963 0164

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+1 669 900 6833 US (San Jose)

+1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

+1 386 347 5053 US

+1 564 217 2000 US

+1 646 931 3860 US

+1 929 205 6099 US (New York)

833 548 0276 US Toll-free

833 548 0282 US Toll-free

877 853 5257 US Toll-free

888 475 4499 US Toll-free

Meeting ID: 880 6963 0164

Find your local number: <https://us02web.zoom.us/u/kddf6B4Xmt>

Comments may be presented in person during this meeting, or in writing as noted below. The draft plans and all supporting documents may be viewed at Homes for Good Service Center 100 West 13th Ave Eugene, OR 97401 and on our website at homesforgood.org

If you have any questions regarding the plans or would like to submit any written comments, please contact Mira Miller, Compliance & Data Analyst; at 100 West 13th Ave Eugene, OR 97401, mmiller@homesforgood.org or 541-682-2588. To request a reasonable accommodation for this meeting, please call 541-682-2588 at least 24 hours prior to the meeting time.

The Agency is an equal opportunity employer and complies with State and Federal laws and regulations relating to the 1973 Rehabilitation Act, Section 504, and the 1990 Americans with Disabilities Act (ADA) and the 2009 ADA Amendments Act (ADAAA). Homes for Good does not discriminate on the basis of disability status in the admission or access to its federally assisted programs or activities.



100 West 13th Avenue, Eugene, OR 97401 • PH 541-682-3755 • FAX 541-682-3411



Homes. People. Partnerships. Good. www.homesforgood.org

Homes for Good MTW Supplement to the Annual Plan Notice of 45-Day Comment Period and Public Hearing

Homes for Good Housing Agency is preparing its first Moving to Work (MTW) Supplement to the PHA Annual Plan (the "Supplement") for submission to HUD. The Supplement will be submitted to HUD as part of its Annual Plan process. The MTW program gives Homes for Good specific funding and programmatic flexibilities. The Supplement describes the ways in which Homes for Good plans to use its MTW flexibilities in the Fiscal Year starting October 1, 2023. Homes for Good also prepared a "reader-friendly" narrative that describes the waivers included in its plan. This narrative can be found on the MTW page on the Homes for Good website.

A separate public hearing is required for the Supplement because it includes a request to waive one or more of HUD's safe harbor waivers and an agency-specific waiver. The public examination and comment period of the Supplement begins May 5, 2023 and ends June 20, 2023. There will be a public hearing on June 16, 2023 at 2:00 p.m. at the Homes for Good Service Center first floor at 100 West 13th Avenue Eugene, OR 97401 and via Zoom.

Topic: Homes for Good MTW Supplement to the Annual Plan Public Hearing
Time: June 16, 2023 at 02:00 PM Pacific Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/88069630164>

Meeting ID: 880 6963 0164

One tap mobile

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888 475 4499 US Toll-free

Meeting ID: 880 6963 0164

Find your local number: <https://us02web.zoom.us/j/88069630164>

Comments may be presented in person during this meeting, or in writing as noted below. The draft MTW Supplement and all supporting documents may be viewed at Homes for Good Service Center 100 West 13th Ave Eugene, OR 97401 and on our website at homesforgood.org

If you have any questions regarding the plans or would like to submit any written comments, please contact Mira Miller, Compliance & Data Analyst; at 100 West 13th Ave Eugene, OR 97401, mmiller@homesforgood.org or 541-682-2588. To request a reasonable accommodation for this meeting, please call 541-682-2588 at least 24 hours prior to the meeting time.

The Agency is an equal opportunity employer and complies with State and Federal laws and regulations relating to the 1973 Rehabilitation Act, Section 504, and the 1990 Americans with Disabilities Act (ADA) and the 2009 ADA Amendments Act (ADAAA). Homes for Good does not discriminate on the basis of disability status in the admission or access to its federally assisted programs or activities.

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
--------------------------------------------------------------------	-----------------------------------------------------------------------------------------	-----------------------------------------

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> PHA Name: <u>Homes for Good Housing Agency</u> PHA Code: <u>OR006</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>595</u> Number of Housing Choice Vouchers (HCVs) <u>3199</u> Total Combined <u>3794</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>See Attachment B.1 Revision of PHA Plan Elements See Attachment B.1.a Key Modifications ACOP FY24 See Attachment B.1.b Key Modifications Admin Plan FY24</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>See Attachment B.3 Progress Report</p>

B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/26/2022.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><i>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D.	Affirmatively Furthering Fair Housing (AFFH).																		
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Fair Housing Goal:</td> <td></td> </tr> <tr> <td></td> <td><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></td> </tr> <tr> <td colspan="2" style="height: 150px;"></td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Fair Housing Goal:</td> <td></td> </tr> <tr> <td></td> <td><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></td> </tr> <tr> <td colspan="2" style="height: 150px;"></td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Fair Housing Goal:</td> <td></td> </tr> <tr> <td></td> <td><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></td> </tr> <tr> <td colspan="2" style="height: 150px;"></td> </tr> </table>	Fair Housing Goal:			<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>			Fair Housing Goal:			<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>			Fair Housing Goal:			<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>		
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Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(2\)\(i\)](#)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. [24 CFR §903.7\(b\)](#) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. [24 CFR §903.7\(b\)](#) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. [24 CFR §903.7\(b\)](#)

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. ([24 CFR §903.7\(k\)](#) and 24 CFR §903.12(b).

Safety and Crime Prevention (VAWA). A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

HOPE VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. ([Notice PIH 2011-47](#))

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. ([24 CFR §903.7\(h\)](#))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. ([24 CFR §903.7\(j\)](#))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further

fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.



Attachment B.1 Revision of PHA Plan Elements

Statement of Housing Needs and Strategy for Addressing Housing Needs

The assessment of the impediments to fair housing and fair housing plan strategies was developed with input from the City of Eugene and the City of Springfield Consolidated plan 2020.

As a first step in this effort Homes for Good assessed impediments and barriers to fair housing as part of its Annual PHA Plan. This was developed with input during the City of Eugene and the City of Springfield Consolidated planning process and consultation with many community partners. Its effectiveness is reviewed and measured annually so that strategies can be adjusted, as necessary. Through this work it was found that the two primary issues related to housing need are 1) The lack of affordable units and 2) Significant barriers to providing equal access to units that are available.

Families with incomes below 30 percent of area median income (extremely low-income)

Unless otherwise noted, all information below is from the 2020 Eugene-Springfield Consolidated Plan. In Eugene-Springfield 44% of households in the plan area have extremely low, very low or low-moderate incomes. HUD provided numbers in the Consolidated plan indicated that 14.8% of total households were identified as extremely low income (less than 30% AMI) and 12.3% as low income (between 30 and 50% AMI). More households with children under age 6 (55%) and households with people over age 75 (54%) have low incomes.

The Eugene-Springfield Consolidated Plan notes that housing costs in the Eugene-Springfield area have risen sharply over the past 25 years while incomes have risen slowly, forcing many households to pay more for housing than is affordable. Households paying more than 30% of household income are considered to have a 'housing cost burden'. Most of the renters in Eugene (54%) and Springfield (51%) are considered housing cost burdened, while approximately a third of homeowners are also cost burdened (Eugene – 32%, Springfield – 33%). The elderly makes up 15% of the very low income with a housing cost burden.

Low and very low-income people need increased access to quality affordable rental housing. There is a total of 31,055 low-income renter households in Eugene, and 7,335 in Springfield.

A significant majority of low-income renters experience a housing cost burden, overcrowding, and/or substandard housing conditions (Eugene – 78%, Springfield – 76%).

A significant majority of low-income renters spend more than 30% of their income on housing costs (Eugene – 76%, Springfield – 74%).

A large percentage of low-income renters spend more than 50% of their income on housing costs (Eugene – 51%, Springfield – 34%).

Elderly families and families with disabilities

Elderly individuals and families make up 13.9% (Renter) and 33.7% (Owner) of the total households with a severe housing cost burden by income. A severe housing cost burden indicates that over 50% of the income is spent on housing.

The Consolidated Plan also indicates that about 14% of population in the Cities of Eugene and Springfield lives with one or more disabilities (29,125 people). Persons with disabilities face a number of barriers related to mobility, transportation, housing, employment, and access to services. In addition, persons with disabilities report many instances of discrimination.

Households of various races and ethnic groups residing in the jurisdiction

In most income categories, there are racial or ethnic groups which are experiencing a disproportionately greater need than the needs of the income category as a whole. For people with very low incomes (30-50% MFI), American Indian/Alaskan Native and Black/African Americans experience a disproportionately greater need than the general population. For people with low incomes (50-80% MFI), Black/African Americans experience a disproportionate level of need. For people with moderate income (80%-100 MFI), Asian, Latino, and Black/African American experience a disproportionately greater need than the income category as a whole. In Eugene and Springfield, there are approximately 13% of the people who identified as a minority race in the 2010 census. There are five census tracts where a higher percentage (17%- 23%) of people identified as a minority race.

Hispanic households experience a disproportionately greater incidence of housing cost burden compared to the entire population, with 53% of the Hispanic households paying more than 30% of their income for housing costs. Asian households experience a disproportionately greater incidence of severe housing cost burdens compared to the entire population; 35% of Asian households spend more than 50% of their income on housing costs.

Black/African American households experience a disproportionately greater need with severe housing problems in both very low-income (30-50% AMI) and moderate income (80-100% AMI) categories. Severe housing problems exist when a household experiences one or more of the following housing problems: lacks complete kitchen facilities, lacks complete plumbing facilities, has over 1.5 people per room, and a housing cost burden over 50%. Both Asian and Hispanic low-income (50-80% AMI) households experience a disproportionate number of severe housing problems.

Affordability and supply

The lack of availability rental and owner-occupied units for low-income residents, as indicated by the significant waiting lists for public housing, and the difficulty experienced by Section 8 voucher-holders in trying to find affordable available housing. Additionally, vacancy rates remain low, at 2% for Eugene owner-occupied and rental housing, and 2% in Springfield for owner-occupied housing and 3% for renter units. Data from Oregon Housing and Community Services further supports this need indicating there is a deficit of over 2,700 affordable housing units in Lane County in 2016.

Our strategies to increase the availability of affordable, accessible housing include aggressively pursuing additions to the housing supply through the use of government subsidies and incentives as well as public/private partnerships. Homes for Good has set aside units in numerous recent developments for incomes at or below 30% AMI and continues to work with Lane County to serve extremely low-income individuals and families from the centralized waitlist.

Homes for Good is addressing this need in a variety of ways which include:

- New Construction
- Preservation
- Development Pipeline

New Construction

5 New Construction projects were recently completed totaling 230 units.

The Commons on MLK (\$13 million total budget)	This 51-unit housing first project completed construction in January of 2021 is a powerful partnership with Lane County to implement the priorities/goals of the Poverty and Homelessness Board.
Sarang (1 of 2 projects part of \$32mm Rental Assistance Demonstration Preservation RAD replacement Project.)	This 49-unit project is one of two different sites in one financial transaction. for Good received approval from HUD through the RAD program to sell 100 single family homes and duplexes that receive a Public Housing rental/operating subsidy and converting these subsidies to a Section 8 subsidy that will be place into 100 newly constructed units. This project was completed in June of 2021 and provides 49 of the units in Eugene.
Hayden Bridge Landing (2 nd RAD replacement project)	This 70-unit project is the second site in the one financial transaction and was completed in June of 2021. This project provides the remaining 53 replacement of the units in Springfield with attached rental subsidy and an additional 17 units that will provide much needed one-bedroom units.
The Keystone	This 15-unit Permanent Supportive Housing development in Eugene serves homeless families and includes 15 PBVs. It was completed in fall of 2021.
The Nel	This 45-unit Permanent Supportive Housing development in Eugene will serve homeless individuals and includes 45 PBVs. It began construction in May 2021 and will be complete in July of 2022.

Preservation

Future RAD Conversions	<p>Homes for Good is looking at future phases of converting the remaining public housing through the RAD process.</p> <p>Preservation of Federal Subsidies in Lane County – Homes for Good is looking at several developments that may need preservation work to preserve ongoing federal subsidies.</p>
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Development Pipeline

Lazy Days	Homes for Good purchased a mobile home park up the McKenzie River that was destroyed in the Holiday Farm fire. The park will provide 30 units of housing including 20 units for homeownership and 10 for rental
Bridges on Broadway	Lane County acquired a 50-unit hotel that it is using to house people displaced by wildfires. Lane County is transferring the property to Homes for good and a funding application will be submitted in early 2023 to convert the property to Permanent Supportive Housing.
The Coleman	Homes for Good is partnering with Lane County and Sponsors Inc. to develop 38 units of affordable housing on property owned by Lane County on Highway 99 in Eugene. Homes for Good intends to pursue funding from the State of Oregon in summer of 2023.
Naval Reserve Site	Homes for Good was awarded a City of Eugene landbank site on 13 th Avenue in Eugene that will be used for the future development of approximately 80 affordable units along with an Early Learning Center. Homes for Good intends to submit a funding application to the State of Oregon in early 2023 for this development.
Quince Street Florence	Homes for Good acquired a 6.88-acre parcel that will be used for the future development of approximately 85 affordable units. Homes for Good intends to submit a funding application to the State of Oregon in early 2023 for this development.
Rural Lane County	Homes for Good is working with Lane County and the cities of Cottage Grove and Florence to acquire land for rural affordable housing projects
Glenwood	Homes for acquired property in Glenwood that will be used for a future development of 100 to 150 units.
Permanent Supportive Housing	Homes for Good is working with Lane County and has identified several sites in the Metro area that will be used for future PSH projects.

Impediments to Fair Housing

While some of the identified impediments are not directly related to the federal Fair Housing Act, as a Public Housing Authority that sponsors the Fair Housing Council of Oregon, Homes for Good continues to believe that the lack of availability of affordable, accessible housing is a problem in our community and therefore, had maintained its efforts to promote affordable, accessible housing in addition to our efforts to overcome the more specific impediments which are directly related to the federal Fair Housing Act.

Three major impediments to providing equal housing to populations were identified in development of the annual plan as follows:

1. Limited awareness of Fair Housing policies in the broader community
2. Cultural differences and language barriers which inhibit access to Fair Housing
3. People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes.

To address these various impediments, we created an Equity Strategy Team which has guided the implementation of the Strategic Equity Plan. This team helped guide the approval of an agency wide Strategic Equity Plan (SEP) that guides all facets of work at the agency. The SEP has four pillars which are designed to address the impediments in various ways and each pillar includes goals and tactics to implement the work. These are listed goals and tactics are included below as they apply.

Impediment: Limited awareness of fair housing policies in the broader community.

Strategies to address this impediment include:

- Participating in community engagement and is very involved in area- wide Fair Housing planning and efforts.
- Deepen the partnership with the Fair Housing Council of Oregon beyond all staff training to determine when and how Homes for Good should address instances of racial and income discrimination. Joining various relevant boards, including the Rental Owners Association (ROA), Human Rights Commission, Housing Policy Board, United Way Equity Coalition and Lane County Poverty and Homeless Board.
- Executive Director Jacob Fox is on the Poverty and Homelessness Board and chairs their facilities committee; in that position Jacob strives to further the goals of Fair Housing.
- Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Lane County Rental Owner's Association (ROA). This board meets monthly and has over 1,200 members.
- Real Estate Development Director, Steve Ochs is on the Housing Policy Board which sets local policy regarding housing and works to further Fair Housing Goals.
- Provide two trainings per year for our non-profit local preference partner network and provide these partners an opportunity to give feedback on how the system could improve.
- Provide at least one presentation to local and state jurisdictions and one presentation to the business community that focuses on the Rent Assistance Division's local preferences and other housing referral partnerships like Permanent Supportive Housing and Project-Based Vouchers.
- Homes for Good supported the Juneteenth Celebration last summer and plans to continue supporting that event in the future.
- Homes for Good is planning a mandated 4-hour all-staff training in Fair Housing laws.
- Updated Fair Housing information was added to the Section 8 program briefing packets.

- Homes for Good has produced updated maps showing concentrations of poverty in Lane County.
- Homes for Good has a presence on the Human Rights Commission and the United Way Equity Coalition.

Impediment: Cultural differences and language barriers which inhibit access to fair housing.

Strategies to address this impediment include:

- Conducted waitlist connect event at Centro Latino Americano and NAACP
- As part of an agency centralized list, identify culturally specific organizations, and organizations serving the BIPOC members in the community that we currently work with, and want to partner with in the future. In the centralized agency list, we will identify organizational interest for the partnership, including who key leaders are, main points of contact, the organization's capacity, benefits for both organizations, and a description of the current partnership.
- Continue Rent Assistance Leadership membership in the NAACP Housing Committee.
- Create and implement a plan for a mix of pre-created and organic content for social media channels, including the capacity to find and share content from the BIPOC community, culturally specific organizations, and people with disabilities.
- Monitor and evaluate content shared to ensure no group is disproportionately represented to not present the appearance that one group of people disproportionately utilizes our services.
- Create opportunities for clients to share their experiences, balancing the needs of client privacy and the personal nature of housing.
- Determine whether to implement Local Preference partnership(s) with community organizations that are culturally specific or who have programmatic specialization in supporting people from the BIPOC and people with disabilities.
- Conduct targeted recruitments for bilingual employees. At the present time there are 15 English-Spanish bilingual employees. Homes for Good also has 1 staff member fluent in Polish.
- Homes for Good has implemented a Language Access Plan, which provides access to interpretation and translation services as needed for participants.

Impediment: People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes. Strategies to address this impediment include:

- Accessibility survey of all Homes for Good owned units has been conducted. The results of this are being used to accurately advertise what accessibility features are available in units guide future capital improvements to improve accessibility.
- For new construction apartment communities, work with architects to hold focus group with people with disabilities and review design for common areas and Accessible units.
- Utilize already gathered data to assess how clients from the BIPOC community and clients with disabilities are providing feedback now, or if they even are.
- Quarterly meetings with Shelter Plus Care service providers to expedite referrals for S+C Program.
- Working closely with residents to ensure reasonable accommodations are approved when appropriate.

- Homes for Good, in partnership with Lane County, is working to expand the Housing First movement for people with disabilities or other barriers to housing.
- In addition to these specific strategies Homes for Good has made a strong commitment to promoting Fair Housing rights and Fair Housing choice by providing information regarding Fair Housing and Fair Housing choice to applicants, residents and staff. The following is a list of actions that Homes for Good has taken:
 - The Fair Housing logo "Equal Housing Opportunity" is prominently displayed on location signs at Homes for Good administrative offices and at its various housing complexes
 - The Fair housing logo is prominently displayed on signs/banners at various Homes for Good locations, announcing the availability of low-income rental units
 - The Fair Housing logo is on Homes for Good letterhead and business cards
 - The Agency's Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed in the lobbies of the two administrative offices and in public areas at its various housing complexes
 - The Agency's Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed on the website: www.HomesforGood.org
 - HUD Form 928.1 ("We Do Business in Accordance with the Federal Fair Housing Law" poster) is prominently displayed in English and Spanish in Homes for Good's administrative office and in public areas at the various housing complexes
 - HUD Form 1686-FHEO (*Fair Housing – It's Your Right* Pamphlet) is available in English and Spanish in Homes for Good administrative offices
 - *Filing a Housing 'Discrimination Complaint* - a pamphlet created by Consumer Action with funding from the U.S Department of Housing and Urban Development (HUD) is available in English and Spanish at Homes for Good administrative offices
 - Applicants or residents with questions about Fair Housing issues are referred, or directed via website link, to the Fair Housing Council of Oregon, Legal Aid Services of Oregon (LSAO) or Lane County Law & Advocacy Center (LCLAC), the Oregon Advocacy Center (OAC), the Lane Independent Living Alliance (LILA), the Oregon Bureau of Labor and Industries (BOLI), and/or to the US Department of Housing & Urban Development (HUDF) / Office of Fair Housing and Equal Opportunity (FHEO)
 - Homes for Good has a long-standing Policy on Reasonable Accommodation, which is recognized in the Pacific Northwest among public Housing Authorities and by the regional HUD office as being comprehensive, well-written, and well-implemented.
 - Homes for Good's Policy on Reasonable Accommodation is prominently displayed in administrative office and in public areas of its various housing complexes. It is available to any applicant or resident and is included in the Admin Plan and Admissions and Continued Occupancy Policies. It is also posted on Homes for Good's website at www.HomesforGood.org
 - Applicants for, and recipients of, housing assistance from Homes for Good are advised of their right to request reasonable accommodation for their disability. Information regarding reasonable accommodations is provided on the pre-application for assistance, in initial determination of ineligibility, in the public housing and assisted housing lease agreements, in notices of eviction, in periodic resident

newsletters, and discussed during the intake process during any informal settlement discussions and during other discussions with applicants and residents when inquiries are made about accommodating disabilities.

- Under the terms of a voluntary compliance agreement between the us department of HUD/FHEO and Homes for Good's pre-application for housing assistance requests information from applicants, which is not used in determining their eligibility for housing regarding their ethnicity, race, and disability status. This information is recorded, retained, and available to HUD upon request.
- Homes for Good has completed outreach presentations to agencies representing youth, seniors/elderly, people with physical and/or mental disabilities, and minorities, to help assure that a broad base of the community has access to information about the availability of housing. This outreach effort is ongoing and representatives from a number of those social service and advocacy agencies serve on Homes for Good's family self-sufficiency advisory board.
- Homes for Good has also worked to increase the ability of low-income community members to access housing by developing an innovative program in cooperation with community lending-works, the lending arm of DevNW (neighborhood economic development corporation), to assist applicants to its agency-owned housing programs, in obtaining loans to cover the cost of their security deposits, as they lease up with Homes for Good. Homes for Good indemnifies the loans, guaranteeing payment to DevNW, should the applicant default.

Financial Resources

	<u>2021</u> <u>BUDGET</u>	<u>2021</u> <u>ACTUAL</u>	<u>2022</u> <u>BUDGET</u>	<u>2022</u> <u>PROJECTED</u>	<u>2023</u> <u>BUDGET</u>
Beginning Restricted Reserves	2,431,194	\$ 5,260,500	\$ 17,828,700	\$ 7,287,900	\$ 3,991,700
Beginning Unrestricted Reserves	17,735,706	6,840,200	8,887,300	9,481,500	10,808,400
Total Beginning Reserves	<u>20,166,900</u>	<u>12,100,700</u>	<u>26,716,000</u>	<u>16,769,400</u>	<u>14,800,100</u>
Revenue	48,742,300	68,651,600	58,825,300	53,781,500	66,730,000
Expenses					
Personnel Services	8,192,800	7,888,000	11,244,800	10,964,200	11,832,800
Materials & Services	32,428,500	47,609,700	40,788,900	40,702,500	46,071,400
Overhead	527,300	-	634,600	-	745,900
Total Expenses	<u>41,148,600</u>	<u>55,497,700</u>	<u>52,668,300</u>	<u>51,666,700</u>	<u>58,650,100</u>
Net Change	<u>7,593,700</u>	<u>13,153,900</u>	<u>6,157,000</u>	<u>2,114,800</u>	<u>8,079,900</u>
Other Financing Sources and (Uses)					
Capital Outlay	(2,677,700)	(13,244,800)	(1,862,100)	(3,182,900)	(3,985,700)
Reserves Uses (Savings)	(4,596,400)	(1,756,100)	774,200	1,969,300	(3,095,200)
Debt Issuance	1,130,000	6,263,000	907,600	1,468,000	1,350,000
Debt Service	(966,900)	(1,503,400)	(1,097,800)	(2,369,200)	(2,349,000)
Inter-Program Transfers In	422,500	9,583,100	1,040,600	3,194,700	35,134,400
Inter-Program Transfers Out	(422,500)	(9,583,100)	(1,040,600)	(3,194,700)	(35,134,400)
Other Financing Sources and (Uses)	<u>(7,111,000)</u>	<u>(10,241,300)</u>	<u>(1,278,100)</u>	<u>(2,114,800)</u>	<u>(8,079,900)</u>
Excess (Deficiency) of Revenue Over (Under) Total Expenses and Other Resources	<u>482,700</u>	<u>2,912,600</u>	<u>4,878,900</u>	<u>-</u>	<u>-</u>
Ending Restricted Reserves	18,141,700	7,287,900	20,885,200	3,991,700	3,529,300
Ending Unrestricted Reserves	27,387,400	9,481,500	10,132,700	10,808,400	14,366,000
Total Ending Reserves	<u>\$ 45,529,100</u>	<u>\$ 16,769,400</u>	<u>\$ 31,017,900</u>	<u>\$ 14,800,100</u>	<u>\$ 17,895,300</u>
Program Expenses					
Community Services	\$ 4,682,800	\$ 4,662,200	\$ 6,912,500	\$ 4,263,200	\$ 5,955,700
Supportive Housing	7,736,000	8,651,000	8,772,700	9,007,100	10,285,500
Rent Assistance	25,551,700	38,581,500	33,096,200	34,179,000	38,060,200
COCC	3,178,100	3,603,000	3,886,900	4,217,400	4,348,700
Total Program Expenses	<u>41,148,600</u>	<u>55,497,700</u>	<u>52,668,300</u>	<u>51,666,700</u>	<u>58,650,100</u>
Program Other Resources					
Community Services	(6,187,000)	(10,752,600)	(690,900)	(3,661,900)	(6,574,700)
Housing	(1,419,400)	1,641,000	(1,627,200)	(2,338,400)	1,384,200
Rent Assistance	883,500	1,746,500	1,277,300	3,131,400	(3,141,800)
COCC	(388,100)	(2,876,200)	(237,300)	754,100	252,400
Total Other Resources	<u>\$ (7,111,000)</u>	<u>\$ (10,241,300)</u>	<u>\$ (1,278,100)</u>	<u>\$ (2,114,800)</u>	<u>\$ (8,079,900)</u>
Full-Time Equivalent Positions	<u>102.00</u>	<u>116.00</u>	<u>122.00</u>	<u>126.00</u>	<u>130.00</u>

Significant Amendment or Modification

Definitions of Substantial Deviation to the PHA 5 Year Plan and Significant Amendment to the 5 Year and Annual Plan

In accordance with 24 CFR 903.7(r)(2) which requires public housing authorities to identify the basic criteria the agency will use to determine a substantial deviation from its 5 Year Plan and significant amendments or modification to the 5 Year Plan and Annual Plan, the following definitions are offered:

Definition of Substantial Deviation from the 5 Year Plan:

- A substantial change in a goal(s) identified in the 5 Year Plan.

Definition of Significant Amendment or Modification to the Annual and 5 Year Plan:

- Changes of a sufficient nature to the rent, admissions policies, or the organization of the waiting list not required by federal regulatory requirements as to a change in the Section 8 Administration Plan or the Public Housing Admissions and Continued Occupancy Policy. This includes elimination or major changes in any activities proposed, or policies provided in the agency plan that would momentarily affect services or programs provided residents. This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.
- Significant dollar or work item changes to the Capital Fund grant. Significant dollar change to be defined as more than 20% of the total annual grant. Moving a work item from one year to another will not be considered a significant change even if that change produces a dollar change over 20%.
- Changes of a sufficient nature with regard to demolition or disposition, designation, homeownership programs, or conversion activities.

As a result of our participation in the Rental Assistance Demonstration (RAD), Homes for Good previously further defined Substantial Deviation and Significant Amendment or Modification to exclude the following RAD-specific items:

- The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance.
- Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds.
- Changes to the construction and rehabilitation plan for each approved RAD conversion.
- Changes to the financing structure for each approved RAD conversion.



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**Updates to the Homes for Good
Public Housing Admissions and Continued Occupancy Policy (ACOP) Fiscal Year 2024**
Effective Date 10-01-2023 to 09-30-2024

Proposed changes to the following chapters:

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<p>2-I.C. Discrimination Complaints</p> <p>Page 2-5</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Applicants or tenant families who believe that they have been subject to unlawful discrimination may notify the PHA either orally or in writing. Within 10 business days of receiving the complaint, the PHA will provide a written notice to those alleged to have violated the rule. The PHA will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD’s Office of Fair Housing and Equal Opportunity (FHEO).</p> <p>The PHA will attempt to remedy discrimination complaints made against the PHA and will conduct an investigation into all allegations of discrimination.</p> <p>Within 10 business days following the conclusion of the PHA’s investigation, the PHA will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.</p> <p>The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)</p>	<p>Applicants or tenant families who believe that they have been subject to unlawful discrimination may notify the PHA either orally or in writing. Within 10 business days of receiving the complaint, the PHA will investigate and attempt to remedy discrimination complaints made against the PHA.</p> <p>The PHA will also advise the family of their right to file a fair housing complaint with HUD’s Office of Fair Housing and Equal Opportunity (FHEO). The fair housing poster, posted in conspicuous and accessible locations in PHA lobbies, will reference how to file a complaint with FHEO.</p> <p>The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)</p>
<p>2-I.C. Discrimination Complaints</p> <p>Page 2-7</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This new policy clarifies the PHA responsibility in processing equal access rule rights complaints against the PHA.</p>		<p><u>PHA Policy</u></p> <p>Applicants or tenant families who believe that they have been subject to unlawful discrimination based on marital status, gender identity, or sexual orientation under the Equal Access Rule may notify the PHA either orally or in writing.</p> <p>Within 10 business days of receiving the complaint, the PHA will provide a written notice to those alleged to have violated the rule. The PHA will also send a written notice to the complainant informing them that notice was sent to those alleged to have</p>

What & why?	Current Policy	Proposed Policy
		<p>violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).</p> <p>The PHA will attempt to remedy discrimination complaints made against the PHA and will conduct an investigation into all allegations of discrimination.</p> <p>Within 10 business days following the conclusion of the PHA's investigation, the PHA will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.</p> <p>The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)</p>
<p>2-I.C. Discrimination Complaints</p> <p>Page 2-8</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This new policy clarifies the PHA responsibility in processing VAWA rights complaints against the PHA.</p>		<p>PHA Policy</p> <p>Applicants or tenant families who wish to file a VAWA complaint against the PHA may notify the PHA either orally or in writing.</p> <p>The PHA will advise the family of their right to file a VAWA complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The PHA will inform the family that not later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO's online complaint form via mail, email, or telephone.</p> <p>The PHA will attempt to remedy complaints made against the PHA and will conduct an investigation into all allegations of discrimination.</p>

What & why?	Current Policy	Proposed Policy
		The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)
<p>2-II.A. OVERVIEW</p> <p>Page 2-7</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This is a best practice update.</p>	<p><u>PHA Policy</u></p> <p>The PHA will ask all applicants and resident families if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:</p> <p>“If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority.”</p> <p>A specific position and phone number will be provided as the contact person for requests for accommodation for persons with disabilities.</p>	<p><u>PHA Policy</u></p> <p>The PHA will ask all applicants and resident families if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:</p> <p>“If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority.”</p> <p>A specific position and phone number will be provided as the contact person for requests for accommodation for persons with disabilities.</p> <p>The PHA will display posters and other housing information and signage in locations throughout the PHA’s office in such a manner as to be easily readable from a wheelchair.</p>
<p>2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION</p> <p>Page 2-11</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This change would align Public Housing reasonable accommodation processing timelines with Section 8 programs governed by the Administrative Plan. Using business days rather than calendar days reflects available staff time and excludes holidays and weekends.</p>	<p><u>PHA Policy</u></p> <p>After a request for an accommodation is presented, the PHA will respond, in writing, within 14 calendar days.</p> <p>...</p> <p>If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, in writing, of its determination within 14 calendar days from the date of the most recent discussion or communication with the family. The notice will inform the family of the right to appeal the PHA’s decision through an informal hearing (for applicants) or the grievance process (see Chapter 14).</p>	<p><u>PHA Policy</u></p> <p>After a request for an accommodation is presented, the PHA will respond, in writing, within 14 business days.</p> <p>...</p> <p>If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, in writing, of its determination within 14 business days from the date of the most recent discussion or communication with the family. The notice will inform the family of the right to appeal the PHA’s decision through an informal hearing (for applicants) or the grievance process (see Chapter 14).</p>

What & why?	Current Policy	Proposed Policy
<p>3-III.B. REQUIRED DENIAL OF ADMISSION [24 CFR 960.204]</p> <p>Page 3-20</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This is a best practice update and more accurately reflects the decision-making process used in Public Housing admissions.</p>	<p><u>PHA Policy</u> In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. A record or records of arrest will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.</p>	<p><u>PHA Policy</u> In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A record or records of arrest will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.</p>
<p>3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION</p> <p>Page 3-21</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This is a best practice update and more accurately reflect the decision-making process used in Public Housing admissions.</p>	<p><u>PHA Policy</u> ... Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past three years.</p> <p>A conviction for such activity will be given more weight than an arrest or an eviction. A record or records of arrest will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity.</p>	<p><u>PHA Policy</u> ... Evidence of such criminal activity includes, but is not limited to:</p> <p>Any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past three years.</p> <p>A record or records of arrest will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity.</p>
<p>3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION</p> <p>Page 3-22</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language update provides clarity on how debts to PHAs are reviewed during Public Housing admissions.</p>	<p><u>PHA Policy</u> The PHA may deny admission to an applicant family if the PHA determines that the family: Has a pattern of eviction from housing or termination from residential programs within the past three years (considering relevant circumstances).</p> <p>Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing program Misrepresented or does not provide complete information related to eligibility, including</p>	<p><u>PHA Policy</u> The PHA will deny admission to an applicant family if the PHA determines that the family: Has a pattern of eviction from housing or termination from residential programs within the past three years (considering relevant circumstances).</p> <p>Owes rent or other amounts to any PHA in connection with Section 8, public housing, or other public housing assistance under the 1937 Act, unless the family repays the full</p>

What & why?	Current Policy	Proposed Policy
	<p>income, award of preferences for admission, expenses, family composition or rent</p> <p>Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program</p> <p>Has engaged in or threatened violent or abusive behavior toward PHA personnel</p> <p><i>Abusive or violent behavior towards PHA personnel</i> includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.</p> <p><i>Threatening</i> refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.</p> <p>In making its decision to deny admission, the PHA will consider the factors discussed in Sections 3-III.E and 3-III.F. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny admission.</p> <p>The PHA will consider the existence of mitigating factors, such as loss of employment or other financial difficulties, before denying admission to an applicant based on the failure to meet prior financial obligations.</p>	<p>amount of the debt prior to being selected from the waiting list.</p> <p>When denying admission due to family debts as shown in HUD's EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report.</p> <p>If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family's claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.</p> <p>Misrepresented or does not provide complete information related to eligibility, including income, award of preferences for admission, expenses, family composition or rent</p> <p>Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program</p> <p>Has engaged in or threatened violent or abusive behavior toward PHA personnel</p> <p><i>Abusive or violent behavior towards PHA personnel</i> includes verbal as well as physical abuse or violence. Use of racial</p>

What & why?	Current Policy	Proposed Policy
		<p>epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.</p> <p><i>Threatening</i> refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.</p> <p>In making its decision to deny admission, the PHA will consider the factors discussed in Sections 3-III.E and 3-III.F. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny admission.</p> <p>The PHA will consider the existence of mitigating factors, such as loss of employment or other financial difficulties, before denying admission to an applicant based on the failure to meet prior financial obligations. In the case of money owing to this or another PHA, the applicant will be notified by the PHA of the amount owed. The applicant will be given 14 calendar days to provide the PHA with proof of payment or documentation that a repayment agreement has been reached and that the applicant is considered to be in good standing/up to date on payments.</p>

What & why?	Current Policy	Proposed Policy
<p>3-III.E. CRITERIA FOR DECIDING TO DENY ADMISSION</p> <p>Page 3-30</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language update more clearly explains how arrests are reviewed during Public Housing admissions.</p>	<p><u>PHA Policy</u> The PHA will consider the following facts and circumstances prior to making its decision:</p> <p>...</p> <p>While a record of arrest(s) will not be used as the basis for denial, an arrest may, however, trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:</p> <ul style="list-style-type: none"> Any statements made by witnesses or the applicant not included in the police report Whether criminal charges were filed Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity 	<p><u>PHA Policy</u> The PHA will consider the following facts and circumstances prior to making its decision:</p> <p>...</p> <p>While a record or records of arrest will not be used as the sole basis for denial, an arrest may trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:</p> <ul style="list-style-type: none"> Any statements made by witnesses or the applicant not included in the police report Whether criminal charges were filed Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity

Chapter 4 Applications

What & why?	Current Policy	Proposed Policy
<p>4-I.B. APPLYING FOR ASSISTANCE</p> <p>Page 4-3</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language explains how the Public Housing admissions process works, that</p>	<p><u>PHA Policy</u> Depending upon the length of time between the date of application and the availability of housing, the PHA may use a one- or two-step application process.</p> <p>A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At</p>	<p><u>PHA Policy</u> Depending upon the length of time between the date of application and the availability of housing, the PHA may use a one- or two-step application process.</p> <p>A one-step process will be used when it is expected that a family will be selected from the waiting list</p>

What & why?	Current Policy	Proposed Policy
<p>applications are available online, and that applications must be complete to be accepted.</p>	<p>application, the family must provide all of the information necessary to establish family eligibility and the amount of rent the family will pay.</p> <p>A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list.</p>	<p>within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and the amount of rent the family will pay.</p> <p>A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list.</p> <p>Families may complete an application on-line when a Waiting List is open. Applications must be complete in order to be accepted by the PHA for processing.</p>
<p>4-I.D. PLACEMENT ON THE WAITING LIST</p> <p>Page 4-5</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This change would align Public Housing ineligibility timelines with Section 8 programs governed by the Administrative Plan. Using business days rather than calendar days reflects available staff time and excludes holidays and weekends.</p>	<p><u>PHA Policy</u></p> <p>If the PHA determines from the information provided that a family is ineligible, the family will not be placed on the waiting list. When a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 14 calendar days of receipt of the completed application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14).</p>	<p><u>PHA Policy</u></p> <p>If the PHA determines from the information provided that a family is ineligible, the family will not be placed on the waiting list. When a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 14 business days of receipt of the completed application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14).</p>
<p>4-II.C. OPENING AND CLOSING THE WAITING LIST</p> <p>Page 4-9</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><u>PHA Policy</u></p> <p>The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will</p>	<p><u>PHA Policy</u></p> <p>The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The</p>

What & why?	Current Policy	Proposed Policy
<p>This change would align Public Housing waitlist opening outreach with Section 8 programs governed by the Administrative Plan.</p>	<p>be contained in the notice. The notice will specify where, when, and how applications are to be received.</p>	<p>notice will specify where, when, and how applications are to be received.</p> <p>The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:</p> <p><i>Local media publications</i> <i>Homes for Good Website</i> <i>Centro Latino Americano</i> <i>Senior and Disabled Services</i> <i>Department of Human Services</i></p>
<p>4-II.F. UPDATING THE WAITING LIST</p> <p>Page 4-12</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This change would align Public Housing waitlist administration with Project-Based Voucher projects governed by the Administrative Plan. Removing households that have already been housed from other waitlists will prevent extended processing delays for families on those same waitlists.</p>	<p><u>PHA Policy</u></p> <p>If the PHA determines that the family is not eligible for admission (see Chapter 3) at any time while the family is on the waiting list the family will be removed from the waiting list.</p> <p>If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the PHA's decision (see Chapter 14) [24 CFR 960.208(a)].</p> <p>The PHA will remove an applicant from the waiting list upon request by the applicant family. In such cases no informal hearing is required.</p> <p>If the applicant does not provide, within the time stated on the PHA letter, required documentation necessary for the PHA to determine eligibility, and the PHA is therefore unable to determine eligibility, the applicant will be removed from the waiting list.</p>	<p><u>PHA Policy</u></p> <p>If the PHA determines that the family is not eligible for admission (see Chapter 3) at any time while the family is on the waiting list the family will be removed from the waiting list.</p> <p>If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the PHA's decision (see Chapter 14) [24 CFR 960.208(a)].</p> <p>If the family accepts the unit then the family will be removed from all other PHA managed waiting lists. This includes tenant based vouchers, project based vouchers, public housing, multi family housing and affordable housing unless the family declares they want to remain on a waiting list(s).</p> <p>The PHA will remove an applicant from the waiting list upon request by the applicant family. In such cases no informal hearing is required.</p> <p>If the applicant does not provide, within the time stated on the PHA letter, required documentation</p>

What & why?	Current Policy	Proposed Policy
		<p>necessary for the PHA to determine eligibility, and the PHA is therefore unable to determine eligibility, the applicant will be removed from the waiting list.</p>
<p>4-II.F. UPDATING THE WAITING LIST</p> <p>Page 4-21</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language aligns selection preferences with current waitlist structuring.</p>	<p><u>PHA Policy</u></p> <p>Families will be selected from the waiting list based on preference and a random selection ranking method at the time the waiting list closes. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.</p> <p>When selecting applicants from the waiting list, the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The PHA will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.</p> <p>By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.</p> <p>Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.</p>	<p><u>PHA Policy</u></p> <p>Families will be selected from the waiting list based on the selection preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable. Within each preference category, families will be selected by their assigned random selection number or on a first-come, first-served basis according to the date and time of their complete application as applicable.</p>
<p>4-III.B. SELECTION METHOD</p> <p>Page 4-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language aligns selection preferences with current waitlist structuring.</p>	<p><u>PHA Policy</u></p> <p>An approved entity with higher preference points will be indicated in the MOU and on Homes for Good's website. Unless otherwise noted all Local Preferences will be weighted the same. The PHA will offer the following preferences:</p> <p>Permanent Housed Family Preference This preference applies to families that are currently served in other permanent housing assistance</p>	<p><u>PHA Policy</u></p> <p>An approved entity with higher preference points will be indicated in the MOU and on Homes for Good's website. Unless otherwise noted all Local Preferences will be weighted the same. The PHA will offer the following preferences:</p> <p>Permanent Housed Family Preference This preference applies to families that are currently served in other permanent housing assistance</p>

