Housing Authority of Clackamas County

2024-2025 Annual Plan

& Moving to Work Supplement

Effective Dates July 1, 2024 – June 30, 2025

HACC Interim Executive Director: Chris Aiosa

Health, Housing & Human Services CLACKAMAS COUNTY

Approval Process: RAB Review: 1/25/24, Public Comment Period 1/30/24-3/15/24, Public Hearing 2/22/24, Board Approval 4/4/24: HUD Submission 4/12/2; Return for Revisions 5/30/24; Revised HUD Submission 6/21/24; HUD Approval 6/25/24.

FINAL

Housing Authority of Clackamas County

2024 Annual Plan & MTW Supplement
Effective 7/1/2024-6/30/2025

Table of Contents

Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only 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 if administering both programs, or PHAS if only administering public housing.
(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, 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

PHA Name: Housing Authority of Clackamas County **PHA Code**: OR001
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2024
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units: 445 Number of Housing Choice Vouchers (HCVs): 2204 Total Combined Units/Vouchers: 2649
PHA Plan Submission Type: ☒ Annual Submission ☐Revised Annual Submission

Availability of Information. 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. 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 with a copy of their PHA Plans.

1) Housing Authority Administrative Office, 13930 S Gain Street, Oregon City, OR 97045
2) Housing Authority Clackamas Heights Property Management Office, 13900 S Gain Street, Oregon City, OR 97045
3) Housing Authority Hillside Manor Property Management Office, 2889 Hillside Court, Milwaukie, OR 97222
4) Housing Authority Website: http://www.clackamas.us/housingauthority/plansandreports.html
5) Clackamas County Public Library located at 16201 S.E. Mcloughlin, Oak Grove, OR 97222
6) Resident Advisory Boards (RAB) Members receive a full draft Annual Plan which includes a summary of policy changes to share with other residents.

☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

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:					

B.	Plan Elements
B.1	**Revision of Existing PHA Plan Elements.** (a) Have the following PHA Plan elements been revised by the PHA? Y N ☐ ☒ Statement of Housing Needs and Strategy for Addressing Housing Needs ☒ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. ☒ ☐ Financial Resources. ☒ ☐ Rent Determination. ☐ ☒ Operation and Management. ☐ ☒ Grievance Procedures. ☐ ☒ Homeownership Programs. ☒ ☐ Community Service and Self-Sufficiency Programs. ☐ ☒ Safety and Crime Prevention. ☐ ☒ Pet Policy. ☒ ☐ Asset Management. ☐ ☒ Substantial Deviation. ☐ ☒ Significant Amendment/Modification Changes and revisions to elements are included in this plan as follows: (b) If the PHA answered yes for any element, describe the revisions for each revised element(s): • Changes in policies that govern eligibility, selection, and admissions as well as rent determination proposed for HACC's Housing Choice Voucher Administrative Plan (Admin Plan) and Public Housing Admissions and Occupancy Policy (ACOP) are detailed in Attachments A and B, respectively. Due to changes in Housing Opportunity Through Modernization Act (HOTMA) implementation timelines, HACC is updating its implementation of many policy changes proposed including conditionally approved Moving to Work (MTW) waivers. HACC plans to implement all changes no later than January 1, 2025 in accordance with HOTMA final rule. Implementation dates will be communicated with residents and referenced in the Admin Plan and ACOP, if differing from the January 1, 2025 date. • Community Service and Self Sufficiency Programs: HACC has expanded and continues to expand their resident services programing. More staff positions have been added and offerings expanded. More detailed information is provided in Sections B.2.- New Activities and B.3.- Progress Report. • Financial Resources updates are detailed in Attachment G • Asset Management changes: Recent efforts in Asset Management include active recruitment to fill vacant positions. The now fully staffed Asset/Property Management team is working on building out Standard Operating Procedures utilizing our new software and industry wide best practices to help create a more efficient and effective working environment which will help us in our efforts to get back to High Performer status. Additional information is provided in Sections B.2.- New Activities and B.3.- Progress Report. (c) The PHA must submit its Deconcentration Policy for Field Office review. • Deconcentration Policy – unchanged – is included in Attachment D for review.
B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☒ ☐ Hope VI or Choice Neighborhoods. ☒ ☐ Mixed Finance Modernization or Development. ☒ ☐ Demolition and/or Disposition. ☐ ☒ Designated Housing for Elderly and/or Disabled Families. ☒ ☐ Conversion of Public Housing to Tenant-Based Assistance. ☒ ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ ☒ Occupancy by Over-Income Families. ☐ ☒ Occupancy by Police Officers. ☐ ☒ Non-Smoking Policies. ☒ ☐ Project-Based Vouchers. ☒ ☐ Units with Approved Vacancies for Modernization. ☒ ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(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.