What & why?	Current Policy	Proposed Policy
	<p>programs administered by the PHA, when the other program is unable to serve the family and when such assistance is necessary for the PHA to appropriately house the family. This preference requires approval of Directors of both programs.</p> <p>Transitional Homeless Family Preference This preference applies to transitional housing persons who are homeless and who are referred from a PHA approved entity (an entity with an active MOU/MOA with the PHA). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity.</p>	<p>programs administered by the PHA, when the other program is unable to serve the family and when such assistance is necessary for the PHA to appropriately house the family. This preference requires approval of Directors of both programs.</p> <p>Transitional Homeless Family Preference This preference applies to transitional housing persons who are homeless and who are referred from a PHA approved entity (an entity with an active MOU/MOA with the PHA). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity.</p> <p>Continuum of Care Preference Participants in Lane County's Continuum of Care programs, who have completed an assessment for move on readiness with a system screening tool and are referred through Lane County Coordinated Entry based on prioritized readiness.</p> <p>Domestic Violence Preference This preference applies to persons who are victims of domestic violence, dating violence, sexual assault, or stalking (as defined under VAWA; see Chapter 16) who have been referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).</p>
<p>4-III.C. NOTIFICATION OF SELECTION</p> <p>Page 4-23</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy update would more accurately reflect the waitlist notification process for families on the waitlist.</p>	<p><u>PHA Policy</u> The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:</p> <p>How to obtain an application packet</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's</p>	<p><u>PHA Policy</u> The PHA will notify the family by first class mail when it is selected from the waiting list. The notification will contain the full application packet.</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list, without further notice.</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from</p>

What & why?	Current Policy	Proposed Policy
	<p>address of record, as well as to any known alternate address. The PHA will initially notify the family by phone or in writing. The PHA will inquire whether the family is still interested in moving into public housing.</p> <p>Families indicating an interest in public housing will be sent an application packet, to be completed and returned in 14 calendar days. The application packet will inform the family of:</p> <p style="padding-left: 40px;">Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation</p> <p style="padding-left: 40px;">Documents that must be provided at the interview to document eligibility for a preference, if applicable</p> <p style="padding-left: 40px;">Other documents and information that should be brought to the interview</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination; therefore no informal hearing will be offered.</p>	<p>the waiting list without further notice. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination; therefore no informal hearing will be offered.</p>
<p>4-III.D. THE INTAKE INTERVIEW</p> <p>Page 4-24</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language would add a clear 14 business day deadline that aligns with waitlists managed by the Section 8 Administrative Plan. It would also align by extending social security number</p>	<p><u>PHA Policy</u> Families selected from the waiting list are required to submit an application. Applications will be reviewed for completeness. Applicants with incomplete applications will be contacted via phone, mail, or email to complete the application.</p> <p>Verification of information pertaining to adult members of the household will not begin until signed release forms are returned to the PHA.</p>	<p><u>PHA Policy</u> Families selected from the waiting list are required to submit an application. Applications will be reviewed for completeness. Applicants with incomplete applications will be contacted via phone, mail, or email to complete the application.</p> <p>The family must provide the required documentation to the PHA within 14 business days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails</p>

What & why?	Current Policy	Proposed Policy
<p>verification deadlines until the maximum 180 days.</p>	<p>Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 60 days. If not all household members have disclosed their SSNs (if applicable) at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.</p> <p>The family must provide the required documentation to the PHA, during regular business hours, within 14 business days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails to provide the required documentation within 14 business days.</p>	<p>to provide the required documentation within 14 business days.</p> <p>Verification of information pertaining to adult members of the household will not begin until signed release forms are returned to the PHA.</p> <p>Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 180 days. If not all household members have disclosed their SSNs (if applicable) at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.</p> <p>The family must provide the required documentation to the PHA, during regular business hours, within 14 business days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails to provide the required documentation within 14 business days.</p>

Chapter 5 Occupancy Standards and Unit Offers

What & why?	Current Policy	Proposed Policy
<p>5-I.B. DETERMINING UNIT SIZE</p> <p>Page 5-2</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This proposed policy would allow more opportunities for family unification and allow families that are increasing in size to select the appropriate bedroom size without requiring a transfer.</p>	<p><u>PHA Policy</u> The PHA will use the same occupancy standards for each of its developments. The PHA's occupancy standards are as follows: The head of household, including the spouse or co-head, will be allocated one bedroom.</p> <p>All other household members will be based on two (2) persons per bedroom, without regard to gender or age.</p> <p>Live-in aides will be allocated a separate bedroom. Family members of a live-in aide will not be considered when determining family unit size.</p> <p>Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.</p>	<p><u>PHA Policy</u> The PHA will use the same occupancy standards for each of its developments. The PHA's occupancy standards are as follows: The head of household, including the spouse or co-head, will be allocated one bedroom.</p> <p>All other household members will be based on two (2) persons per bedroom, without regard to gender or age.</p> <p>Live-in aides will be allocated a separate bedroom. Family members of a live-in aide will not be considered when determining family unit size.</p> <p>Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.</p>

What & why?	Current Policy	Proposed Policy
	<p>Foster children will be considered when determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on the PHA’s occupancy standards.</p> <p>Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.</p>	<p>Foster children will be considered when determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on the PHA’s occupancy standards.</p> <p>Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.</p> <p>A family that can demonstrate that the birth, adoption or court awarded custody of a child will be obtained within 9 months of determination of eligibility will receive an occupancy standard based on the anticipated addition.</p>
<p>5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS</p> <p>Page 5-4</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language update clarifies that guidance from the Fair Housing Council or Oregon has been used to set a policy definition of overcrowding rather than local housing code (which does not set a local limit).</p>	<p><u>PHA Policy</u> The PHA will consider granting exceptions to the occupancy standards at the family’s request if the PHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances.</p> <p>For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section 5-I.B) and the family does not want to transfer to a larger size unit.</p> <p>When evaluating exception requests the PHA will consider the size and configuration of the unit. In no case will the PHA grant an exception that is in violation of local housing or occupancy codes, regulations or laws.</p>	<p><u>PHA Policy</u> The PHA will consider granting exceptions to the occupancy standards at the family’s request if the PHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances.</p> <p>For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section 5-I.B) and the family does not want to transfer to a larger size unit.</p> <p>When evaluating exception requests the PHA will consider the size and configuration of the unit. In no case will the PHA grant an exception that is in violation of local housing or occupancy codes, regulations or laws.</p>

What & why?	Current Policy	Proposed Policy																												
	<p>Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to local code, and the family agrees not to request a transfer for a period of one year from the date of admission, unless they have a subsequent change in family size or composition. Requests need supervisor approval.</p> <p>To prevent vacancies, the PHA may provide an applicant family with a larger unit than the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer to.</p>	<p>Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to guidance from the Fair Housing Council of Oregon who recommend two persons per bedroom plus one additional person, and the family agrees not to request a transfer for a period of one year from the date of admission, unless they have a subsequent change in family size or composition. Requests need supervisor approval.</p> <p>To prevent vacancies, the PHA may provide an applicant family with a larger unit than the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer to.</p>																												
<p>5-II.B. NUMBER OF OFFERS</p> <p>Page 5-5</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Given the large geographic distribution of Public Housing properties, removing a two unit offer maximum increases flexibility for families whose circumstances may have changed since selecting properties in metro or rural areas.</p>	<p><u>PHA Policy</u> The PHA has established a system of site-based waiting lists. Applicants may choose to apply for any or all site-based locations consist of:</p> <table border="1" data-bbox="743 954 1354 1485"> <tr> <td>Eugene</td> <td>Maplewood Meadows (general occupancy) Parkview Terrace (elderly/disabled)</td> </tr> <tr> <td>Springfield</td> <td>McKenzie Village (general occupancy with 1 bdrm units for elderly/disabled) Pengra Court (general occupancy)</td> </tr> <tr> <td>Veneta</td> <td>Veneta Villa (elderly/disabled) Scattered Sites (general occupancy)</td> </tr> <tr> <td>Junction City</td> <td>Lindeborg Place (elderly/disabled)</td> </tr> <tr> <td>Creswell</td> <td>Cresview Villa (elderly/disabled)</td> </tr> <tr> <td>Cottage Grove</td> <td>Riverview Terrace (elderly/disabled)</td> </tr> <tr> <td>Florence</td> <td>Laurelwood Homes (general occupancy with 1 bdrm units for elderly/disabled)</td> </tr> </table> <p>Applicants will receive one offer to a suitable unit in</p>	Eugene	Maplewood Meadows (general occupancy) Parkview Terrace (elderly/disabled)	Springfield	McKenzie Village (general occupancy with 1 bdrm units for elderly/disabled) Pengra Court (general occupancy)	Veneta	Veneta Villa (elderly/disabled) Scattered Sites (general occupancy)	Junction City	Lindeborg Place (elderly/disabled)	Creswell	Cresview Villa (elderly/disabled)	Cottage Grove	Riverview Terrace (elderly/disabled)	Florence	Laurelwood Homes (general occupancy with 1 bdrm units for elderly/disabled)	<p><u>PHA Policy</u> The PHA has established a system of site-based waiting lists. Applicants may choose to apply for any or all site-based locations consist of:</p> <table border="1" data-bbox="1379 954 1990 1528"> <tr> <td>Eugene</td> <td>Maplewood Meadows (general occupancy) Parkview Terrace (elderly/disabled)</td> </tr> <tr> <td>Springfield</td> <td>McKenzie Village (general occupancy with 1 bdrm units for elderly/disabled) Pengra Court (general occupancy)</td> </tr> <tr> <td>Veneta</td> <td>Veneta Villa (elderly/disabled) Scattered Sites (general occupancy)</td> </tr> <tr> <td>Junction City</td> <td>Lindeborg Place (elderly/disabled)</td> </tr> <tr> <td>Creswell</td> <td>Cresview Villa (elderly/disabled)</td> </tr> <tr> <td>Cottage Grove</td> <td>Riverview Terrace (elderly/disabled)</td> </tr> <tr> <td>Florence</td> <td>Laurelwood Homes (general occupancy with 1 bdrm units for elderly/disabled)</td> </tr> </table>	Eugene	Maplewood Meadows (general occupancy) Parkview Terrace (elderly/disabled)	Springfield	McKenzie Village (general occupancy with 1 bdrm units for elderly/disabled) Pengra Court (general occupancy)	Veneta	Veneta Villa (elderly/disabled) Scattered Sites (general occupancy)	Junction City	Lindeborg Place (elderly/disabled)	Creswell	Cresview Villa (elderly/disabled)	Cottage Grove	Riverview Terrace (elderly/disabled)	Florence	Laurelwood Homes (general occupancy with 1 bdrm units for elderly/disabled)
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What & why?	Current Policy	Proposed Policy
	<p>the site-based location indicated by the applicant. If the offer is rejected without good cause, the application for that bedroom-size wait list will be withdrawn.</p> <p>If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.</p> <p>Each applicant gets a maximum of two offers. The two offers will be at different site- based locations.</p> <p>The PHA’s record-keeping is limited to the offer made, whether it is accepted or refused, and whether the applicant has good cause for refusal (and is entitled to another offer).</p>	<p>Applicants will receive one offer to a suitable unit in the site-based location indicated by the applicant. If the offer is rejected without good cause, the application for that bedroom-size wait list will be withdrawn.</p> <p>If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.</p> <p>The PHA’s record-keeping is limited to the offer made, whether it is accepted or refused, and whether the applicant has good cause for refusal (and is entitled to another offer).</p>
<p>5-II.C. TIME LIMIT FOR UNIT OFFER ACCEPTANCE OR REFUSAL</p> <p>Page 5-7</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language clarifies the waitlist removal deadline for unit offers that have been solely made by mail.</p>	<p><u>PHA Policy</u> Applicants must accept or refuse a unit offer within 3 business days of the date of the unit offer.</p> <p>Applicants who fail to respond within three business days will be considered to have refused the unit.</p> <p>Offers made solely by mail will be given three additional days for mailing time.</p> <p>Applicants who fail to respond within 3 business days will be removed from the wait list.</p>	<p><u>PHA Policy</u> Applicants must accept or refuse a unit offer within five business days of the date of the unit offer.</p> <p>Applicants who fail to respond within five business days will be considered to have refused the unit.</p> <p>Offers made solely by mail will be given three additional calendar days for mailing time.</p> <p>Applicants who fail to respond by the deadline will be removed from the wait list.</p>

Chapter 6 Income

What & why?	Current Policy	Proposed Policy
<p>6-I.F. BUSINESS INCOME [24 CFR 5.609(b)(2)]</p> <p>Page 6-17</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><u>PHA Policy</u> To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is</p>	<p><u>PHA Policy</u> To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is</p>

What & why?	Current Policy	Proposed Policy
<p>This language adds additional clarity about business expenses and aligns with the Section 8 Administrative Plan.</p>	<p>addressed by HUD regulations or guidance as described below.</p>	<p>addressed by HUD regulations or guidance as described below.</p> <ul style="list-style-type: none"> • IRS Form 1040, including: <ol style="list-style-type: none"> 1. Schedule C (Small Business) 2. Schedule E (Rental Property Income) 3. Schedule F (Farm Income) • If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules. • Audited or unaudited financial statement(s) of the business. • Documents such as manifests, appointment books, cash books, bank statements, and receipts will be used as a guide for the prior six months (or lesser period if not in business for six months) to project income for the next 12 months. The family will be advised to maintain these documents in the future if they are not available. • Family's self-certification as to net income realized from the business during previous years. <ul style="list-style-type: none"> ○ If the applicant/participant is operating a "cash and carry" operation (which may or may not be licensed), the PHA will require that the applicant/participant complete a form for each customer which indicates: name of person(s). If the family has filed tax return, the family will be required to provide it.
<p>6-I.G. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)]</p> <p>Page 6-20</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language clarifies the annual administrative process for updating the</p>	<p><u>PHA Policy</u> The PHA will initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC). The PHA will review the passbook rate annually, in December of each year. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the</p>	<p><u>PHA Policy</u> The PHA initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).</p> <p>The PHA will review the passbook rate annually. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national</p>

What & why?	Current Policy	Proposed Policy
<p>passbook rate. This is needed for calculating income-based rent.</p>	<p>passbook rate will be set at the current national rate.</p> <p>Changes to the passbook rate will take effect on February 1 following the December review.</p>	<p>rate, the passbook rate will be set at the current national rate.</p> <p>The effective date of changes to the passbook rate will be determined at the time of the review.</p>
<p>6-II.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]</p> <p>Page 6-31</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This update reflects that the cost of maintaining an assistance animal may be an eligible medical expense. This is a language update to define animals that are kept to meet a disability-related need.</p>	<p><u>PHA Policy</u></p> <p>Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.</p>	<p><u>PHA Policy</u></p> <p>Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service or assistance animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.</p>
<p>6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]</p> <p>Page 6-56</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This policy explains how and when the PHA will consider requests for an increased utility allowance.</p>	<p>Reasonable Accommodation [24 CFR 8]</p> <p>On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [PH Occ GB, p. 172]. Residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172]. See Chapter 2 for policies related to reasonable accommodations.</p>	<p>Reasonable Accommodation and Individual Relief</p> <p>On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [24 CFR 8 and 100, PH Occ GB, p. 172]. Likewise, residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].</p> <p>See Chapter 2 for policies related to reasonable accommodations.</p> <p>Further, the PHA may grant requests for relief from charges in excess of the utility allowance on reasonable grounds, such as special needs of the elderly, ill, or residents with disabilities, or special</p>

What & why?	Current Policy	Proposed Policy
		<p>factors not within control of the resident, as the PHA deems appropriate. The family must request the higher allowance and provide the PHA with an explanation about the additional allowance required.</p> <p>PHAs should develop criteria for granting individual relief, notify residents about the availability of individual relief, and notify participants about the availability of individual relief programs (sometimes referred to as "Medical Baseline discounts") offered by the local utility company [Utility Allowance GB, p. 19; 24 CFR 965.508].</p>
<p>6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]</p> <p>Page 6-57</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This policy explains how and when the PHA will consider requests for an increased utility allowance.</p>		<p><u>PHA Policy</u></p> <p>The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.</p> <p>The PHA will consider the following criteria as valid reasons for granting individual relief:</p> <p>The family's consumption was mistakenly portrayed as excessive due to defects in the meter or errors in the meter reading.</p> <p>The excessive consumption is caused by a characteristic of the unit or owner-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation. The allowance should be adjusted to reflect the higher consumption needs associated with the unit until the situation is remedied. The resident should be granted individual relief until the allowance is adjusted.</p> <p>The excessive consumption is due to special needs of the family that are beyond their control, such as the need for specialized equipment in the case</p>

What & why?	Current Policy	Proposed Policy
		<p style="text-align: center;">of a family member who is ill, elderly, or who has a disability.</p> <p>In determining the amount of the reasonable accommodation or individual relief, the PHA will allow a reasonable measure of additional usage as necessary. To arrive at the amount of additional utility cost of specific equipment, the family may provide information from the manufacturer of the equipment, or the family or PHA may conduct an internet search for an estimate of usage or additional monthly cost.</p> <p>Information on reasonable accommodation and individual relief for charges in excess of the utility allowance will be provided to all residents at move-in and with any notice of proposed allowances, schedule surcharges, and revisions. The PHA will also provide information on utility relief programs or medical discounts (sometimes referred to as "Medical Baseline discounts") that may be available through local utility providers. The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.</p> <p>At its discretion, the PHA may reevaluate the need for the increased utility allowance as a reasonable accommodation at any regular reexamination.</p> <p>If the excessive consumption is caused by a characteristic of the unit or PHA-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation, the individual relief to the resident will cease when the situation is remedied.</p>
6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]	<u>PHA Policy</u> Unless the PHA is required to revise utility allowances retroactively, revised utility	<u>PHA Policy</u> Between annual reviews of utility allowances, the PHA will only revise its utility allowances

What & why?	Current Policy	Proposed Policy
<p>Page 6-57</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language update better explains how and when the PHA will revise utility allowances.</p>	<p>allowances will be applied to a family's rent calculations at the first annual reexamination after the allowance is adopted.</p>	<p>due to a rate change, when required to by the regulation.</p>

Chapter 7 Verification

What & why?	Current Policy	Proposed Policy
<p>7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS</p> <p>Page 7-3</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language better reflects how the PHA accepts self-certifications from Public Housing families.</p>	<p><u>PHA Policy</u> Any documents used for verification must be the original or valid copy and generally must be dated within 60 days of the PHA request. The documents must not be damaged, altered or in any way illegible.</p> <p>Print-outs from web pages and emailed original documents are considered original documents.</p> <p>The PHA staff member who views the original document must make a photocopy</p> <p>Any family self-certifications must be made in a format acceptable to the PHA and may be signed in the presence of a PHA representative or PHA notary public.</p>	<p><u>PHA Policy</u> Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the PHA request. The documents must not be damaged, altered or in any way illegible.</p> <p>Print-outs from web pages are considered original documents.</p> <p>The PHA staff member who views the original document must make a photocopy.</p> <p>Any family self-certifications must be made in a format acceptable to the PHA and may be signed by the family member whose information or status is being verified.</p>
<p>7-I.C. UP-FRONT INCOME VERIFICATION (UIV)</p> <p>Page 7-5</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language clarifies that the PHA will keep income verification records for the entire duration of Public Housing tenancy.</p>	<p><u>PHA Policy</u> The PHA will obtain income and IVT reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.</p> <p>Income and IVT reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6.I.C. Income reports may also be used to meet the regulatory requirement for third party</p>	<p><u>PHA Policy</u> The PHA will obtain income and IVT reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.</p> <p>Income and IVT reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6.I.C. Income reports may also be used to meet the regulatory requirement for third party</p>

What & why?	Current Policy	Proposed Policy
	<p>verification, as described above. Policies for resolving discrepancies between income and IVT reports and family-provided information will be resolved as described in Chapter 6.I.C. and in this chapter.</p> <p>Income and IVT reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.</p> <p>Income and IVT reports will be retained in resident files with the applicable annual or interim reexamination documents.</p> <p>When the PHA determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.</p>	<p>verification, as described above. Policies for resolving discrepancies between income and IVT reports and family-provided information will be resolved as described in Chapter 6.I.C. and in this chapter.</p> <p>Income and IVT reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.</p> <p>Income and IVT reports will be retained in resident files with the applicable annual or interim reexamination documents for the duration of the tenancy.</p> <p>When the PHA determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.</p>
<p>7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION</p> <p>Page 7-7</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language would allow the PHA to request additional information from a family to calculate income-based rent when the two most current consecutive pay stubs show inconsistent income.</p>	<p><u>PHA Policy</u> Third-party documents provided by the family must be dated within 60 days of the PHA request date.</p> <p>If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation.</p> <p>As verification of earned income, the PHA will require the family to provide the two most current, consecutive pay stubs.</p>	<p><u>PHA Policy</u> Third-party documents provided by the family must be dated within 60 days of the PHA request date.</p> <p>If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation.</p> <p>As verification of earned income, the PHA will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.</p>

What & why?	Current Policy	Proposed Policy				
<p>7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION</p> <p>Page 7-8</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy change would set a clear time limit for third parties to complete and return written verification forms. Oral verification by phone would allow recertifications to be completed efficiently when third parties are not willing or able to submit documentation.</p>	<p><u>PHA Policy</u> The PHA may send third-party verification forms directly to the third party.</p> <p>Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.</p>	<p><u>PHA Policy</u> The PHA may send third-party verification forms directly to the third party.</p> <p>Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.</p> <p>The PHA will proceed to oral third-party verification if the third-party verification forms are not returned within ten business days.</p>				
<p>7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION</p> <p>Page 7-8</p> <p>Required Change? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This policy change would set a clear time limit for third parties to provide oral verification, in order to allow recertifications to be completed efficiently when third parties are not willing or able to submit documentation.</p>	<p><u>PHA Policy</u> In collecting third-party oral verification, PHA staff will record in the family’s file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided. When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.</p>	<p><u>PHA Policy</u> In collecting third-party oral verification, PHA staff will record in the family’s file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided. When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.</p> <p>When requesting third-party oral verification, PHA will wait 3 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.</p>				
<p>7-II.A. VERIFICATION OF LEGAL IDENTITY</p> <p>Page 7-12</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This language clarifies that acceptable employer identification cards must be from a government employer and include a picture of the employee.</p>	<p><u>PHA Policy</u> The PHA will require families to furnish verification of legal identity for each household member.</p> <table border="1" data-bbox="745 1263 1352 1328"> <tr> <td>Verification of Legal Identity for Adults</td> <td>Verification of Legal Identity for Children</td> </tr> </table>	Verification of Legal Identity for Adults	Verification of Legal Identity for Children	<p><u>PHA Policy</u> The PHA will require families to furnish verification of legal identity for each household member.</p> <table border="1" data-bbox="1381 1263 1988 1328"> <tr> <td>Verification of Legal Identity for Adults</td> <td>Verification of Legal Identity for Children</td> </tr> </table>	Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Verification of Legal Identity for Adults	Verification of Legal Identity for Children					
Verification of Legal Identity for Adults	Verification of Legal Identity for Children					

What & why?	Current Policy	Proposed Policy				
	<table border="1" data-bbox="751 142 1350 557"> <tr> <td data-bbox="751 142 1045 557"> Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicle identification card U.S. military discharge (DD 214) Current U.S. passport Current employer identification card </td> <td data-bbox="1056 142 1350 557"> Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records </td> </tr> </table> <p data-bbox="751 565 1350 654">If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.</p> <p data-bbox="751 686 1350 914">If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and may be signed in the presence of a PHA representative or PHA notary public.</p> <p data-bbox="751 946 1350 1101">Legal identity will be verified for all applicants at the time of eligibility determination and in cases where the PHA has reason to doubt the identity of a person representing themselves to be a tenant or a member of a tenant family.</p>	Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicle identification card U.S. military discharge (DD 214) Current U.S. passport Current employer identification card	Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records	<table border="1" data-bbox="1381 142 1990 589"> <tr> <td data-bbox="1381 142 1675 589"> Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicle identification card U.S. military discharge (DD 214) Current U.S. passport Current government employer identification card with picture </td> <td data-bbox="1686 142 1990 589"> Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records </td> </tr> </table> <p data-bbox="1381 597 1990 686">If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.</p> <p data-bbox="1381 719 1990 946">If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and be signed by the family member whose information or status is being verified.</p> <p data-bbox="1381 979 1990 1133">Legal identity will be verified for all applicants at the time of eligibility determination and in cases where the PHA has reason to doubt the identity of a person representing themselves to be a tenant or a member of a tenant family.</p>	Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicle identification card U.S. military discharge (DD 214) Current U.S. passport Current government employer identification card with picture	Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records
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<p data-bbox="100 1146 730 1211">7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and Notice PIH 2018-24]</p> <p data-bbox="100 1243 231 1276">Page 7-14</p> <p data-bbox="100 1308 478 1341">Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p data-bbox="100 1373 730 1498">This policy update is not a procedure change. The language is more specific to say that documentation of verified social security numbers will not be deleted or destroyed.</p>	<p data-bbox="741 1146 1360 1179"><u>PHA Policy</u></p> <p data-bbox="741 1179 1360 1308">Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will maintain all records in the tenant file and will store tenant files in a secure manner.</p>	<p data-bbox="1371 1146 1999 1179"><u>PHA Policy</u></p> <p data-bbox="1371 1179 1999 1341">Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will not remove and destroy copies of documentation accepted as evidence of social security numbers.</p>				

What & why?	Current Policy	Proposed Policy
<p>7-II.D. FAMILY RELATIONSHIPS</p> <p>Page 7-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy would provide greater flexibility for verification when an adult is no longer a household member.</p>	<p><u>PHA Policy</u></p> <p>If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill) or sign an affidavit that the person is no longer a member of the family.</p>	<p><u>PHA Policy</u></p> <p>If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill), if the PHA so requests.</p>
<p>7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME</p> <p>Page 7-20</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This update would simplify the income reporting process for newly self-employed Public Housing residents.</p>	<p><u>PHA Policy</u></p> <p>Business owners and self-employed persons will be required to provide:</p> <p style="padding-left: 40px;">An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.</p> <p style="padding-left: 40px;">All schedules completed for filing federal and local taxes in the preceding year.</p> <p>If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.</p> <p>The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.</p> <p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>	<p><u>PHA Policy</u></p> <p>Business owners and self-employed persons will be required to provide:</p> <p style="padding-left: 40px;">An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.</p> <p style="padding-left: 40px;">All schedules completed for filing federal and local taxes in the preceding year.</p> <p>If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.</p> <p>The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.</p> <p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>

What & why?	Current Policy	Proposed Policy
	<p>If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.</p>	
<p>7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS</p> <p>Page 7-22</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This change better explains the relationship between the Social Security Administration benefit verification and EIV.</p>	<p><u>PHA Policy</u></p> <p>To verify the SS/SSI benefits of applicants, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member who receives social security benefits. If a family member is unable to provide the document, the PHA will help the applicant request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the family has received the original benefit verification letter, it will be required to provide the letter to the PHA.</p> <p>To verify the SS/SSI benefits of residents, the PHA will obtain information about social security/SSI benefits through HUD's EIV system, and confirm with the resident(s) that the current listed benefit amount is correct. If the resident disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, the PHA will request a current SSA benefit verification letter from each family member that receives social security benefits. If a family member is unable to provide the document, the PHA will help the resident request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the family has received the benefit</p>	<p>Social Security/SSI Benefits</p> <p>Verification requirements for Social Security (SS) and Supplemental Security Income (SSI) benefits differ for applicants and participants.</p> <p>For applicants, since EIV does not contain SS or SSI benefit information, the PHA must ask applicants to provide a copy of their current SS and/or SSI benefit letter (dated within the last 60 calendar days) for each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the applicant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter from the applicant, make a photocopy of the document for the file, and return the original to the family.</p> <p>For participants, the PHA must obtain information through the HUD EIV system and confirm with the participants that the current listed benefit amount is correct.</p> <ul style="list-style-type: none"> • If the participant agrees with the amount reported in EIV, the PHA must use the EIV-reported gross benefit amount to calculate annual income from Social Security. PHAs are required to use the EIV-reported SS and SSI benefit amounts when calculating income unless the tenant disputes the EIV-reported amount. For example, an SSA benefit letter may list the monthly benefit amount as \$450.80 and EIV displays the amount as \$450.00. The PHA must

What & why?	Current Policy	Proposed Policy
	verification letter, it will be required to provide the letter to the PHA.	<p>use the EIV-reported amount unless the participant disputes the amount.</p> <ul style="list-style-type: none"> If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in EIV, the PHA must request a current SSA benefit verification letter (dated within the last 60 calendar days) from each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the participant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter from the participant, make a photocopy of the document for the file, and return the original to the family. Photocopies of social security checks or bank statements are not acceptable forms of verification for SS/SSI benefits.
<p>7-IV.C. DISABILITY ASSISTANCE EXPENSES</p> <p>Page 7-28</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This change better explains the hierarchy for attendant care verification.</p>	<p><u>PHA Policy</u></p> <p>The PHA will accept written third-party documents provided by the family.</p> <p>If family-provided documents are not available, the PHA will provide a third-party verification form directly to the care provider requesting the needed information.</p>	<p><u>PHA Policy</u></p> <p>Expenses for attendant care will be verified through: Written third-party documents provided by the family, such as receipts or cancelled checks. Third-party verification form signed by the provider, if family-provided documents are not available. If third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.</p>

Chapter 8 Leasing

What & why?	Current Policy	Proposed Policy
<p>8-I.B. LEASE ORIENTATION</p> <p>Page 8-2</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><u>PHA Policy</u></p> <p>When families attend the lease orientation, they will be provided with:</p> <ul style="list-style-type: none"> A copy of the Welcome Book A copy of the lease A copy of the PHA's grievance procedure A copy of the Community Rules 	<p><u>PHA Policy</u></p> <p>When families attend the lease orientation, they will be provided with:</p> <ul style="list-style-type: none"> A copy of the Welcome Book A copy of the lease A copy of the PHA's grievance procedure A copy of the Community Rules

What & why?	Current Policy	Proposed Policy
<p>The name of the “Base Charge” List has been updated to the “Schedule of Charges” list. Also, Parking Agreements, Recycling Notices, HUD lead-based paint pamphlet, and Smoke Alarm/Carbon Monoxide Alarm Agreements are a part of the Public Housing Lease orientation.</p>	<p>A copy of the Base Charge List Smoke Alarm/Carbon Monoxide Alarm Agreement A copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse A copy of “What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12 A copy of the form HUD-5380, VAWA Notice of Occupancy Rights A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking ...</p>	<p>A copy of the Schedule of Charges List A copy of the Parking Agreement A copy of the Recycling Notice A copy of the Smoke Alarm/Carbon Monoxide Alarm Agreement A copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse A copy of “What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12 A copy of the form HUD-5380, VAWA Notice of Occupancy Rights A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking The HUD pamphlet on lead-based paint entitled, “Protect Your Family from Lead in Your Home.</p>
<p>8-I.F. PAYMENTS UNDER THE LEASE</p> <p>Page 8-8</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The PHA now accepts electronic payments.</p>	<p><u>PHA Policy</u> The tenant rent is due and payable at the PHA-designated location on the first of every month. If the first falls on a weekend or holiday, the rent is due and payable on the first business day thereafter. The PHA accepts checks, money orders, and automatic debit payments on bank accounts for rent. The PHA does not accept cash. The PHA may choose to allow electronic payments or other methods as advances in technology permit. If a family’s tenant rent changes, the PHA will notify the family of the new amount and the effective date by sending a lease rider which will become an attachment to the lease.</p>	<p><u>PHA Policy</u> The tenant rent is due and payable at the PHA-designated location on the first of every month. If the first falls on a weekend or holiday, the rent is due and payable on the first business day thereafter. The PHA accepts checks, money orders, automatic debit payments on bank accounts, and electronic payments for rent. The PHA does not accept cash. If a family’s tenant rent changes, the PHA will notify the family of the new amount and the effective date by sending a lease rider which will become an attachment to the lease.</p>
<p>8-I.F. PAYMENTS UNDER THE LEASE</p> <p>Page 8-9</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><u>PHA Policy</u> If the family fails to pay their rent by the seventh day of the month, and the PHA has not agreed to accept payment at a later date, a 30-Day Notice of Termination for Nonpayment of Rent will be issued</p>	<p><u>PHA Policy</u> If the family fails to pay their rent by the seventh day of the month, and the PHA has not agreed to accept payment at a later date, a 30-day Notice to Vacate (during nationwide emergency orders) or a 14-day Notice to</p>

What & why?	Current Policy	Proposed Policy
<p>This language reflects HUD guidance that occurred due to the COVID-19 pandemic. In times of nationwide emergency orders, PHAs are restricted from issuing less than a 14-day notice to vacate for nonpayment of rent.</p>	<p>to the resident for failure to pay rent, demanding payment in full or the surrender of the premises.</p> <p>In addition, if the resident fails to make payment by the end of office hours on the seventh day of the month, a late fee of \$50.00 will be charged. Notices of late fees will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, the PHA may not take action for nonpayment of the fee until the conclusion of the grievance process.</p> <p>When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a returned check fee will be charged to the family. The fee will be due and payable 14 days after billing.</p>	<p>Vacate (upon expiration of nationwide emergency orders) will be issued to the resident for failure to pay rent, demanding payment in full or the surrender of the premises.</p> <p>In addition, if the resident fails to make payment by the end of office hours on the seventh day of the month, a late fee of \$50.00 will be charged. Notices of late fees will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, the PHA may not take action for nonpayment of the fee until the conclusion of the grievance process. If the resident can document financial hardship, the late fee may be waived on a case-by-case basis.</p> <p>When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a returned check fee of \$25.00 will be charged to the family. The fee will be due and payable 14 days after billing.</p>
<p>8-II.B. TYPES OF INSPECTIONS</p> <p>Page 8-15</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>NSPIRE is the new name of HUD’s updated inspection program.</p>	<p><u>PHA Policy</u></p> <p>PHA staff may conduct a special inspection for any of the following reasons:</p> <ul style="list-style-type: none"> Housekeeping Unit condition Suspected lease violation Preventive maintenance Routine maintenance Preparation for HUD, REAC, or other inspections There is reasonable cause to believe an emergency exists 	<p><u>PHA Policy</u></p> <p>PHA staff may conduct a special inspection for any of the following reasons:</p> <ul style="list-style-type: none"> Housekeeping Unit condition Suspected lease violation Preventive maintenance Routine maintenance Preparation for HUD, REAC/NSPIRE, or other inspections There is reasonable cause to believe an emergency exists
<p>8-II.C. NOTICE AND SCHEDULING OF INSPECTIONS</p> <p>Page 8-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><u>PHA Policy</u></p> <p>The PHA will notify the resident in writing at least 48 hours prior to any non-emergency inspection. For regular annual inspections, the family will receive at least 2 weeks written notice of the</p>	<p><u>PHA Policy</u></p> <p>The PHA will notify the resident in writing at least 48 hours prior to any non-emergency inspection. For regular annual inspections, the family will receive at least 2 weeks written notice of the</p>

What & why?	Current Policy	Proposed Policy
<p>This rule update would increase safety for resident animals and management staff.</p>	<p>inspection to allow the family to prepare the unit for the inspection.</p> <p>Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the PHA to enter the unit.</p>	<p>inspection to allow the family to prepare the unit for the inspection.</p> <p>Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the PHA to enter the unit.</p> <p>Except for emergencies, management will not enter the dwelling unit to perform inspections where a pet resides unless accompanied for the entire duration of the inspection by the pet owner or responsible person designated by the pet owner in accordance with the pet policies in Section 10-II.D.</p>
<p>8-II.D. INSPECTION RESULTS</p> <p>Page 8-18</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This update specifies that missing or inoperable carbon monoxide detectors require an emergency work order to correct.</p>	<p><u>PHA Policy</u></p> <p>When conditions in the unit are hazardous to life, health, or safety, the PHA will make repairs or otherwise abate the situation within 24 hours. Defects hazardous to life, health, or safety include, but are not limited to, the following:</p> <ul style="list-style-type: none"> Any condition that jeopardizes the security of the unit Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling Natural or LP gas or fuel oil leaks Any electrical problem or condition that could result in shock or fire Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit Utilities not in service, including no running hot water Conditions that present the imminent possibility of injury Obstacles that prevent safe entrance or exit from the unit Absence of a functioning toilet in the unit Inoperable smoke detectors 	<p><u>PHA Policy</u></p> <p>When conditions in the unit are hazardous to life, health, or safety, the PHA will make repairs or otherwise abate the situation within 24 hours. Defects hazardous to life, health, or safety include, but are not limited to, the following:</p> <ul style="list-style-type: none"> Any condition that jeopardizes the security of the unit Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling Natural or LP gas or fuel oil leaks Any electrical problem or condition that could result in shock or fire Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit Utilities not in service, including no running hot water Conditions that present the imminent possibility of injury Obstacles that prevent safe entrance or exit from the unit Absence of a functioning toilet in the unit Inoperable smoke detectors <p>In in situations where the unit or building has a fuel burning appliance</p>

What & why?	Current Policy	Proposed Policy
		or an attached garage, missing or inoperable carbon monoxide detectors
<p>8-II.D. INSPECTION RESULTS</p> <p>Page 8-19</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This rule update would increase safety for resident animals and management staff.</p>	<p><u>PHA Policy</u></p> <p>The PHA will correct non-life threatening health and safety defects within 15 business days of the inspection date. If the PHA is unable to make repairs within that period due to circumstances beyond the PHA's control (e.g. required parts or services are not available, weather conditions, etc.) the PHA will notify the family of an estimated date of completion. The family must allow the PHA access to the unit to make repairs.</p>	<p><u>PHA Policy</u></p> <p>The PHA will correct non-life threatening health and safety defects within 15 business days of the inspection date. If the PHA is unable to make repairs within that period due to circumstances beyond the PHA's control (e.g. required parts or services are not available, weather conditions, etc.) the PHA will notify the family of an estimated date of completion. The family must allow the PHA access to the unit to make repairs.</p>

Chapter 9 Reexaminations

What & why?	Current Policy	Proposed Policy
<p>9-I.D. CONDUCTING ANNUAL REEXAMINATIONS</p> <p>Page 9-7</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language adds flexibility to setting due dates for documentation or information needed to complete a reexamination in situation where the family may face Public Housing lease termination due to incomplete paperwork. A deadline of fewer than 14 business days may be necessary for continued program participation.</p>	<p><u>PHA Policy</u></p> <p>Families will be asked to provide all required information (as described in the reexamination notice) to the PHA. The required information will include a PHA- designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family's income, expenses, and family composition.</p> <p>Any required documents or information requested by the PHA must be provided within 14 business days of the PHA's request. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.</p> <p>If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p>	<p><u>PHA Policy</u></p> <p>Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a PHA-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family's income, expenses, and family composition.</p> <p>Any required documents or information that the family is unable to provide at the time of the interview or any stated deadline must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.</p> <p>If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p>

What & why?	Current Policy	Proposed Policy
<p>9-II.C. REEXAMINATION OF FAMILY COMPOSITION (“ANNUAL UPDATE”)</p> <p>Page 9-11</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>For families paying flat rents, updates of family composition will be conducted annually. In scheduling the annual update, the PHA will follow the policy used for scheduling the annual reexamination of families paying income-based rent as set forth in Section 9-I.B. above.</p>	<p><u>PHA Policy</u></p> <p>For families paying flat rents, updates of family composition may be conducted annually. In scheduling the annual update, the PHA will follow the policy used for scheduling the annual reexamination of families paying income-based rent as set forth in Section 9-I.B. above.</p>
<p>9-II.C. REEXAMINATION OF FAMILY COMPOSITION (“ANNUAL UPDATE”)</p> <p>Page 9-11</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>Generally, the family will not be required to attend an interview for an annual update. However, if the PHA determines that an interview is warranted, the family may be required to attend.</p> <p>Notification of the annual update will be sent by first-class mail and will inform the family of the information and documentation that must be provided to the PHA. The family will have 14 calendar days to submit the required information to the PHA. If the family is unable to obtain the information or documents within the required time frame, the family may request an extension. The PHA will accept required documentation by mail, by fax, electronically or in person.</p> <p>If the family’s submission is incomplete, or the family does not submit the information in the required time frame, the PHA will send a second written notice to the family. The family will have 14 calendar days from the date of the second notice to provide the missing information or documentation to the PHA.</p> <p>If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p>	<p><u>PHA Policy</u></p> <p>Generally, the family will not be required to attend an interview for an annual update. However, if the PHA determines that an interview is warranted, the family may be required to attend.</p> <p>Notification of the annual update will be sent by first-class mail and will inform the family of the information and documentation that must be provided to the PHA. The family will have 14 business days to submit the required information to the PHA. If the family is unable to obtain the information or documents within the required time frame, the family may request an extension. The PHA will accept required documentation by mail, by fax, electronically or in person.</p> <p>If the family’s submission is incomplete, or the family does not submit the information in the required time frame, the PHA will send a second written notice to the family. The family will have 14 business days from the date of the second notice to provide the missing information or documentation to the PHA.</p> <p>If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p>