Development:

Repositioning Strategy:

In 2024-2025, HACC will review the feasibility of submitting a Section 18 Demolition and/or Disposition, a Rental Administration Demonstration (RAD), a Section 18/RAD blend application, Choice Neighborhoods, or Hope VI for Clackamas Heights, a 100-unit Public Housing property located at 13900 S. Gain St., Oregon City, OR 97045. If an application is submitted and approved, HACC will relocate all 100 households following the approved Relocation Plan and with the assistance of Section 8 vouchers. In October 2023, a Section 18 Physical Needs Analysis was completed and an environmental review (ER) under 24 CFR part 58 is currently underway for Clackamas Heights.

In 2024-2025, HACC will review the feasibility of submitting a Section 18 Demolition and/or Disposition, a Rental Administration Demonstration (RAD), a Section 18/RAD blend application, Choice Neighborhoods, or Hope VI for Oregon City View Manor, a 100-unit Public Housing property located at 200 S. Longview Way in Oregon City. If an application is submitted and approved, HACC will relocate all 100 households following the approved Relocation Plan and with the assistance of Section 8 vouchers. In October 2023, a Section 18 Physical Needs Analysis was completed and an environmental review (ER) under 24 CFR part 58 is currently underway for Oregon City View Manor.

In 2018-2019, HACC embarked on a Master Planning process that envisioned the redevelopment of the Hillside Park public housing community (OR001003000). The planning process engaged residents and community members, who helped develop a vision for a vibrant mixed-use, mixed-income community. The design preserves and rebuilds existing affordable housing at the site, while creating opportunities for expanded housing choice and type. In late 2020, HACC submitted a land use application to the city of Milwaukie seeking to rezone the site to allow for increased density and mixed-use housing. In late 2021, the City of Milwaukie formally approved HACC's land use application. In 2020, HACC completed an environmental review conducted under 24 CFR part 58 and the RRFO and AUGF were approved by HUD. In November 2022, HACC submitted a Section 18 Disposition application for the first phase of project (54 units). On June 26, 2023, HUD approved the application. On September 1st, HACC received approval for 54 Tenant Protection Vouchers. Relocation of the 54 impacted households is underway and is anticipated to conclude in early spring 2024. Construction of the first three buildings in the Hillside Park Master-Planned Redevelopment project, including 275 units of affordable housing, is expected to commence in late spring/early summer 2024.

HACC has 145 scattered sites throughout Clackamas County. In March 2022, HACC completed the environmental review (ER) process conducted under 24 CFR part 58. In 2024-2025, HACC anticipates submitting Section 18 Disposition applications for these sites. If Section 18 applications are submitted and approved, HACC will relocate all 145 households following the approved Relocation Plan with the assistance of a relocation contractor and Section 8 vouchers.

Metro Affordable Housing Bond:

In 2018, regional voters approved a $652.8 million Metro Affordable Housing Bond for the creation of 3,900 affordable housing units within the urban growth boundary. The bond allows the Metro region the opportunity to invest in the development of new housing resources for some of its most vulnerable and historically marginalized residents.

Recognizing the need and opportunity throughout the region, bond revenue is distributed based on assessed value of each of the three counties within the Metro district. Bond revenues dedicated to Clackamas County are $116,188,094. As an implementing jurisdiction of the Metro Bonds, all bond resources allocated to Clackamas County will run through HACC. The goal for HACC is to support the development of at least 812 units of affordable housing throughout the eligible Metro boundary within the county. This support may include direct acquisition, development, and/or ownership by HACC or involve partnering with non-profit or for-profit developers to support the development of units throughout the eligible Metro boundary. HACC's strategy for reaching this goal is outlined in the 2019 Clackamas County Local Implementation Strategy (LIS).

HACC currently has 1028 Metro Affordable Housing Bond-funded units underway in Clackamas County, including 291 units complete, 271 units in construction, and 466 units in pre-development.