What & why?	Current Policy	Proposed Policy
<p>9-III.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION</p> <p>Page 9-15</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs.</p>	<p><u>PHA Policy</u> The family must inform the PHA of the birth, adoption, or court-awarded custody of a child within 14 calendar days.</p>	<p><u>PHA Policy</u> The family must inform the PHA of the birth, adoption, or court-awarded custody of a child within 14 business days.</p>
<p>9-III.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION</p> <p>Page 9-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u> If a family member ceases to reside in the unit, the family must inform the PHA within 14 calendar days. This requirement also applies to family members who had been considered temporarily absent, who are now permanently absent. If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform the PHA within 14 calendar days.</p>	<p><u>PHA Policy</u> If a family member ceases to reside in the unit, the family must inform the PHA within 14 business days. This requirement also applies to family members who had been considered temporarily absent, who are now permanently absent. If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform the PHA within 14 business days.</p>
<p>9-III.C. CHANGES AFFECTING INCOME OR EXPENSES</p> <p>Page 9-17</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This removes the requirement for zero income households to report no income every three months.</p>	<p><u>PHA Policy</u> The PHA will conduct interim reexaminations in each of the following instances: For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start, to adjust the exclusion with any changes in income, and at the conclusion of the 24-month eligibility period. If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income. The PHA may conduct an</p>	<p><u>PHA Policy</u> The PHA will conduct interim reexaminations in each of the following instances: For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start, to adjust the exclusion with any changes in income, and at the conclusion of the 24-month eligibility period. The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.</p>

What & why?	Current Policy	Proposed Policy
	interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.	
<p>9-III.D. PROCESSING THE INTERIM REEXAMINATION</p> <p>Page 9-19</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u> The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.</p> <p>Generally, the family will not be required to attend an interview for an interim reexamination.</p> <p>However, if the PHA determines that an interview is warranted, the family will be required to attend.</p> <p>Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 calendar days of receiving a request from the PHA.</p> <p>This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, electronically or in person.</p>	<p><u>PHA Policy</u> The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.</p> <p>Generally, the family will not be required to attend an interview for an interim reexamination.</p> <p>However, if the PHA determines that an interview is warranted, the family will be required to attend.</p> <p>Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 business days of receiving a request from the PHA.</p> <p>This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, electronically or in person.</p>
<p>9-IV.B. CHANGES IN UTILITY ALLOWANCES [24 CFR 965.507, 24 CFR 966.4]</p> <p>Page 9-21</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The removal of this language means that revised utility allowances would not be applied at interim but instead wait until the family had its next annual reexamination.</p>	<p><u>PHA Policy</u> Unless the PHA is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first interim or annual reexamination after the allowance is adopted.</p>	<p><u>PHA Policy</u> Unless the PHA is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first annual reexamination after the allowance is adopted.</p>

What & why?	Current Policy	Proposed Policy
<p>10-I.C. CARE AND HANDLING</p> <p>Page 10-8</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy language clarifies that residents may require the assistance of family, friends, volunteers, or service providers in order to maintain their assistance animals. The term “service animals” has been removed to reflect updated federal guidance related to assistance animals.</p>	<p><u>PHA Policy</u> Residents must care for service animals and assistance animals in a manner that complies with state and local laws, including anti-cruelty laws.</p> <p>Residents must ensure that service animals and assistance animals do not pose a direct threat to the health or safety of others, or cause substantial physical damage to the development, dwelling unit, or property of other residents.</p> <p>When a resident’s care or handling of a service animals or assistance animal violates these policies, the PHA will consider whether the violation could be reduced or eliminated by a reasonable accommodation. If the PHA determines that no such accommodation can be made, the PHA may withdraw the approval of a particular service or assistance animal.</p>	<p><u>PHA Policy</u> Residents are responsible for feeding, maintaining, providing veterinary care, and controlling their assistance animals. A resident may do this on their own or with the assistance of family, friends, volunteers, or service providers.</p> <p>Residents must care for assistance animals in a manner that complies with state and local laws, including anti-cruelty laws.</p> <p>Residents must ensure that assistance animals do not pose a direct threat to the health or safety of others, or cause substantial physical damage to the development, dwelling unit, or property of other residents.</p> <p>When a resident’s care or handling of an assistance animal violates these policies, the PHA will consider whether the violation could be reduced or eliminated by a reasonable accommodation. If the PHA determines that no such accommodation can be made, the PHA may withdraw the approval of a particular service or assistance animal.</p>
<p>10-II.B. MANAGEMENT APPROVAL OF PETS</p> <p>Page 10-10</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language better explains how conditional approval works so that residents may complete required steps that are sometimes not possible until after they bring a pet home.</p>	<p><u>PHA Policy</u> Pets must be registered with the PHA before they are brought onto the premises.</p> <p>Conditional approval (not to exceed one month) may be granted to facilitate registration steps.</p> <p>Registration includes documentation signed by a licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration must be renewed annually and will be coordinated with the annual reexamination date.</p>	<p><u>PHA Policy</u> Pets must be authorized by the PHA before they are brought onto the premises.</p> <p>Conditional approval (not to exceed one month) may be granted to facilitate registration steps.</p> <p>Registration includes documentation signed by a licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration may be renewed annually.</p> <p>Pets will not be approved to reside in a unit until completion of the registration requirements.</p>

What & why?	Current Policy	Proposed Policy
<p>10-II.B. MANAGEMENT APPROVAL OF PETS</p> <p>Page 10-11</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language change would allow greater flexibility for the pet owner to complete or update registration at times other than annual resident update.</p>	<p>Pets will not be approved to reside in a unit until completion of the registration requirements.</p> <p><u>PHA Policy</u> The PHA will refuse to register a pet if:</p> <p>The pet is not <i>a common household pet</i> as defined in Section 10-II.C. below Keeping the pet would violate any pet restrictions listed in this policy</p> <p>The pet owner fails to provide complete pet registration information, or fails to update the registration annually</p> <p>The applicant or tenant has previously been charged with animal cruelty under state or local law; or has been evicted, had to relinquish a pet or been prohibited from future pet ownership due to pet rule violations or a court order</p> <p>The PHA reasonably determines that the pet owner is unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease.</p> <p>If the PHA refuses to register a pet, a written notification will be sent to the pet owner within 14 calendar days of the PHA's decision. The notice will state the reason for refusing to register the pet and will inform the family of their right to appeal the decision in accordance with the PHA's grievance procedures.</p>	<p><u>PHA Policy</u> The PHA will refuse to register a pet if: The pet is not <i>a common household pet</i> as defined in Section 10-II.C. below</p> <p>Keeping the pet would violate any pet restrictions listed in this policy The pet owner fails to provide complete pet registration information, or fails to update the registration by PHA request.</p> <p>The applicant or tenant has previously been charged with animal cruelty under state or local law; or has been evicted, had to relinquish a pet or been prohibited from future pet ownership due to pet rule violations or a court order</p> <p>The PHA reasonably determines that the pet owner is unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease.</p> <p>If the PHA refuses to register a pet, a written notification will be sent to the pet owner within 14 calendar days of the PHA's decision. The notice will state the reason for refusing to register the pet and will inform the family of their right to appeal the decision in accordance with the PHA's grievance procedures.</p>
<p>10-II.B. MANAGEMENT APPROVAL OF PETS</p> <p>Page 10-11</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language better explains how conditional approval works so that residents</p>	<p><u>PHA Policy</u> Residents who have been approved to have a pet must enter into a pet agreement with the PHA, or the approval of the pet will be withdrawn.</p> <p>The pet agreement is the resident's certification that they have received a copy of the PHA's pet policy and applicable house rules, that they have</p>	<p><u>PHA Policy</u> Residents who have been authorized to have a pet must enter into a pet agreement with the PHA, or authorization of the pet will be withdrawn.</p> <p>The pet agreement is the resident's certification that they have received a copy of the PHA's pet policy and applicable house rules, that they have</p>

What & why?	Current Policy	Proposed Policy
<p>may complete required steps that are sometimes not possible until after they bring a pet home.</p>	<p>read the policies and/or rules, understands them, and agrees to comply with them.</p> <p>The resident further certifies by signing the pet agreement that they understand that noncompliance with the PHA's pet policy and applicable house rules may result in the withdrawal of PHA approval of the pet or termination of tenancy.</p>	<p>read the policies and/or rules, understands them, and agrees to comply with them.</p> <p>The resident further certifies by signing the pet agreement that they understand that noncompliance with the PHA's pet policy and applicable house rules may result in the withdrawal of PHA approval of the pet or termination of tenancy.</p>
<p>10-II.D. PET RULES</p> <p>Page 10-15</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This is a clarification of existing rules to explain that the pet owner is responsible for the removal of all waste from anywhere and not only "the exercise area."</p>	<p><u>PHA Policy</u></p> <p>The pet owner shall be responsible for the removal of waste from the exercise area by placing it in a sealed plastic bag and disposing of it in an appropriate receptacle.</p> <p>The pet owner shall take adequate precautions to eliminate any pet odors within or around the unit and to maintain the unit in a sanitary condition at all times.</p> <p>Litter box requirements:</p> <ul style="list-style-type: none"> Pet owners must promptly dispose of waste from litter boxes and must maintain litter boxes in a sanitary manner. Litter shall not be disposed of by being flushed through a toilet. Litter boxes shall be kept inside the resident's dwelling unit. 	<p><u>PHA Policy</u></p> <p>The pet owner shall be responsible for the removal of waste by placing it in a sealed plastic bag and disposing of it in an appropriate receptacle.</p> <p>The pet owner shall take adequate precautions to eliminate any pet odors within or around the unit and to maintain the unit in a sanitary condition at all times.</p> <p>Litter box requirements:</p> <ul style="list-style-type: none"> Pet owners must promptly dispose of waste from litter boxes and must maintain litter boxes in a sanitary manner. Litter shall not be disposed of by being flushed through a toilet. Litter boxes shall be kept inside the resident's dwelling unit.
<p>10-II.D. PET RULES</p> <p>Page 10-15</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This is a clarification of existing rules.</p>	<p><u>PHA Policy</u></p> <p>Each pet owner shall be responsible for adequate care, nutrition, exercise and medical attention for his/her pet.</p> <p>Each pet owner shall be responsible for appropriately training and caring for his/her pet to ensure that the pet is not a nuisance or danger to other residents and does not damage PHA property.</p> <p>No dogs may be allowed unleashed outside unless the pet owner has a fully fenced private yard and maintains the dog within that space.</p>	<p><u>PHA Policy</u></p> <p>Each pet owner shall be responsible for adequate care, nutrition, exercise and medical attention for their pet.</p> <p>Each pet owner shall be responsible for appropriately training and caring for their pet to ensure that the pet is not a nuisance or danger to other residents and does not damage PHA property.</p> <p>Dogs may be allowed unleashed outside with household supervision if the pet owner has a</p>

What & why?	Current Policy	Proposed Policy
	No animals may be tethered or chained inside or outside the dwelling unit at any time.	fully fenced private yard and maintains the dog within that space. No animals may be tethered or chained inside or outside the dwelling unit at any time.
<p>10-II.D. PET RULES</p> <p>Page 10-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy change would reduce the requirements for residents caring for their neighbors' animals to only circumstances where the animal would be cared for in the second resident's home.</p>	<p><u>PHA Policy</u></p> <p>The pet owner will be required to designate a responsible party for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet.</p> <p>A resident who cares for another resident's pet must notify the PHA and sign a statement that they agree to abide by all of the pet rules.</p>	<p><u>PHA Policy</u></p> <p>The pet owner will be required to designate a responsible party for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet.</p> <p>A resident who cares for another resident's pet must notify the PHA if providing care in their own home and sign a statement that they agree to abide by all of the pet rules.</p>
<p>10-II.D. PET RULES</p> <p>Page 10-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This update will align with the recently updated Community Rules.</p>	<p><u>PHA Policy</u></p> <p>Pets that are not owned by a tenant are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals. Residents may however have bird feeders.</p> <p>This rule does not apply to visiting pet programs sponsored by a humane society or other non-profit organizations, and approved by the PHA.</p>	<p><u>PHA Policy</u></p> <p>Pets that are not owned by a tenant are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals. Residents may however have bird feeders unless it creates a pest control issue.</p> <p>This rule does not apply to visiting pet programs sponsored by a humane society or other non-profit organizations, and approved by the PHA.</p>
<p>10-II.D. PET RULES</p> <p>Page 10-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This updated timeline matches the dates already used in the standard lease violation cure period of 14 calendar days.</p>	<p><u>PHA Policy</u></p> <p>All complaints of cruelty and all dog bites will be referred to animal control or an applicable agency for investigation and enforcement.</p> <p>If a determination is made on objective facts supported by written statements, that a resident/pet owner has violated the pet rules, written notice will be served.</p> <p>The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated. The notice will also state:</p>	<p><u>PHA Policy</u></p> <p>All complaints of cruelty and all dog bites will be referred to animal control or an applicable agency for investigation and enforcement.</p> <p>If a determination is made on objective facts supported by written statements, that a resident/pet owner has violated the pet rules, written notice will be served.</p> <p>The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated. The notice will also state:</p>

What & why?	Current Policy	Proposed Policy
	<p>That the pet owner has 10 business days from the effective date of the service of notice to correct the violation or make written request for a meeting to discuss the violation</p> <p>That the pet owner is entitled to be accompanied by another person of his or her choice at the meeting</p> <p>That the pet owner's failure to correct the violation, request a meeting, or appear at a requested meeting may result in initiation of procedures to remove the pet, or to terminate the pet owner's tenancy</p>	<p>That the pet owner has 14 calendar days from the effective date of the service of notice to correct the violation or make written request for a meeting to discuss the violation</p> <p>That the pet owner is entitled to be accompanied by another person of their choice at the meeting</p> <p>That the pet owner's failure to correct the violation, request a meeting, or appear at a requested meeting may result in initiation of procedures to remove the pet, or to terminate the pet owner's tenancy</p>
<p>10-III.B. PET DEPOSITS</p> <p>Page 10-21</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language allows for the gradual payment of a pet deposit rather than in full immediately.</p>	<p><u>PHA Policy</u> Pet owners are required to pay a pet deposit in addition to any other required deposits. The amount of the deposit is the higher of the family's total tenant payment or \$50.00, and must be paid in full before the pet is brought on the premises.</p>	<p><u>PHA Policy</u> Pet owners are required to pay a pet deposit of \$200 in addition to any other required deposits. The deposit may be paid in full or with a signed payment plan of \$50 down and \$10 per month before the pet is brought on the premises.</p>
<p>10-III.C. OTHER CHARGES</p> <p>Page 10-22</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy aligns with an already implemented rule that says residents will only be charged for pest control if they do not comply with pest control company instructions. The goal is to encourage pest-free homes and not penalize residents for reporting pest control issues that they cannot address on their own.</p>	<p><u>PHA Policy</u> All reasonable expenses incurred by the PHA as a result of damages directly attributable to the presence of the pet in the project will be the responsibility of the resident, including: The cost of repairs and replacements to the resident's dwelling unit Fumigation of the dwelling unit Repairs to common areas of the project</p> <p>The expense of flea elimination shall also be the responsibility of the resident.</p> <p>If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with the policies in Section 8-I.G, Maintenance and Damage Charges. Pet deposits</p>	<p><u>PHA Policy</u> All reasonable expenses incurred by the PHA as a result of damages directly attributable to the presence of the pet in the project will be the responsibility of the resident, including: The cost of repairs and replacements to the resident's dwelling unit Fumigation of the dwelling unit Repairs to common areas of the project</p> <p>The expense of flea elimination may also be the responsibility of the resident.</p> <p>If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with the policies in Section 8-I.G, Maintenance and Damage Charges. Pet deposits</p>

What & why?	Current Policy	Proposed Policy
	<p>will not be applied to the costs of pet-related damages during occupancy.</p> <p>Charges for pet-related damage are not part of rent payable by the resident.</p>	<p>will not be applied to the costs of pet-related damages during occupancy.</p> <p>Charges for pet-related damage are not part of rent payable by the resident.</p>
<p>10-IV.B. PET DEPOSITS</p> <p>Page 10-23</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language allows for the gradual payment of a pet deposit rather than in full immediately.</p>	<p><u>PHA Policy</u></p> <p>Pet owners are required to pay a pet deposit in addition to any other required deposits. The amount of the deposit is the higher of the family's total tenant payment or \$50.00, and must be paid in full before the pet is brought on the premises.</p>	<p><u>PHA Policy</u></p> <p>Pet owners are required to pay a pet deposit of \$200 in addition to any other required deposits. The deposit may be paid in full or with a signed payment plan of \$50 down and \$10 per month before the pet is brought on the premises.</p>
<p>10-IV.D. OTHER CHARGES</p> <p>Page 10-22</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy aligns with an already implemented rule that says residents will only be charged for pest control if they do not comply with pest control company instructions. The goal is to encourage pest-free homes and not penalize residents for reporting pest control issues that they cannot address on their own.</p>	<p><u>PHA Policy</u></p> <p>All reasonable expenses incurred by the PHA as a result of damages directly attributable to the presence of the pet in the project will be the responsibility of the resident, including:</p> <ul style="list-style-type: none"> The cost of repairs and replacements to the resident's dwelling unit Fumigation of the dwelling unit Repairs to common areas of the project <p>The expense of flea elimination shall also be the responsibility of the resident.</p> <p>If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with the policies in Section 8-I.G, Maintenance and Damage Charges. Pet deposits will not be applied to the costs of pet-related damages during occupancy.</p> <p>Charges for pet-related damage are not part of rent payable by the resident.</p>	<p><u>PHA Policy</u></p> <p>All reasonable expenses incurred by the PHA as a result of damages directly attributable to the presence of the pet in the project will be the responsibility of the resident, including:</p> <ul style="list-style-type: none"> The cost of repairs and replacements to the resident's dwelling unit Fumigation of the dwelling unit Repairs to common areas of the project <p>The expense of flea elimination may also be the responsibility of the resident.</p> <p>If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with the policies in Section 8-I.G, Maintenance and Damage Charges. Pet deposits will not be applied to the costs of pet-related damages during occupancy.</p> <p>Charges for pet-related damage are not part of rent payable by the resident.</p>

Chapter 12 Transfer Policy

What & why?	Current Policy	Proposed Policy
<p>12-I.C. EMERGENCY TRANSFER PROCEDURES</p>	<p><u>PHA Policy</u></p>	<p><u>PHA Policy</u></p>

What & why?	Current Policy	Proposed Policy
<p>Page 12-3</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This added language expands who is eligible for alternative accommodations and explains that good standing under the lease is not required to qualify.</p>	<p>If the transfer is necessary because of maintenance conditions, and an appropriate unit is not immediately available, the PHA will provide temporary accommodations to the tenant by arranging for temporary lodging at a hotel or similar location.</p> <p>If the conditions that required the transfer cannot be repaired, or the condition cannot be repaired in a reasonable amount of time, the PHA will transfer the resident to the first available and appropriate unit after the temporary relocation.</p> <p>Emergency transfers that arise due to maintenance conditions are mandatory for the tenant.</p> <p>If the emergency transfer is necessary to protect a victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will follow procedures outlined in Exhibit 16-4.</p>	<p>Any condition that would produce an emergency work order would qualify a family for an emergency transfer if the repairs cannot be abated or completed within 24 hours.</p> <p>If the transfer is necessary because of maintenance conditions, and an appropriate unit is not immediately available, the PHA will provide temporary accommodations to the tenant by arranging for temporary lodging at a hotel or similar location. The family is entitled to alternative accommodations even if the tenant, household member, guest, or other covered person is responsible for the damage that caused the hazard or if a family is in the process of being evicted.</p> <p>If the conditions that required the transfer cannot be repaired, or the condition cannot be repaired in a reasonable amount of time, the PHA will transfer the resident to the first available and appropriate unit after the temporary relocation.</p> <p>Emergency transfers that arise due to maintenance conditions are mandatory for the tenant.</p> <p>If the emergency transfer is necessary to protect a victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will follow procedures outlined in Exhibit 16-4.</p>
<p>12-I.D. COSTS OF TRANSFER</p> <p>Page 12-3</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This updated language would explain how moving allowances and reimbursements should take place.</p>	<p><u>PHA Policy</u></p> <p>The PHA will bear the reasonable costs of temporarily accommodating the tenant and of long term transfers, if any, due to emergency conditions.</p> <p>The reasonable cost of transfers includes the cost of packing, moving, and unloading belongings, as well as reimbursing the family for eligible out of pocket expenses in accordance with the PHA's Relocation Procedures.</p>	<p><u>PHA Policy</u></p> <p>The PHA will bear the reasonable costs of temporarily accommodating the tenant and of long-term transfers, if any, due to emergency conditions.</p> <p>The reasonable cost of transfers includes the cost of packing, moving, and unloading.</p> <p>The PHA will establish a moving allowance based on the typical costs in the community of packing, moving, and unloading. To establish</p>

What & why?	Current Policy	Proposed Policy
		<p>typical costs, the PHA will collect information from companies in the community that provide these services.</p> <p>The PHA will reimburse the family for eligible out-of-pocket moving expenses up to the PHA's established moving allowance.</p>
<p>12-III.E. COST OF TRANSFER</p> <p>Page 12-11</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This updated language clarifies that the PHA will pay transfer costs for residents with disabilities if the transfer is to an accessible unit.</p>	<p><u>PHA Policy</u></p> <p>The resident will bear all of the costs of transfer they request. However, the PHA will bear the transfer costs when the transfer is done as a reasonable accommodation.</p>	<p><u>PHA Policy</u></p> <p>The resident will bear all of the costs of transfer they request. However, the PHA will bear the transfer costs to transfer a resident with a disability to an accessible unit as an accommodation for the resident's disability.</p>
<p>12-IV.F. REEXAMINATION POLICIES FOR TRANSFERS</p> <p>Page 12-15</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy language change would mean that only long term transfers due to Demolition, Disposition, Revitalizations, or Rehabilitation would cause a reexamination to take place.</p>	<p><u>PHA Policy</u></p> <p>The reexamination will be changed when a transfer takes place, except for emergency transfers and temporary transfers related to Demolition, Disposition, Revitalizations, or Rehabilitation.</p>	<p><u>PHA Policy</u></p> <p>The reexamination will not be changed when a transfer takes place, except for transfers related to Demolition, Disposition, Revitalizations, or Rehabilitation.</p>

Chapter 13 Lease Terminations

What & why?	Current Policy	Proposed Policy
<p>13-I.A. TENANT CHOOSES TO TERMINATE THE LEASE [24 CFR 966.4(k)(1)(ii) and 24 CFR 966.4(l)(1)]</p> <p>Page 13-3</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><u>PHA Policy</u></p> <p>If a family desires to move and terminate their tenancy with the PHA, they must give at least 30 calendar days advance written notice to the PHA of their intent to vacate. When a family must give less than 30 days notice due to circumstances beyond their control the PHA, at its discretion, may waive the 30 day requirement.</p>	<p><u>PHA Policy</u></p> <p>If a family desires to move and terminate their tenancy with the PHA, they must give at least 30 calendar days advance written notice to the PHA of their intent to vacate. When a family must give less than 30 days notice due to circumstances beyond their control the PHA, at its discretion, may waive the 30 day requirement.</p>

What & why?	Current Policy	Proposed Policy
<p>Adding spouse and cohead to this policy would allow adults with the same program participation responsibilities to sign their own notice of lease termination.</p>	<p>The notice of lease termination must be signed by the head of household.</p>	<p>The notice of lease termination must be signed by the head of household, spouse, or cohead.</p>
<p>13-III.C. OTHER AUTHORIZED REASONS FOR TERMINATION [24 CFR 966.4(I)(2) and (5)(ii)(B)]</p> <p>Page 13-17</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Changing from “will” to “may” provides additional flexibility to prevent lease termination.</p>	<p><u>PHA Policy</u></p> <p>The family must supply any information or certification requested by the PHA to verify that the family is living in the unit, or relating to family absence from the unit, including any PHA-requested information or certification on the purposes of family absences. The family must cooperate with the PHA for this purpose.</p> <p>The family must promptly notify the PHA when all family members will be absent from the unit for more than 7 calendar days. The family must obtain PHA approval before all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 calendar days. Absences of the entire family for more than 30 days will be considered on a case-by-case basis.</p> <p>If a family is absent from the public housing unit for more than 30 consecutive days without Homes for Good approval, and the family does not adequately verify that they are living in the unit, the unit will be considered abandoned, and Homes for Good will terminate the lease for other good cause.</p> <p><i>Abandonment of the unit.</i> If the family appears to have vacated the unit without giving proper notice, the PHA will follow state and local landlord-tenant law pertaining to abandonment before taking possession of the unit. If necessary, the PHA will secure the unit immediately to prevent vandalism and other criminal activity.</p>	<p><u>PHA Policy</u></p> <p>The family must supply any information or certification requested by the PHA to verify that the family is living in the unit, or relating to family absence from the unit, including any PHA-requested information or certification on the purposes of family absences. The family must cooperate with the PHA for this purpose.</p> <p>The family must promptly notify the PHA when all family members will be absent from the unit for more than 7 calendar days. The family must obtain PHA approval before all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 calendar days. Absences of the entire family for more than 30 days will be considered on a case-by-case basis.</p> <p>If a family is absent from the public housing unit for more than 30 consecutive days without Homes for Good approval, and the family does not adequately verify that they are living in the unit, the unit may be considered abandoned, and Homes for Good may terminate the lease for other good cause.</p> <p><i>Abandonment of the unit.</i> If the family appears to have vacated the unit without giving proper notice, the PHA will follow state and local landlord-tenant law pertaining to abandonment before taking possession of the unit. If necessary, the PHA will secure the unit</p>
<p>13-III.C. OTHER AUTHORIZED REASONS FOR TERMINATION [24 CFR 966.4(I)(2) and (5)(ii)(B)]</p>	<p><u>PHA Policy</u></p> <p>At annual or interim reexamination, if a family's adjusted income exceeds the applicable over-</p>	

What & why?	Current Policy	Proposed Policy
<p>Page 13-18</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This policy language has been moved and expanded into 13-II.J OVER INCOME FAMILIES.</p>	<p>income limit, the PHA will document the family file and begin tracking the family's over-income status.</p> <p>If one year after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, the PHA will notify the family in writing that their income has exceeded the over-income limit for one year, and that if the family continues to be over-income for 12 consecutive months, the family will be subject to the PHA's over-income policies.</p> <p>If two years after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, the PHA will charge the family a rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit. The PHA will notify the family in writing of their new rent amount. The new rent amount will be effective 30 days after the PHA's written notice to the family.</p> <p>If, at any time, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with PHA policy. If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification.</p> <p>The PHA will notify the family in writing that over-income policies no longer apply to them. If the family's income later exceeds the over-income limit again, the family is entitled to a new two-year grace period.</p> <p>The PHA will begin tracking over-income families once these policies have been adopted, but no later than March 24, 2019.</p>	

What & why?	Current Policy	Proposed Policy
	The PHA will not evict or terminate the tenancies of families whose income exceeds the income limit for program eligibility as described at 24 CFR 960.261.	
<p>13-III.E. CRITERIA FOR DECIDING TO TERMINATE TENANCY</p> <p>Page 13-23</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This proposed policy would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>The PHA will consider the following facts and circumstances before deciding whether to terminate the lease for any of the HUD required lease provisions or for any other reasons:</p> <ul style="list-style-type: none"> The seriousness of the offending action, especially with respect to how it would affect other residents' safety or property The extent of participation or culpability of the leaseholder, or other household members, in the offending action, including whether the culpable member is a minor, a person with disabilities, or (as discussed further in section 13-III.F) a victim of domestic violence, dating violence, sexual assault, or stalking The effects that the eviction will have on other family members who were not involved in the action or failure to act The effect on the community of the termination, or of the PHA's failure to terminate the tenancy The effect of the PHA's decision on the integrity of the public housing program The extent to which the leaseholder has shown personal responsibility and whether they have taken all reasonable steps to prevent or mitigate the offending action The length of time since the violation occurred, the family's recent history, and the likelihood of favorable conduct in the future <p>While a record of arrest(s) will not be used as the basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the</p>	<p><u>PHA Policy</u></p> <p>The PHA will consider the following facts and circumstances before deciding whether to terminate the lease for any of the HUD required lease provisions or for any other reasons:</p> <ul style="list-style-type: none"> The seriousness of the offending action, especially with respect to how it would affect other residents' safety or property The extent of participation or culpability of the leaseholder, or other household members, in the offending action, including whether the culpable member is a minor, a person with disabilities, or (as discussed further in section 13-III.F) a victim of domestic violence, dating violence, sexual assault, or stalking The effects that the eviction will have on other family members who were not involved in the action or failure to act The effect on the community of the termination, or of the PHA's failure to terminate the tenancy The effect of the PHA's decision on the integrity of the public housing program The extent to which the leaseholder has shown personal responsibility and whether they have taken all reasonable steps to prevent or mitigate the offending action The length of time since the violation occurred, the family's recent history, and the likelihood of favorable conduct in the future <p>While a record of arrest(s) will not be used as the basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the</p>

What & why?	Current Policy	Proposed Policy
	<p>arrest and consider the reported circumstances of the arrest. The PHA may also consider:</p> <ul style="list-style-type: none"> Any statements made by witnesses or the participant not included in the police report Whether criminal charges were filed Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal Any other evidence relevant to determining whether or not the participant engaged in disqualifying activity <p>Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property.</p> <p>In the case of program abuse the dollar amount of the underpaid rent and whether or not a false certification was signed by the family</p>	<p>arrest and consider the reported circumstances of the arrest. The PHA may also consider:</p> <ul style="list-style-type: none"> Any statements made by witnesses or the participant not included in the police report Whether criminal charges were filed Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal Any other evidence relevant to determining whether or not the participant engaged in disqualifying activity <p>Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property.</p> <p>In the case of program abuse, whether or not a false certification was signed by the family</p>
<p>13-III.E. CRITERIA FOR DECIDING TO TERMINATE TENANCY</p> <p>Page 13-25</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Changing from “will” to “may” adds additional flexibility for Public Housing applicant screening and reduces barriers to participation.</p>	<p><u>PHA Policy</u></p> <p>In determining whether to terminate the lease for illegal drug use or a pattern of illegal drug use, or for abuse or a pattern of abuse of alcohol, by a household member who is no longer engaging in such use or abuse, the PHA will consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program.</p> <p>For this purpose the PHA will require the tenant to submit evidence of the household member’s participation in or successful completion of a supervised drug or alcohol rehabilitation program.</p>	<p><u>PHA Policy</u></p> <p>In determining whether to terminate the lease for illegal drug use or a pattern of illegal drug use, or for abuse or a pattern of abuse of alcohol, by a household member who is no longer engaging in such use or abuse, the PHA will consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program.</p> <p>For this purpose the PHA may require the tenant to submit evidence of the household member’s participation in or successful completion of a supervised drug or alcohol rehabilitation program.</p>
<p>13-III.F. TERMINATIONS RELATED TO DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING</p> <p>Page 13-28</p>	<p><u>PHA Policy</u></p> <p>The PHA will bifurcate a family’s lease and terminate the tenancy of a family member if the PHA determines that the family member has committed criminal acts of physical violence against</p>	<p><u>PHA Policy</u></p> <p>The PHA may bifurcate a family’s lease and terminate the tenancy of a family member if the PHA determines that the family member has committed criminal acts of physical violence against</p>

What & why?	Current Policy	Proposed Policy
<p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Changing from “will” to “may” adds additional flexibility for the PHA to work with and determine next steps for a family affected by domestic violence, dating violence, sexual assault, or stalking.</p>	<p>other family members or others. This action will not affect the tenancy or program assistance of the remaining, nonculpable family members.</p> <p>In making its decision, the PHA will consider all credible evidence, including, but not limited to, a signed certification (form HUD-5382) or other documentation of abuse submitted to the PHA by the victim in accordance with this section and section 16-VII.D. The PHA will also consider the factors in section 13.III.E. Upon such consideration, the PHA may, on a case-by-case basis, choose not to bifurcate the lease and terminate the tenancy of the culpable family member.</p> <p>If the PHA does bifurcate the lease and terminate the tenancy of the culpable family member, it will do so in accordance with the lease, applicable law, and the policies in this ACOP. If the person removed from the lease was the only tenant eligible to receive assistance, the PHA must provide any remaining tenant a chance to establish eligibility for the unit. If the remaining tenant cannot do so, the PHA must provide the tenant reasonable time to find new housing or to establish eligibility for another housing program covered by VAWA 2013.</p>	<p>other family members or others. This action will not affect the tenancy or program assistance of the remaining, nonculpable family members.</p> <p>In making its decision, the PHA will consider all credible evidence, including, but not limited to, a signed certification (form HUD-5382) or other documentation of abuse submitted to the PHA by the victim in accordance with this section and section 16-VII.D. The PHA will also consider the factors in section 13.III.E. Upon such consideration, the PHA may, on a case-by-case basis, choose not to bifurcate the lease and terminate the tenancy of the culpable family member.</p> <p>If the PHA does bifurcate the lease and terminate the tenancy of the culpable family member, it will do so in accordance with the lease, applicable law, and the policies in this ACOP. If the person removed from the lease was the only tenant eligible to receive assistance, the PHA must provide any remaining tenant a chance to establish eligibility for the unit. If the remaining tenant cannot do so, the PHA must provide the tenant reasonable time to find new housing or to establish eligibility for another housing program covered by VAWA 2013.</p>
<p>13-IV.B. CONDUCTING CRIMINAL RECORDS CHECKS [24 CFR 5.903(e)(ii) and 24 CFR 960.259]</p> <p>Page 13-30</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Changing from “will” to “may” adds additional flexibility to when and how the PHA will use criminal records.</p>	<p><u>PHA Policy</u> The PHA will conduct criminal records checks when it has come to the attention of the PHA, either from local law enforcement or by other means, that an individual has engaged in the destruction of property, engaged in violent activity against another person, or has interfered with the right to peaceful enjoyment of the premises of other residents. Such checks will also include sex offender registration information. In order to obtain such information, all adult household members must sign consent forms for release of criminal conviction and sex offender registration records on an annual basis.</p>	<p><u>PHA Policy</u> The PHA may conduct criminal records checks when it has come to the attention of the PHA, either from local law enforcement or by other means, that an individual has engaged in the destruction of property, engaged in violent activity against another person, or has interfered with the right to peaceful enjoyment of the premises of other residents. Such checks will also include sex offender registration information. In order to obtain such information, all adult household members must sign consent forms for release of criminal conviction and sex offender registration records on an annual basis.</p>

What & why?	Current Policy	Proposed Policy
<p>13-IV.D. LEASE TERMINATION NOTICE [24 CFR 966.4(I)(3); Notice PIH 2021-29]</p> <p>Page 13-32</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This new policy language explains PHA obligation to notify families about remote hearings and the assistance available for the family to participate.</p>		<p><u>PHA Policy</u> If the PHA offers remote hearings, the notice will also state that the resident may request a remote hearing.</p> <p>If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the resident informing them of the right to request a hearing, the resident will be notified that the hearing will be conducted remotely. The resident will be informed of the processes involved in a remote hearing and that the PHA will provide technical assistance, if needed, before the hearing.</p>
What & why?	Current Policy	Proposed Policy
<p>13-IV.D. LEASE TERMINATION NOTICE [24 CFR 966.4(I)(3); Notice PIH 2021-29]</p> <p>Page 13-33</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This updated policy language explains how lease termination notices are different during nationwide emergency orders, such as during the COVID-19 pandemic.</p>	<p><u>PHA Policy</u> All lease termination notices will be sent by first-class mail. The PHA may also attempt to deliver notices of lease termination directly to the tenant or an adult member of the household or post in a sealed envelope to the front door. Except where otherwise stated, the PHA will give 30 days' written notice. Oregon state law allows 24 hour termination notice for certain circumstance, and the PHA will serve 24 hour lease termination notices per Oregon state law. Oregon state law allows 72 hour termination notice for certain circumstance, and the PHA will serve 72 hour lease termination notices per Oregon state law.</p>	<p><u>PHA Policy</u> The PHA will give written notice of 30 calendar days from the date the tenant receives the notice for nonpayment of rent (during nationwide emergency orders) or 14 calendar days from the date the tenant receives the notice for nonpayment of rent (upon expiration of nationwide emergency orders). For all other lease terminations, the PHA will give 30 days written notice or, if state or local law allows less than 30 days, such shorter notice will be given.</p> <p>Oregon state law allows 24 hour termination notice for certain circumstance, and the PHA will serve 24 hour lease termination notices per Oregon state law.</p>
What & why?	Current Policy	Proposed Policy
<p>13-IV.D. LEASE TERMINATION NOTICE [24 CFR 966.4(I)(3); Notice PIH 2021-29]</p> <p>Page 13-33</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This new policy language explains how lease termination notice requirement apply in situations where state or local law are</p>		<p><u>PHA Policy</u> Any Notice to Vacate or Notice to Quit that is required by state or local law will be combined with the Notice of Lease Termination under this section.</p>

What & why?	Current Policy	Proposed Policy
different than Public Housing program requirements.		

Chapter 14 Grievances and Appeals

What & why?	Current Policy	Proposed Policy
<p>14-I.B. INFORMAL HEARING PROCESS [24 CFR 960.208(a) and PH Occ GB, p. 58]</p> <p>Page 14-2</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This new policy language explains PHA obligation to notify families about remote hearings and the assistance available for the family to participate.</p>		<p><u>PHA Policy</u> As applicable, the PHA's notice of denial will include information about required or requested remote informal hearings.</p>
<p>14-I.B. INFORMAL HEARING PROCESS [24 CFR 960.208(a) and PH Occ GB, p. 58]</p> <p>Page 14-3</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u> A request for an informal hearing must be made by phone or in writing by the close of the business day, no later than 14 calendar days from the date of the PHA's notification of denial of admission.</p> <p>The PHA will schedule and send written notice of the informal hearing within 14 calendar days of the family's request.</p> <p>If the PHA informal hearing will be conducted remotely, at the time the notice is sent to the family, the family will be informed: Regarding the processes involved in a remote informal hearing; That the PHA will provide technical assistance prior to and during the informal hearing, if needed; and That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal hearing, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to</p>	<p><u>PHA Policy</u> A request for an informal hearing must be made by phone or in writing by the close of the business day, no later than 14 business days from the date of the PHA's notification of denial of admission.</p> <p>The PHA will schedule and send written notice of the informal hearing within 14 business days of the family's request.</p> <p>If the PHA informal hearing will be conducted remotely, at the time the notice is sent to the family, the family will be informed: Regarding the processes involved in a remote informal hearing; That the PHA will provide technical assistance prior to and during the informal hearing, if needed; and That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal hearing, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to</p>

What & why?	Current Policy	Proposed Policy
<p>14-I.B. INFORMAL HEARING PROCESS [24 CFR 960.208(a) and PH Occ GB, p. 58]</p> <p>Page 14-6</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p>participate in an in-person informal hearing, as appropriate.</p> <p><u>PHA Policy</u> The PHA will notify the applicant of the PHA’s final decision, including a brief statement of the reasons for the final decision.</p> <p>In rendering a decision, the PHA will evaluate the following matters:</p> <p>Whether or not the grounds for denial were stated factually in the notice</p> <p>The validity of grounds for denial of admission. If the grounds for denial are not specified in the regulations or in PHA policy, then the decision to deny assistance will be overturned. See Chapter 3 for a detailed discussion of the grounds for applicant denial.</p> <p>The validity of the evidence. The PHA will evaluate whether the facts presented prove the grounds for denial of admission. If the facts prove that there are grounds for denial, and the denial is required by HUD, the PHA will uphold the decision to deny admission.</p> <p>If the facts prove the grounds for denial, and the denial is discretionary, the PHA will consider the recommendation of the person conducting the informal hearing in making the final decision whether to deny admission.</p> <p>The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 14 calendar days of the informal hearing, to the applicant and his or her representative, if any.</p>	<p>participate in an in-person informal hearing, as appropriate.</p> <p><u>PHA Policy</u> The PHA will notify the applicant of the PHA’s final decision, including a brief statement of the reasons for the final decision.</p> <p>In rendering a decision, the PHA will evaluate the following matters:</p> <p>Whether or not the grounds for denial were stated factually in the notice</p> <p>The validity of grounds for denial of admission. If the grounds for denial are not specified in the regulations or in PHA policy, then the decision to deny assistance will be overturned. See Chapter 3 for a detailed discussion of the grounds for applicant denial.</p> <p>The validity of the evidence. The PHA will evaluate whether the facts presented prove the grounds for denial of admission. If the facts prove that there are grounds for denial, and the denial is required by HUD, the PHA will uphold the decision to deny admission.</p> <p>If the facts prove the grounds for denial, and the denial is discretionary, the PHA will consider the recommendation of the person conducting the informal hearing in making the final decision whether to deny admission.</p> <p>The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 14 business days of the informal hearing, to the applicant and their representative, if any.</p>

What & why?	Current Policy	Proposed Policy
	<p>If the informal hearing decision overturns the denial, processing for admission will resume.</p> <p>If the family fails to appear for their informal hearing, the denial of admission will stand and the family will be so notified.</p>	<p>If the informal hearing decision overturns the denial, processing for admission will resume.</p> <p>If the family fails to appear for their informal hearing, the denial of admission will stand and the family will be so notified.</p>
<p>14-II.A. HEARING AND APPEAL PROVISIONS FOR NONCITIZENS [24 CFR 5.514]</p> <p>Page 14-8</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>The PHA will notify the family in writing of the results of the USCIS secondary verification within 14 calendar days of receiving the results.</p> <p>The family must provide the PHA with a copy of the written request for appeal and proof of mailing within 14 calendar days of sending the request to the USCIS.</p>	<p><u>PHA Policy</u></p> <p>The PHA will notify the family in writing of the results of the USCIS secondary verification within 14 business days of receiving the results.</p> <p>The family must provide the PHA with a copy of the written request for appeal and proof of mailing within 14 business days of sending the request to the USCIS.</p>
<p>14-II.A. HEARING AND APPEAL PROVISIONS FOR NONCITIZENS [24 CFR 5.514]</p> <p>Page 14-8</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>The PHA will send written notice to the family of its right to request an informal hearing within 14 calendar days of receiving notice of the USCIS decision regarding the family's immigration status.</p>	<p><u>PHA Policy</u></p> <p>The PHA will send written notice to the family of its right to request an informal hearing within 14 business days of receiving notice of the USCIS decision regarding the family's immigration status.</p>
<p>14-III.D. INFORMAL SETTLEMENT OF GRIEVANCE [24 CFR 966.54]</p> <p>Page 14-14</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8</p>	<p><u>PHA Policy</u></p> <p>The PHA will accept requests for an informal settlement of a grievance either orally or in writing, to the PHA office within 5 business days of non payment of rent notice or 14 calendar days for any other grievance. Within 14 calendar days of receipt of the request the PHA will arrange a meeting with the tenant at a mutually agreeable time and confirm such meeting in writing to the tenant.</p>	<p><u>PHA Policy</u></p> <p>The PHA will accept requests for an informal settlement of a grievance either orally or in writing, to the PHA office within 10 business days of the grievable event. Within 10 business days of receipt of the request the PHA will arrange a meeting with the tenant at a mutually agreeable time and confirm such meeting in writing to the tenant.</p>

What & why?	Current Policy	Proposed Policy
<p>programs covered by the Administrative Plan.</p> <p>This proposed change is intended to make it clearer that hearings will be rescheduled on a case-by-case basis for extenuating circumstances only.</p>	<p>The informal settlement may be conducted remotely as required by the PHA or may be conducted remotely upon consideration of the request of the tenant. See 14-III.G for information on how and under what circumstances remote informal settlements may be conducted.</p> <p>If a tenant fails to attend the scheduled meeting without prior notice, the PHA will reschedule the appointment only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.</p> <p>Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family.</p>	<p>The informal settlement may be conducted remotely as required by the PHA or may be conducted remotely upon consideration of the request of the tenant. See 14-III.G for information on how and under what circumstances remote informal settlements may be conducted.</p> <p>If a tenant fails to attend the scheduled meeting without prior notice, the PHA will reschedule the appointment only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.</p> <p>Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Extenuating circumstances will be considered on a case-by-case basis.</p>
<p>14-III.E. PROCEDURES TO OBTAIN A HEARING</p> <p>Page 14-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p> <p>This language also explains PHA obligation to notify families about remote hearings and the assistance available for the family to participate.</p>	<p><u>PHA Policy</u> Within 14 calendar days of receiving a written request for a hearing, the hearing officer will schedule and send written notice of the hearing to both the complainant and the PHA.</p>	<p><u>PHA Policy</u> Within 14 business days of receiving a written request for a hearing, the hearing officer will schedule and send written notice of the hearing to both the complainant and the PHA.</p> <p>If the PHA hearing will be conducted remotely, at the time the notice is sent to the family, the family will be notified:</p> <p>Regarding the processes involved in a remote grievance hearing;</p> <p>That the PHA will provide technical assistance prior to and during the hearing, if needed; and</p> <p>That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform the PHA and the PHA will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate.</p>

What & why?	Current Policy	Proposed Policy
<p>14-III.E. PROCEDURES TO OBTAIN A HEARING</p> <p>Page 14-16</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This proposed change is intended to make it clearer that hearings will be rescheduled on a case-by-case basis for extenuating circumstances only.</p>	<p><u>PHA Policy</u> The tenant may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the PHA may request documentation of the "good cause" prior to rescheduling the hearing.</p>	<p><u>PHA Policy</u> The tenant may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Extenuating circumstances will be considered on a case-by-case basis. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the PHA may request documentation of the "good cause" prior to rescheduling the hearing.</p>
<p>14-III.G. PROCEDURES GOVERNING THE HEARING [24 CFR 966.56]</p> <p>Page 14-23</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This change would mean that households can receive copies of any documents related to their hearing for no charge, if requested by noon the previous day.</p>	<p><u>PHA Policy</u> The tenant will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the hearing.</p>	<p><u>PHA Policy</u> The tenant will be allowed to copy any documents related to the hearing at no cost to the family. There will be no charge for documents emailed by the PHA. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the hearing.</p>
<p>14-III.G. PROCEDURES GOVERNING THE HEARING [24 CFR 966.56]</p> <p>Page 14-22</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This proposed change is intended to make it clearer that hearings will be rescheduled on a case-by-case basis for extenuating circumstances only.</p>	<p><u>PHA Policy</u> If the PHA offers remote hearings, the notice will also state that the resident may request a remote hearing.</p> <p>If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the resident informing them of the right to request a hearing, the resident will be notified that the hearing will be conducted remotely. The resident will be informed of the processes involved in a remote hearing and that the PHA will provide technical assistance, if needed, before the hearing.</p> <p>If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 30 minutes. If the tenant appears within 30 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 30</p>	<p><u>PHA Policy</u> If the PHA offers remote hearings, the notice will also state that the resident may request a remote hearing.</p> <p>If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the resident informing them of the right to request a hearing, the resident will be notified that the hearing will be conducted remotely. The resident will be informed of the processes involved in a remote hearing and that the PHA will provide technical assistance, if needed, before the hearing.</p> <p>If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 30 minutes. If the tenant appears within 30 minutes of the scheduled time, the hearing will be</p>

What & why?	Current Policy	Proposed Policy
	<p>minutes of the scheduled time, they will be considered to have failed to appear.</p> <p>If the tenant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The hearing officer will reschedule the hearing only if the tenant can show good cause for the failure to appear, or it is needed as a reasonable accommodation for a person with disabilities.</p> <p>"Good cause" is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.</p>	<p>held. If the tenant does not arrive within 30 minutes of the scheduled time, they will be considered to have failed to appear.</p> <p>If the tenant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The hearing officer will reschedule the hearing only if the tenant can show good cause for the failure to appear, or it is needed as a reasonable accommodation for a person with disabilities.</p> <p>"Good cause" is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Extenuating circumstances will be considered on a case-by-case basis.</p>
<p>14-III.H. DECISION OF THE HEARING OFFICER [24 CFR 966.57]</p> <p>Page 14-26</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>In rendering a decision, the hearing officer will consider the following matters:</p> <p>PHA Notice to the Family: The hearing officer will determine if the reasons for the PHA's decision are factually stated in the notice.</p> <p>Discovery: The hearing officer will determine if the family was given the opportunity to examine any relevant documents in accordance with PHA policy.</p> <p>PHA Evidence to Support the PHA Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support the PHA's conclusion.</p> <p>Validity of Grounds for Termination of Tenancy (when applicable): The hearing officer will determine if the termination of tenancy is for one of the</p>	<p><u>PHA Policy</u></p> <p>In rendering a decision, the hearing officer will consider the following matters:</p> <p>PHA Notice to the Family: The hearing officer will determine if the reasons for the PHA's decision are factually stated in the notice.</p> <p>Discovery: The hearing officer will determine if the family was given the opportunity to examine any relevant documents in accordance with PHA policy.</p> <p>PHA Evidence to Support the PHA Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support the PHA's conclusion.</p> <p>Validity of Grounds for Termination of Tenancy (when applicable): The hearing officer will determine if the termination of tenancy is for one of the</p>

What & why?	Current Policy	Proposed Policy
	<p>grounds specified in the HUD regulations and PHA policies. If the grounds for termination are not specified in the regulations or in compliance with PHA policies, then the decision of the PHA will be overturned.</p> <p>The hearing officer will issue a written decision to the family and the PHA no later than 10 business days after the hearing.</p> <p>...</p>	<p>grounds specified in the HUD regulations and PHA policies. If the grounds for termination are not specified in the regulations or in compliance with PHA policies, then the decision of the PHA will be overturned.</p> <p>The hearing officer will issue a written decision to the family and the PHA no later than 14 business days after the hearing.</p> <p>...</p>
<p>14-III.H. DECISION OF THE HEARING OFFICER [24 CFR 966.57]</p> <p>Page 14-28</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>When the PHA considers the decision of the hearing officer to be invalid due to the reasons stated above, it will present the matter to the PHA Board of Commissioners within 14 calendar days of the date of the hearing officer’s decision. The Board has 30 calendar days to consider the decision. If the Board decides to reverse the hearing officer’s decision, it must notify the complainant within 14 calendar days of this decision.</p>	<p><u>PHA Policy</u></p> <p>When the PHA considers the decision of the hearing officer to be invalid due to the reasons stated above, it will present the matter to the PHA Board of Commissioners within 14 business days of the date of the hearing officer’s decision. The Board has 30 calendar days to consider the decision. If the Board decides to reverse the hearing officer’s decision, it must notify the complainant within 14 business days of this decision.</p>

Chapter 15 Program Integrity

What & why?	Current Policy	Proposed Policy
<p>15-I.A. PREVENTING ERRORS AND PROGRAM ABUSE</p> <p>Page 15-3</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language change better reflects the tenant education intended by orientation session rather being used as a barrier to exclude prospective residents.</p>	<p><u>PHA Policy</u></p> <p>The PHA anticipates that the vast majority of families and PHA employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.</p> <p>To ensure that the PHA’s program is administered effectively and according to the highest ethical and legal standards, the PHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.</p> <p>The PHA will provide each applicant and resident with a copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains</p>	<p><u>PHA Policy</u></p> <p>The PHA anticipates that the vast majority of families and PHA employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.</p> <p>To ensure that the PHA’s program is administered effectively and according to the highest ethical and legal standards, the PHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.</p> <p>The PHA will provide each applicant and resident with a copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains</p>

What & why?	Current Policy	Proposed Policy
	<p>the types of actions a family must avoid and the penalties for program abuse.</p> <p>The PHA will provide each applicant and resident with a copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12. In addition, the PHA will require the head of each household to acknowledge receipt of the guide by signing a copy for retention in the family file.</p> <p>The PHA will require mandatory orientation sessions for all prospective residents either prior to or upon execution of the lease. The PHA will discuss program compliance and integrity issues. At the conclusion of all program orientation sessions, the family representative will be required to sign a program briefing certificate to confirm that all rules and pertinent regulations were explained to them.</p> <p>The PHA will routinely provide resident counseling as part of every reexamination interview in order to clarify any confusion pertaining to program rules and requirements.</p> <p>PHA staff will be required to review and explain the contents of all HUD- and PHA-required forms prior to requesting family member signatures.</p> <p>The PHA will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key PHA forms and form letters that request information from a family member.</p>	<p>the types of actions a family must avoid and the penalties for program abuse.</p> <p>The PHA will provide each applicant and resident with a copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12. In addition, the PHA will require the head of each household to acknowledge receipt of the guide by signing a copy for retention in the family file.</p> <p>The PHA will provide orientation sessions for all prospective residents either prior to or upon execution of the lease. The PHA will discuss program compliance and integrity issues. At the conclusion of all program orientation sessions, the family representative will be required to sign a program briefing certificate to confirm that all rules and pertinent regulations were explained to them.</p> <p>The PHA will routinely provide resident counseling as part of every reexamination interview in order to clarify any confusion pertaining to program rules and requirements.</p> <p>PHA staff will be required to review and explain the contents of all HUD- and PHA-required forms prior to requesting family member signatures.</p> <p>The PHA will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key PHA forms and form letters that request information from a family member.</p>

What & why?	Current Policy	Proposed Policy
	<p>The PHA will provide each PHA employee with the necessary training on program rules and the organization's standards of conduct and ethics.</p> <p>At every regular reexamination the PHA staff will explain any changes in HUD regulations or PHA policy that affect residents.</p> <p>For purposes of this chapter the term error refers to an unintentional error or omission. Program abuse or fraud refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.</p>	<p>The PHA will provide each PHA employee with the necessary training on program rules and the organization's standards of conduct and ethics.</p> <p>At every regular reexamination the PHA staff will explain any changes in HUD regulations or PHA policy that affect residents.</p> <p>For purposes of this chapter the term error refers to an unintentional error or omission. Program abuse or fraud refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.</p>
<p>15-I.B. DETECTING ERRORS AND PROGRAM ABUSE</p> <p>Page 15-4</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language provides additional flexibility about how the PHA may use the Work Number and other income verification systems.</p>	<p><u>PHA Policy</u></p> <p>The PHA will employ a variety of methods to detect errors and program abuse, including:</p> <p>The PHA routinely will use EIV and other non-HUD sources of up-front income verification. This includes the Work Number and any other private or public databases available to the PHA.</p> <p>At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.</p> <p>The PHA will compare family-reported income and expenditures to detect possible unreported income.</p>	<p><u>PHA Policy</u></p> <p>The PHA will employ a variety of methods to detect errors and program abuse, including:</p> <p>The PHA routinely will use EIV and other non-HUD sources of up-front income verification. This may include the Work Number and any other private or public databases available to the PHA.</p> <p>At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.</p> <p>The PHA will compare family-reported income and expenditures to detect possible unreported income.</p>

What & why?	Current Policy	Proposed Policy
<p>15-I.C. INVESTIGATING ERRORS AND PROGRAM ABUSE</p> <p>Page 15-6</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u></p> <p>The PHA will inform the relevant party in writing of its findings and remedies within 10 business days of the conclusion of the investigation. The notice will include (1) a description of the error or program abuse, (2) the basis on which the PHA determined the error or program abuses, (3) the remedies to be employed, and (4) the family's right to appeal the results through an informal hearing or grievance hearing (see Chapter 14).</p>	<p><u>PHA Policy</u></p> <p>The PHA will inform the relevant party in writing of its findings and remedies within 14 business days of the conclusion of the investigation. The notice will include (1) a description of the error or program abuse, (2) the basis on which the PHA determined the error or program abuses, (3) the remedies to be employed, and (4) the family's right to appeal the results through an informal hearing or grievance hearing (see Chapter 14).</p>

Chapter 16 Program Administration

What & why?	Current Language	Proposed Language
<p>16-I.E. REASONABLE ACCOMMODATION [24 CFR 965.508]</p> <p>Page 16-6</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This policy explains the PHA obligation to notify residents about the availability of increased utility allowances for extenuating circumstances.</p>	<p>On request from a family that includes a disabled or elderly person, the PHA must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family [PH Occ GB, p. 172].</p> <p>Likewise, residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].</p> <p>See Chapter 2 for policies regarding the request and approval of reasonable accommodations.</p>	<p>16-I.E. REASONABLE ACCOMMODATION AND INDIVIDUAL RELIEF [24 CFR 965.508]</p> <p>On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [24 CFR 8 and 100, PH Occ GB, p. 172].</p> <p>Likewise, residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [24 CFR 8 and 100, PH Occ GB, p. 172].</p> <p>See Chapter 2 for policies regarding the request and approval of reasonable accommodations.</p> <p>Further, the PHA may grant requests for relief from charges in excess of the utility allowance on reasonable grounds, such as special needs of the elderly, ill, or residents with disabilities, or special factors not within</p>

What & why?	Current Language	Proposed Language
		<p>control of the resident, as the PHA deems appropriate. The family must request the higher allowance and provide the PHA with information about the additional allowance required.</p> <p>PHAs should develop criteria for granting individual relief and to notify residents about the availability of individual relief, and also to notify participants about the availability of individual relief programs (sometimes referred to as "Medical Baseline discounts") offered by the local utility company [Utility Allowance GB, p. 19, 24 CFR 965.508].</p>
<p>16-II.B. FLAT RENTS [24 CFR 960.253(b) and Notice PIH 2017-23]</p> <p>Page 16-8</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language clarifies existing flat rent procedure.</p>		<p><u>PHA Policy</u> The PHA will apply updated flat rents at each family's next annual reexamination or flat rent update after implementation of the new flat rents.</p>
<p>16-III.A. OVERVIEW</p> <p>Page 16-9</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy has been split from one policy to two policies, in order to explain the money owing process more clearly.</p>	<p><u>PHA Policy</u> When an action or inaction of a resident family results in the underpayment of rent or other amounts, the PHA holds the family liable to return any underpayments to the PHA. The PHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover overpayments.</p> <p>When a family refuses to repay monies owed to the PHA, the PHA will utilize other available collection alternatives including, but not limited to, the following: Collection agencies Small claims court Civil law suit State income tax set-off program</p>	<p><u>PHA Policy</u> When an action or inaction of a resident family results in the underpayment of rent or other amounts, the PHA holds the family liable to return any underpayments to the PHA. The PHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover overpayments.</p>
<p>16-III.B. REPAYMENT POLICY</p>		<p><u>PHA Policy</u></p>

What & why?	Current Language	Proposed Language
<p>Page 16-10</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This policy has been split from one policy to two policies, in order to explain the money owing process more clearly.</p>		<p>When a family refuses to repay monies owed to the PHA, in addition to termination of program assistance, the PHA will utilize other available collection alternatives including, but not limited to, the following:</p> <ul style="list-style-type: none"> Collection agencies Small claims court Civil lawsuit State income tax set-off program
<p>16-III.B. REPAYMENT POLICY</p> <p>Page 16-10</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This change would make all repayment agreement payments due on the first of the month and allow residents to make one monthly payment for all money owed.</p>	<p><u>PHA Policy</u></p> <p>All payments are due by the close of business on the 15th day of the month. If the 15th does not fall on a business day, the due date is the close of business on the 15th business day after the first.</p>	<p><u>PHA Policy</u></p> <p>All payments are due by the close of business on the first day of the month. If the first does not fall on a business day, the due date is the close of business on the first business day after the first.</p>
<p>16-III.B. REPAYMENT POLICY</p> <p>Page 16-10</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This change would make deadline to make a late payment 14 calendar days to match the standard cure period on lease violations.</p>	<p><u>PHA Policy</u></p> <p>If a payment is not received by the end of the business day on the date due, and prior approval for the missed payment has not been given by the PHA, the PHA will send the family a delinquency notice giving the family 10 business days to make the late payment. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and the PHA will terminate tenancy in accordance with the policies in Chapter 13.</p> <p>If a family receives three delinquency notices for unexcused late payments in a 12-month period, the repayment agreement will be considered in default, and the PHA will terminate tenancy in accordance with the policies in Chapter 13.</p>	<p><u>PHA Policy</u></p> <p>If a payment is not received by the end of the business day on the date due, and prior approval for the missed payment has not been given by the PHA, the PHA will send the family a delinquency notice giving the family 14 calendar days to make the late payment. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and the PHA may terminate tenancy in accordance with the policies in Chapter 13.</p>
<p>16-V.B. RECORD RETENTION</p> <p>Page 16-19</p>	<p><u>PHA Policy</u></p> <p>The PHA will keep the last three years of the Form HUD-50058 and supporting documentation, and for</p>	<p><u>PHA Policy</u></p> <p>The PHA will keep the last three years of the Form HUD-50058 and supporting documentation, and for</p>

What & why?	Current Language	Proposed Language
<p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>This language clarifies that EIV reports will be kept in the tenant file for the entire tenancy and for three years after the tenant moves out.</p>	<p>at least three years after end of participation all documents related to a family’s eligibility, tenancy, and termination.</p> <p>In addition, the PHA will keep the following records for at least three years:</p> <ul style="list-style-type: none"> An application from each ineligible family and notice that the applicant is not eligible Lead-based paint records as required by 24 CFR 35, Subpart B Documentation supporting the establishment of flat rents Documentation supporting the establishment of utility allowances and surcharges Documentation related to PHAS Accounts and other records supporting PHA budget and financial statements for the program Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule Confidential records of all emergency transfers related to VAWA requested under the PHA’s Emergency Transfer Plan and the outcomes of such requests Other records as determined by the PHA or as required by HUD <p>If a hearing to establish a family’s citizenship status is held, longer retention requirements apply for some types of documents. For specific requirements, see Section 14-II.A.</p>	<p>at least three years after end of participation all documents related to a family’s eligibility, tenancy, and termination.</p> <p>The PHA will keep Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy and for three years from the end of participation date.</p> <p>In addition, the PHA will keep the following records for at least three years:</p> <ul style="list-style-type: none"> An application from each ineligible family and notice that the applicant is not eligible Lead-based paint records as required by 24 CFR 35, Subpart B Documentation supporting the establishment of flat rents Documentation supporting the establishment of utility allowances and surcharges Documentation related to PHAS Accounts and other records supporting PHA budget and financial statements for the program Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule Confidential records of all emergency transfers related to VAWA requested under the PHA’s Emergency Transfer Plan and the outcomes of such requests Other records as determined by the PHA or as required by HUD

What & why?	Current Language	Proposed Language
		<p>If a hearing to establish a family’s citizenship status is held, longer retention requirements apply for some types of documents. For specific requirements, see Section 14-II.A.</p>
<p>16-VII.D. DOCUMENTATION [24 CFR 5.2007]</p> <p>Page 16-29</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>The change from calendar days to business days would further align Public Housing program participation with Section 8 programs covered by the Administrative Plan.</p>	<p><u>PHA Policy</u> Any request for documentation of domestic violence, dating violence, sexual assault, or stalking will be in writing, will specify a deadline of 14 calendar days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.</p> <p>The PHA may, in its discretion, extend the deadline for 10 calendar days. In determining whether to extend the deadline, the PHA will consider factors that may contribute to the victim’s inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim’s need to address health or safety issues. Any extension granted by the PHA will be in writing.</p> <p>Once the victim provides documentation, the PHA will acknowledge receipt of the documentation within 10 calendar days.</p>	<p><u>PHA Policy</u> Any request for documentation of domestic violence, dating violence, sexual assault, or stalking will be in writing, will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.</p> <p>The PHA may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, the PHA will consider factors that may contribute to the victim’s inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim’s need to address health or safety issues. Any extension granted by the PHA will be in writing.</p> <p>Once the victim provides documentation, the PHA will acknowledge receipt of the documentation within 10 business days.</p>

What & why?	Current Language	Proposed Language
<p>Page GL-6</p>	<p><i>Domestic violence.</i> Felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.</p>	<p><i>Domestic violence.</i> Felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction receiving grant funding, and in the case of victim services, includes the user or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who is:</p> <ul style="list-style-type: none"> - The current or former spouse or intimate partner of the victim, or person similarly situated to a spouse or intimate partner of the victim - A person who is cohabitating or has cohabitated with the victim as a spouse or intimate partner - A person with whom the victim shares a child in common - A person who commits acts against a youth or adult victim who is protected from those acts under the domestic or family violence laws of the jurisdiction
		<p><i>Economic abuse.</i> Behavior that is coercive, deceptive, or unreasonably controls or restrains a person’s ability to acquire, use, or maintain economic resources to which they are entitle, including using coercion, fraud, and manipulation to:</p>

What & why?	Current Language	Proposed Language
		<ul style="list-style-type: none"> - Restrict a person's access to money, assets, credit, or financial information - Unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage - Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or to whom one has a fiduciary duty
Page GL-7	<i>Family self-sufficiency program</i> (FSS program). The program established by a PHA in accordance with 24 CFR part 984 to promote self-sufficiency of assisted families, including the coordination of supportive services (42 U.S.C. 1437u).	<i>Family self-sufficiency program</i> (FSS program). The program established by a PHA within its jurisdiction to promote self-sufficiency among participating families, including the coordination of supportive services to these families (24 CFR 984.103)
Page GL-8	<i>Flat rent.</i> Established by the PHA for each public housing unit; a rent based on the market rent charged for comparable units in the unassisted rental market, set at no less than 80 percent of the applicable Fair Market Rent (FMR), and adjusted by the amount of the utility allowance, if any	<i>Flat rent.</i> Rent that is based on the market rent charged for comparable units in the private unassisted rental market, set at no less than 80 percent of the current fair market rent (FMR), 80 percent of the small area fair market rent (SAFMR), or 80 percent of the unadjusted rent, with utility allowances applied as necessary. The unadjusted rent is the FMR estimated directly from source data that HUD uses to calculate FMRs in nonmetropolitan areas.
Page GL-10		<p><i>Human trafficking.</i> A crime involving the exploitation of a person for labor, services, or commercial sex. The Trafficking Victims Protection Act of 2000 and its subsequent reauthorizations recognize and define two primary forms of human trafficking:</p> <ul style="list-style-type: none"> - Sex trafficking is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act in which a

What & why?	Current Language	Proposed Language
		<p>commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age. See 22 U.S.C. § 7102(11)(A).</p> <p>- Forced labor is the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. See 22 U.S.C. § 7102(11)(B).</p>
<p>Page GL-12</p>	<p><i>Welfare assistance.</i> Income assistance from federal or state welfare programs, including assistance provided under TANF and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, child care or other services for working families. For the FSS program (984.103(b)), <i>welfare assistance</i> includes only cash maintenance payments from federal or state programs designed to meet a family’s ongoing basic needs, but does not include food stamps, emergency rental and utilities assistance, SSI, SSDI, or social security.</p>	<p><i>Welfare assistance.</i> Income assistance from federal or state welfare programs, including assistance provided under TANF and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, child care or other services for working families. For the FSS program (24 CFR 984.103), <i>welfare assistance</i> includes only cash maintenance payments designed to meet a family’s ongoing basic needs. Does not include nonrecurring short term benefits designed to address individual crisis situations, work subsidies, supportive services such as child care and transportation provided to families who are employed, refundable earned income tax credits, contributions to and distributions from Individual Development Accounts under TANF, services such as counseling, case management, peer support, child care information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that to not provide basic income support, amounts solely directed to meeting housing expenses, amounts for health care, Supplemental Nutrition Assistance Program (SNAP) and emergency rental and utilities assistance,</p>

What & why?	Current Language	Proposed Language
		<p>SSI, SSDI, or social security, and child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child's need and not the need of the child's current non-parental caretaker.</p>
<p>Page GL-15</p>		<p><i>Technological abuse.</i> An act or pattern of behavior that occurs within domestic violence, dating violence, sexual assault, or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor another person, except as otherwise permitted by law, that occurs using any form of technology, including but not limited to:</p> <ul style="list-style-type: none"> - Internet enabled devices - Online spaces and platforms - Computers - Mobile devices - Cameras and imaging programs - Apps - Location tracking devices - Communication technologies - Any other emergency technologies
<p>Page GL-15</p>	<p><i>Violence Against Women Reauthorization Act (VAWA) of 2013.</i> Prohibits denying admission to, denying assistance under, or evicting from a public housing unit an otherwise qualified applicant or tenant on the basis that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.</p>	<p><i>Violence Against Women Act (VAWA).</i> Prohibits denying admission to, denying assistance under, or evicting from a public housing unit an otherwise qualified applicant or tenant on the basis that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking.</p>

Property	# Occupied Units	Avg # in Fam	Avg Annual Income
100 Laurelwood Homes	29	2.3	\$17,514
200 McKenzie Village	171	2.0	\$17,338
200 Pengra Court	22	2.5	\$18,466
300 Maplewood Meadows	38	4.2	\$26,263
500 Veneta Scattered Sites	19	3.8	\$17,005
Grand Total	279	2.5	\$18,638

Established Income Range

Range	Value
>= 85%	\$15,842
Average	\$18,638
<= 115%	\$21,434



PET POLICY

The purpose of a pet policy is to establish clear guidelines for ownership of pets and to ensure that no applicant or resident is discriminated against regarding admission or continued occupancy because of ownership of pets. **Registration of Pets**

Pets must be authorized by the PHA before they are brought onto the property.

Conditional approval (not to exceed one month) may be granted to allow registration steps.

Registration includes documentation signed by a licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration must be renewed annually and will be coordinated with the annual reexamination date.

Pets will not be approved to reside in a unit until completion of the registration requirements.

Pet Agreement

Residents who have been authorized to have a pet must enter into a pet agreement with the PHA, or the authorization of the pet will be withdrawn.

The pet agreement is the resident's certification that they have received a copy of the PHA's pet policy and applicable house rules, that they have read the policies and/or rules, understands them, and agrees to comply with them.

The resident further certifies by signing the pet agreement that they understand that noncompliance with the PHA's pet policy and applicable house rules may result in the withdrawal of PHA approval of the pet or termination of tenancy.

Responsible Parties

The pet owner will be required to designate a responsible party for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet.

A resident who cares for another resident's pet must notify the PHA if providing care in their own home and sign a statement that they agree to abide by all pet rules.

Refusal to Register Pets

The PHA will refuse to register a pet if:

- The pet is not *a common household pet* as defined below
- Keeping the pet would violate any pet restrictions listed in this policy
- The pet owner fails to provide complete pet registration information, or fails to update the registration annually
- The applicant or tenant has previously been charged with animal cruelty under state or local law; or has been evicted, had to relinquish a pet or been prohibited from future pet ownership due to pet rule violations or a court order
- The PHA reasonably determines that the pet owner is unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease.

If the PHA refuses to register a pet, a written notification will be sent to the pet owner within 14 calendar days of the PHA's decision. The notice will state the reason for refusing to register the pet and will inform the family of their right to appeal the decision in accordance with the PHA's grievance procedures.

Pet Removal

If the death or incapacity of the pet owner threatens the health or safety of the pet, or other factors occur that render the owner unable to care for the pet, the situation will be reported to the responsible party designated by the pet owner.

If the responsible party is unwilling or unable to care for the pet, or if the PHA after reasonable efforts cannot contact the responsible party, the PHA may contact the appropriate state or local agency and request the removal of the pet.

Definition of "Common Household Pet"

Common household pet means a domesticated animal, such as a dog, cat, bird, or fish that is traditionally recognized as a companion animal and is kept in the home for pleasure rather than commercial purposes.

The following animals are not considered common household pets:

- Reptiles
- Rodents
- Insects
- Arachnids
- Wild animals or feral animals
- Pot-bellied pigs
- Animals used for commercial breeding

Pet Restrictions

The following animals are not permitted:

Any animal whose adult weight will exceed 30 pounds and whose shoulder height will exceed 15 inches.

Ferrets or other animals whose natural protective mechanisms pose a risk to small children of serious bites or lacerations

Any animal not permitted under state or local law or code

Number of Pets

Residents may own a maximum of 2 pets, only 1 of which may be a dog.

In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 10 gallons. Such a tank or aquarium will be counted as 1 pet.

Other Requirements

Dogs and cats must be spayed or neutered at the time of registration or, in the case of underage animals, within 30 days of the pet reaching 6 months of age. Exceptions may be made upon veterinary certification that subjecting this particular pet to the procedure would be temporarily or permanently medically unsafe or unnecessary.

Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration and by Homes for Good request..

Pet Area Restrictions

Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash or carried. They must be under the control of the resident or other responsible individual at all times.

Pets other than dogs or cats must be kept in a cage or carrier when outside of the unit.

Pets are not permitted in common areas including lobbies, community rooms and laundry areas except for those common areas which are entrances to and exits from the building.

Pet owners are not permitted to exercise pets or permit pets to deposit waste on the property outside of the areas designated for such purposes.

Noise

Pet owners must agree to control the noise of pets so that their noise is not a nuisance to other residents or interrupt their peaceful enjoyment of their housing unit or property. This includes, but is not limited to loud or continuous barking, howling, whining, biting, scratching, chirping, or other such activities.

Pets Temporarily on the Premises

Pets that are not owned by a tenant are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals. Residents may however have bird feeders unless it creates a pest control issue.

This rule does not apply to visiting pet programs sponsored by a humane society or other non-profit organizations, and approved by the PHA.

Cleanliness

The pet owner shall be responsible for the removal of waste by placing it in a sealed plastic bag and disposing of it in an appropriate receptacle.

The pet owner shall take adequate precautions to eliminate any pet odors within or around the unit and to maintain the unit in a sanitary condition at all times.

Litter box requirements:

Pet owners must promptly dispose of waste from litter boxes and maintain litter boxes in a sanitary manner.

Litter shall not be disposed of by being flushed through a toilet.

Litter boxes shall be kept inside the resident's dwelling unit.

Pet Care

Each pet owner shall be responsible for adequate care, nutrition, exercise and medical attention for their pet.

Each pet owner shall be responsible for appropriately training and caring for their pet to ensure that the pet is not a nuisance or danger to other residents and does not damage PHA property.

No dog may be allowed unleashed outside unless the pet owner has a fully fenced private yard and maintains the dog within that space. No animals may be tethered or chained inside or outside the dwelling unit at any time.

Alterations to Unit

Pet owners shall not alter their unit, patio, premises or common areas to create an enclosure for any animal.

Installation of pet doors is not allowed.

Pet Rule Violations

All complaints of cruelty and all dog bites will be referred to animal control or an applicable agency for investigation and enforcement.

If a determination is made on objective facts supported by written statements, that a resident/pet owner has violated the pet rules, written notice will be served.

The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated. The notice will also state:

That the pet owner has 14 calendar days from the effective date of the service of notice to correct the violation or make written request for a meeting to discuss the violation

That the resident is entitled to be accompanied by another person of their choice at the meeting

That the resident's failure to correct the violation, request a meeting, or appear at a requested meeting may result in initiation of procedures to remove the pet, or to terminate the pet owner's tenancy

Notice for Pet Removal

If the resident and the PHA are unable to resolve the violation at the meeting or the pet owner fails to correct the violation in the time period allotted by the PHA, the PHA may serve notice to remove the pet.

The notice will contain:

A brief statement of the factual basis for the PHA's determination of the pet rule that has been violated

The requirement that the resident must remove the pet within 30 calendar days of the notice

A statement that failure to remove the pet may result in the initiation of termination of tenancy procedures

Termination of Tenancy

The PHA may initiate procedures for termination of tenancy based on a pet rule violation if:

The resident has failed to remove the pet or correct a pet rule violation within the time period specified

The pet rule violation is sufficient to begin procedures to terminate tenancy under terms of the lease

Emergencies

The PHA will take all necessary steps to ensure that pets that become vicious, display symptoms of severe illness, or demonstrate behavior that constitutes an immediate threat to the health or safety of others, are immediately removed from the premises by referring the situation to the appropriate state or local entity authorized to remove such animals.

If it is necessary for the PHA to place the pet in a shelter facility, the cost will be the responsibility of the pet owner.

If the pet is removed as a result of any aggressive act on the part of the pet, the pet will not be allowed back on the property.

Payment of Deposit

Pet owners are required to pay a pet deposit of \$200 in addition to any other required deposits. The deposit may be paid in full or with a signed payment plan of \$50 down and \$10 per month before the pet is brought on the premises.

The pet deposit is not part of rent payable by the resident.

Refund of Deposit

The PHA will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit, within 30 days of move-out or removal of the pet from the unit.

The resident will be billed for any amount that exceeds the pet deposit.

The PHA will provide the resident with a written list of any charges against the pet deposit within 30 calendar days of the move-out inspection. If the resident disagrees with the amount charged to the pet deposit, the PHA will provide a meeting to discuss the charges.

Pet-Related Damages During Occupancy

Pet owners will immediately notify PHA of any personal injury or property damage caused by pet.

All reasonable expenses incurred by the PHA as a result of damages directly attributable to the presence of the pet on the property will be the responsibility of the resident, including:

Cost of repairs and replacements to the resident's dwelling unit

Fumigation of the dwelling unit

Repairs to common areas of the property

The cost of flea elimination may also be the responsibility of the resident.

If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with the policies for Maintenance and Damage Charges. Pet deposits will not be applied to the costs of pet-related damages during occupancy.

Charges for pet-related damage are not part of rent payable by the resident.

My signature below indicates that I have read, understood, and agree to this policy:

Signature: _____

Date: _____

Signature: _____

Date: _____

Signature: _____

Date: _____

Signature: _____

Date: _____

Homes for Good Signature: _____

Date: _____



100 West 13th Avenue, Eugene, OR 97401 • PH 541-682-3755 • FAX 541-682-3411



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**Updates to the Homes for Good
Rent Assistance Administrative Plan Fiscal Year 2024**
Effective Date 10-1-2023 to 9-30-2024

Proposed changes to the following chapters:

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Introduction

What & why?	Current Policy	Proposed Policy
<p>Introduction</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Indicates how the new and old Guidebook will be referenced through the Admin Plan.</p>	N/A	<p>HUD HCV Guidebook</p> <p>In November 2019 HUD began issuing a new version of the HCV Guidebook chapter-by-chapter. Unlike the previous version of the HCV Guidebook in which chapters were numbered, the new version of the guidebook includes chapter names, but no numbers. As the new version of the guidebook has not yet been fully released, and since the previous version of the guidebook contains guidance not found in the new version, the model policy cites both versions of the guidebook. Therefore, where the HCV Guidebook is cited in the model policy, the citation will make a distinction between the "old" and "new" versions of the guidebook. The "old" version of the guidebook will continue to be cited as <i>HCV GB</i> with a chapter/page reference (example: HCV GB, p. 5-4). If HUD has also released a new chapter on the same topic with information that either adds new information or updates existing information from the previous guidebook, the new guidebook will be cited as <i>New HCV GB</i> with a chapter title and page reference (example: <i>New HCV GB, Payment Standards</i>, p. 11).</p>
<p>Introduction</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides explanation of added abbreviation in Admin Plan</p>	N/A	<p>New HCV GB - Housing Choice Voucher Program Guidebook (7420.10G), Various dates of release</p>

Chapter 3 Eligibility

What & why?	Current Policy	Proposed Policy
<p>3-I.F</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes</p>	<p>If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, an IRS return showing which family has claimed the child for income tax purposes, school records, or other credible documentation.</p>

What & why?	Current Policy	Proposed Policy
Provides flexibility on acceptable documents to verify dependents.		
3-I.M Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Aligns live-in aide screening policy with other screening policies.	The person commits drug-related criminal activity or violent criminal activity ; or	The person is convicted of criminal activity in violation of the PHA's criminal screening policies ; or
3-II.A Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Provides clarity on when income will be determined for eligibility.	The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list.	The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list. The PHA will determine a family's income at time of receipt of the full application. Income changes that are effective after the receipt of the full application will not be used to determine income for the purpose of eligibility.
3-III.B Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Removes unnecessary sentence as Admin Plan already indicates that an arrest will not be used as sole basis of determining reasonable cause.	In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. A record or records of arrest will not be used as the sole basis of determining reasonable cause. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.	In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A record or records of arrest will not be used as the sole basis of determining reasonable cause. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.
3-III.C. Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Reduces housing barriers for those who have a criminal conviction.	If any household member is currently engaged in or has engaged in any of the following criminal activities, within the past three years, the family will be denied assistance. <i>Drug-related criminal activity, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].</i>	The PHA will not assess for other permitted reasons for denial of assistance.

What & why?	Current Policy	Proposed Policy
	<p><i>Violent criminal activity</i>, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].</p> <p>Criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity; or</p> <p>Criminal activity that may threaten the health or safety of property owners, management staff, and persons performing contract administration functions or other responsibilities on behalf of the PHA (including a PHA employee or a PHA contractor, subcontractor, or agent).</p> <p><i>Immediate vicinity</i> means within a three-block radius of the premises.</p> <p>Evidence of such criminal activity includes, but is not limited to:</p> <p>Any conviction for drug-related or violent criminal activity within the past three years.</p> <p>Records of arrests for drug-related or violent criminal activity within the past three years, although a record or records of arrest(s) will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity.</p> <p>A conviction for drug-related or violent criminal activity will be given more weight than an arrest for such activity.</p> <p>In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E.</p> <p>Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.</p>	
<p>3-III.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Per the alternative requirements listed in the <i>Federal Register</i> notice dated December 29, 2014, PHAs are no longer permitted to deny assistance to a family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program [FR Notice 12/29/14].</p>	<p>PHAs are not permitted to deny assistance to a family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program [24 CFR 984.101(d)].</p>

What & why?	Current Policy	Proposed Policy
<p>Provides updated language per the source of the regulation.</p>		
<p>3-III.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clear pathway for applicants to contest EIV findings.</p>	<p>The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement or enters into a repayment agreement when selected from the waiting list.</p>	<p>The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement or enters into a repayment agreement when selected from the waiting list.</p> <p>When denying admission due to family debts as shown in HUD’s EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report.</p> <p>If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family’s claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.</p>

Chapter 4 Applications, Waiting List and Tenant Selection

What & why?	Current Policy	Proposed Policy
<p>4-II.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Broadens what media publications we could publish in to fluctuate with how accessed a media publication is by the community.</p>	<p>The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:</p> <p style="text-align: center;"><i>Register Guard</i></p>	<p>The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:</p> <p style="text-align: center;"><i>Local media publications</i></p>

What & why?	Current Policy	Proposed Policy
<p>4-II.F</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Reduces time spent contacting applicants who are already housed in other Homes for Good housing programs and in turn, increases Homes for Good’s ability to get housing subsidy to those who are in need.</p>	<p>The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA’s decision (see Chapter 16) [24 CFR 982.201(f)].</p> <p>For applicant families that are on the same tenant-based voucher waitlist multiple times, if applicant family accepts subsidy then the family will be removed from the tenant- based voucher waitlist. The applicant family will not be removed from other PHA waitlists.</p> <p>For applicant families that are on the same project-based voucher waitlist (regardless of bedroom size), if applicant family accepts subsidy then the family will be removed from that project-based voucher waitlist (all bedroom sizes for which they were on). The applicant family will not be removed from other PHA waitlists.</p>	<p>The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA’s decision (see Chapter 16) [24 CFR 982.201(f)].</p> <p>If the family accepts the subsidy then the family will be removed from all other PHA managed waiting lists unless the subsidy they accepted was an FYI voucher. This includes tenant based vouchers, project based vouchers, public housing, multi family housing and affordable housing unless the family declares they want to remain on a waiting list(s).</p>
<p>4-III.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity of type of organization where verification can be accessed and creates more access by removing deadline for referral.</p>	<p>Persons who claim they are being or have been displaced due to fire or Natural Disaster must be a resident of Lane County, and have written verification from a Homes for Good approved entity such as First Place Family Center, the Red Cross, local Fire Department, etc., of displacement. Referrals must be received within 45 days of the displacement.</p>	<p>Persons who claim they are being or have been displaced due to fire or Natural Disaster must be a resident of Lane County, and have written verification from a Homes for Good approved entity or a local organization serving displaced families such as the Red Cross, local Fire Department, etc., of displacement.</p>
<p>4-III.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Aligns policy of targeted funding and selection preferences with current waitlist structuring.</p>	<p>Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA’s hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA as to whether families on the list qualify for and</p>	<p>Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA’s hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected by their assigned random selection number or on a first-come, first-served basis according to the date and time of their complete application as applicable.</p>

What & why?	Current Policy	Proposed Policy
	<p>are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.</p>	
<p>4-III.D</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clear direction on required action in the instance of no response to a packet or returned mail.</p>	<p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list, without further notice.</p>	<p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list, without further notice.</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination; therefore no informal hearing will be offered.</p>
<p>4-III.E</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Removes extraneous language and aligns with current procedure.</p>	<p>The family must provide the required documentation to the PHA, during regular business hours, within 14 business days of an otherwise complete application.</p>	<p>The family must provide the required documentation to the PHA, within 14 business days of an otherwise complete application.</p>
<p>4-III.E</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Clarifies the missing documentation policy for project- and tenant-based vouchers.</p>	<p>Any required documents or information that the family is unable to provide must be provided within 14 business days of the family being notified of the missing documentation (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).</p>	<p>Any required documents or information that the project based family is unable to provide must be provided within 14 business days of the family being notified of the missing documentation (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).</p> <p>Tenant based voucher families will be provided additional 14 business days to submit missing</p>

What & why?	Current Policy	Proposed Policy
		<p>documentation if the family has provided a partially complete application before the current deadline. Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).</p>

Chapter 5 Briefings and Voucher Issuance

<p>5-I.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Indicates clear outcome of not notifying PHA of completion of briefing.</p>	<p>[Policy not present]</p>	<p>Attendance for Remote Briefings</p> <p><u>PHA Policy</u></p> <p>Applicants who fail to complete the briefing form confirming they completed the remote briefing by the written deadline will be denied assistance (see Chapter 3).</p>
<p>5-I.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Aligns briefing policy with procedure. Allows flexibility for applicants through an asynchronous briefing process.</p>	<p>At least 10 business days prior to scheduling the remote briefing, the PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate. The PHA will conduct remote briefings via a video conferencing platform when available. If applicants are unable to adequately access the video conferencing platform, the briefing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in, the remote briefing will be postponed, and an in-person alternative or one-on-one briefing over the phone will be provided.</p>	<p>The PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate. The PHA will conduct remote briefings when available. If applicants are unable to adequately access the video, an in-person alternative or one-on-one briefing over the phone will be provided. The PHA will provide login information and a copy of the briefing packet.</p>

	<p>The PHA will provide login information and/or conferencing call-in information and an copy of the briefing packet via email at least five business days before the briefing.</p>	
<p>5-I.B Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Enhances accessibility of briefing.</p>	<ul style="list-style-type: none"> For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance. 	<ul style="list-style-type: none"> For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance. <p>In briefing a family that includes a person with disabilities, PHA must also take steps to ensure effective communication.</p>
<p>5-I.B Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Updates what documents will be in the briefing packet.</p>	<ul style="list-style-type: none"> The PHA subsidy standards including when and how exceptions are made. Materials (e.g., brochures) on how to select a unit and any additional information on selecting a unit that HUD provides. Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form. A list of landlords known to the PHA who may be willing to lease a unit to the family or other resources (e.g., newspapers, organizations, online search tools) known to the PHA that may assist the family in locating a unit. PHAs must ensure that the list of landlords or other resources covers areas outside of poverty or minority concentration. Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to the PHA. The family obligations under the program, including any obligations of a welfare-to-work family. The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act. 	<ul style="list-style-type: none"> Materials (e.g., brochures) on how to select a unit and any additional information on selecting a unit that HUD provides (e.g., HUD brochure entitled, "A Good Place to Live"). Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form, including information on how to complete the form and file a fair housing complaint. A list of landlords known to the PHA who may be willing to lease a unit to the family or other resources (e.g., newspapers, organizations, online search tools) known to the PHA that may assist the family in locating a unit. PHAs must ensure that the list of landlords or other resources covers areas outside of poverty or minority concentration. Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to the PHA. The family obligations under the program, including any obligations of a welfare-to-work family, and any obligations of other special programs if the family is participating in one of those programs. The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act.