HACC is using approximately 200 PBV's approved by HUD to support new development and rehabilitation projects that utilize Metro Affordable Housing Bond funds. This is consistent with the PHA Plan to modernize, redevelop, reposition as our PHA Plan is required to align with the County's Consolidated Plan, Fair Housing Plan, Action Plan and Ten-Year Plan to end homelessness.

Utilizing funds allocated to HACC from the Metro Affordable Housing Bond, HACC will continue to expand its development capacity by hiring new staff to direct affordable housing development in the County.

In 2019, Metro Affordable Housing Bond funds were used to acquire a facility located at 18000 Webster Road in Gladstone. This rehabilitation of the Webster Road project was supported by Metro Affordable Housing Bonds, PSH capital and services funding, 48 PBVs, HOME funds, 4% LIHTCs, and Tax-Exempt bond financing. The project closed on construction financing in June 2021. In June 2022, HACC completed the rehabilitation of the Webster Road property, now known as Tukwila Springs. As of November 2022, Tukwila Springs is fully leased and provides 48 units of Permanent Supportive Housing for chronically homeless and very low-income individuals age 50 and older. Conversion to permanent financing occurred in 2023.

HACC will continue to award bonds fund to affordable housing projects sponsored by non-profit or for-profit developers throughout the eligible Metro region of Clackamas County.

In 2020, HACC released a Notice of Funds Availability (NOFA), availing over $40 million dollars in Metro Affordable Housing Bond funds and 125 project-based vouchers toward the development of affordable housing. HACC awarded a total of $42,803,000 in Metro Affordable Housing Bonds and 125 project-based vouchers to three projects proposed for development in Happy Valley, Oregon City, and unincorporated Clackamas County. These three projects will provide a total of 414 new units of those 158 units will be reserved for households at or below 30% AMI.

<u>Projects Overview:</u>
The Fuller Road Station project located in unincorporated Clackamas County closed on construction financing in April 2021 and completed construction in September 2022. The property is fully leased. Fuller Road Station consists of 100 units that serve households with incomes 60% of AMI or below, including 30 units reserved for households with incomes at or below 30% AMI. 25 units are dedicated to households experiencing homelessness.

The Good Shepherd Village project located in Happy Valley closed on construction financing in February 2022 and completed construction in September 2023. This project consists of 143 units that serve households with incomes 60% of AMI or below, including 58 units reserved for households with incomes at or below 30% AMI who are experiencing homelessness. 15 units are prioritized for veterans experiencing homelessness. .

The Las Flores project (formerly known as Maple Apartments) located in Oregon City closed on construction financing in May 2022. This project consists of 171 units that will serve households with incomes 60% of AMI or below, including 70 units reserved for households with incomes at or below 30% AMI. At least nine units will be dedicated to households experiencing homelessness. Construction completion is expected in Spring 2024.

In May 2022, HACC awarded the Mercy Greenbrae project (formerly known as Marylhurst Commons), located in Lake Oswego, $3 Million in Metro Affordable Housing Bond Funds. The project closed on construction financing in September 2022. Marylhurst Commons consists of 100 units that will serve households with incomes of 60% of AMI or below, including 40 units reserved for homeless or at-risk households with incomes at or below 30% AMI. Construction completion is expected in April 2024.

HACC plans to use bond funds to support the repositioning and redevelopment of Hillside Park. HACC expects this redevelopment project will take place in two phases. Phase 1 is expected to break ground in mid-2024 and will consist of the demolition of 54 public housing units that will be redeveloped with 275 units of housing affordable to households at 60% AMI and below, including at 100 units affordable to households with incomes 30% of AMI or below.

In 2023, HACC awarded Metro Bond funds to 3 new affordable housing development projects being proposed in Clackamas County. These projects include the 121-unit Wilsonville TOD project located in Wilsonville, the 55-unit Lake Grove project in Lake Oswego, and a 15-unit affordable homeownership project located in Milwaukie known as Shortstack Milwaukie. The projects are anticipated to break ground on construction in 2024-2025.

In 2024-2025 HACC plans to award its remaining allocation of Metro Bond funds (~$22 MM) to support HACC's public housing repositioning and redevelopment projects, including Hillside Park and Clackamas Heights.