	<ul style="list-style-type: none"> • PHA informal hearing procedures including when the PHA is required to offer a participant family the opportunity for an informal hearing, and how to request the hearing. • An explanation of the advantages of moving to an area that does not have a high concentration of low-income families. 	<ul style="list-style-type: none"> • PHA informal hearing procedures including when the PHA is required to offer a participant family the opportunity for an informal hearing, and how to request the hearing. • An explanation of the advantages of moving to an area that does not have a high concentration of low-income families. • The HUD pamphlet on lead-based paint entitled, "Protect Your Family from Lead in Your Home."
<p>5-I.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Removes redundancy with earlier section.</p>	<p>The PHA will provide the following additional materials in the briefing packet:</p> <p>The HUD pamphlet on lead-based paint entitled <i>Protect Your Family from Lead in Your Home</i> Information on how to fill out and file a housing discrimination complaint form</p>	<p>The PHA will provide the following additional materials in the briefing packet:</p> <p>Information on how to fill out and file a housing discrimination complaint form</p>
<p>5-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows families with anticipated family members to qualify for more accurately sized units/vouchers.</p>	<p>Single person families will be allocated one bedroom.</p>	<p>Single person families will be allocated one bedroom.</p> <p>A family that can demonstrate that the birth, adoption or court awarded custody of a child will be obtained within 9 months of determination of eligibility will receive a subsidy standard based on the anticipated addition.</p>
<p>5-II.E</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides boundaries to extensions to allow other families an opportunity to access subsidy.</p>	<p>The PHA will approve additional extensions only in the following circumstances:</p> <p>It is necessary as a reasonable accommodation for a person with disabilities.</p> <p>It is necessary due to reasons beyond the family's control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:</p> <ul style="list-style-type: none"> • Serious illness or death in the family • Other family emergency • Obstacles due to employment <p>Whether the family has already submitted requests for tenancy approval that were not approved by the PHA</p>	<p>The PHA will approve additional extensions only in the following circumstances:</p> <p>It is necessary as a reasonable accommodation for a person with disabilities.</p> <p>It is necessary due to reasons beyond the family's control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:</p> <ul style="list-style-type: none"> • Serious illness or death in the family • Other family emergency • Obstacles due to employment <p>Whether the family has already submitted requests for tenancy approval that were not approved by the PHA</p>

	Whether family size or other special circumstances make it difficult to find a suitable unit	Whether family size or other special circumstances make it difficult to find a suitable unit For reasons beyond the family’s control the PHA will limit additional extensions to 240 days
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Chapter 6 Income and Subsidy Determinations

What & why?	Current Policy	Proposed Policy
<p>6-I.H</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Ensures accurate income information is utilized.</p>	<p>[Regulatory language not present]</p>	<p>Applying SSA COLA to Current Annual and Interim Reexaminations</p> <p>Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining Social Security and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1st or later of the upcoming year [Notice PIH 2018-24].</p>
<p>6.I.K</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides specificity to ensure the accurate assessment of alimony and child support income.</p>	<p>The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47]. Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.</p>	<p><i>Court-Awarded Support</i></p> <p>The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47]. If the family does not receive the full court-awarded amount and has made reasonable efforts to collect amounts due, the PHA will only count the partial amount received.</p> <p><i>Non-Court-Awarded Support</i></p> <p>Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection. The PHA will use the verification hierarchy in Chapter 7-I to verify the amounts received by the household and will count their support income as such.</p>

<p>6-III.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Alters who is receiving the utility reimbursements to streamline.</p>	<p>The PHA will make utility reimbursements to the utility provider. In instances where there is no utility provider and only a utility fee being charged by the landlord the utility reimbursement funds will be issued directly to the family.</p>	<p>The PHA will make utility reimbursements to the utility provider. In instances where there is no utility provider and only a utility fee being charged by the landlord the utility reimbursement funds will be issued directly to the landlord who is acting as the utility provider.</p>
<p>6-III.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity on who is receiving utility reimbursements monthly.</p>	<p>The PHA will issue all utility reimbursements monthly.</p>	<p>The PHA will issue all utility reimbursements monthly to the utility provider.</p>

Chapter 7 Verification

What & why?	Current Policy	Proposed Policy
<p>7-I.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces administrative burden of recollecting consent forms annually.</p>	<p>Adult family members must sign other consent forms as needed to collect information relevant to the family’s eligibility and level of assistance.</p>	<p>Adult family members must sign other consent forms as needed to collect information relevant to the family’s eligibility and level of assistance.</p> <p>Once an applicant has signed and submitted a new consent form, they are not required to do so again at the next interim or regularly scheduled income reexamination.</p>
<p>7-I.D</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides timeframe to ensure verifications are collected in a timely manner.</p>	<p>The PHA may send third-party verification forms directly to the third party. Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.</p>	<p>The PHA may send third-party verification forms directly to the third party. Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA. The PHA will proceed to oral third-party verification if the third-party verification forms are not returned within five business days.</p>

What & why?	Current Policy	Proposed Policy
<p>7-I.D</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides timeframe to ensure verifications are collected in a timely manner.</p>	<p>When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.</p>	<p>When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.</p> <p>When requesting third-party oral verification, PHA will wait 2 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.</p>
<p>7-II.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity on acceptable verifications.</p>	<p>Current employer identification card</p>	<p>Current government employer identification card with picture</p>
<p>7-II.D</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity of examples of acceptable documentation.</p>	<p>If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill)</p>	<p>If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation that the person has removed themselves from the lease or a statement from the removed adult member).</p>
<p>7-III.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Reduces Administrative burden and aligns with aspects of Move to Work (MTW)'s triennial reexam process.</p>	<p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p> <p>If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.</p>	<p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>

What & why?	Current Policy	Proposed Policy
<p>7-III.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Adds regulation to the EIV policy around Social Security Income.</p>	<p>Social Security/SSI Benefits</p>	<p>Social Security/SSI Benefits</p> <p>To ensure consistency in the determination of annual Social Security and SSI income, PHAs are required to use EIV-reported Social Security and SSI benefit amounts unless the tenant disputes the EIV-reported amount [Notice PIH 2018-24].</p>
<p>7-III.D</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Clarifying verification hierarchy for child support and alimony.</p>	<p>If the family declares that it <i>receives regular payments</i>, verification will be obtained in the following order of priority:</p> <p>Copies of the receipts and/or payment stubs for the 60 days prior to PHA request</p> <p>Third-party verification form from the state or local child support enforcement agency</p> <p>Third-party verification form from the person paying the support</p> <p>Family's self-certification of amount received</p>	<p>If the family declares that it <i>receives regular payments</i>, verification will be obtained in the following order of priority:</p> <p>Copy of the ledger/payment history from the support enforcement agency for the 60 days prior to PHA request</p> <p>Third-party verification form from the state or local child support enforcement agency</p> <p>The third-party verification form for the purpose of verification from the state or local support enforcement agency is the submittal of the release of information signed by the applicant/tenant and submitted by the PHA to request the required documentation.</p> <p>Third-party verification form from the person paying the support</p> <p>Refer to the verification hierarchy in Chapter 7-I for subsequent verification steps</p>

Chapter 10 Moving with Continued Assistance and Portability

What & why?	Current Policy	Proposed Policy
<p>10-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity on when late billing may be accepted.</p>	<p>If the PHA has not received an initial billing notice from the receiving PHA within the billing deadline, it will contact the receiving PHA to inform them that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. The PHA will send the receiving PHA a written confirmation of its decision by mail.</p> <p>The PHA will allow an exception to this policy if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.</p>	<p>The initial PHA's decision as to whether to accept late billing will be based on internal PHA factors, including the initial PHA's leasing or funding status. If the PHA has not received an initial billing notice from the receiving PHA within the billing deadline and does not intend to honor the late billing, it will contact the receiving PHA to inform them that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. In this case, the PHA will send the receiving PHA a written confirmation of its decision by mail.</p>

What & why?	Current Policy	Proposed Policy
		<p>Among other considerations as to whether to accept late billing will be if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.</p>
<p>10-II.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Aligns port briefing policy with standard briefing policy.</p>	<p>The PHA will require the family to attend a briefing. The PHA will provide the family with a briefing packet (as described in Chapter 5) and, in a group briefing, will orally inform the family about the PHA’s payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process. If the family is unable to attend a group briefing, the PHA will send the briefing packet and briefing DVD for the family to watch and follow up with a phone Q&A session to answer any questions.</p>	<p>The PHA will require the family to attend a remote briefing. The PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate.</p> <p>The PHA will conduct remote briefings when available. If applicants are unable to adequately access the video an in-person alternative or one-on-one briefing over the phone will be provided.</p> <p>The PHA will provide login information and a copy of the briefing packet.</p> <p>The PHA will ensure that all electronic information stored or transmitted as part of the briefing meets the requirements for accessibility for persons with disabilities and persons with LEP, and is secure, including ensuring personally identifiable information (PII) is protected.</p> <p>The PHA will ensure that families who participate in remote briefings have the opportunity to ask questions as part of the briefing.</p> <p>If families lose connectivity during any remote briefing or otherwise feel they were unable to access information presented during the briefing, the family</p>

What & why?	Current Policy	Proposed Policy
		may request a one-on-one briefing over the phone or in person with the PHA.
<p>10-II.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Increases flexibility for method of contact.</p>	<p>The PHA will send its initial billing notice by fax or email, if necessary, to meet the billing deadline but will also send the notice by regular mail.</p>	<p>The PHA will send its initial billing notice by fax or email to meet the billing deadline. If fax or email is unavailable, the PHA will send its initial billing notice via regular mail.</p>
<p>10-II.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Increases flexibility for method of contact.</p>	<p>The PHA will send a copy of the updated HUD-50058 by regular mail no later than 14 business days after the effective date of the reexamination.</p>	<p>The PHA will send a copy of the updated HUD-50058 by fax, email, or regular mail no later than 14 business days after the effective date of the reexamination.</p>

Chapter 11 Reexaminations

What & why?	Current Policy	Proposed Policy
<p>11.I.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Describes circumstances in which an annual reexam would be unnecessary.</p>	<p>If the family moves to a new unit, the PHA will perform a new annual reexamination</p>	<p>If the family moves to a new unit, the PHA will perform a new annual reexamination if the prior reexam was not completed within the 60-days from the move-out date.</p>
<p>11-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on when a reexamination is required.</p>	<p>When any new family member is added, the PHA must make appropriate adjustments in the family share of the rent and the HAP payment at the effective date of either the annual or interim reexamination [24 CFR 982.516(e)(2)].</p>	<p>Although the PHA must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added. The PHA may state in policy that an income reexamination will be conducted.</p>
<p>11-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The PHA will not approve the addition of a new family or household member unless the individual meets the PHA’s eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).</p>	<p>The PHA will not approve the addition of a new family or household member unless the individual meets the PHA’s eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).</p>

What & why?	Current Policy	Proposed Policy
Removes extraneous language that is clarified elsewhere.	The PHA will not approve the addition of a foster child or foster adult if it will cause a violation of HQS space standards.	

Chapter 13 Owners

What & why?	Current Policy	Proposed Policy
<p>13-I.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Defines who cannot enter into a Housing Assistance Payment (HAP) Contract.</p>	<ul style="list-style-type: none"> Any member of the Congress of the United States 	<ul style="list-style-type: none"> Any member of the Congress of the United States Such "covered individual" may not have any direct or indirect interest in the HAP contract or in any benefits or payments under the contract (including the interest of an immediate family member of such covered individual) while such person is a covered individual or for one year thereafter. <i>Immediate family member means the spouse, parent (including a stepparent), child (including a stepchild), grandparent, grandchild, sister, or brother (including a stepsister or stepbrother) of any covered individual.</i>
<p>13-II.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides specificity and clarity.</p>	The HAP contract is used for all HCV program tenancies except for assistance under the Section 8 homeownership program, and assistance to families that own a manufactured home and use their assistance to lease the space for the manufactured home. See chapter 15 for a discussion of any special housing types included in the PHA's HCV program.	The HAP contract is used for all HCV tenant-based program tenancies except for assistance under the Section 8 homeownership program, and assistance to families that own a manufactured home and use their assistance to lease the space for the manufactured home. See chapter 15 for a discussion of any special housing types included in the PHA's HCV program.
<p>13-II.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity of owner certification of compliance.</p>	By endorsing the monthly check from the PHA, the owner certifies to compliance with the terms of the HAP contract.	By accepting the monthly check from the PHA, the owner certifies to compliance with the terms of the HAP contract.

Chapter 15 Special Housing Types

What & why?	Current Policy	Proposed Policy
<p>Chapter 15 Introduction</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity for special housing types to avoid double subsidy, preference and requirement.</p>	<p>Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601].</p>	<p>Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601]. A single unit cannot be designated as more than one type of special housing. The PHA cannot give preference to households that wish to live in any of these types of housing and cannot require households to select any of these types of housing [New HCV GB, <i>Special Housing Types</i>, p. 3].</p>
<p>15-I.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on type of special housing on Housing Assistance Payment (HAP) contract.</p>	<p>When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person, and the standard form of the HAP contract is used.</p>	<p>When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Single room occupancy (SRO) housing."</p>
<p>15-I.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what needs to be inspected for Single Room Occupancy (SRO) units.</p>	<p>HQS requirements described in Chapter 8 apply to SRO housing except as modified below.</p>	<p>HQS requirements described in Chapter 8 apply to SRO housing except that sanitary facilities, and space and security characteristics must meet local code standards for SRO housing. In the absence of applicable local code standards for SRO housing, the following standards apply:</p>
<p>15-II.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what needs to be selected in a Housing Assistance Payment (HAP) Contract for Congregate housing.</p>	<p>When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used.</p>	<p>When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Congregate housing."</p>

What & why?	Current Policy	Proposed Policy
<p>15-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity that subsidy is only provided for family that is being assisted.</p>	<p>The payment standard for an individual unit in a congregate housing facility is based on the number of rooms in the private living area.</p>	<p>The payment standard for an individual unit in a congregate housing facility is based on the number of rooms in the private living area for the assisted family.</p>
<p>15-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity for type of special housing on Housing Assistance Payment (HAP) contract.</p>	<p>When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used.</p>	<p>When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Congregate housing."</p>
<p>15-II.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what needs to be inspected for congregate housing</p>	<p>Congregate housing must have a refrigerator of appropriate size in the private living area of each resident, a central kitchen and dining facilities located within the premises and accessible to the residents, and food service for the residents, that is not provided by the residents themselves.</p> <p>The housing quality standards applicable to lead-based paint do not apply.</p>	<p>Congregate housing must have a refrigerator of appropriate size in the private living area of each resident, a central kitchen and dining facilities located within the premises and accessible to the residents, and food service for the residents, that is not provided by the residents themselves.</p> <p>The congregate housing must contain adequate facilities and services for the sanitary disposal of food waste and refuse, including facilities for temporary storage where necessary.</p> <p>The housing quality standards applicable to lead-based paint do not apply unless a child under the age of six is expected to reside in the unit.</p>
<p>15-III.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on definition of group home.</p>	<p>A group home is a state-licensed facility intended for occupancy by elderly persons and/or persons with disabilities.</p>	<p>A group home is a state-approved (licensed, certified, or otherwise approved in writing by the state) facility intended for occupancy by elderly persons and/or persons with disabilities.</p>

What & why?	Current Policy	Proposed Policy
<p>15-III.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what needs to be in the Housing Assistance Payment (HAP) Contract for a Group Home.</p>	<p>When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family, and the standard form of the HAP contract is used.</p>	<p>When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Group home."</p>
<p>15-III.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on family voucher size and Live-in Aide guidelines for group homes. Provides clarity on utility allowance calculation for prorata share.</p>	<p>Unless there is a live-in aide, the family unit size for an assisted occupant of a group home must be zero- or one-bedroom, depending on the PHA's subsidy standard. If there is a live-in aide, the aide must be counted in determining the household's unit size.</p> <p>The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the prorata share of the payment standard for the group home size. The prorata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home.</p> <p>The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.</p> <p>The utility allowance for an assisted occupant in a group home is the prorata share of the utility allowance for the group home.</p> <p>The rents paid for participants residing in group homes are subject to generally applicable standards for rent reasonableness. The rent for an assisted person must not exceed the prorata portion of the reasonable rent for the group home. In determining reasonable rent, the PHA should consider whether sanitary facilities and facilities for food preparation and service are common facilities or private facilities.</p>	<p>Unless there is a live-in aide, the family unit size (voucher size) for an assisted occupant of a group home must be zero- or one-bedroom. If there is a live-in aide, the aide must be counted in determining the household's unit size.</p> <p>The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the prorata share of the payment standard for the group home size. The prorata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home. The number of persons in the assisted household equals one assisted person plus any PHA-approved live-in aide.</p> <p>The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.</p> <p>The utility allowance for an assisted occupant in a group home is the prorata share of the family unit size to the utility allowance for the group home.</p> <p>The rents paid for participants residing in group homes are subject to generally applicable standards for rent reasonableness. The rent for an assisted person must not exceed the prorata portion of the reasonable rent for the group home. In determining reasonable rent, the PHA must consider whether sanitary facilities and facilities for food preparation and service are common facilities or private facilities.</p>

What & why?	Current Policy	Proposed Policy
<p>15-III.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what must be inspection requirements for a Group Home.</p>	<p>HQS requirements described in Chapter 8 apply to group homes except for the requirements stated below.</p>	<p>The entire unit must comply with HQS requirements described in Chapter 8, except for the requirements stated below.</p>
<p>15-III.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what is needed to pass inspection for a Group Home.</p>	<p>Group homes must be accessible to and usable by residents with disabilities.</p>	<p>Group homes must be accessible to and usable by residents with disabilities. Doors and windows accessible from outside the unit must be lockable.</p>
<p>15-III.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what is needed to pass inspection for a Group Home.</p>	<p>The site and neighborhood should be reasonably free from hazards to the health, safety, and general welfare of the residents, and should not be subject to serious adverse conditions, such as:</p>	<p>The site and neighborhood should be reasonably free from disturbing noises and reverberations, and other hazards to the health, safety, and general welfare of the residents, and should not be subject to serious adverse conditions, such as:</p>
<p>15-III.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on when lead-based inspections are required in Group Homes.</p>	<p>The housing quality standards applicable to lead-based paint do not apply</p>	<p>The housing quality standards applicable to lead-based paint do not apply unless a child under the age of six is expected to reside in the unit.</p>
<p>15-IV.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Shared housing is a single housing unit occupied by an assisted family and another resident or residents.</p>	<p>Families in markets with tight rental conditions or with a prevalence of single-family housing may determine a shared housing living arrangement to be a useful way to secure affordable housing. PHAs offering shared housing as a housing solution may</p>

What & why?	Current Policy	Proposed Policy
<p>Describes circumstances in which shared housing may be beneficial to families and the PHA.</p>		<p>also experience some reduction in the average per-unit-cost (PUC) paid on behalf of assisted families.</p> <p>Shared housing is a single housing unit occupied by an assisted family and another resident or residents.</p>
<p>15-IV.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Describes various ways in which a household may be assisted by shared housing.</p>	<p>The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.</p>	<p>The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.</p> <p>When shared housing is offered as a housing option, HUD encourages PHAs to consider ways in which the families may be assisted in finding shared housing, including for-profit shared housing matching (such as roommates or single-family homes) and online sites that charge a fee for their matching services, or nonprofit shared housing matching services. HUD further encourages PHAs to include information about this housing possibility in the family's voucher briefing.</p>
<p>15-IV.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Describes how the PHA will communicate information concerning shared housing.</p>	<p>[No policy present]</p>	<p><u>PHA Policy</u></p> <p>The PHA may provide information to families regarding the shared housing option, including a listing to families of any known rental listings in the community at briefing and upon request.</p>
<p>15-IV.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Describes potential pitfalls with shared housing and how PHAs can proactively handle them.</p>	<p>[No regulatory language present]</p>	<p>PHAs should be aware of potential local legal barriers to HCV participants using shared housing, which can create additional obstacles for shared housing:</p> <ul style="list-style-type: none"> • Municipalities may have occupancy limits for the number of unrelated persons who may share a housing unit. • Local zoning codes for single family housing may restrict occupancy in certain areas to households whose family members are related by blood. <p>PHAs should work with local jurisdictions to find solutions that encourage affordable housing and are</p>

What & why?	Current Policy	Proposed Policy
		<p>consistent with the Fair Housing Act, Title VI, and other federal, state, and local fair housing laws. PHAs should inform HUD if they encounter barriers to shared housing that may conflict with fair housing laws.</p>
<p>15-IV.A Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Informs how the PHA will handle barriers to shared housing.</p>	<p>[No policy present]</p>	<p><u>PHA Policy</u> The PHA will work with local jurisdictions as necessary to identify solutions consistent with fair housing laws and will inform HUD if the PHA encounters barriers to shared housing that conflict with fair housing laws.</p>
<p>15-IV.A Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describes the Housing Assistance Contract used within shared housing.</p>	<p>When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used</p>	<p>When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Shared housing."</p>
<p>15-IV.B Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describes how to calculate the prorate for shared housing.</p>	<p>The prorata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space by the total number of bedrooms in the unit.</p>	<p>The prorata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space, non-shared, by the total number of bedrooms in the unit. The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP. The utility allowance for an assisted family living in shared housing is the lower of the utility allowance for the family unit size (voucher size) or the prorata share of the utility allowance for the shared housing unit.</p>
<p>15-IV.B Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>The rents paid for families living in shared housing are subject to generally applicable standards for rent reasonableness. The rent paid to the owner for the assisted family must not exceed the pro-rata portion of the reasonable rent for the shared unit. In determining</p>	<p>The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP.</p>

What & why?	Current Policy	Proposed Policy
<p>Describes how to calculate the prorate for shared housing.</p>	<p>reasonable rent, the PHA should consider whether sanitary and food preparation areas are private or shared.</p>	<p>The utility allowance for an assisted family living in shared housing is the prorata share of the utility allowance for the shared housing unit.</p> <p>The rents paid for families living in shared housing are subject to generally applicable standards for rent reasonableness. The rent paid to the owner for the assisted family must not exceed the pro-rata portion of the reasonable rent for the shared unit. In determining reasonable rent, the PHA should consider whether sanitary and food preparation areas are private or shared.</p>
<p>15-V.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what documents/contracts are needed for Cooperative Housing</p>	<p>A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged "rent" a cooperative member is charged a "carrying charge."</p> <p>When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used.</p>	<p>A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged "rent" a cooperative member is charged a "carrying charge." The monthly carrying charge includes the member's share of the cooperative debt service, operating expenses, and necessary payments to cooperative reserve funds. It does not include down payments or other payments to purchase the cooperative unit or to amortize a loan made to the family for this purpose.</p> <p>The occupancy agreement or lease and other appropriate documents must provide that the monthly carrying charge is subject to Section 8 limitations on rent to owner, and the rent must be reasonable as compared to comparable unassisted units.</p> <p>When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Cooperative housing."</p>
<p>15-V.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>All standard HQS requirements apply to cooperative housing units. There are no additional HQS requirements.</p>	<p>All standard HQS requirements apply to cooperative housing units. There are no additional HQS requirements. The PHA remedies described in 24 CFR 982.404 do not apply. Rather, if the unit and premises are not maintained in</p>

What & why?	Current Policy	Proposed Policy
<p>Provides clarity on HQS requirements and action taken for noncompliance.</p>		<p>accordance with HQS, the PHA may exercise all available remedies regardless of whether the family or cooperative is responsible for the breach of HQS.</p> <p>No housing assistance payment can be made unless unit meets HQS and the defect is corrected within the period as specified by the PHA and the PHA verifies correction (see Chapter 8).</p> <p>In addition to regular breaches of HQS, breaches of HQS by the family include failure to perform any maintenance for which the family is responsible in accordance with the terms of the cooperative occupancy agreement [HCV GB].</p>
<p>15-VI.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Allows manufactured homes to be used for the Housing Choice Voucher (HCV) homeownership program.</p>	<p>A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in two different ways.</p> <p>(1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.</p> <p>(2) HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families.</p>	<p>A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in three different ways.</p> <p>(1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.</p> <p>(2) A family can purchase a manufactured home under the Housing Choice Voucher Homeownership program.</p> <p>HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families</p>
<p>15-VI.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>There is a separate Tenancy Addendum (Form 52642-a) and separate HAP Contract (Form 52642) for this special housing type.</p>	<p>There is a designated HAP Contract (form HUD-52642) and designated Tenancy Addendum (form HUD 52642-A) for this special housing type.</p>

What & why?	Current Policy	Proposed Policy
<p>Provides a new Housing Assistance Payment (HAP) Contract to use for families renting a pad space.</p>		
<p>15-VI.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what may be needed to determine rent reasonableness for a pad space.</p>	<p>Initially, and annually thereafter the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly HAP check, the owner certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the manufactured home park or elsewhere.</p>	<p>Initially, and at least annually thereafter, the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly housing assistance payment, the owner of the manufactured home space certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the same manufactured home park or elsewhere.</p> <p>If requested by the PHA, the owner must give the PHA information on rents charged by the owner for other manufactured home spaces.</p>
<p>15-VI.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces barriers to utilizing manufactured homes.</p>	<p>The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.</p>	<p>The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.</p> <p>The PHA has a HUD-approved waiver to not require the usage of tie-downs if it is confirmed through inspection that the mobile home is situated in a stable manner on a level lot; if there is continued written verification from state/local agencies that tie-downs are not required for units outside of flood plains, floodways, nor high wind areas; and if there is information maintained in the tenant’s file and a central file for audit purposes.</p>
<p>15-VII.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity that Homes for Good is not required to</p>	<p>The PHA must offer homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.</p>	<p>The PHA may choose not to offer homeownership assistance. However, the PHA must offer homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.</p>

What & why?	Current Policy	Proposed Policy
<p>provide homeownership assistance.</p>		
<p>15-VII.B Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity that Homes for Good is not required to provide homeownership assistance.</p>	<p>The family must meet all of the requirements listed below before the commencement of homeownership assistance.</p>	<p>If the PHA offers the homeownership option, participation by the family is optional. However, the family must meet all of the requirements listed below before the commencement of homeownership assistance.</p>
<p>15-VII.D Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Removes the information from this section, and expands on units under construction in the following section</p>	<ul style="list-style-type: none"> The unit must be under construction or already exist at the time the family enters into the contract of sale. <p>The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium.</p>	<ul style="list-style-type: none"> The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium.
<p>15-VII.D Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides details on what steps must be taken to use homeownership assistance on units that are not yet under construction</p>	<ul style="list-style-type: none"> For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation and the family must have the right to occupy the site for at least 40 years. 	<ul style="list-style-type: none"> For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation and the family must have the right to occupy the site for at least 40 years. Families may enter into contracts of sale for units not yet under construction. However, the PHA will not commence homeownership assistance for the family for that unit until: <ol style="list-style-type: none"> Either the responsible entity completes the environmental review as required by 24 CFR part 58 and HUD approved the environmental certification and request for release of funds prior to commencement of construction or HUD performed an environmental review

What & why?	Current Policy	Proposed Policy
		<p>under CFR part 50 and notified the PHA in writing of environmental approval of the site prior to construction commencement; and</p> <p>Construction of the unit has been completed and the unit has passed the required HQS inspection and independent inspection as addressed elsewhere in this chapter.</p>
<p>15-VII.E</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity on how families on the waitlist for homeownership are served.</p>	<ol style="list-style-type: none"> 1. New clients will be put on a wait list after completing the program eligibility prerequisites. 2. Clients with a pre-approval letter will move to the top of the list and will have two years to purchase a home. If they have not purchased a home in this time frame, they will go to the bottom of the list. 3. If all 35 S8 HO vouchers are taken, when one becomes available the clients at the top of the list will have 6 months to find a home or they will go to the bottom of the list. 	<ol style="list-style-type: none"> 1. New clients will be put on a wait list after completing the program eligibility prerequisites. 2. If all 35 S8 HO vouchers are taken, when one becomes available the clients at the top of the list who already a preapproval letter will have 6 months to find a home and be under contract or they will go to the bottom of the list. <p>The family may be required to report their progress on locating and purchasing a home.</p>
<p>15-VII.F</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Clarifies that homeownership counseling is not mandatory; however, referrals to appropriate financial counseling are optional.</p>	<p>If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD’s Housing Counseling program.</p>	<p>If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD’s Housing Counseling program.</p> <p><u>PHA Policy</u></p> <p>The PHA does not require ongoing post-purchase homeownership counseling.</p>
<p>15-VII.G</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This inspector must be a member of the American Society of Home Inspectors (ASHI) or other recognized professional society, or a licensed engineer. The inspector may not be a PHA employee.</p>	<p>This inspector must be a member of the American Society of Home Inspectors (ASHI) or other recognized professional society, or a licensed engineer. The inspector cannot be a PHA employee or contractor.</p>

What & why?	Current Policy	Proposed Policy
<p>Provides clarity on who can provide an inspection, in turn reducing conflict of interest.</p>		
<p>15-VII.G Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows families to access HQS as needed for financial planning purposes.</p>	<p>If the PHA disapproves the purchase of a home, the family will be notified in writing of the reasons for the disapproval.</p>	<p>If the PHA disapproves the purchase of a home, the family will be notified in writing of the reasons for the disapproval.</p> <p>The PHA will not require HQS inspections while the family is receiving homeownership assistance. The family may request an HQS inspection at will.</p>
<p>15-VII.G Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Ensures homes not yet under construction that are wanted for home ownership are being built on land free from hazard.</p>	<ul style="list-style-type: none"> Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24. 	<ul style="list-style-type: none"> Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24. A contract for the sale of a unit not yet under construction must meet all above requirements, and requirements below. Commencement of construction in violation of the below requirements voids the purchase contract. <ul style="list-style-type: none"> The purchaser is not obligated to purchase the unit unless an environmental review has been performed and the site received environmental approval prior to commencement of construction in accordance with 24 CFR 982.628; and <p>The construction will not commence until the environmental review has been completed and the seller has received written notice from the PHA that environmental approval has been obtained. Environmental approval may be conditioned on the contracting parties' agreement to modification to the unit design or to mitigation actions.</p>

What & why?	Current Policy	Proposed Policy
<p>15-VII.H</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity on when escrow can be accessed.</p>	<p>The PHA will approve a family's request to utilize its Family Self-Sufficiency escrow account for down payment and/or closing costs when purchasing a unit under the HCV homeownership option.</p>	<p>The PHA will approve a family's request to utilize its Family Self-Sufficiency escrow account after final disbursement for down payment and/or closing costs when purchasing a unit under the HCV homeownership option.</p>
<p>15-VII.I</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides a HUD process for family to declare their intent to comply with family obligations of the program.</p>	<p>Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option.</p>	<p>Before commencement of homeownership assistance, the family must execute a statement of family obligations in the form prescribed by HUD [form HUD-52649]. In the statement, the family agrees to comply with all family obligations under the homeownership option.</p>
<p>15-VII.I</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what the family is required to provide when Homes for Good is questioning whether mortgage is being paid.</p>	<p>The family must notify the PHA if the family defaults on the mortgage used to purchase the home.</p>	<p>The family must notify the PHA if the family defaults on the mortgage used to purchase the home.</p> <p>The family must provide the PHA with information on any satisfaction or payment of the mortgage debt.</p>
<p>15-VII.K</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Does not limit which lenders families can receive funding from (I.e. lenders who only take one monthly payment). Regulatory language was maintained and moved later in the chapter.</p>	<p>The payment standard at the most recent regular reexamination of family income and composition since the commencement of homeownership assistance for occupancy of the home.</p> <p>The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.</p>	<p>The payment standard at the most recent regular reexamination of family income and composition since the commencement of homeownership assistance for occupancy of the home.</p>

What & why?	Current Policy	Proposed Policy
<p>15-VII.K</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarifying language on what is require.</p>	<p>Homeownership expenses for a cooperative member may only include amounts allowed by the PHA to cover:</p>	<p>The PHA does not have the discretion to exclude any of the listed homeownership expenses or to add any additional items.</p> <p>Homeownership expenses for a cooperative member include amounts allowed by the PHA to cover:</p>
<p>15-VII.K</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Clarifies to whom and when homeownership HAP can be sent to the family and lender so as not to restrict which lenders families can secure mortgages with.</p>	<p>All clients will be notified of their monthly maintenance, repair and replacement allowance amount after their annual recertification paperwork is completed.</p>	<p>All clients will be notified of their monthly maintenance, repair and replacement allowance amount after their annual recertification paperwork is completed.</p> <p>The PHA may pay the homeownership assistance payments directly to the family, or at the PHA’s discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.</p>
<p>15-VII.M</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces requirements for homeownership families that want to move.</p>	<p>A family receiving homeownership assistance may move with continued tenant-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home.</p>	<p>A family receiving homeownership assistance may move with continued tenant-based assistance or with voucher homeownership assistance.</p> <p>The PHA must determine that all initial requirements have been satisfied if a family that has received homeownership assistance wants to move with continued homeownership assistance. However, the following do not apply:</p> <ul style="list-style-type: none"> The requirement that a family must be a first-time homeowner is not applicable.

What & why?	Current Policy	Proposed Policy
		<ul style="list-style-type: none"> • The requirement for pre-assistance counseling is not applicable. However, the PHA may require that the family complete additional counseling (before or after moving to a new unit with continued homeownership assistance). <p>Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home. However, when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault or stalking and the move is needed to protect the health or safety of the family or family member (or any family member has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family’s request to move), such family or family member may be assisted with continued tenant-based assistance even if they own any title or other interest in the prior home.</p>
<p>15-VII.N</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on the automatic termination of homeownership assistance.</p>	<p>The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy, with the exception of failure to meet obligations under the Family Self-Sufficiency program as prohibited under the alternative requirements set forth in FR Notice 12/29/14</p>	<p>The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy.</p> <p>Homeownership assistance for a family automatically terminates 180 calendar days after the last homeownership assistance payment on behalf of the family. However, a PHA may grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family.</p>

Chapter 16 Program Administration

What & why?	Current Policy	Proposed Policy
<p>16-I</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>The notice makes clear that other activities may also qualify as related development activities. Administrative fees that remain in the UNP account from funding provided prior to 2004 may be used for “other housing purposes permitted by state and</p>	<p>The notice makes clear that other activities may also qualify as related development activities. Administrative fees that remain in the UNP account from funding provided prior to 2004 may be used for “other housing purposes permitted by state and</p>

What & why?	Current Policy	Proposed Policy
<p>Allows Homes for Good to use administrative fee for tenant leasing activities.</p>	<p>local law," in accordance with 24 CFR 982.155(b)(1).</p>	<p>local law," in accordance with 24 CFR 982.155(b)(1).</p> <p>In addition, as specified in Notice PIH 2022-18, PHAs may use administrative fee funding for both administrative and "other expenses" needed to employ strategies and undertake activities beyond regular administrative responsibilities to facilitate the successful leasing and use of housing choice vouchers by families, such as through the use of security deposit assistance and landlord recruitment and incentive payments, among other allowable expenses specified in the notice. PHAs are also permitted to use UNP for these expenses [Notice PIH 2022-18].</p>
<p>16-II.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides broader access to payment standard and utility allowance schedules.</p>	<p>Copies of the payment standard and utility allowance schedules are available for review in the PHA's offices during normal business hours.</p>	<p>Copies of the payment standard and utility allowance schedules are available for review on the PHA's website and in the PHA's offices during normal business hours upon request.</p>
<p>16-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides flexibility for factors in determining the payment standard.</p>	<p>Unit Availability: The PHA will review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.</p> <p>Lease-up Time and Success Rate: The PHA will consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.</p>	<p>Unit Availability: The PHA may review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.</p> <p>Lease-up Time and Success Rate: The PHA may consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.</p>
<p>16-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Assists with Housing Access for VASH tenants.</p>	<p>A PHA that adopts an exception payment standard area must revise its briefing materials to make families aware of the exception payment standard and the area that it covers.</p>	<p>A PHA that adopts an exception payment standard area must revise its briefing materials to make families aware of the exception payment standard and the area that it covers.</p> <p>In addition, HUD allows PHAs to establish a HUD-Veterans Affairs Supportive Housing</p>

What & why?	Current Policy	Proposed Policy
		<p>(HUD-VASH) exception payment standard. PHAs may go up to but no higher than 120 percent of the FMR or SAFMR specifically for VASH families. PHAs who want to establish a VASH exception payment standard over 120 percent must still request a waiver from HUD (See Section 19-III.E.).</p>
<p>16-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Specifies the payment standard utilized for the HUD-VASH program.</p>	<p>[No policy present]</p>	<p>PHA Policy The PHA has established an exception payment standard at 120 percent of the FMR for the HUD-VASH program.</p>
<p>16-II.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows for more accurate utility allowance schedule due to increased need for air conditioning.</p>	<p>The PHA has not included an allowance for air-conditioning in its schedule. Central air-conditioning or a portable air conditioner is not a common practice in Lane County.</p>	<p>The PHA has included an allowance for air-conditioning in its schedule.</p>
<p>16-IV.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Allows participant families flexibility to pay amounts owed to a PHA.</p>	<p>PHAs are required to include in the administrative plan, policies concerning repayment by a family of amounts owed to the PHA [24 CFR 982.54]. This part describes the PHA's policies for recovery of monies owed to the PHA by families or owners.</p>	<p>PHAs are required to include in the administrative plan, policies concerning repayment by a family of amounts owed to the PHA [24 CFR 982.54]. If the family breaches an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA, the PHA, at its discretion, may offer a family the opportunity to enter an agreement to pay amounts owed to a PHA or amounts paid to an owner by a PHA. The PHA may prescribe the terms of the agreement [24 CFR 982.552(c)(1)(vii). This part describes the PHA's policies for recovery of monies owed to the PHA by families or owners.</p>

What & why?	Current Policy	Proposed Policy
<p>16-IV.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows PHA recourse when owner refuses to pay amounts owed.</p>	<p>If the owner fails to repay the debt within the required time frame and is entitled to future HAP payments, the PHA will reduce the future HAP payments by the amount owed until the debt is paid in full.</p> <p>If the owner is not entitled to future HAP payments the PHA may, in its sole discretion, offer to enter into a repayment agreement on terms prescribed by the PHA.</p> <p>If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA may ban the owner from future participation in the program and pursue other modes of collection.</p>	<p>If the owner fails to repay the debt within the required time frame and is entitled to future HAP payments, the PHA will reduce the future HAP payments by the amount owed until the debt is paid in full.</p> <p>If the owner refuses to repay the debt, the PHA may ban the owner from future participation in the program and pursue other modes of collection.</p>
<p>16-IV.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Allows options to collect amounts owed if family refuses to pay.</p>	<p><u>PHA Policy</u> Any amount owed to the PHA by an HCV family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.</p> <p>If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will terminate assistance in accordance with the policies in Chapter 12 and pursue other modes of collection.</p>	<p>Families are required to reimburse the PHA if they were charged less rent than required because the family either underreported or failed to report income. PHAs are required to determine retroactive rent amounts as far back as the PHA has documentation of family unreported income [Notice PIH 2018-18].</p> <p><u>PHA Policy</u> Any amount owed to the PHA by an HCV family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.</p> <p>Refusal to Enter into an Agreement If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA must terminate assistance [Notice PIH 2018-18].</p>
<p>16-IV.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>[No policy present]</p>	<p><u>PHA Policy</u> When a family refuses to repay monies owed to the PHA, in addition to termination of program assistance, the PHA will utilize</p>

What & why?	Current Policy	Proposed Policy
<p>Allows options to collect amounts owed if family refuses to pay.</p>		<p>other available collection alternatives including, but not limited to, the following: Collection agencies Small claims court Civil lawsuit State income tax set-off program</p>
<p>16-IV.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on agreement of repayment.</p>	<p><i>Execution of the Agreement</i></p>	<p><i>Execution of the Agreement</i></p> <p>All repayment agreements must be in writing, dated, and signed by both the family and the PHA [Notice PIH 2018-18].</p>
<p>16-IV.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what is included on repayment agreements.</p>	<p>Repayment Agreements Involving Improper Payments Notice PIH 2017-12 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:</p>	<p>Repayment Agreement Terms All repayment agreements must be in writing, dated, signed by both the family and the PHA, include the total retroactive rent amount owed, any amount of lump sum payment made at time of execution, if applicable, and the monthly repayment amount. Notice PIH 2018-18 requires certain provisions, at a minimum, be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:</p>
<p>16-V.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Updates definition of late annual indicator.</p>	<p>Points are based on the percent of reexaminations that are more than 2 months overdue, according to data from PIC.</p>	<p>Points are based on the percent of reexaminations that are less than two months overdue, according to data from PIC.</p>
<p>16-V.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity to inspection pass date in relation to HAP contract start date.</p>	<p>Points are based on the percent of newly leased units that passed HQS inspection prior to the effective date of the lease and HAP contract, according to data from PIC.</p>	<p>Points are based on the percent of newly leased units that passed HQS inspection on or before the effective date of the lease and HAP contract, according to data from PIC.</p>

What & why?	Current Policy	Proposed Policy
<p>16.VI.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on record retention period for 58's and EIV's.</p>	<p>Notice PIH 2014-20 requires PHAs to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.</p>	<p>The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].</p> <p>The PHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date [Notice PIH 2018-18].</p> <p>Notice PIH 2014-20 requires PHAs to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.</p>
<p>16-VIII.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity on PHA funds available.</p>	<p>If the total annual HAP needs equal or exceed the annual budget authority, or if the PHA cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, the PHA will be considered to have insufficient funding.</p>	<p>If the total annual HAP needs equal or exceed the annual budget authority and funding reserves, or if the PHA cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, the PHA will be considered to have insufficient funding.</p>
<p>Exhibit 16-3</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides flexibility for emergency transfers.</p>	<p>Emergency transfers will not take priority over waiting list admissions for these programs. At your request, the PHA will refer you to organizations that may be able to further assist you.</p>	<p>Emergency transfers will not take priority over waiting list admissions for these programs. At your request, the PHA will refer you to organizations that may be able to further assist you.</p> <p>Emergency transfers may be able to utilize a local preference when applying into other programs.</p>

Chapter 17 Project-Based Vouchers

What & why?	Current Policy	Proposed Policy
<p>17-I.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on timeframe of exception.</p>	<p>Units qualify under this exception if the units:</p>	<p>For units under a HAP contract that was first executed on or after April 18, 2017, units qualify under this exception if the units:</p>
<p>17-I.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Clarifies when FUP/FYI assistance is included in the exception.</p>	<p>Only units that that are under a HAP contract that was first executed on or after April 18, 2017, are covered by the 10 percent exception.</p>	<p>PBV units that house eligible youth receiving FUPY/FYI assistance are also covered by this 10 percent exception authority if the units are under a HAP contract that became effective after December 27, 2020, and if the unit is occupied by an eligible youth receiving FUPY/FYI assistance. FYI TPVs that were awarded under Notice PIH 2019-20 are not part of this exception since PHAs are prohibited from project-basing FYI TPVs. Units added after December 27, 2020, through an amendment of a HAP contract that became effective after December 27, 2020, are eligible for this 10 percent exception authority. In contrast, units added after December 27, 2020, through an amendment of a HAP contract that became effective on or prior to December 27, 2020, are not eligible for this 10 percent exception authority [FR Notice 1/24/22]. See Chapter 19 for policies specific to project-basing FUPY vouchers.</p>
<p>17-II.F</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides access to create more project based voucher units beyond what is currently allowable.</p>	<p>Projects where these caps were implemented prior to HOTMA (HAP contracts executed prior to April 18, 2017) may continue to use the former exceptions and may renew their HAP contracts under the old requirements, unless the PHA and owner agree to change the conditions of the HAP contract. However, this change may not be made if it would jeopardize an assisted family’s eligibility for continued assistance in the project.</p>	<p>Under the Fostering Stable Housing Opportunities (FSHO) amendments, units exclusively made available to youth receiving FUPY/FYI assistance may be excepted from the project cap for HAP contracts first effective after December 27, 2020. For more information on excepted units for FUPY, see Chapter 19.</p> <p>Projects where these caps were implemented prior to HOTMA (HAP contracts executed prior to April 18, 2017) or FSHO (contract in effect on or prior to December 27, 2020) may continue to use the former exceptions and may renew their HAP contracts under the old requirements, unless the PHA and owner agree to change the conditions of the HAP contract.</p>

What & why?	Current Policy	Proposed Policy
<p>17-II.F</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Regulatory language was removed as five years has expired.</p>	<p>Projects not Subject to a Project Cap [FR Notice 1/18/17; Notice PIH 2017-21]</p> <p>PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV assistance. To qualify for the exception, the unit must:</p> <ul style="list-style-type: none"> • Be covered by a PBV HAP contract that first became effective on or after 4/18/17; and • In the five years prior to the date the PHA either issued the RFP under which the project was selected or the PHA selected the project without competition, the unit met at least one of the two following conditions: <ul style="list-style-type: none"> - The unit received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for the Elderly (Section 303), Housing for Persons with disabilities (Section 811), the Rental Supplement program, - The unit was subject to a rent restriction as a result of one of the following HUD loans or insurance programs: Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for the Elderly (Section 202), or Housing for Persons with Disabilities (Section 811) <p>Units that were previously receiving PBV assistance are not covered by the</p>	<p>Projects not Subject to a Project Cap [FR Notice 1/18/17; Notice PIH 2017-21]</p> <p>PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV assistance.</p>

What & why?	Current Policy	Proposed Policy
	<p>exception. Both existing and rehabilitation units are eligible for this exception. Newly constructed units qualify if they meet the definition of <i>replacement unit</i> described in FR Notice 1/18/17.</p>	
<p>17-III.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides Homes for Good flexibility to use another inspection instead of Housing Quality Standards (HQS).</p>	<p>Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14]</p> <p>At least once every 24 months during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement.</p>	<p>Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14]</p> <p>At least once every 24 months during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement. The PHA also has the option in certain mixed finance properties to rely on alternative inspections conducted at least triennially.</p>
<p>17-VII.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows families to remain housed if they don't meet occupancy standards, but still meet Housing Quality Standards i.e.) two persons per bedroom, and two persons per sleeping area.</p>	<p>The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.</p>	<p>The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member or if the family's household composition is not in violation of HQS standards.</p>
<p>17-VIII.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Rent changes for PBV units are now assessed at a higher threshold (10%).</p>	<p>During the term of the HAP contract, the rent to owner is redetermined at the owner's request in accordance with program requirements, and at such time that there is a five percent or greater decrease in the published FMR.</p>	<p>During the term of the HAP contract, the rent to owner is redetermined at the owner's request in accordance with program requirements, and at such time that there is a ten percent or greater decrease in the published FMR.</p>

What & why?	Current Policy	Proposed Policy
<p>Exhibit 17-2</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides further information on the special provisions applying to TPV's awarded as a part of a voluntary conversion of public housing units in projects that include RAD PBV units.</p>	<p>[Not present]</p>	<p>[Added into plan]</p>

Chapter 18 Project Based Vouchers (PBV) Under the Rental Assistance Demonstration (RAD) Program

What & why?	Current Policy	Proposed Policy
<p>18-VI.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Clarifies lease requirements for RAD PBV.</p>	<ul style="list-style-type: none"> • A specification of the services, maintenance, equipment, and utilities that will be provided by the owner; and • The amount of any charges for food, furniture, or supportive services. 	<ul style="list-style-type: none"> • A specification of the services, maintenance, equipment, and utilities that will be provided by the owner; • The amount of any charges for food, furniture, or supportive services; and <p>For any family admitted following conversion, the lease must specify what will happen if the family elects to remain in its unit after increasing its income such that it requires zero HAP. Specifically, the lease must make clear how the tenant rent will be calculated, and it must address the transition to a new lease.</p>
<p>18-VI.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on what happens when a RAD family is no longer receiving a housing subsidy.</p>	<p>If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.</p>	<p>If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.</p> <p>Per the RAD Use Agreement, the owner may charge the family a rent that does not exceed 30 percent of 80 percent of the area median income. If a unit is removed from the RAD PBV HAP contract, then the lease terminates automatically, as stated in the tenancy addendum, as though the RAD PBV HAP contract had been terminated. The tenant must be offered a new lease, which must reflect the new tenant rent. A tenant in this circumstance is no longer a program participant and therefore no longer benefits from any of the rights or protections specific to RAD, or to the PBV program. Should the family subsequently lose employment, the</p>

What & why?	Current Policy	Proposed Policy
		owner may choose to reduce the family's rent, but if the family wishes to be admitted to the HCV/PBV program, then it must be admitted through the waiting list like any other applicant.
<p>18-VI.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity on when a security deposit can be collected, allowing for one to be collected if not previously done so.</p>	<p>Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. Otherwise the security deposit requirements for standard PBV apply.</p>	<p>Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. If a tenant residing in a converting project has not previously provided a security deposit, then the owner may collect a security deposit at the time of initial lease execution. Otherwise the security deposit requirements for standard PBV apply.</p>
<p>18-VI.E</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides family more opportunity to remain housed as long as Housing Quality Standards (HQS) is met.</p>	<p>The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, other medical emergency of a family member,</p>	<p>The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, other medical emergency of a family member, or if the family's household composition is not in violation of HQS standards.</p>
<p>18-VI.E</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Clarifies when families are eligible for choice mobility and requirements of information provided to residents.</p>	<p>Choice Mobility [Notice PIH 2019-23]</p>	<p>Choice Mobility [Notice PIH 2019-23; PRRAC Choice Mobility Implementation Guidance, 8/20] <i>Family's Right to Choice Mobility</i> Under RAD PBV, the choice mobility option provides families with the opportunity to move with continued assistance any time after 12 months of occupancy. All residents in converted properties should be aware of their housing mobility rights and of their options in a range of neighborhoods.</p>
<p>18-VI.E</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity on the information to be provided to RAD families regarding choice mobility.</p>	<p>[No policy present]</p>	<p>To ensure that residents are fully aware of and understand their rights under choice mobility, the PHA will inform families of their rights under the choice mobility option and the benefits to moving to lower poverty areas, and provide a summary of the steps necessary to exercise this option, at the time the family</p>

What & why?	Current Policy	Proposed Policy
		<p>signs the lease for the RAD PBV unit and during their annual recertification. Information on choice mobility will be made accessible to persons with disabilities, ensuring any information, electronic or otherwise, is accessible for persons with vision, hearing, and other disabilities. This information will also be made available in accordance with Limited English Proficiency (LEP) requirements, including document translation and user of interpretation services. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements.</p>
<p>18-VI.E Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Clarifies when families are eligible for choice mobility.</p>	<p>If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.</p>	<p>Families are eligible to move with continued assistance under choice mobility after 12 months of occupancy. If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.</p>
<p>18-VI.E Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Provides families stable housing in the RAD PBV unit while they look for a unit with their HCV voucher.</p>	<p>The choice mobility waiting list will be organized by date received of the family’s written request to exercise choice mobility.</p>	<p>The choice mobility waiting list will be organized by date received of the family’s written request to exercise choice mobility. The PHA will not subject RAD PBV families applying for choice mobility vouchers to any additional rescreening requirements in order to receive a tenant-based voucher. Families exercising choice mobility will not be required to vacate their units before a lease has been entered into using their tenant-based voucher. At the time the PHA issues a choice mobility voucher, the PHA will notify the family of their right to remain in their unit if they are unable find a rental unit using the tenant-based voucher.</p>
<p>18-VII.B Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Provides clarity on how rent increases are calculated for RAD PBV units.</p>	<p>Contract rents will be adjusted annually only by HUD’s operating cost adjustment factor (OCAF) at each anniversary of the HAP contract, subject to the availability of appropriations for each year of the contract term. As such, section 8(o)(13)(I) of the 1937 Act, and 24 CFR 983.301 and 983.302, concerning rent determinations, do not apply when adjusting rents. The rent to owner may at no time exceed the reasonable rent</p>	<p>RAD PBV contract rents are adjusted differently than contract rents in the standard PBV program. At each annual anniversary of the HAP contract, contract rents will be adjusted annually only by HUD’s operating cost adjustment factor (OCAF) that is applied to the current contract rent, less the portion of the rent paid for debt service, subject to the availability of appropriations for each year of the contract term. As such, section 8(o)(13)(I) of the 1937 Act, and 24 CFR 983.301 and 983.302, concerning rent determinations, do not apply when adjusting rents. The rent to owner may at no time</p>

What & why?	Current Policy	Proposed Policy
	<p>charged for comparable unassisted units in the private market, as determined by the contract administrator in accordance with 24 CFR 983.303.</p> <p>Contract rents may not exceed the reasonable rent, with the exception that the contract rent for each unit may not be reduced below the initial contract rent under the initial HAP contract.</p>	<p>exceed the reasonable rent charged for comparable unassisted units in the private market, as determined by the contract administrator in accordance with 24 CFR 983.303.</p> <p>Contract rents may not exceed the reasonable rent (as determined by the PHA that administers the contract or the independent entity, as applicable), with the exception that the contract rent for each unit may not be reduced below the initial contract rent under the initial HAP contract.</p>
<p>18-VII.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity for owners on the OCAF requirement and process for rent adjustments.</p>	<p>The administering PHA (or independent entity, if the project is PHA-owned) is responsible for processing rent adjustments, at each contract anniversary date, in accordance with the prevailing OCAF</p>	<p>The PHA who administers the contract (directly or via an independent entity) must maintain records to demonstrate how OCAF amounts were determined and how rent adjustments were calculated. HUD approval of rent adjustments is not required.</p> <p>Properties are eligible to receive prior years' OCAF adjustments for years in which the OCAF was not taken. The OCAF must be applied retroactively if it was missed. The PHA administering the contract (or the independent entity) must make sure that all OCAFs have been applied correctly since the RAD closing and calculate the current rents accordingly, including making sure that the RAD PBV contract rents do not exceed the PBV program caps.</p>
<p>18-VII.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides clarity for owners on the OCAF requirement and process for rent adjustments.</p>	<p>[No policy present]</p>	<p>PHA Policy</p> <p>The owner will request a contract rent adjustment from the PHA who administers the contract within 120 days, but no less than 60 days, prior to the HAP contract anniversary date by submitting a completed OCAF rent adjustment worksheet (Form HUD-9624). The independent entity will validate the data on the form and determine whether the rent exceeds the reasonable rent charged for comparable unassisted units in the private market, in accordance with 24 CFR 983.303. If rents would be unreasonable following application of the requested OCAF, then the rent will only be increased up to the reasonable rent. The independent entity will notify the PHA who administers the contract in writing of the</p>

What & why?	Current Policy	Proposed Policy
		<p>results of its review of the rent adjustment request. The PHA who administers the contract will retain a copy of the worksheet and any other records necessary to demonstrate how the OCAF was used to make rent adjustments for audit purposes. The approved rent adjustment will go into effect via written notice from the PHA that administers the project to the owner. This notice will constitute an amendment to the rents specified on Exhibit A of the RAD PBV HAP contract. The new rents to owner will take effect on the date of the contract anniversary.</p>
<p>18-VII.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity for when new utility allowance will be in effect and clarifies options on implementing utility allowance.</p>	<p>After conversion, the PHA may maintain a utility allowance schedule for tenant-paid utilities in accordance with standard PBV and HCV utility allowance regulations at 24 CFR 983.301(f)(2)(ii) and 24 CFR 982.517 respectively. The PHA may instead, however, apply site specific utility allowances. HUD waived the requirement for the standard PBV program that the HCV utility allowance be used. If a site-specific utility allowance is used, the utility allowance is applicable to non-RAD PBV units in the project and is calculated consistent with Notice H 2015 04.</p>	<p>After conversion the PHA that administers the contract must maintain the utility allowance schedule. The PHA may either maintain a utility allowance schedule for tenant-paid utilities in accordance with standard PBV and HCV utility allowance regulations at 24 CFR 983.301(f)(2)(ii) and 24 CFR 982.517, respectively, or the PHA may instead, however, apply site specific utility allowances. HUD waived the requirement for the standard PBV program that the HCV utility allowance be used. If a site-specific utility allowance is used, the utility allowance is applicable to non-RAD PBV units in the project and is calculated consistent with Notice H 2015 04.</p> <p>Each family transitions to the new utility allowance at their first recertification following conversion.</p>
<p>18-VIII.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Changes policy provision to regulatory provision.</p>	<p>The PHA must communicate this policy in writing to affected residents.</p>	<p>The PHA must communicate this policy in writing to affected residents. Any non-RAD PBV units located in the same covered project are subject to the terms of the phase-in provisions.</p>
<p>18-VIII.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides clarity to phase in required period.</p>	<p>Once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward.</p>	<p>Once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward.</p> <p>If the family’s income falls during the phase-in period such that the currently calculated PBV TTP falls below the amount that would otherwise be the phased-in rent,</p>

What & why?	Current Policy	Proposed Policy
		the family pays the currently calculated PBV TTP and the phase-in ends.

Chapter 19 Special Purpose Vouchers

What & why?	Current Policy	Proposed Policy
<p>Chapter 19</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides chapter with regulation and policy regarding special voucher types.</p>	[N/A]	[Added]



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Moving to Work (MTW) Updates to the Homes for Good Rent Assistance Administrative Plan (Admin Plan) Fiscal Year 2024 Effective Date 10-1-2023 to 9-30-2024

Proposed changes to the following chapters:

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Chapter 6 Income and Subsidy Determinations 1
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What & why?	Current Policy	Proposed Policy
<p>6-I.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides families opportunity to retain income for a longer period of time before it is calculated by Homes for Good. Provides Administrative relief to staff.</p>	<p>The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.</p>	<p>The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.</p> <p><u>MTW Policy</u> The PHA is using a triennial reexam schedule excluding homeownership and FYI vouchers.</p>
<p>6-I.H</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Not doing a retroactive payment aligns with a triennial income review process.</p>	<p>Most lump-sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not counted as income. Additionally, any deferred disability benefits that are received in a lump-sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [24 CFR 5.609(c)(14)].</p>	<p>Most lump-sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not counted as income. Additionally, any deferred disability benefits that are received in a lump-sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [24 CFR 5.609(c)(14)].</p> <p><u>MTW Policy</u> The PHA will not adjust the subsidy retroactively for any delayed start of periodic payments received and reported during the period in which the PHA is processing an annual reexam.</p>
<p>6-III.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows the benefit of the increased Payment Standard to be applied when it is needed.</p>	<p>Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].</p>	<p>Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].</p> <p><u>MTW Policy</u> Interim reexams as a result of a rent increase request from the landlord will result in the most current payment standard being applied.</p>
<p>6-III.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows Homes for Good to approve the request instead</p>	<p>If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR.</p>	<p>If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR.</p> <p><u>MTW Policy</u></p>

What & why?	Current Policy	Proposed Policy 144
<p>of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.</p>		<p>Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA’s reasonable accommodation approval process.</p>

Chapter 8 Housing Quality Standards and Rent Reasonableness Determinations

What & why?	Current Policy	Proposed Policy
<p>8-II.A</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces the amount of time to provide subsidy to a prospective unit.</p>	<ul style="list-style-type: none"> <i>Quality Control Inspections.</i> HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with the HQS. 	<ul style="list-style-type: none"> <i>Quality Control Inspections.</i> HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with the HQS. <p><u>MTW Policy</u> The PHA engages in prequalifying unit inspections (HCV).</p>
<p>8-II.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Reduces Administrative burden in having to contract an outside inspector and allows Homes for Good to complete inspections quickly.</p>	<p>The independent agency must be approved by HUD and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).</p>	<p>The independent agency must be approved by HUD and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).</p> <p><u>MTW Policy</u> Using its MTW authority, Homes for Good waived the requirements of 24 CFR 982.352(b). This waiver allows Homes for Good to conduct HQS inspections on units it owns, such as those in its Project-Based Voucher portfolio.</p>
<p>8-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Allows for pre-inspections to be completed and provides guidelines within which they would be permissible. Facilitates earlier subsidy start dates for participants</p>	<p>The unit must pass the HQS inspection on or before the effective date of the HAP contract.</p> <p>The PHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.</p>	<p>The unit must pass the HQS inspection on or before the effective date of the HAP contract.</p> <p>The PHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.</p> <p><u>MTW Policy</u> The PHA engages in prequalifying unit inspections (HCV).</p>

What & why?	Current Policy	Proposed Policy 145
<p>because the units will already have passed inspection.</p>		<p><i>Vacant Units with No Attached RTA</i></p> <p>For prequalifying unit inspections, the PHA will inspect one-bedroom units and smaller with the assumption that no children under the age of six will reside in the unit.</p> <p>For prequalifying unit inspections of units with two or more bedrooms, the PHA will inspect the unit with the assumption that a child under the age of six may reside in the unit.</p> <p>Prequalifying unit inspections cannot be utilized by households that are required to use portions of the unit as sleeping areas prior to the completion of the inspection.</p> <p><i>Vacant Units with an Attached RTA</i></p> <p>Prequalifying unit inspections will be completed for vacant units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</p> <p>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</p> <p><i>Occupied Units with an Attached RTA</i></p> <p>Prequalifying unit inspections will be completed for occupied units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</p> <p>If the RTA is not approved for an occupied unit, the prequalifying unit inspection will be voided.</p> <p>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</p> <p><i>Occupied Units without an Attached RTAA</i> PHA will not complete a prequalifying inspection.</p>

What & why?	Current Policy	Proposed Policy	146
<p>8-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Specifies the timeline of prequalifying inspection to be completed. Aligns the timelines from “request” to “inspection” with RTA policy.</p>	<p><u>PHA Policy</u></p> <p>The PHA will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA).</p>	<p><u>PHA Policy</u></p> <p>The PHA will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA).</p> <p><u>MTW Policy</u></p> <p>The PHA will complete the prequalifying unit inspection for initial inspection within 15 days of the PHA receiving a written request for prequalifying unit inspection.</p>	
<p>8-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces administrative burden by limiting prequalifying reinspections to two and allows passed inspections to be valid for 90 days.</p>	<p>Following a failed reinspection(s) where the unit was rejected, the family may submit a new Request for Tenancy Approval after the owner has made repairs, if they are unable to locate another suitable unit.</p>	<p>Following a failed reinspection(s) where the unit was rejected, the family may submit a new Request for Tenancy Approval after the owner has made repairs, if they are unable to locate another suitable unit.</p> <p><u>MTW Policy</u></p> <p>In order for the prequalifying unit inspection to serve as the initial unit inspection, the prequalifying unit inspection must have an HQS pass date that is no greater than 90 calendar days from the receipt of the Request for Tenancy Approval by the PHA given that the inspection was completed within 90 days of occupancy.</p> <p>The PHA may offer up to two reinspections for a prequalifying unit inspection.</p>	
<p>8-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Clarifies which utilities need to be in place for a prequalifying inspection. Allows tenant provided trash to be established after inspection and before HAP execution.</p>	<p>If the family is responsible for supplying the trash service, the PHA will allow the trash service to be placed in the unit after the unit has met all other HQS requirements. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon certification from the family that the trash service has been installed. Trash service is defined as: a garbage can with a lid that will be transported to a recycling/trash center on a regular basis or service from a local trash removal provider such as Sanipac or Lane Apex.</p>	<p>If the family is responsible for supplying the trash service, the PHA will allow the trash service to be placed in the unit after the unit has met all other HQS requirements. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon certification from the family that the trash service has been installed. Trash service is defined as: a garbage can with a lid that will be transported to a recycling/trash center on a regular basis or service from a local trash removal provider such as Sanipac or Lane Apex.</p> <p><u>MTW Policy</u></p>	

What & why?	Current Policy	Proposed Policy 147
		<p>All utilities must be in place and operational for a prequalifying unit inspection with the exception of tenant-supplied trash service. Should a family submit an RTA for a prequalifying unit that has passed HQS, the PHA will allow the trash service to be placed in the unit. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon written certification from the family that the trash service has been installed.</p>
<p>8-II.B</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Clarifies when appliances need to be in place for a prequalifying inspection. Aligns with regular move in policy for tenant supplied appliances.</p>	<p><u>PHA Policy</u></p> <p>If the family is responsible for supplying the stove and/or refrigerator, the PHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The required appliances must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.</p>	<p><u>PHA Policy</u></p> <p>If the family is responsible for supplying the stove and/or refrigerator, the PHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The required appliances must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.</p> <p><u>MTW Policy</u></p> <p>If the family is responsible for supplying the stove and/or refrigerator and they have submitted an RTA for a prequalifying unit that has passed HQS, the PHA will allow the stove and refrigerator to be placed in the unit as long as all required appliances are present before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a written certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.</p>
<p>8-II.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces administrative burden by allowing Housing</p>	<p><u>PHA Policy</u></p> <p>Each unit under HAP contract must be inspected biennially within 24 months of the last full HQS inspection. The PHA reserves the right to require annual inspections of any unit or owner at any time.</p>	<p><u>PHA Policy</u></p> <p>Each unit under HAP contract must be inspected biennially within 24 months of the last full HQS inspection. The PHA reserves the right to require annual inspections of any unit or owner at any time.</p>

What & why?	Current Policy	Proposed Policy 148
<p>Quality Standard inspection to occur triennially.</p>	<p>The PHA will not rely on alternative inspection standards.</p>	<p>The PHA will not rely on alternative inspection standards.</p> <p><u>MTW Policy</u></p> <p>The PHA engages in triennial HQS inspections. The PHA reserves the right to require annual or biennial inspections of any unit or owner at any time.</p>
<p>8-II.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Allows a participant who moved in with a prequalifying inspection to request a more current inspection to address any HQS concerns they have within a specified window of time.</p>	<p><u>PHA Policy</u></p> <p>During a special inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.</p> <p>If the annual/biennial inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full annual/biennial inspection.</p>	<p><u>PHA Policy</u></p> <p>During a special inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.</p> <p>If the annual/biennial inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full annual/biennial inspection.</p> <p><u>MTW Policy</u></p> <p>A participant who has utilized a prequalifying unit inspection can request an interim inspection within 90 calendar days of the start of their Housing Assistance Payment contract.</p> <p>Participants may request an interim inspection by providing the PHA a copy of the written maintenance request submitted to the unit owner and the owner has had at least 15 full calendar days to address the maintenance concerns. Should the HQS concerns be life-threatening, the PHA will conduct an interim inspection within 24 hours.</p>
<p>8-II.E</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Ensures that adequate quality control is being taken across PHA-owned and non-PHA-owned units for both HQS and rent reasonableness.</p>	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.</p> <p>The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of</p>	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.</p> <p>The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.</p>

What & why?	Current Policy	Proposed Policy 149
	neighborhoods and the work of a cross section of inspectors.	<p><u>MTW Policy</u></p> <p>The PHA will sample both PHA-owned and non-PHA-owned units to conduct quality control inspections. For those units selected, a quality control of rent reasonableness for PHA-owned units will also be completed.</p>
<p>8-II.F</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provides participants who utilize prequalifying inspections a copy of the inspection report.</p>	<p>Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).</p>	<p>Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).</p> <p><u>MTW Policy</u></p> <p>Participants moving into units with passed prequalifying unit inspections will be provided with a copy of the passed HQS inspection report upon approval of the RTA.</p>
<p>8-III.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Reduces Administrative burden in having to contract an outside entity to complete the rent reasonableness process and allows Homes for Good to complete the process quickly.</p>	<p>The independent agency must communicate the results of the rent reasonableness determination to the family and the PHA. The independent agency must be approved by HUD, and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).</p>	<p>The independent agency must communicate the results of the rent reasonableness determination to the family and the PHA. The independent agency must be approved by HUD, and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).</p> <p><u>MTW Policy</u></p> <p>Using its MTW authority, Homes for Good opted to determine rent reasonableness for units that the agency owns without using an independent entity. As vacancies occur within properties owned by Homes for Good, the Rental Assistance Division will conduct rent reasonableness determinations using the standard currently used to perform all other Housing Choice Voucher rent reasonableness determinations. A quality control of rent reasonableness for PHA-owned units will be completed.</p>

What & why?	Current Policy	Proposed Policy 150
<p>8-III.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows the benefit of the increased Payment Standard to be applied when it is needed.</p>	<p>All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later.</p>	<p>All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later.</p> <p><u>MTW Policy</u> All rent adjustments will utilize the most current payment standard upon execution of the mid-year rent increase.</p>

What & why?	Current Policy	Proposed Policy 152
<p>11.I.A</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides families opportunity to retain income for a longer period of time before it is calculated by Homes for Good. Provides Administrative relief to staff.</p>	<p>The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.</p>	<p>The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.</p> <p><u>MTW Policy</u> This PHA will conduct reexams on a triennial basis with the exception of Homeownership and Foster Youth to Independence (FYI) vouchers.</p>
<p>11-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Reduces Administrative burden by reducing the number of interims needed. Captures income of new adult family members.</p>	<p><u>PHA Policy</u> The PHA will not conduct a reexamination of income when a new family member is added. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member. However, if the new member qualifies for a dependent deduction, an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.</p>	<p><u>PHA Policy</u> The PHA will not conduct a reexamination of income when a new family member is added. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member. However, if the new member qualifies for a dependent deduction, an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.</p> <p><u>MTW Policy</u> The PHA will not conduct a reexamination of income when a new family member is added who is a minor. The PHA will conduct a reexamination of income when a new family member is added who is an adult family member. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member.</p>

<p>11-III.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows the benefit of the increased Payment Standard to be applied when it is needed.</p>	<ul style="list-style-type: none"> If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed. 	<p style="text-align: right;">153</p> <ul style="list-style-type: none"> If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed. <p><u>MTW Policy</u> Interim reexams as a result of a rent increase request from the landlord will result in the most current payment standard being applied.</p>
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Chapter 14 Program Integrity

What & why?	Current Policy	Proposed Policy
<p>14-I.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Provides guidelines in which quality control will be conducted without the submission of SEMAP. Reduces administrative burden to not submit a SEMAP report to HUD.</p>	<p><u>PHA Policy</u></p> <p>In addition to the SEMAP quality control requirements, the PHA will employ a variety of methods to detect errors and program abuse.</p> <p>The PHA routinely will use HUD and other non-HUD sources of up-front income verification. This includes EIV and any other private or public databases available to the PHA.</p> <p>At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.</p> <p>The PHA will compare family-reported income and expenditures to detect possible unreported income.</p>	<p><u>PHA Policy</u></p> <p>In addition to the SEMAP quality control requirements, the PHA will employ a variety of methods to detect errors and program abuse.</p> <p>The PHA routinely will use HUD and other non-HUD sources of up-front income verification. This includes EIV and any other private or public databases available to the PHA.</p> <p>At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.</p> <p>The PHA will compare family-reported income and expenditures to detect possible unreported income.</p> <p><u>MTW Policy</u></p> <p>The PHA will complete monthly quality control reviews (i.e. EIV reports, multisubsidy reports, identity verification reports, etc) to assess that applicable HUD regulations, policies, and procedures are being adhered to.</p>

What & why?	Current Policy	Proposed Policy
<p>Chapter 15</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Clarifies the reexamination schedule for the Section 8 Homeownership program.</p>	<p><u>Part VII: Homeownership</u></p>	<p><u>Part VII: Homeownership</u></p> <p><u>MTW Policy</u></p> <p>The PHA's triennial re-examination policy does not apply to the Homeownership program. Homeownership families will continue to undergo an annual reexam process.</p>

Chapter 16 Program Administration

What & why?	Current Policy	Proposed Policy
<p>16-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows Homes for Good to approve the request instead of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.</p>	<p><u>PHA Policy</u></p> <p>The PHA has established an exception payment standard at 120 percent of the FMR for the HUD-VASH program.</p>	<p><u>PHA Policy</u></p> <p>The PHA has established an exception payment standard at 120 percent of the FMR for the HUD-VASH program.</p> <p><u>MTW Policy</u></p> <p>Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA's reasonable accommodation approval process.</p>

What & why?	Current Policy	Proposed Policy 156
<p>17-II.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Reduces Administrative burden by not having to engage in the public process of awarding PBV.</p>	<ul style="list-style-type: none"> <u>The PHA may select proposal that were previously selected based on a competition.</u> This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PHA need not conduct another competition. 	<ul style="list-style-type: none"> <u>The PHA may select proposal that were previously selected based on a competition.</u> This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PHA need not conduct another competition. <p><u>MTW Policy</u> Homes for Good may select projects under its MTW authority without engaging in a competitive process. Projects selected must be approved by the Homes for Good Board of Commissioners and are subject to HUD's requirements regarding environmental and subsidy layering reviews, if applicable.</p>
<p>17-III.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces administrative burden by allowing Housing Quality Standard inspection to occur triennially.</p>	<p><u>PHA Policy</u> The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Or The PHA will inspect on an biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program.</p>	<p><u>PHA Policy</u> The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Or The PHA will inspect on an biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program. <u>MTW Policy</u> The PHA may engage in a triennial inspection schedule.</p>

<p>17-VII.C</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Limits when choice mobility can be accessed by permanent supportive housing families.</p>	<p>If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance. If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.</p>	<p>If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance. If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.</p> <p><u>MTW Policy</u> Access to continued tenant-based assistance for permanent supportive housing (PSH) projects will be obtained via local preference referral from an approved entity. For non-PSH project based voucher households, the current twelve months of occupancy before choice mobility can be obtained will remain.</p>
<p>17-VIII.B</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows Homes for Good to approve the request instead of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.</p>	<p>In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints.</p>	<p>In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints.</p> <p><u>MTW Policy</u> Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA's reasonable accommodation approval process.</p>

What & why?	Current Policy	Proposed Policy
<p>18-III.D</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reduces administrative burden by allowing Housing Quality Standard inspection to occur triennially.</p>	<p><u>PHA Policy</u></p> <p>The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.</p> <p>Or</p> <p>The PHA will inspect on a biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program.</p>	<p><u>PHA Policy</u></p> <p>The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.</p> <p>Or</p> <p>The PHA will inspect on a biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program.</p> <p><u>MTW Policy</u> The PHA may engage in a triennial inspection schedule.</p>
<p>TPS-V.C</p> <p>Required Change? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Allows for pre-inspections to be completed and provides guidelines within which they would be permissible. Facilitates sooner subsidy start dates for participants because the units will already have passed inspection.</p>	<p><u>PHA Policy</u></p> <p>To expedite the leasing process, the PHA may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.</p> <p>The family will be free to select his or her unit.</p> <p>When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections</p>	<p><u>PHA Policy</u></p> <p>To expedite the leasing process, the PHA may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.</p> <p>The family will be free to select his or her unit.</p> <p>When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections.</p> <p><u>MTW Policy</u> The PHA engages in prequalifying inspections. The PHA will complete the prequalifying unit inspection for initial inspection within 15 days of the PHA receiving a written request for prequalifying unit inspection. In order for the prequalifying unit inspection to serve as the initial unit inspection, the prequalifying unit inspection must have an HQS pass date that is no greater than 90 calendar days</p>

What & why?	Current Policy	Proposed Policy 159
		<p>from the receipt of the Request for Tenancy Approval.</p> <p>The PHA may offer up to two reinspections for a prequalifying unit inspection.</p> <p><i>Vacant Units with No Attached RTA</i></p> <p>For prequalifying unit inspections, the PHA will inspect one-bedroom units and smaller with the assumption that no children under the age of six will reside in the unit.</p> <p>For prequalifying unit inspections of units with two or more bedrooms, the PHA will inspect the unit with the assumption that a child under the age of six may reside in the unit.</p> <p>Prequalifying unit inspections cannot be utilized by households that are required to use portions of the unit as sleeping areas.</p> <p><i>Vacant Units with an Attached RTA</i></p> <p>Prequalifying unit inspections will be completed for vacant units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</p> <p>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</p> <p><i>Occupied Units with an Attached RTA</i></p> <p>Prequalifying unit inspections will be completed for occupied units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</p> <p>If the RTA is not approved for an occupied unit, the prequalifying unit inspection will be voided.</p> <p>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</p> <p><i>Occupied Units without an Attached RTAA</i> PHA will not complete a prequalifying inspection.</p>

What & why?	Current Policy	Proposed Policy
<p>TPS-V.F</p> <p>Required Change? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Allows Homes for Good to approve the request instead of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.</p>	<p><u>PHA Policy</u></p> <p>The PHA will establish a higher payment standard amount for EHVs. The PHA will use 120 percent of the published Fair Market Rent (FMR) as the payment standard for EHV.</p>	<p><u>PHA Policy</u></p> <p>The PHA will establish a higher payment standard amount for EHVs. The PHA will use 120 percent of the published Fair Market Rent (FMR) as the payment standard for EHV.</p> <p><u>MTW Policy</u> Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA’s reasonable accommodation approval process.</p>

Attachment B.2 New Activities

✓ **Demolition and/or Disposition**

Homes for Good is evaluating the remaining public housing portfolio to determine if Demo/Disposition or a RAD conversion is appropriate. Homes for Good has submitted a letter of interest (LOI) to HUD regarding the conversion of the remaining Public Housing Portfolio. If it is determined to be appropriate, Homes for Good may submit a Demo/Dispo application for a portion of its public housing portfolio.

✓ **Conversion of Public Housing to Project Based Assistance under RAD**

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing access to private sources of capital to repair and preserve its affordable housing assets. Homes for Good submitted applications for participation in the RAD program in November of 2013 to convert 112 of its scattered sites to Project Based Vouchers (PBV). Homes for Good submitted a revised multi-phase application in May of 2016 which allowed conversion of 12 units into Richardson Bridge Apartments as part of a major rehabilitation and sold 12 units of scattered site housing and will transfer assistance to new sites which include 49 units at Sarang in Eugene and 51 units at Hayden Bridge Landing in Springfield. Homes for Good received a Commitment to enter into a Housing Assistance Payment (CHAP) for the remaining 100 units in August of 2018 for AMP 200 and 300.

AMP 200 Springfield Sites: AMP 200 OR000600200 included 20 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converted 3 units of public housing and transferred the assistance to Richardson Bridge (an existing Homes for Good development). The next phase converted the remaining 17 units to two new housing developments. Construction of the replacement housing began in the spring of 2020 and was completed in June of 2021. Almost all of the scattered sites have been sold and is expected to be completed by summer of 2023.

AMP 300, Eugene Scattered Sites: AMP 300 OR000600300 includes 92 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converted 9 units of public housing and transferred the assistance to Richardson Bridge (an existing Homes for Good development). Homes for Good disposed of the 9 former PH units for affordable housing purposes in 2018. The next phase was to transfer the remaining 83 units to two new housing developments. Construction of the replacement housing began in the spring of 2020 and was completed in June of 2021. Almost all of the scattered sites have been sold and is expected to be completed by summer of 2023.

Homes for Good is evaluating the remaining public housing portfolio to determine if Demo/Disposition or a RAD conversion is appropriate. Homes for Good submitted a letter of interest (LOI) to HUD regarding the conversion of the remaining Public Housing Portfolio in the fall of 2018.

✓ **Project Based Vouchers**

Homes for Good has 159 units of Project Based Voucher (PBV) across five Projects and 112 units of Rental Assistance Demonstration (RAD) PBV across three Projects and 5 units of VASH PBV in 1 project. These are all owned by Homes for Good. Project Based Vouchers have also been awarded to the following future developments that will be owned by Homes for Good:

The Coleman – 18 PBV units
 The Naval Reserve site – 80 PBV units
 Bridges on Broadway – 57 PBV units
 Quince Street – 86 PBV units

In addition, Homes for Good has entered into a PBV Contract for a project, owned by an entity outside of Homes for Good, Ketanji Court. Ketanji Court is a 59-unit complex in Eugene that contains 13 PBV units. Homes for Good is slated to enter into a PBV Contract in the summer of 2023 with another outside entity, Shorepines at Munsel Park. This community is a 68-unit complex in Florence that will contain 31 PBV units.