Voucher Programs:
HACC was awarded 16 new Fair Shares vouchers and 25 new Veteran's Affairs Supportive Housing (VASH) vouchers in addition to the 56 tenant protection vouchers for the Hillside Park Redevelopment. HACC will continue to apply for and accept additional vouchers in the future.

HACC submitted and was approved to maximize the number of units Project Based to increase the inventory of new affordable housing construction into the future. Under MTW, HACC has been conditionally approved to remove the 20% CAP on PBV. As HACC continues to redevelop aged Public Housing to bring new affordable housing units, HACC will likely be increasing its PBV cap.

The Supportive Housing Services (SHS) Measure, passed regionally in 2020, aimed to eradicate chronic homelessness through pairing rental assistance and supportive services. This local funding source adds about 45 million dollars to the County's Homeless Services budget. Through this funding source, HACC has assisted over 600 families with Regional Long Term Rent Assistance (RLRA) vouchers. This program is expanding rapidly with a goal of serving and additional 30 households a month ongoing with a commitment to serve no less 1,065 total families. Each RLRA voucher is paired with supportive services to increase housing stability.

Given SHS funding, the County and HACC has seen a climb in service offerings. Navigation, placement and housing stabilization services are paired with all RLRA vouchers. In addition, SHS funding has added service components to other housing programs to increase housing stability across the continuum and bring better housing success to all housing programs. HACC will act not only as the RLRA administrator but also as an RLRA landlord for RLRA voucher holders housed at local project sites and will be eligible for the SHS landlord incentive program.

HACC will continue to pursue opportunities to project-base vouchers, both Federal and RLRA, in developments and established properties to increase affordable and supportive housing options. In addition, HACC is also exploring a master leasing model for the RLRA program, to increase housing options for clients most difficult to house. HACC will also continue to pursue options for onsite supportive services and resident services through SHS and other local funding to increase housing stability and community building especially at properties with master leased or project-based units.

SHS funding is set to expire in 2031, but HACC has hope that voters will continue the funding for an additional 10 years.

Public Housing:
The Housing Authority will continue to operate and maintain public housing units as the repositioning outlined in the Development section begins to unfold. Currently working on creating Standard Operating Procedures (SOP) to create more efficient workflows utilizing our new software and industry best practices to help us reach High Performer status once again.

Capital Funds - Given this repositioning strategy, HACC will be looking to limit its investments in the properties to only those necessary to address health & safety concerns. Section 18 and MTW flexibility will allow HACC to use Capital Funds for relocations and other needs for operations. Whatever funds are not used for modernization and/or health & safety concerns, will be utilized in the repositioning efforts. The planned capital fund projects and proposed budget summary is detailed in Attachment H and the Capital fund annual statement is included in Attachment I and HACC will continue to apply for additional funds to meet the needs of their communities.

Units with Approved Vacancies for Modernization - The Housing Authority currently has three units approved for modernization through HUD; 4033, 1071, 12038. We anticipate 7-10 units throughout the year will require modernization at turnover.

HACC's Resident Services team continues to expand services provided to public housing participants and their activities are detailed in the next section.

Resident Services:
HACC will continue to seek additional funding opportunities and leverage local funds to ensure our residents have safe and secure communities in which to thrive and will continue to expand its growing resident services team to assist public housing residents with housing retention and pathways to greater self-sufficiency and is working to further expand resident services to voucher program participants. Resident surveys continue to report very high ratings agreeing or strongly agreeing that the Housing Authority staff members responding to their needs were friendly/courteous and professional.

The Resident Services team is currently made up of a x number of members including a ROSS Coordinator, 2 FSS Coordinators (expanded from 1), 3 Resident Services Specialists, ? Housing Specialists, 2.5 Peer Support Specialists, 2 Americorps participants and 1 Social Work Intern through direct hires and community partner contracts. The resident service team continues to expand to support supports HACC's Properties as well now expanding to the Housing Choice Voucher participants. The team supports individuals, families, seniors, and people with disabilities in Housing Authority programs.