For Attachment B.3 Progress Report

Goal 1 Objective:

Increase the number of affordable housing units

Indicator	FY22 Progress	FY23 Progress
Create 300 new affordable housing units.	Homes for Good recently completed The Nel (45 units) and the Keystone (15 units.)	Funding applications will be submitted for The Naval Reserve Site (81 units), Quince Street (86 units) and Bridges on Broadway (57 units) in the Spring of 2023 and for The Coleman (38 units) submitted in Summer of 2023.
Increase number of permanent supporting housing units. (Featured projects: The Keystone, The Nel, Bridges on Broadway)	Homes for Good recently completed The Nel (45 units) and the Keystone (15 units.) which are all PSH units.	Bridges on Broadway (57 units PSH) will submit for funding spring of 2023.
Maintain public housing vacancies at 3% or less.	Public Housing continues to maintain an occupancy rate of 97% across the portfolio, with higher vacancies associated with the RAD resident relocations.	Public Housing continues to maintain an average occupancy of above 97% (98.5% for FY21 YTD).
Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons.	We received an additional allocation of 75 Mainstream Vouchers on April 1, 2021, bringing our total allocation of Mainstream Vouchers to 151. Effective March 2021 we expanded access to Mainstream vouchers to all non-elderly disabled persons on our waiting list, while also still continuing our work with partner agencies to distribute the vouchers	As of March 1, 2023, Homes for Good has 181 Mainstream Vouchers. Utilization for CY2022 was 97.6%.
Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County.	As of March 2021, 222 VASH vouchers are under lease. 46 VASH recipients have been issued vouchers and are searching for housing. CARES Act funds were obtained to provide deposit assistance for VASH voucher holders. Homes for Good is now meeting with local agencies on a monthly basis to collaborate on the use of all VASH vouchers.	As of March 2023, 248 VASH vouchers are under lease. We received an additional 50 VASH vouchers, for a total of 319 vouchers. We have provided local preference for the VA team to utilize PBV sites for VASH voucher holders. We continue with a Remote Video Inspection (RVI) project with the VA. RVI, an initiative deployed by HUD in response to COVID-19 provides a process for in field proxy inspectors to connect via video platform within office Housing Quality Standard Inspection staff to complete required HUD inspections.

Goal 2 Objective: Continue to receive high performer status.

Indicator	FY22 Progress	FY23 Progress
Homes for Good received high performer status for FY18 SEMAP.	. Homes for Good will not be submitting a FY21 SEMAP assessment. In accordance with the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136), HUD will not issue a new SEMAP score. HUD will instead carry forward the most recent SEMAP score on record. The most recent SEMAP score for Homes for Good is high performer status.	Homes for Good will no longer be required to submit SEMAP as the requirement to do so is removed with our designation as a Move to Work agency.
Obligate all capital funds within 24 months of grant award.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.
Expend all capital funds within 48 months of grant award.		
Comply with the financial reporting requirements of asset management.	Homes for Good continues to receive high performer status.	Homes for Good continues to receive high performer status.
Comply with the new PHAS requirements (when published) to continue to receive high performer status.		
Submit all PHAS reports within required timelines.		
Meeting all capital fund, financial reporting, and PHAS reporting requirements.		

Goal 3 Objective: Improve community quality of life and economic vitality.

Indicator	FY22 Progress	FY23 Progress
Creation of a Housing Liaison position that will provide education and advocacy to persons searching for housing. Once housed, the Housing Liaison's continued education and advocacy supports will increase housing stability.	Homes for Good Housing Liaison has assisted over 100 participants in challenges related to lease up with their Housing Choice Voucher program and has implemented participant and partner education related to housing navigation.	Due to budget constraints, Housing Liaison has been removed from the budget and the Resident Services team has worked to increase tenant education resources available through our Rent Well program.
Continue to encourage and promote resident involvement in the Resident Advisory Board by maintaining and expanding the number of representatives from public and assisted housing, as well as the Section 8 program.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.
Enhance the customer service experience across agency programs by simplifying and aligning processes, providing access to services staff and by connecting participants to needed resources in the community.		Homes for Good continues to work to streamline and simplify agency processes and increasing availability of Resident Services and other support staff.
Enhance resident and agency communication through Resident Newsletters, improved website access, email communication and social media.	All communities continue to receive a monthly or quarterly residential newsletter.	All communities continue to receive a monthly or quarterly residential newsletter as well as more frequent resident updates related to COVID-19 and Agency operations which are posted and emailed to all residents.
Annually monitor income levels by development and provide targeted support to deconcentrate poverty. Bring higher income PH households into lower income developments and vice versa, if necessary.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.
Continue giving preferences to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units).		

Goal 4 Objective: Promote self-sufficiency and asset development of households served through public and assisted housing as well as the Section 8 homeownership program.

Indicator	FY22 Progress	FY23 Progress
Expand access to the Family Self-Sufficiency (FSS) program to reach enrollment of 200 households or more.	Homes for Good Family Self-Sufficiency program currently has 149 households enrolled	Homes for Good Family Self-Sufficiency program currently has 128 households enrolled and have worked to adapt recruitment and intake to meet COVID-19 precautions.
Maintain a minimum representation of 15 community services agencies on the Family Self-Sufficiency Advisory Board.	and has increased participation on the FSS Advisory Board to over 18 community partners.	The FSS Advisory Board continues to grow with new organizations joining each year. Currently there are over 20 community partners engaged with this board.
Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet. Info Sessions have moved from monthly to every other week to increase availability and attendance.
Assist a minimum of two FSS participants a year in purchasing a home.	FSS has assisted 3 participants to purchase homes this year.	FSS has assisted 2 participants in purchasing homes this year and are working with several more to hopefully complete purchases by the end of the fiscal year.
Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.	FSS has assisted 11 residents to open IDA's.	FSS has assisted 6 households in opening IDA's this year. Funding for this opportunity has decreased this year but we are hopeful that it will return to pre-pandemic levels by the start of the fiscal year.

Goal 5 objective: To provide decent, safe and sanitary housing for very low-income families while maintaining their rent payments at an affordable level.

Indicator	FY22 Progress	FY23 Progress
Complete the Rent Assistance Demonstration construction and sale of scattered site homes.	Homes for Good has completed the RAD new construction.	Homes for Good has completed construction of the replacement housing and will complete scattered site sales in the summer of 2023.
Focus preservation efforts communicating with local, state and national funders to help preserve affordable housing opportunities.	Through realtor looked at all preservation housing opportunities.	Provided offer to 100-unit affordable project in Springfield through the PUSH program which gives Homes for Good first right of refusal if owner sell in the next few years.
The Landlord Liaison continues with community engagement, providing routine educational seminars for landlords and supportive service organizations. Expansion of classes include courses specifically focused on housing quality standard guidelines, thus giving landlords the education and tools needed to prepare for successful housing inspections under HUD requirements.	The Landlord Liaison provides routine education on accessing housing through Homes for Good to both landlord and community partners. The Landlord Liaison is engaged in a pilot Remote Video Inspection (RVI) program in partnership with our local VA office. The RVI process allows for remote video inspections with VA staff serving as proxy inspectors.	The Landlord Liaison position continues to provide routine education on accessing housing through Homes for Good to both landlord and community partners.
Partnered with NEDCO to provide zero interest loans for security deposits to Section 8 and VASH families.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher recipients. Over the course of FY20 14 loans were issued.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher recipients. For FY21 and as of April FY22, 17 loans have been requested. 10 were approved. 3 families have paid the loans back, 2 families defaulted and 5 are actively paying the loan back. For FY 22 and as of March 2023 – 29 applications were received, and 21 approved. 9 families have paid in full and 2 defaulted. 10 are actively paying.

Goal 6 objective: To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families.

Indicator	FY22 Progress	FY23 Progress
<p>Increase success of Section 8 participants, particularly those coming out of homelessness or transitioning from permanent supportive or transitional housing through engagement with the Housing Liaison</p> <p>Grown the Landlord Liaison offerings of support for landlords through continuous communication, trainings and sharing resources</p> <p>Awarded funding to provide monetary incentives to landlords who agree to rent to persons with high housing barriers</p>	<p>Homes for Good has expanded local preference provider partnerships to thirteen community agencies. These agencies work with high barrier populations to access housing. The Landlord Liaison provides education to local preference partners on accessing housing through Homes for Good. Several community partners also have access to EHA funds which aid with deposits and other move in related costs. As of February 2021, success rate for utilization of a tenant-based voucher was 78%.</p>	<p>The Landlord Liaison continues to provide education to local preference partners. Homes for Good has expanded partnerships and now has 23 local preference partners. Homes for Good received 184 Emergency Housing Vouchers (EHV). These vouchers are to serve homeless person, persons fleeing domestic violence and persons fleeing human trafficking. As of March 2023, we have 179 vouchers in use. 18 PHAs across Oregon were awarded EHV. These funds also provide a \$2K per household assistance option for items such as move in costs and essential household items. As of April 1, 2022, these funds have been utilized to assist 151 families.</p>
<p>Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program</p>	<p>The Housing Liaison has initiated a quarterly Housing Navigator meetup to support local Housing Navigators in increasing the success of their participants who are seeking to lease up with their Section 8 voucher and is in the process of initiating a lease up support group to help participants in building their housing portfolio, searching for housing and leasing up in available units.</p>	
<p>Monitor the payment standards and area rents on the private market to keep Section 8 families' portion of rent affordable and allow the Agency to serve the same number of families as in previous years.</p>	<p>A rent study was completed for the 2020 Fair Market Rents. Homes for Good received a 12% increase to the FMRs, which directly impact the Payment Standards utilized by those receiving tenant-based subsidies. This increase will expand housing stock (will now be able to qualify for units they once could not afford) and the dollar amount (more funds to each household) of assistance Homes for Good provides. Success rate for utilization of vouchers for 02/2019 was 69%. It grew to a success rate of 78% by 02/2021. Some of this growth in success rate can be contributed to the increase in Payment Standards. In addition, rent burden for families has decreased. Prior to the FMR study 16.7% of 4-bedroom families were paying 41% or more of their income towards rent. Post FMR study 4.8% of 4-bedroom families are paying 41% or more of their income towards rent.</p>	<p>At time of setting the Payment Standards for CY22, 3.2% of 4-bedroom families were paying more than 41% of their income towards rent. A 1.6% decrease since FMR study implementation. As of 03/2022 success rate for tenant-based voucher utilization was 62%. In 02/2022 utilization was at 70%. Some of this fluctuation can be attributed to lack of housing stock and the impacts COVID-19 has had on the community as a whole.</p> <p>At time of setting the Payment Standards for CY23, 13.9% of 4-bedroom families were paying more than 41% of their income towards rent. As of 03.2023 success rate for tenant-based voucher utilization was 67%. The increase in rent portion for families could be contributed to loss of income and/or increase in contract rent costs. We will continue to monitor this information.</p>

<p>A Homes for Good staff member serves on the board for the local Rental Owners association</p>	<p>The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association (ROA). The Landlord Liaison attends general membership meetings and contributes articles to the ROA's monthly newsletter which is distributed to 1180 members representing 18,617 rental units.</p>	<p>The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association (ROA). The Landlord Liaison position attends general membership meetings and contributes articles to the ROA's monthly newsletter which is distributed to over 1200 members representing over 20,000 rental units. The Landlord Liaison position also provides routine educational seminars for ROA members on aspects of the housing subsidy process. We have also obtained the credentials to issue Continuing Education Credits (CEUs) to participating Landlords.</p>
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Attachment C.1 Resident Advisory Board (RAB) Comments

Admissions and Continued Occupancy Policy (ACOP)

Question	Response
Could the ACOP be more clearly formatted by putting topics like Intake & Transfers next to each other?	Our ACOP template is provided by a Public Housing industry standard vendor and specifically used to meet compliance requirements. We can look at some of the formatting in future meetings. If this was a situation an applicant ran into, we would send them a letter with clear wording and information.
About Intake screening criteria: What if applicants owed money because of past program participation? Does Homes for Good have wording to clarify that we will review information based on all available information? RAB requesting added verbiage that HFG will work with individuals dependent on their situation.	We have wording that we will review all information and provide notice that they have 14 days to return documentation that the amount owed is paid or a payment plan is in place.
If someone was on multiple waitlists, would they get information at lease up that they would be removed from other waitlists?	No, this would happen after they are housed. They'd have a form or phone number to call. Removal of applicant from other waitlists once they are housed with Public Housing is to reduce time, paperwork, and confusion.
Would applicants have knowledge that they will be removed from other waitlists once they have been offered housing?	Ultimately, this is not necessary since applicants can request at any time to be returned to the waitlist.
How many waitlists can applicants be on?	As many as they want.
Is there a limit to how many waitlists I can be on if I'm housed?	No, applicants can elect to remain on other waitlists if they request. If they were removed from the waitlist, we can readd them without a lot of hoops if they weren't served from that waitlist.
Expressed concern regarding allowing applicants to remain on waitlists will create a hinderance to unhoused individuals. Suggestion to limit applicants access to 10 waitlists	Discussion regarding waitlist size not being the problem: Typically, applicants applying for housing they don't qualify for is the problem because it causes a slowdown in the process for other households on the waiting lists.
Occupancy calculator suggested for our website: When we switch over to Yardi, can we have something on the website where you put in your info and it tells you which properties you're eligible for similar to on DHS website?	This is interesting idea that we can investigate when we're further into the Yardi software conversion project.

Administrative Plan

Question	Response
What does shared housing mean?	Renting a room out of a house was not something that we used to allow but we are expanding this. Landlords can have individual leases with one room or each room occupied by S8 tenants as long as they each have their own leases.
Shared Housing: Does this include quads with shared kitchen?	No, they do not have a centralized sprinkler system so they do not meet HUD standards.
Cooperative Housing: Can Sec. 8 recipients qualify for this type of residence?	Yes. However, this is a rare case by case situation and needs further clarification.

Moving to Work (MTW) Supplement

Question	Response
Are Section 8 annuals going to be every three years?	Preliminary analysis is that it will be too costly for doing this across the board for all voucher holders. We may alter this to be triennial for those on fixed incomes instead. With moving to Yardi, the caveats are considered As we get the final analysis, we will update RAB.
Is the agency as a whole going to MTW?	<p>Homes for Good is transitioning to MTW in phases. The first phase is looking for efficiency. It will initially support our software conversion beginning in Year 1 with changes only to voucher programs covered by the Administrative Plan. In Year 2, we will begin any Public Housing MTW changes covered by the ACOP.</p> <p>Once we have staff additional capacity built in, we will look at the drawing board and be able to propose newer, creative solutions. MTW designation does not award additional funding. Getting additional flexibility from HUD does allow greater efficiency that saves us money that we can spend elsewhere. Services and resources for residents will be offered as our main goal after first year is efficiency gained within the agency (specifically our software conversion).</p>

Future RAB Discussions:

ACOP Ch. 12

- Cost of Transfer
 - Requesting in depth discussion regarding transfers in RAB meeting, subsidy overlap and getting bumped due to higher priority applicant.
 - Can we talk about transfers at RAB and how they work - they look conflicting - communication, subsidy overlap, and getting bumped in favor of other things?

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> PHA Name: <u>Homes for Good Housing Agency</u> PHA Code: <u>OR006</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>595</u> Number of Housing Choice Vouchers (HCVs) <u>3199</u> Total Combined <u>3794</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <i>The Plan and Plan Elements are available the AMP 100 office at Laurelwood Homes, AMP 200 office at McKenzie Village, AMP 300 office at Maplewood Meadows, AMP 500 office at Veneta Villa, AMP 600 office at Riverview Terrace. Home for Good's administrative offices are located at 100 W 13th Ave Eugene, OR 97401.</i> </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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		PH	HCV																								
Lead PHA:																											

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>See Attachment B.1 Revision of PHA Plan Elements See Attachment B.1.a Key Modifications ACOP FY24 See Attachment B.1.b Key Modifications Admin Plan FY24</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>See Attachment B.3 Progress Report</p>

B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/26/2022.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See Attachment C.1 RAB Comments</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing.
Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:
<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>

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<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(2\)\(i\)](#)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. ([24 CFR §903.7\(b\)](#)) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. ([24 CFR §903.7\(b\)](#)) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. ([24 CFR §903.7\(b\)](#))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. ([24 CFR §903.7\(k\)](#) and 24 CFR §903.12(b).

Safety and Crime Prevention (VAWA). A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

HOPE VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. ([Notice PIH 2011-47](#))

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. ([24 CFR §903.7\(h\)](#))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. ([24 CFR §903.7\(j\)](#))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7 \(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further

fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/28/2023

AGENDA TITLE: In the Matter of Approving Contracts 23-P-0024 (Early Design Scope) and 23-P-0025 (Architectural Services) for Ollie Court

DEPARTMENT: Real Estate Development Division

CONTACT : Matt Salazar

EXT: 2528

PRESENTER: Matt Salazar

EXT: 2528

ESTIMATED TIME : 10 minutes

- ORDER/RESOLUTION**
- PUBLIC HEARING/ORDINANCE**
- DISCUSSION OR PRESENTATION (NO ACTION)**
- APPOINTMENTS**
- REPORT**
- PUBLIC COMMENT ANTICIPATED**

Approval Signature

EXECUTIVE DIRECTOR:

A handwritten signature in black ink, appearing to be "MS", is written over a horizontal line.

DATE: 06.20.2023

LEGAL STAFF :

DATE:

MANAGEMENT STAFF:

DATE:



HOMES FOR GOOD MEMORANDUM

REFERENCE DOCUMENT

TO: Homes for Good Board of Commissioners

FROM: Matt Salazar, Project Developer

TITLE: In the Matter of Approving Contracts 23-P-0024 (Early Design Scope) and 23-P-0025 (Architectural Services) for Ollie Court

DATE: June 28th, 2023

MOTION:

It is moved that the Homes for Good Board of Commissioners authorize the Executive Director or Designee to award contracts 23-P-0024 (Early Design Scope) and 23-P-0025 (Architectural Services) to PIVOT Architecture for Ollie Court at 1520 W. 13th Avenue in Eugene, Oregon.

DISCUSSION:

A. Issue

Homes for Good Housing Agency is developing a new 81-unit multifamily housing community and early learning center on a 3.06-acre parcel of land located in the Jefferson Westside neighborhood of Eugene, Oregon. Architectural design development work is commencing on this development, with a target of starting construction in July 2024, necessitating these contracts to be executed.

B. Background

The site, also known as the Naval Reserve site, was made available by the city of Eugene through the HOME Request for Proposals (RFP) in September 2022 for the development of affordable housing. In November 2022, Homes for Good submitted a proposal which was approved by the Eugene-Springfield HOME Consortium Governing Board in February 2023. Homes for Good has worked with PIVOT Architecture to develop a conceptual design and Chambers Construction to prepare a budget estimate as part of application materials for the HOME RFP, Project-Based Vouchers RFP, the city of Eugene SDC Exemption RFP, and the Oregon Housing and Community Services (OHCS) Local Innovation and Fast Track (LIFT) Notice of Funding Availability (NOFA). An application for the OHCS LIFT NOFA was submitted by Homes for Good staff in March 2023, and Homes for Good will be notified of the status of this application in August 2023.



To facilitate ongoing design work needed to achieve scheduling targets, the full scope of Architectural Services is split into two contracts. Contract 23-P-0024 (Early Design Scope) covers early design work needed prior to the notice of funding award expected from OHCS in August 2023. Contract 23-P-0025 (Architectural Services) covers all work that would be performed after this date if funding is awarded to this project.

Ollie Court will be an 81-unit multifamily housing community serving singles and families. The development on this property will consist of two 4-story, elevator-served buildings with a mix of one-, two- and three-bedroom apartments, common areas, and space for supportive services. A 10,000 square foot Early Learning Center consisting of five classrooms, movement space, and offices would be located on the ground floor of one of the buildings.

C. Analysis

In December 2019, Homes for Good put out a Request for Proposals for Architect/Engineer Price Agreements in order to develop a pool of architectural firms to choose for future projects. Of 9 applicants, four firms were selected for this pool based on such factors as experience, local knowledge, design approach, DEI strategies, and capacity. PIVOT Architecture was among these four selected firms.

PIVOT was selected from this pool for the Ollie Court project because of years of groundwork the firm has laid in building relationships with local early learning providers with the goal of designing a project that co-locates affordable housing with an early learning center. Homes for Good previously executed Contract 22-P-0048 with PIVOT Architecture in October 2022 for Preliminary Design scope necessary for previous funding applications. The amount of this contract was \$53,000.

The contract amount for the Early Design Scope is \$100,000 and the amount for the Architectural Services Scope is \$1,652,980 including contingencies). Board approval for the Early Design Scope is being sought because the contact amount combined with the contract amount for prior preliminary design work exceeds the threshold for Board approval.

D. Furtherance of the Strategic Equity Plan

In furtherance of the Strategic Equity Plan (SEP)'s goal of supporting non-profits through preferences and partnerships, Homes for Good is exploring a variety of preferences and partnerships for this project with a particular focus on preferences that will allow low-income families and Black, Indigenous, and other People of Color (BIPOC) to access this housing and services. Foremost among these partnerships are those with the childcare providers who will allow low-income families throughout the community at-large increased access to childcare. Staff at PIVOT Architecture have been active in collaborating with Homes for Good staff and staff of BIPOC-serving partner agencies to receive and incorporate design feedback to best serve the needs of these populations.



Additionally, this project and the development of new affordable housing units also furthers the SEP's goal of continuing affordable housing production. The approach of maximizing the number of units that can be fit onsite into two four-story buildings also represents a commitment to "experiment with housing types and scale."

E. Alternatives & Other Options

The board could choose to approve both contracts in order to meet scheduling goals for design and construction. This approach would give PIVOT Architecture the most assurance compared with the two alternatives listed below.

One alternative for consideration is approval of only the Early Design Scope at this stage and considering the Architectural Services Scope at the August board meeting after notice of funding award. No project delays are expected from this approach but would require another board order.

A final alternative is to approve neither contract and ask staff to engage with another architect for this project. With this option, Homes for Good will need to stop the Early Design Scope, which would delay the start of construction by approximately two months. A delay would push the start of construction into the wet season and would increase construction costs.

F. Timing & Implementation

Upon approval of the Order, Homes for Good will execute the contract for Early Design Scope immediately. The Architectural Services contract will be executed after OHCS funding award notification in August. If all sources of funding are secured, the estimated timeline is to start construction in summer 2024 with completion in summer/fall 2025.

G. Recommendation

It is recommended that the Board of Commissioners approve the attached board order to allow Homes for Good Housing Agency to execute contracts for Early Design Scope as well as Architectural Services with PIVOT Architecture.

H. Follow Up

If successful in the OHCS NOFA, there will be future approvals needed from the board to move forward with development of the site. These board orders will include approval for the formation of Limited Partnerships, entering into the construction contract, and final approval of the borrowing and financing.

I. Attachments

None

IN THE BOARD OF COMMISSIONERS OF THE
HOMES FOR GOOD HOUSING AGENCY, OF LANE COUNTY OREGON

ORDER 23-28-06-02H

In the Matter of Approving Contracts 23-P-0024 (Early Design Scope) and 23-P-0025 (Architectural Services) for Ollie Court

WHEREAS, Housing and Community Services Agency of Lane County doing business as Homes for Good Housing Agency (the "Authority") is a public body corporate and politic, exercising public and essential governmental functions, and having all the powers necessary or convenient to carry out and effectuate the purposes of the ORS 456.055 to 456.235 (the "Housing Authorities Law"); and

WHEREAS, a purpose of the Authority under the Housing Authorities Law is to construct, acquire, manage, and operate affordable housing for persons of lower income; and

WHEREAS, the Authority has been collaborating with Head Start of Lane County and Early Childhood CARES to innovate ways of co-locating early learning services with affordable housing; and

WHEREAS, the Authority has the need for professional Architectural Services in order to carry out the development of the Ollie Court co-location development; and

WHEREAS, the Authority has the need for Early Design work to be performed before notice of Oregon Housing and Community Services Local Innovation and Fast Track (LIFT) funding award in order to meet previously identified timelines for the development of the Ollie Court co-location development; and

WHEREAS, the Authority has completed a formal procurement process for the selection of PIVOT Architecture to provide Early Design Scope as well as Architectural Services.

NOW IT IS THEREFORE ORDERED THAT:

The Executive Director or Designee is authorized to enter into an Early Design Scope Contract and an Architectural Services Contract with PIVOT Architecture for Ollie Court.

DATED this _____ day of _____, 2023

Vice-Chair, Homes for Good Board of Commissioners

Secretary, Homes for Good Board of Commissioners



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/28/2023

AGENDA TITLE: In the Matter of Authorizing the Transfer of Property at 375 Iowa Street in Eugene Oregon to Sponsors Inc.

DEPARTMENT: Real Estate Development Division

CONTACT : Steve Ochs

EXT: 2530

PRESENTER: Steve Ochs

EXT: 2530

ESTIMATED TIME : 15 Minutes

- ORDER/RESOLUTION**
- PUBLIC HEARING/ORDINANCE**
- DISCUSSION OR PRESENTATION (NO ACTION)**
- APPOINTMENTS**
- REPORT**
- PUBLIC COMMENT ANTICIPATED**

Approval Signature

EXECUTIVE DIRECTOR:

DATE: 06.20.2023

LEGAL STAFF :

DATE:

MANAGEMENT STAFF:

DATE:



HOMES FOR GOOD MEMORANDUM

TO: Homes for Good Board of Commissioners

FROM: Steve Ochs, Real Estate Development Director

TITLE: In the Matter of Authorizing the transfer of property at 375 Iowa Street in Eugene Oregon to Sponsors, Inc.

DATE: June 28th, 2023

MOTION:

It is moved that the Agency is authorized to transfer property at 375 Iowa Street in Eugene Oregon to Sponsors, Inc.

DISCUSSION:

A. Issue

Homes for Good Housing Agency owns property consisting of two parcels (Map and Tax lots 17-04-26-24-00300 and 17-04-26-24-00301) totaling 0.41 acres at 375 Iowa Street in Eugene Oregon that has been developed with affordable housing by Sponsor, Inc. and need to be transferred to Sponsors Inc.

B. Background

Sponsors, Inc., and Homes for Good partnership goes back many years. In August of 2007, prior to construction of Roosevelt Crossing (2010) Sponsors, Inc. purchased two parcels of land, one located at 338 Highway 99 N and a second property at 375 Iowa Street in Eugene. The property at 375 Iowa Street was purchased for \$210,000.

At the time the plan was to build the new Roosevelt Crossing facility on the Hwy 99 property and to build a warehouse on the Iowa Street property. As development it became apparent that an easement would be needed from the property owner of a warehouse located directly behind the Hwy 99 property to properly access the property on Iowa Street. The owner of the property was not amenable to an easement but offered to sell the property with warehouse. The lot with the warehouse was contiguous to the site being planned for development of for Roosevelt Crossing.

As a result, Sponsors, Inc. purchased of the warehouse property which then negated the need to develop the Iowa Street property. Sponsors, Inc. transferred the property to Homes for Good (then Housing and Community Services Agency of Lane County) as



Homes for Good could hold the property without paying taxes, with the understanding that the property would be transferred back to Sponsors when the site was developed or sold.

In 2019 Sponsors developed the 375 Iowa Street property with Jeffrey Commons which consist of 10 Tiny Homes which serve a permanent housing for clients of Sponsors.

C. Analysis

Jeffrey Commons, consisting of 10 Tiny Homes was developed solely by Sponsors Inc. and provides affordable housing for Sponsor Inc. There is no need for Homes for Good to continue to own the property. There is in fact some risk in continuing to own the property from a liability perspective while not have control over the use.

D. Furtherance of the Strategic Equity Plan

This land transfer is not directly related to current goals in the Strategic Equity Plan but does continue to further the valuable partnership Homes for Good has with Sponsor's Inc. in helping to help people rebuild their lives after being incarcerated.

E. Alternatives & Other Options

If this board order is not approved Homes for Good would retain ownership of the property and would need to discuss further with Sponsors, Inc. when and how a transfer of the property would occur.

F. Timing & Implementation

Once the board order is passed the necessary documents will be executed to facilitate the transfer of the property.

G. Recommendation

It is recommended that the Board of Commissioners authorize Homes for Good to transfer property at 375 Iowa Street in Eugene Oregon to Sponsors, Inc.

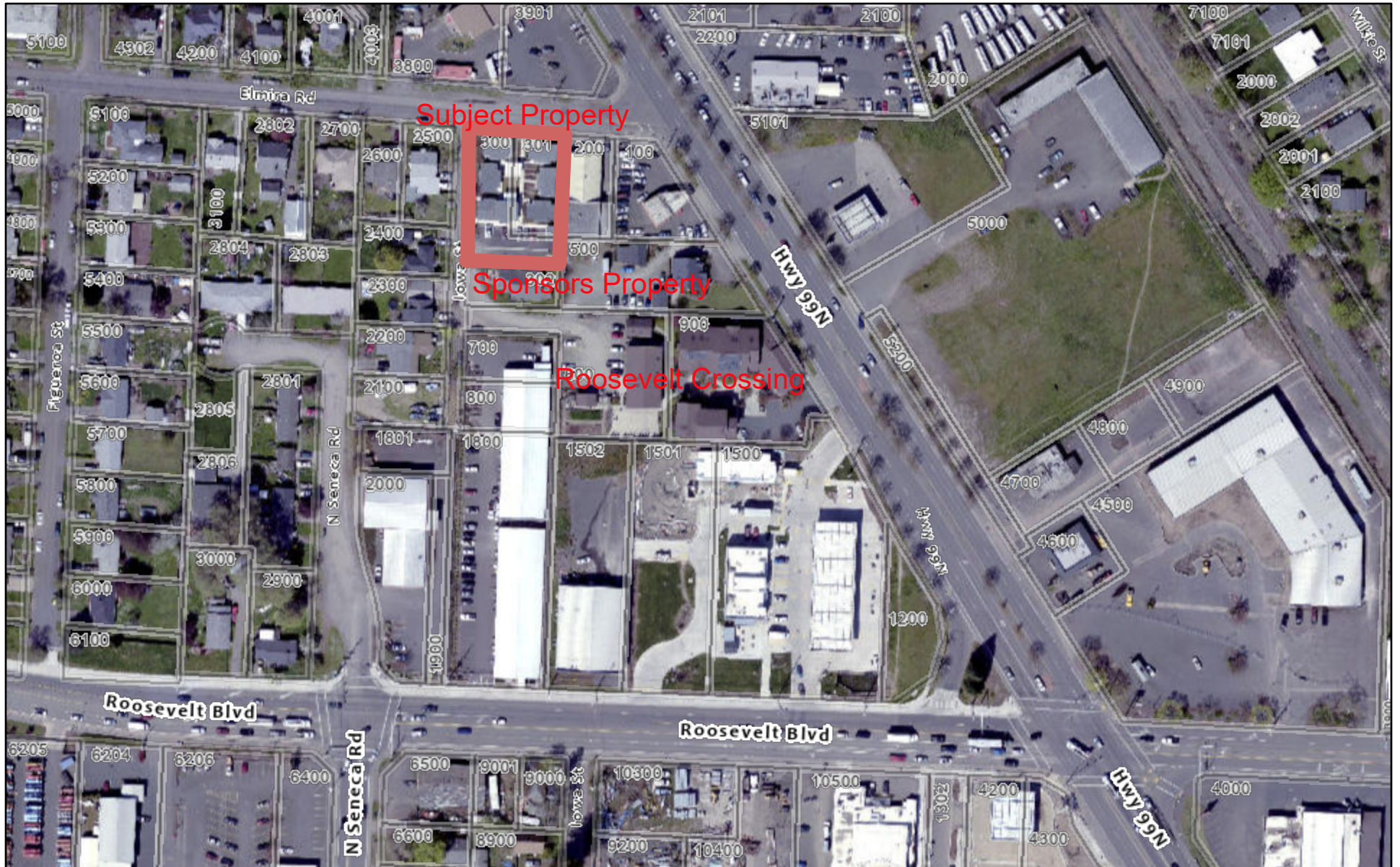
H. Follow Up

No other board action is required to facilitate the land transfer, but an update will be provided to the board once the transfer has occurred.

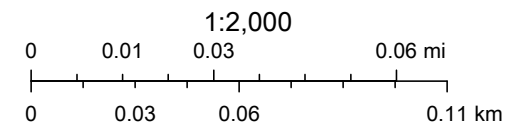
I. Attachments

- Exhibit A: Vicinity Map 375 Iowa Street
- Exhibit B: Deeds of Trust

Ex A Vicinity Map Iowa Street



6/16/2023, 9:33:00 AM



①

F O CASCADE TITLE CO.



Division of Chief Deputy Clerk
Lane County Deeds and Records

2007-056131



\$31.00

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08/10/2007 09:48:53 AM

RPR-DEED Cnt=1 Stn=9 CASHIER 04
\$10.00 \$11.00 \$10.00

TITLE NO. 0254897MB
ESCROW NO. EU07-1441
TAX ACCT. NO. 451193
TAX ACCT. NO. 451201
MAP/TAX LOT NO. 17 04 26 2 4 00300
MAP/TAX LOT NO. 17 04 26 2 4 00301

WARRANTY DEED -- STATUTORY FORM

KYU CHIN HWANG, Grantor,

conveys and warrants to

SPONSORS, INC., an Oregon Corporation, Grantee,

the following described real property free of encumbrances except as specifically set forth herein:

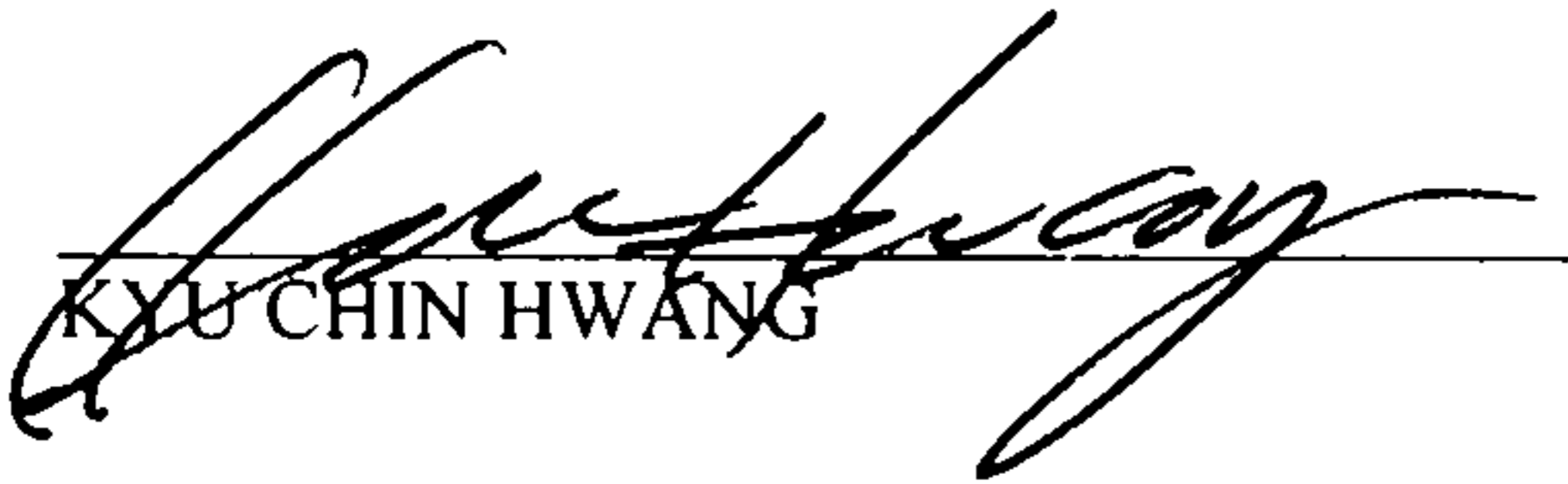
SEE EXHIBIT A WHICH IS MADE A PART HEREOF BY THIS REFERENCE

BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON TRANSFERRING FEE TITLE SHOULD INQUIRE ABOUT THE PERSON'S RIGHTS, IF ANY, UNDER ORS 197.352. THIS INSTRUMENT DOES NOT ALLOW USE OF THE PROPERTY DESCRIBED IN THIS INSTRUMENT IN VIOLATION OF APPLICABLE LAND USE LAWS AND REGULATIONS. BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON ACQUIRING FEE TITLE TO THE PROPERTY SHOULD CHECK WITH THE APPROPRIATE CITY OR COUNTY PLANNING DEPARTMENT TO VERIFY APPROVED USES, TO DETERMINE ANY LIMITS ON LAWSUITS AGAINST FARMING OR FOREST PRACTICES AS DEFINED IN ORS 30.930 AND TO INQUIRE ABOUT THE RIGHTS OF NEIGHBORING PROPERTY OWNERS, IF ANY, UNDER ORS 197.352.

Except the following encumbrances:
2007/08 TAXES WHICH ARE A LIEN BUT NOT YET DUE AND PAYABLE.
COVENANTS, CONDITIONS, RESTRICTIONS AND EASEMENTS OF RECORD.

The true consideration for this conveyance is \$210,000.00 .


Dated this 8th day of August, 2007.


KYU CHIN HWANG

State of Oregon
County of LANE

This instrument was acknowledged before me on August 8, 2007 by KYU CHIN HWANG.




(Notary Public for Oregon)
My commission expires 9.16.09

KYU CHIN HWANG
84885 SOUTH WILLAMETTE STREET #
C
EUGENE, OR 97405
GRANTOR'S NAME AND ADDRESS

Until a change is requested
all tax statements shall be
sent to the following address:
SAME AS GRANTEE

SPONSORS, INC.
C/O RON CHASE
1756 WILLAMETTE STREET
EUGENE, OR 97401
GRANTEE'S NAME AND ADDRESS

After recording return to:
CASCADE TITLE CO.
811 WILLAMETTE
EUGENE, OR 97401

PROPERTY DESCRIPTION

Beginning at a point on the South right of way line of County Road No. 1167 (Elmira Road), 2085.6 feet South and 868.32 feet South 87° 40' East from the Northwest corner of the Solomon Zumwalt Donation Land Claim No. 41, Township 17 South, Range 4 West of the Willamette Meridian; thence North 87° 40' West, 62.72 feet; thence South 0° 19' West 213.7 feet; thence South 89° 12' 30" East, 124.0 feet; thence North 0° 19' East, 85.8 feet; thence West 61.33 feet; thence North 0° 19' West, 127.34 feet to the point of beginning, in Lane County, Oregon;

EXCEPT that tract of land conveyed to State of Oregon, by and through its State Highway Commission, by deed recorded October 5, 1971, Reception No. 66929, Lane County Official Records, in Lane County, Oregon.

ALSO: Beginning at a point on the South line of County Road No. 1167, 2085.6 feet South and 929.69 feet South 87° 40' East from the Northwest corner of the Solomon Zumwalt Donation Land Claim No. 41, Township 17 South, Range 4 West of the Willamette Meridian; thence South 0° 19' West, 125.2 feet, more or less, to the Northwest corner of the tract conveyed to Arthur Hennigan and wife, by deed recorded January 28, 1936, in Book 181, Page 408, Lane County Oregon Deed Records; thence West 61.33 feet; thence North 127.34 feet to the South line of said County Road; thence South 87° 40' East along the South line of said road, 61.37 feet to the place of beginning, in Lane County, Oregon.

20
10
11

7199-1182300

After Recording Return To
First American Title
PO Box 10146
Eugene, OR 97440



After recording return to:
Housing Authority and Community
Services Agency of Lane County
177 Day Island
Eugene, OR 97401

Until a change is requested all tax statements
shall be sent to the following address:
Housing Authority and Community
Services
177 Day Island
Eugene, OR 97401

File No.: NCS-338825-OR1 (tc)
Date: February 12, 2008

Division of Chief Deputy Clerk
Lane County Deeds and Records

2008-008470



\$41.00

00976078200800084700040048

02/15/2008 01:18:45 PM

RPR-DEED Cnt=1 Stn=6 CASHIER 07
\$20.00 \$11.00 \$10.00

STATUTORY WARRANTY DEED

SPONSORS, INC., an Oregon corporation, Grantor, conveys and warrants to Housing Authority and Community Services Agency of Lane County, Grantee, the following described real property free of liens and encumbrances, except as specifically set forth herein:

See Exhibit "A" attached hereto and incorporated herein by this reference

Subject to:

1. The rights of the public in and to that portion of the premises herein described lying within the limits of streets, roads and highways.

The true consideration for this conveyance is **\$210,000.00**. (Here comply with requirements of ORS 93.030)

APN:

Statutory Warranty Deed
- continued

File No.: **NCS-338825-OR1 (tc)**
Date: **02/12/2008**

BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON TRANSFERRING FEE TITLE SHOULD INQUIRE ABOUT THE PERSON'S RIGHTS, IF ANY, UNDER ORS 195.300, 195.301 AND 195.305 TO 195-336 AND SECTIONS 5 TO 11, OF CHAPTER 424, OREGON LAWS 2007. THIS INSTRUMENT DOES NOT ALLOW USE OF THE PROPERTY DESCRIBED IN THIS INSTRUMENT IN VIOLATION OF APPLICABLE LAND USE LAWS AND REGULATIONS. BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON ACQUIRING FEE TITLE TO THE PROPERTY SHOULD CHECK WITH THE APPROPRIATE CITY OR COUNTY PLANNING DEPARTMENT TO VERIFY THAT THE UNIT OF LAND BEING TRANSFERRED IS A LAWFULLY ESTABLISHED LOT OR PARCEL, AS DEFINED IN ORS 92.010 OR 215.010, TO VERIFY THE APPROVED USES OF THE LOT OR PARCEL, TO DETERMINE ANY LIMITS ON LAWSUITS AGAINST FARMING OR FOREST PRACTICES AS DEFINED IN ORS 30.930 AND TO INQUIRE ABOUT THE RIGHTS OF NEIGHBORING PROPERTY OWNERS, IF ANY, UNDER ORS 195.300, 195.301 AND 195.305 TO 195-336 AND SECTIONS 5 TO 11, OF CHAPTER 424, OREGON LAWS 2007.

Dated this 14th day of February, 2008.

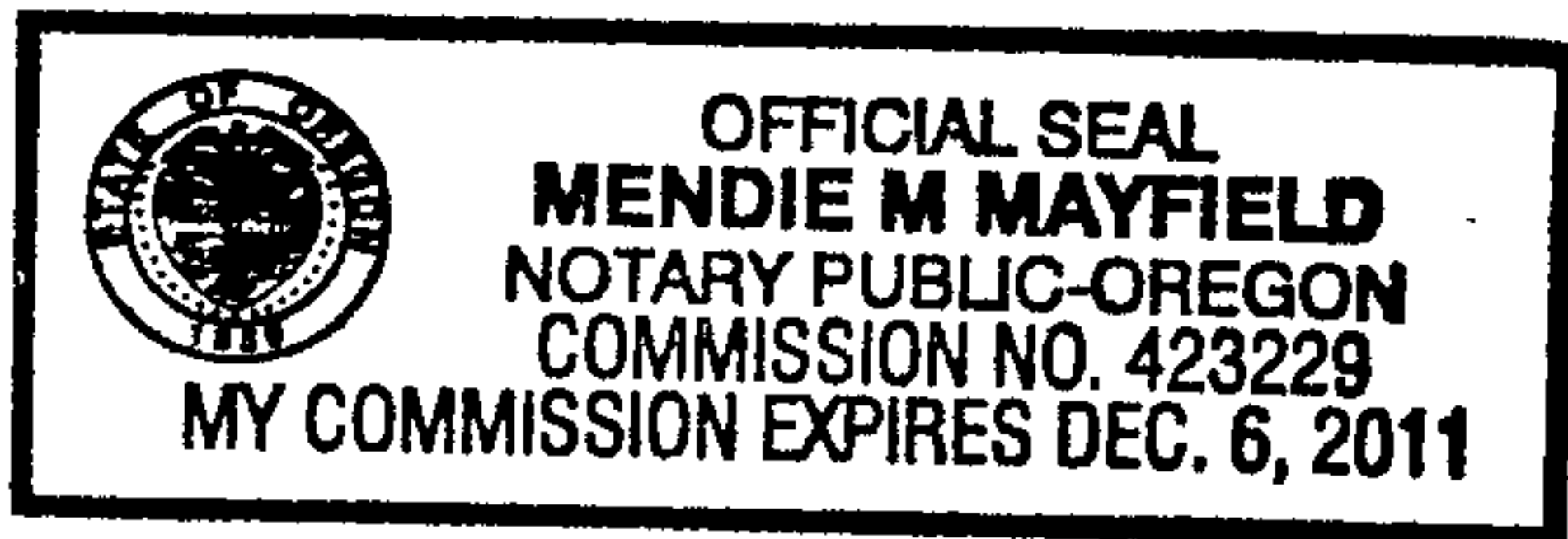
SPONSORS, INC., an Oregon corporation

By: Richard Greene, Chairman

By: Ron Chase, Executive Director

STATE OF Oregon)
)ss.
County of Lane)

This instrument was acknowledged before me on this 14th day of February, 2008 by Richard Greene as Chairman of SPONSORS, INC., on behalf of the corporation.



Print Name: Mendie M Mayfield
Notary Public for Oregon
My commission expires: : 12-6-11

APN:

Statutory Warranty Deed
- continued

File No.: **NCS-338825-OR1 (tc)**
Date: **02/12/2008**

STATE OF Oregon)
)ss.
County of Lane)

This instrument was acknowledged before me on this 14th day of February, 2008
by Ron Chase as Executive Director of SPONSORS, INC., on behalf of the corporation.

Mendie M. Mayfield
Print Name: Mendie M. Mayfield
Notary Public for Oregon
My commission expires: : 12-6-11

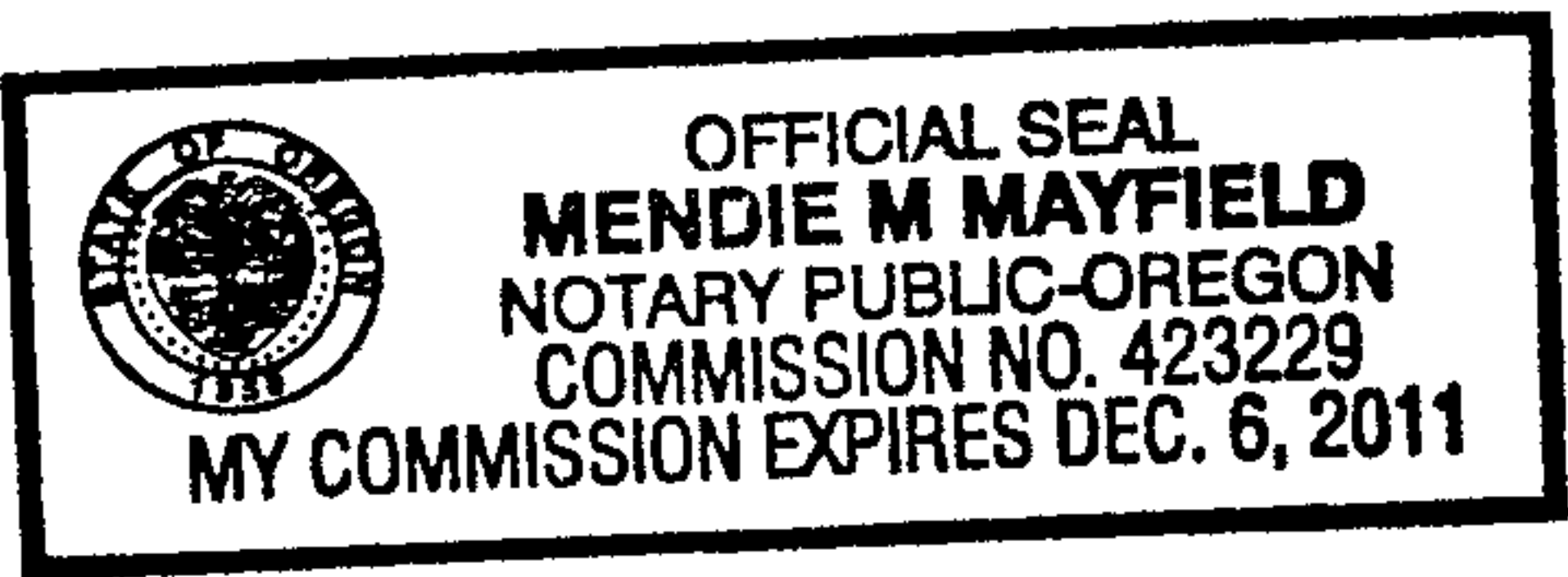


EXHIBIT A

LEGAL DESCRIPTION:

BEGINNING AT A POINT ON THE SOUTH RIGHT OF WAY LINE OF COUNTY ROAD NO. 1167 (ELMIRA ROAD), 2085.6 FEET SOUTH AND 868.32 FEET SOUTH 87° 40' EAST FROM THE NORTHWEST CORNER OF THE SOLOMON ZUMWALT DONATION LAND CLAIM NO. 41, TOWNSHIP 17 SOUTH, RANGE 4 WEST OF THE WILLAMETTE MERIDIAN; THENCE NORTH 87° 40' WEST, 62.72 FEET; THENCE SOUTH 0° 19' WEST 213.7 FEET; THENCE SOUTH 89° 12' 30" EAST, 124.0 FEET; THENCE NORTH 0° 19' EAST, 85.8 FEET; THENCE WEST 61.33 FEET; THENCE NORTH 0° 19' WEST, 127.34 FEET TO THE POINT OF BEGINNING, IN LANE COUNTY, OREGON;

EXCEPT THAT TRACT OF LAND CONVEYED TO STATE OF OREGON, BY AND THROUGH ITS STATE HIGHWAY COMMISSION, BY DEED RECORDED OCTOBER 05, 1971, RECEPTION NO. 66929, LANE COUNTY OFFICIAL RECORDS, IN LANE COUNTY, OREGON.

ALSO: BEGINNING AT A POINT ON THE SOUTH LINE OF COUNTY ROAD NO. 1167, 2085.6 FEET SOUTH AND 929.69 FEET SOUTH 87° 40' EAST FROM THE NORTHWEST CORNER OF THE SOLOMON ZUMWALT DONATION LAND CLAIM NO. 41, TOWNSHIP 17 SOUTH, RANGE 4 WEST OF THE WILLAMETTE MERIDIAN; THENCE SOUTH 0° 19' WEST, 125.2 FEET, MORE OR LESS, TO THE NORTHWEST CORNER OF THE TRACT CONVEYED TO ARTHUR HENNIGAN AND WIFE, BY DEED RECORDED JANUARY 28, 1936 IN BOOK 181, PAGE 408, LANE COUNTY OREGON DEED RECORDS; THENCE WEST 61.33 FEET; THENCE NORTH 127.34 FEET TO THE SOUTH LINE OF SAID COUNTY ROAD; THENCE SOUTH 87° 40' EAST ALONG THE SOUTH LINE OF SAID ROAD, 61.37 FEET TO THE PLACE OF BEGINNING, IN LANE COUNTY, OREGON.

THIS LEGAL DESCRIPTION WAS CREATED PRIOR TO JANUARY 01, 2008.

IN THE BOARD OF COMMISSIONERS OF THE
HOMES FOR GOOD HOUSING AGENCY, OF LANE COUNTY OREGON

ORDER 23-28-06-03H

In the Matter of Authorizing the Transfer of
Property at 375 Iowa Street in Eugene
Oregon to Sponsors, Inc.

WHEREAS, Housing and Community Services Agency of Lane County doing business as Homes for Good Housing Agency (the "Authority") is a public body corporate and politic, exercising public and essential governmental functions, and having all the powers necessary or convenient to carry out and effectuate the purposes of the ORS 456.055 to 456.235 (the "Housing Authorities Law");

WHEREAS, Homes for Good Housing Agency partnered with Sponsors, Inc. to construct Roosevelt Crossing, a housing facility serving those exiting incarceration;

WHEREAS, Sponsors Inc. purchased two parcels of land at 375 Iowa Street and subsequently sold the property to the "Authority" to hold until the property was developed or sold;

WHEREAS, Sponsor's Inc, developed Jeffrey Commons, a 10-unit affordable housing community on the site in 2019;

NOW IT IS THEREFORE ORDERED THAT:

The Executive Director or Designee is authorized to transfer the property at 375 Iowa Street consisting of Map and Tax lots 17-04-26-24-00300 and 17-04-26-24-00301 to Sponsors Inc. for

DATED this _____ day of _____, 2023

Vice-Chair, Homes for Good Board of Commissioners

Secretary, Homes for Good Board of Commissioners



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/28/2023

AGENDA TITLE: In the Matter of Approving the Submission of the PHA FY2024 Move to Work Supplement Plan

DEPARTMENT: Rent Assistance Division

CONTACT : Beth Ochs

EXT: 2547

PRESENTER: Beth Ochs

EXT: 2547

ESTIMATED TIME : 15 minutes

- ORDER/RESOLUTION**
- PUBLIC HEARING/ORDINANCE**
- DISCUSSION OR PRESENTATION (NO ACTION)**
- APPOINTMENTS**
- REPORT**
- PUBLIC COMMENT ANTICIPATED**

Approval Signature

EXECUTIVE DIRECTOR:

A handwritten signature in black ink, appearing to be "JAF", is written over a horizontal line.

DATE: 06.20.2023

LEGAL STAFF :

DATE:

MANAGEMENT STAFF:

DATE:



HOMES FOR GOOD MEMORANDUM

TO: Homes for Good Board of Commissioners

FROM: Beth Ochs, Rent Assistance Division Director

TITLE: In the Matter of Approving the Submission of the PHA FY2024 Move to Work Supplement Plan and MTW Certifications of Compliance

DATE: June 28th, 2023

MOTION:

Seeking Board Approval to:
Approve the Submission of the PHA FY2024 Move to Work (MTW) Supplement Plan and MTW Certifications of Compliance

DISCUSSION:

A. Issue

Homes for Good is seeking approval to submit its first MTW Supplement Plan and MTW Certifications of Compliance. The plan will be a supplement to the Administrative Plan and will identify the MTW Waivers Homes for Good will implement.

B. Background

On May 5, 2022, Homes for Good entered into the Moving to Work Amendment to Annual Contributions Contract. Under this contract, Homes for Good is required to abide by the MTW Operations Notice in the creation of its MTW Supplement Plan.

C. Analysis

The MTW Operations Notice provides regulatory guidance on what waivers a Public Housing Agency (PHA) is required to complete an analysis for as part MTW Supplement process.

For the waivers Homes for Good has selected, analysis was required for the re-examination schedule for annual income review. The initial proposal is to move from an annual income review process to a triennial income review income review process.

The implementation of this change will not take effect until Homes for Good has converted to our new software system, Yardi.

In completing the analysis, we focused on two key areas: disparate impact based on demographics and

financial impact to Homes for Good.

The analysis concluded that there would be a negative financial impact to Homes for Good in implementing this change, an approximate 3% increase in Housing Assistance Payment (HAP) expense, approx. 1.2million dollars.

The analysis concluded that no households would see a negative impact due to the policy change. The analysis did show that some households had a more positive impact than others:

- Large households would have more increases in income and those increases would be larger than other groups since there are more household members to earn income and a larger household to sustain;
- Elderly and disabled households saw increases in income, but this was mainly due to fixed income increases and the amounts were marginal;
- There was not a significant difference in the impact on households based on race or ethnicity and the most disproportionate impact (Native Hawaiian/Pacific Islander) is likely due to the small number of households in that group.
- The higher a household's income is, the more likely they are to have an increase in income and higher the increase in income is likely to be.

The remaining waivers Homes for Good is seeking to implement do not require an analysis. A full list of the requested waivers is contained in the attached MTW Waivers Narrative.

Homes for Good did not receive any public comment during the public hearing process for the MTW Supplement.

Homes for Good engaged with the RAB in the formation of the MTW Supplement Plan. The RAB contains membership of both Public Housing and Housing Choice Voucher Program participants.

D. Furtherance of the Strategic Equity Plan

Implementing the MTW Supplement Plan is in alignment with our overall Strategic Equity Plan. It is the overall goal of Homes for Good to implement administrative efficiencies where they can be obtained in order to create bandwidth for work product that is tied to our Strategic Equity Plan.

E. Alternatives & Other Options

Homes for Good could choose to implement some of the proposed waivers, none of the proposed waivers or all of the proposed waivers.

Implementing none of the waivers would reduce the administrative efficiencies and timely access to housing that Homes for Good is seeking to gain under MTW. For example, inspecting units we own instead of having contracted entities complete this process.

Once Yardi is in place, Homes for Good will revisit the negative financial impact that the triennial recertification process would result in. At that time, we will investigate other waivers that may offset that cost and bring to the board for further discussion/approval.

F. Timing & Implementation

Following Board Approval:

Homes for Good will submit the MTW Supplement Plan, MTW Certifications of Compliance and Impact Analysis to HUD for approval. Once approval is obtained, the MTW Supplement Plan will become a supplemental document to the Administrative Plan for FY2024.

G. Recommendation

Homes for Good recommends the board approve the request to approve the MTW Supplement Plan and the MTW Certifications of Compliance.

H. Follow Up

Homes for Good will monitor the impacts of the MTW Supplement Plan and will collaborate with Yardi on any furtherance of the triennial recertification process.

I. Attachments

- Impact Analysis for Waiver 3.b Alternative Reexamination Schedule for Households (HCV)
- MTW Waiver Narratives
- MTW Certifications of Compliance

Impact Analysis for Waiver 3.b Alternative Reexamination Schedule for Households (HCV)

June 9, 2023

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DEMOGRAPHIC IMPACT	5
OTHER IMPACT ANALYSIS QUESTIONS	6
CONCLUSIONS	7

Description of the Waiver

Homes for Good proposes to implement a triennial reexamination schedule for all Housing Choice Voucher (HCV) households other than those in the Homeownership or Foster Youth Initiative (FYI) programs. Under this waiver, households in the HCV program will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:

1. Approved rent increases will use an interim 50058 and will apply the most current payment standard.
2. Homes for Good will conduct an interim reexamination when an adult household member is added and not when a minor household is added.
3. If a family moves into a new unit, a full reexamination will be conducted, and the household’s reexamination schedule will be reset.

This standard waiver is dependent on Homes for Good implementation of a new software system that can generate and submit the HUD Expansion 50058. Homes for Good current software is unable to generate the Expansion 50058, which will be required for implementing this activity.

Definitions Used in this Analysis

- **Work able:** household does not receive an elderly/disabled allowance.
- **Race and ethnicity:** race and ethnicity applies to the head of household only, not other individual household members.
- **Large families:** a family of four (4) or more members.
- **ELI:** Extremely Low Income, equal to 30% or less of the area median income
- **VLI:** Very Low Income, equal to income between 30% and 50% of the area median income
- **LI:** Low Income, equal to income between 50% and 80% of the area median income

Impact Analysis Method

The Homes for Good team first selected the metrics to review based on anticipated impact of the waiver. The chart below shows the metrics and the method for analysis. The results of these data points informed the other subsequent analysis of the impact on the agency’s finances and households by demographic and will help Homes for Good to set a baseline for analyzing the impact of this activity in the future.

Data Point	Data Analysis Method
Number of fixed income households	Review most recent 50058 data
Number of work able households	Review most recent 50058 data
Number of near-elderly households (will turn 62 in next three years)	Review most recent 50058 data
Annual staff time in hours to process recertifications (no interims)	Staff survey, timing exercises, other means
Annual postage cost to mail certification documents to households (if applicable and no interims)	HAB Financial Statement
Average number of interims due to decrease in income over last 3 years.	Review of last 3 years of 50058 data
Average number of interims due to decrease in income over last 3 years for fixed income households. Decreased in income or increase in expenses.	Review of last 3 years of 50058 data
Average decrease in income for interims downs	Review of last 3 years of 50058 data

Data Point	Data Analysis Method
Average tenant rent decrease for interim downs	Last 3 years of 50058 data exported from HAB or HAB report showing this information
Average decrease in income for interims downs (fixed income)	Review of last 3 years of 50058 data
Average tenant rent decrease for interim downs (fixed income)	Review of last 3 years of 50058 data
Number of zero-income households	Review most recent 50058 data
Number of work able households with no earned income	Review most recent 50058 data
Number of work able households with income from a temporary source (TANF, GA, child support, unemployment, other non-wage)	Review most recent 50058 data
Number of households with 1 or more members who will turn 18 within the next 3 years	Review most recent 50058 data

These metrics were assigned to members of the project team, who then gathered the required data elements. Next, an in-depth analysis was performed using 50058 data from the last three (3) years. The goal of the analysis is to identify the following:

1. Financial impact to the agency
2. Disparate impact based on demographics

Answers to the other impact analysis questions were derived from these analyses. Note that Homes for Good does not anticipate the policy changes to have a negative impact on any specific households, but instead measured the positive impact to identify cases where certain groups were impacted more positively than others. The analysis confirmed that there will not be a negative impact to the families currently on program. However, the analysis also shows that fewer families may be able to be served in the future due to these changes.

Results

Data Point used in the Analysis

The chart below shows the results for the original data points measured.

Data Point	Result
Number of fixed income households	2,603
Number of work able households	978
Number of near-elderly households (will turn 62 in next three years)	327

Data Point	Result
Annual staff time in hours to process recertifications (no interims) – includes houses spent on hearings for missing paperwork, processing follow-up letters, etc.	737.25 Hours per month
Annual postage cost to mail certification documents to households (if applicable and no interims)	\$12,805.58
Average number of interims due to decrease in income over last 3 years.	531
Average number of interims due to decrease in income over last 3 years for fixed income households. Decreased in income or increase in expenses.	201
Average decrease in income for interims downs (per year)	\$10,900.00
Average tenant rent decrease for interim downs (per month)	\$220.00
Average decrease in income for interims downs (fixed income – per year)	\$8,808.00
Average tenant rent decrease for interim downs (fixed income – per month)	\$187.00
Number of zero-income households	170
Number of work able households with no earned income	520
Number of work able households with income from a temporary source (TANF, GA, child support, unemployment, other non-wage)	493
Number of households with 1 or more members who will turn 18 within the next 3 years	427

Financial Impact to the Agency

Based on its analysis, Homes for Good determined that this policy change will have a negative impact to the agency’s HAP expenses, increasing annual HAP expenditures by \$1,199,938 per year, a 3% increase. This is measured by looking at the increases in income that has been processed over the last three years and the associated increase in rent and decrease in HAP. By changing the review cycle to every three (3) years, the incremental decreases in HAP expense will not be realized. The chart below shows a summary of this analysis.

Metric	All HH's	Formula	Questions / Comments
- Control: Number of Annuals Last 3 Years	10,455		"Annuals" also includes move ins and port ins; limited to VO program only
a. Avg Increase in Income Last 3 Years	\$3,845		
b. Number of Households with Increase in Income Last 3 Years	5,615		
c. Reduction in HAP due to Income Increases Last 3 Years	\$4,626,228		
d. Number of Interim Ups Last 3 Years	445		
e. Avg Cost to Process Interim	\$27		
f. Avg Cost to Process Annual	\$135		
g. Total Annual Cost to Process Interim Ups	\$3,935	$(d \times e) / 3$	
h. Number of Interim Downs Last 3 Years	1,433		
i. Average Number of Interims Last 3 Years	2,182		
j. Estimated Number of Interims Under New Policy	478	$h / 3$	
k. Average Number of Annuals Last 3 Years	3,008		
l. Estimated Number of Annuals Under New Policy	1,003	$k / 3$	
m. Total Annual Reduction in Number of Reviews Under New Policy	3,710	$(k - l) + (i - j)$	
n. Cost Savings Due to Reduction in Reviews	\$342,138	$(f \times (k - l)) + (e \times (i - j)) + \text{Postage}$	
o. Total Annual Cost Savings (Loss)	-\$1,199,938	$n - (c / 3)$	

Demographic Impact

To measure the demographic impact, Homes for Good looked at the number of income increases over the last three (3) years by demographic group, including race, ethnicity, large families, elderly, income level, and disabled households. Race and ethnicity data is based on the head of household only. This assessment was done for all HCV households, work able households with an increase in any type of income, and work able households with an increase in earned income. The results shown in the chart below confirm the assumptions made by the team:

1. No households will see a negative impact due to this policy change, so the analysis shows which households had a more positive impact than others;
2. Large households would have more increases in income and those increases would be larger than other groups since there are more household members to earn income and a larger household to sustain;
3. Elderly and disabled households saw increases in income, but this was mainly due to fixed income increases and the amounts were marginal;
4. There was not a significant difference in the impact on households based on race or ethnicity and the most disproportionate impact (Native Hawaiian/Pacific Islander) is likely due to the small number of households in that group.
5. The higher a household's income is, the more likely they are to have an increase in income and higher the increase in income is likely to be.

Metric	Asian	African American	Native HI/Pacific	Native Amer.	White	Hispanic	Non-Hispanic	Large Family	Disabled	Elderly	ELI	VLI	LI	Formula
a. Total Population (# annuals/move-ins last 3 years)	154	579	91	665	9,702	826	9,631	1,418	6,712	3,129	8,755	1,364	298	
b. Households with Increase in Income Last 3 Years	81	295	44	346	5,214	404	5,211	693	3,949	2,004	4,434	907	241	
c. Percent of Population with Increase	53%	51%	48%	52%	54%	49%	54%	49%	59%	64%	51%	66%	81%	b / a
d. Average Income Increase	\$4,193	\$5,008	\$8,899	\$4,731	\$3,798	\$5,338	\$3,729	\$9,926	\$2,164	\$1,520	\$2,060.20	\$6,996.49	\$18,930.29	
e. Total Work Able Population (# annuals/move-ins last 3 years)	43	240	38	203	2,758	390	2,611	1,039	0	0	2,370	442	164	
f. Work Able Households with Increase in Income Last 3 Years	20	97	17	78	1,138	156	1,086	477	0	0	806	287	129	
g. Percent of Population with Increase - Work Able	47%	40%	45%	38%	41%	40%	42%	46%	0%	0%	34%	65%	79%	f / e
h. Average Income Increase - Work Able	\$9,609	\$9,502	\$8,825	\$10,434	\$9,466	\$7,776	\$9,683	\$11,043	\$0	\$0	\$5,766	\$12,298	\$20,837	
j. Work Able Households with Increase in Earned Income Last 3 Years	8	40	4	46	534	88	493	240	0	0	328	157	78	
k. Percent of Work Able HH's with Increase in Earned Income	19%	17%	11%	23%	19%	23%	19%	23%	0%	0%	14%	36%	48%	j / e

Other Impact Analysis Questions

Below are answers to the additional impact analysis questions identified in the MTW Operations Notice.

#	Question	Answer
1	Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	While there is a chance that one or more families becomes over-income and remain housed (see question 2 below), Homes for Good anticipates any impact to the waitlist or the amount of time families on the waitlist to be inconsequential.
2	Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	Homes for Good anticipates that this policy change could result in a family becoming over-income and remaining on program until the next review. This would most likely impact Low Income households, whose increases in income were the largest over the last three years (\$18,930 vs. \$2,060 for ELI families). These households only represent only 3% of the total population, so the rate of occurrence will be minimal.
3	Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program	With a reduction in HAP, Homes for Good may see a slight reduction in utilization due to this policy change. However, the agency will still meet its Substantially the Same (STS) requirement and the reduction in households served will be offset by future MTW policy changes.
4	Impact on meeting the MTW statutory goals of cost effectiveness, self sufficiency, and/or housing choice	Cost effectiveness Homes for Good's analysis shows that by reducing the number of annuals and interims, this policy change will save the agency \$342,000 per year in administrative expenses
		Self-sufficiency Homes for Good believes that allowing households to increase their income without an impact on rent will encourage households to increase their income and work to become self-sufficient
		Housing choice Homes for Good does not anticipate any impact on housing choice

#	Question	Answer	
5	Impact on the agency's ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	Homes for Good will continue to use its current admissions policies, ensuring that this requirement is met.
		2. Establish a reasonable rent policy that encourages employment and self-sufficiency	While this policy is not a rent change policy, Homes for Good believes that allowing households to increase their income without an impact on rent will encourage households to increase their income.
		3. Continue to assist substantially the same number of households	With a reduction in HAP, Homes for Good will be able to serve 85 fewer households. The agency will still meet its STS requirement and the reduction in households served will be offset by future MTW policy changes.
		4. Continue to assist a comparable mix of households by family size	This policy will not have an impact on the household size of households served, although the analysis has shown that larger households will see more benefit from this policy change than small households.
		5. Meet Housing Quality Standards requirements	This policy change will not have any impact on HQS.
6	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	Homes for Good does not anticipate any hardships as a result of this policy change as it will not have a negative impact on household's rent or utility payments.	

Conclusions

Homes for Good recognizes that the change to reexamination frequency will have a negative impact on the funds it has available to house families in the HCV program. However, the agency also recognizes that the positive impact that this change will have on households could be significant and the increase in HAP expenditures can be offset by reduced administrative costs and other policy choices that the agency will be considering prior to the next MTW planning cycle. Homes for Good will also explore other MTW options available in Yardi for offsetting the losses related to the implementation of the triennial recertification waiver.

MTW Waiver Narratives

March 31, 2023

Introduction

Homes for Good became a Moving to Work (MTW) agency in 2022. As part of its participation in the MTW program, Homes for Good must draft a document each year describing its use of MTW authority. This document, which is known as the MTW Supplement to the PHA Plan, will go through a public process prior to being submitted to HUD for approval.

The Moving to Work Program

Congress created the MTW program in 1996. The MTW allows housing authorities to alter HUD program rules for the Housing Choice Voucher and Public Housing programs. The purpose of the program is to identify policy adjustments and local policy changes that can improve outcomes. MTW agencies represent a small percentage of all housing authorities, but the number is growing: HUD is in the process of adding another one hundred (100) agencies to the program. MTW must ensure that their use of MTW flexibilities meets one or more of the following objectives:

- 1) Increase affordable housing choices,
- 2) Increase cost effectiveness, and/or
- 3) Promote self-sufficiency.

MTW Waivers

Each MTW agency must tell HUD and the public which policies it plans to waive and why. This happens through the agency's annual planning process. HUD has some standard waivers that MTW agencies may choose to use, or MTW agencies can design their own waivers based on local needs. These are known as "agency-specific" waivers. For its first year in the MTW program, Homes for Good has selected seven (7) standard waivers and one (1) agency-specific waiver to implement. These waivers are described below.

Homes for Good Waivers

Rent Reasonableness 3rd Party Requirement

Homes for Good proposes eliminating the requirement to use a third-party to perform rent-reasonableness determinations for units and properties that Homes for Good owns. Rent reasonableness is a process that housing authorities use to determine whether a rent is reasonable before entering into a contract with the landlord or approving a rent increase. Housing authorities are typically not allowed to perform rent reasonableness on units that the agency owns and are required to hire a third-party to do this work.

Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency. Instead, Homes for Good will apply its current rent reasonableness process for units it does not own or manage to units it does own or manage. This process has

adequate controls in place to ensure uniformity, auditability, and transparency of the determination.

While the intention of the HUD rule is to ensure impartiality in rent reasonableness decisions, the third-party software used by Homes for Good bases its results on objective measures, reducing the risk of impartiality.

Alternative Reexamination Schedule

Homes for Good proposes to implement triennial reexamination schedule for certain Housing Choice Voucher (HCV) households. This policy will apply to all HCV households other than those in the Homeownership or Foster Youth Initiative (FYI) programs. Under the new policy, households in the HCV program will have a reexamination once every three (3) years unless their household income decreases. As part of this policy change, the following policy decisions were made:

1. Approved rent increases will use the most current payment standard.
2. Homes for Good will only conduct a reexamination when an adult household member is added and not when a minor household is added.
3. If a family moves into a new unit, a full reexamination will be conducted, and the household's reexamination schedule will be reset.

This standard waiver is dependent on Homes for Good's implementation of a new software system that can generate and submit required information to HUD. Homes for Good's current software is unable to do this and so implementation of this activity will need to wait until a new software is in place. The move to the new software could take up to two (2) years.

Once this policy is in place, it will benefit both the client and the agency by reducing the burden of the regular review cycle. As part of the approval process, Homes for Good has conducted an impact analysis. Based on this analysis, households will only see a positive impact due to this change. Homes for Good also confirmed that there is not a significant disparate impact based on demographic.

Pre-Qualifying Unit Inspections

Homes for Good's recent landlord outreach revealed a desire among landlords to reduce the time it takes to approve units for the HCV program. Inspections for new move-ins typically happen once the unit is approved but prior to the tenant moving into the unit. Since the scheduling of the inspection and the potential for failures and re-inspections takes time, the current process can delay the move-in. By pre-qualifying unit inspections, Homes for Good will be able to perform the inspection earlier in the process. This will enable the household to move into the unit as soon as it is approved.

Third-Party Requirement for PBV Inspections

Homes for Good proposes to eliminate the requirement that the agency use a third-party entity to perform inspections on units and properties it owns. Procuring and overseeing a third-party contractor for inspection services is costly and time-consuming for the agency. Instead, Homes for Good will utilize its in-house inspection team and the policies and procedures governing inspections for the HCV program. The inspection process has built-in quality control measures in place that will help to ensure all inspections performed by Homes for Good are fair and that the process is transparent and auditable.

Alternative Inspection Schedule

Currently, Homes for Good inspects its HCV units every two (2) years. HFG proposes changing the policy so that it only inspects units every three (3) years. This policy change will give inspectors more time for pre-inspections, re-inspections, and responding to special inspection requests. Homes for Good expects that this will allow inspectors to complete inspections sooner. This will reduce the amount of time it takes to lease up units, process unit transfers, and reinspect units that failed inspection. In addition, Homes for Good hired a full-time Landlord Educator. This position will 1) work with tenants over concerns regarding their existing housing and, 2) work with landlords to address concerns and help them better uHomes for Good is confident that concerns that arise between inspections will be addressed through outreach and education.

Eliminate PBV Selection Process for PHA-Owned Properties

Homes for Good proposes eliminating the requirement that the agency engage in a selection process when awarding project-based vouchers to properties it owns or controls. This will allow Homes for Good to award project-based vouchers to non-Public Housing properties it owns without a selection process. This policy change will help to streamline the development of new affordable housing units in the County. This change does not impact other HUD-required selection requirements and the agency will ensure that the process to award vouchers is uniform and transparent.

Limit Portability for PBV

HFG proposes waiving the requirement that it provide a tenant-based voucher to project-based voucher (PBV) households after being on a PBV for twelve (12) months. Homes for Good's Permanent Supportive Housing (PSH) projects will use a referral from an approved entity instead of offering a tenant-based voucher to everyone after twelve (12) months of occupancy. This policy change does not apply to non-PSH PBV projects.

Waiving the portability requirement will:

- Decrease the paperwork that it initiated by PSH-PBV clients who state they want to move but are not ready to move, and then withdraw their request to move.
- Approved entities will work with households who are using PSH-PBV to support them in becoming successful in the private rental market. By implementing a better system for PSH-PBV clients who express interest in moving, we aim to reduce the amount of

paperwork generated when clients change their minds about moving. This can be achieved by providing support and resources to help them make informed decisions and be prepared for the private rental market. Changing this process will not only save time and resources, but also improve overall client satisfaction and engagement with the program.

Self-Certification of Exception Payment Standards

Currently, Homes for Good is required to ask HUD's approval in order to apply an exception payment standard (EPS). An EPS is any payment standard above 110% of the Fair Market Rent (FMR). Instead, Homes for Good proposes allowing it to self-certify EPS's in the case of reasonable accommodation. This will increase the housing opportunities of HCV Program participants needing accessibility features requiring a reasonable accommodation.

The current process to approve EPS's through the field office is time consuming and burdensome for the family, the housing agency, and HUD. In some instances, the unit becomes unavailable while Homes for Good is waiting for HUD's approval. Units with accessibility features typically have significantly higher rents and, without an expedited approval of the EPS, households with accessibility needs are severely limited in their housing options.

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

** Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

IN THE BOARD OF COMMISSIONERS OF THE
HOMES FOR GOOD HOUSING AGENCY, OF LANE COUNTY OREGON

ORDER 23-28-06-04H

In the Matter of Approving the Submission of
the PHA FY2024 Move to Work Supplement
Plan and MTW Certifications of Compliance.

WHEREAS, Homes for Good has entered into a Moving to Work Amendment to Annual Contributions Contract on May 5, 2022.

WHEREAS, Homes for Good is required to submit a Move to Work Supplement Plan with its Public Housing Agency Annual Plan.

WHEREAS, Homes for Good is required to submit the MTW Certifications of Compliance

WHEREAS, Homes for Good has worked with RAB to ensure adequate involvement.

WHEREAS, Homes for Good completed the required public hearing process.

WHEREAS, Homes for Good is permitted to implement waivers as a Moving to Work Public Housing Agency.

WHEREAS, Homes for Good is required to submit the board approved Moving to Work Supplement Plan to HUD for approval.

NOW IT IS THEREFORE ORDERED THAT:

The Move to Work Supplement Plan be approved, and added as a supplement document to the Administrative Plan for FY2024.

The MTW Certifications of Compliance be approved.

DATED this _____ day of _____, 2023

Vice-Chair, Homes for Good Board of Commissioners

Secretary, Homes for Good Board of Commissioners



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/28/2023

AGENDA TITLE: Energy Services Division Program Overview

DEPARTMENT: Energy Services Division

CONTACT : 541-682-2563

EXT:

PRESENTER: Esteban Montero Chacon

EXT:

ESTIMATED TIME : 15 mins

- ORDER/RESOLUTION
- PUBLIC HEARING/ORDINANCE
- DISCUSSION OR PRESENTATION (NO ACTION)
- APPOINTMENTS
- REPORT
- PUBLIC COMMENT ANTICIPATED

Approval Signature

EXECUTIVE DIRECTOR:

A handwritten signature in black ink, appearing to be "JAF", is written over a horizontal line.

DATE:06.20.2023

LEGAL STAFF :

DATE:

MANAGEMENT STAFF:

DATE:



Weatherization Workshop

Esteban Montero Chacon

Energy Services Director

Programs



Weatherization

Heat Systems Crisis

Energy Education

Weatherization

Weatherization



**Heat Systems
Crisis**

**Energy
Education**

Eligibility

- 200% federal poverty line
- Lane County resident
- Owners/Renters
- Sign the weatherization agreement
- Home free of structural damage
- No Cost to the applicant
- Long waitlist

Measures

- Insulation
Ceiling/Floor/Wall
- Air Sealing
- Duct Sealing
- HVAC System
- Some health & safety measures
- *Window
- *Refrigerator

Heat Crisis

Weatherization

**Heat Systems
Crisis**

**Energy
Education**



Eligibility

- Qualify for LIHEAP
- No Permanent Heat
- Lane County resident
- Seasonal
- Only addresses heating

Measures

- Space Heaters
- Repair/replace heating system
- Short waitlist
- 48-72hrs call back
- Some Health & Safety

Energy Ed

Weatherization

Heat Systems
Crisis

Energy
Education



Client Education

- During home audit
- One-on-One
- Equipment demonstration
- Written materials

Community Events

- Group of people
- Props available
- Written materials
- *In-person classes

Scope of Department of Energy Weatherization Assistance Program



Mechanical

- HVAC system
- Duct insulation and leaks
- Programmable thermostats
- Water heaters
- Mechanical Ventilation

Building Shell

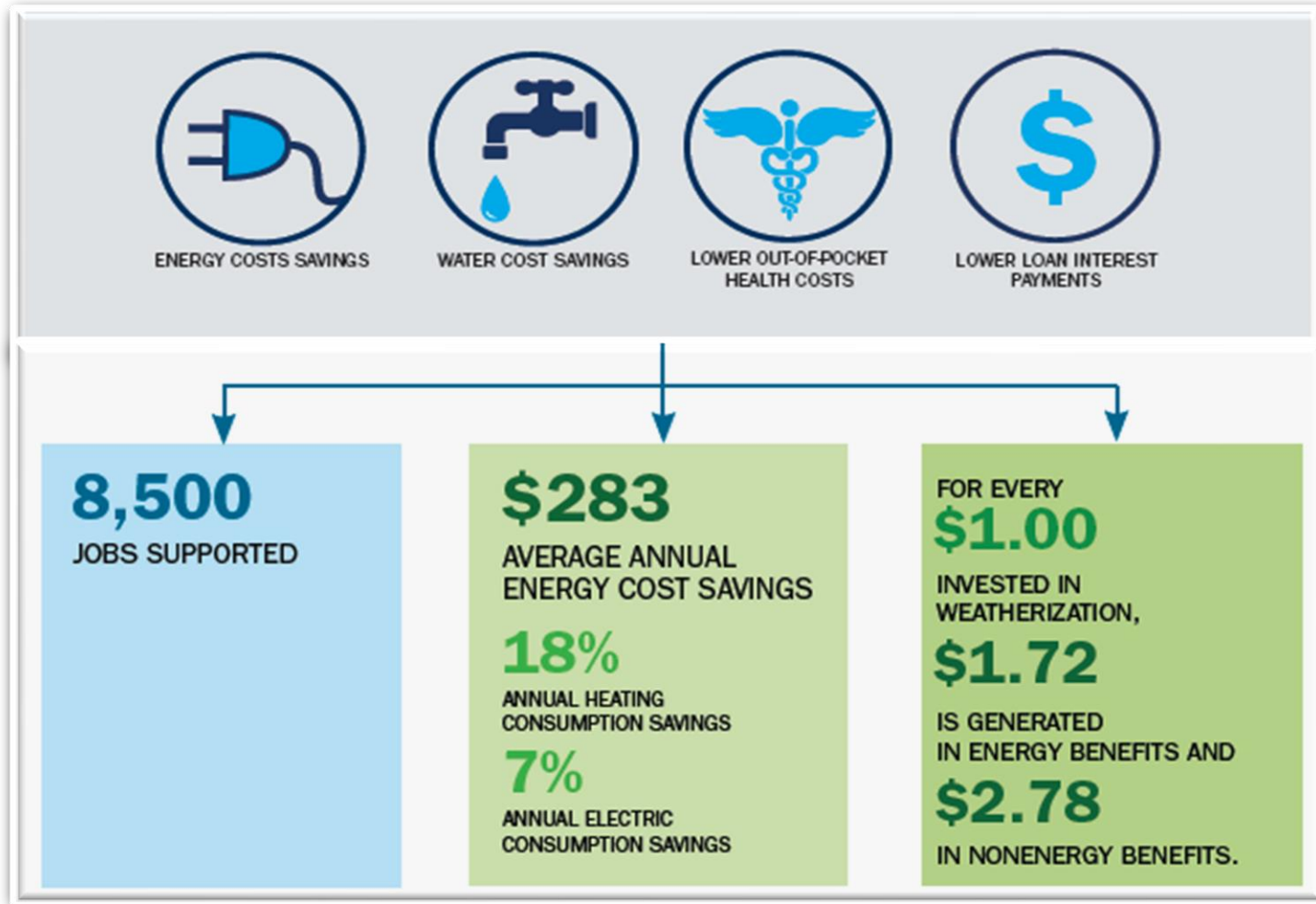
- Insulation
- Air Seal
- Repair/replace windows
- Minor roof or wall leaks

Health and Safety

- Combustion appliance testing
- Ventilation system
- Smoke and CO alarms
- Incidental safety repairs



Benefits of Weatherization



Community Impact



Low-income Energy Burden 13.9%
Other Populations 3.0%

Average household energy savings \$283 per year

Improve health & safety

Utility Contributions \$860 million

Decrease out-of-pocket \$514

Health Related Benefits \$14,148



Thank You!



Homes. People. Partnerships. Good.

Questions?