Resident Services Programs focus on the following objectives:

1. Housing Stability: partner with property management to address the needs of households, creating proactive activities around lease engagement, including when an eviction notice is given, resident services respond by informing households of their options and attempt to remedy the issues in order to maintain housing stability and prevent eviction.
2. Economic Stability and Self-Reliance: increase earning potential, Resident Services provide work-focused households coaching and connections to asset building, education, and employment support. Fundamentals include job training, GED/high school completion, credit repair through our rent reporting for credit building program, expungement of criminal history, and removing barriers to greater economic stability.
3. Promoting Quality of Life: Too often a sense of isolation can exist for seniors and people with disabilities. For seniors and people with disabilities, Resident Services works towards creating social networks and effective linkages to programs that promote a positive quality of life including affordable nutritious food, better access to wellness programs and enhanced social activities.
4. Advancing Young People: For families to achieve and sustain housing and economic stability, the needs of the entire family, especially those with children, must be addressed. Stability in housing and success at school go hand in hand. Youth programming through Because People Matter and Trash for Peace seek to develop greater educational and leadership opportunities for youth early on to create greater economic stability in their adult lives.
5. Community Building: The entire community is transformed when its members can access a full range of health, wellness, and social activity programs. Resident Service strives to build a sense of community by engaging with partners and residents to design activities and services that promote healthy and well-connected neighbors and neighborhoods.

Examples of specific resident services and/or service connections include:

- Individualized case coordination, life skills, credit repair, and financial counseling
- Connections to area workforce, employment, and higher education
- Parent support in raising healthy children who are ready to learn and succeed
- Mental health counseling
- Alcohol and drug treatment and recovery
- Eligible public benefits

	• Legal services • Housekeeping and personal care services • Health care and wellness programs • Culturally specific services • Safety net services • Domestic violence services • Peer-delivered support and relationships; and • Volunteer and social activities.
B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. **PHA Goal 1 – Improve the quality of Housing Authority assisted housing and customer service** *PHA Strategy 1.a – Maintain high performer status* • Achieved ratings of a high performer in HCV program and will work toward reestablishing high performer status by improving unit conditions with regular inspections in Public Housing and maintaining financial reporting. *PHA Strategy 1.b – Improve access by making remote access options available for program intake, payments and signatures.* • Continued to offer remote briefings and orientations and is working to expand the usage of Yardi Rent Café. *PHA Strategy 1.c – Continue robust client feedback system for continued service improvements.* • Continued to survey clients at annual exams and used the information to look at systemic improvements in customer service. • Survey results show that over 92% of respondents felt their needs were met by Housing Authority staff. *PHA Strategy 1.d - Engage in capital fund rehabilitation projects to maintain units.* • Focus on improvements required for High Performer status due to the repositioning strategy. The repositioning strategy will over time replace aging Public Housing units with new affordable housing units. *PHA Strategy 1.e – Continue ongoing staff training and cross-training to continue* • Continued training staff across programs including federal voucher programs, local funded voucher programs (RLRA) and Public Housing. Internal promotions across programs spread detailed program knowledge and experience to different program areas. **PHA Goal 2 – Improve community quality of life and economic vitality** *PHA Strategy 2.a – Continue Resident Services programs through partnerships with community groups & service providers to build community and meet resident needs including food insecurity and those affected by COVID-19.* • Expanded the Resident Services team to include additional staff to expand program to add supports for Housing Choice Voucher participants and to include peer support and a housing specialist, to help families navigate the housing continuum and coordinate with community programs. • Expanded the community garden program by adding an additional Americorps member, allowing one dedicated staff member for each community garden program to engage residents and coordinate food programs. *PHA Strategy 2.b – Encouraged Resident participation through resident associations and surveys to access housing needs.* • Deploy community needs survey at least every three years with thoughtful outreach and response. • Working to expand the role and frequency of meetings of the Resident Advisory Board to include additional opportunities to provide HACC operations feedback. • The completion of resident surveys is encouraged at annual examinations. In addition, HACC will reach out annually to encourage families shifting to a triennial schedule to complete the resident survey each year. **PHA Goal 3 – Promote self-sufficiency and asset development of families and individuals** *PHA Strategy 3.a - Continue to partner with local & regional workforce partners to increase the number of employed/underemployed living in housing* • Resident services staff continued to provide service coordination and referrals for residents including Foster Youth to Independence participants to employment partners

- Board approved a partnership agreement with Clackamas Workforce Development Board to help fund the Clackamas WorkSource One-Stop employment center with other community partners.

PHA Strategy 3.b - Partner with agencies to provide supportive services including outreach, housing stabilization, and fostering independence for voucher program participants and work to expand self-sufficiency and supportive services programs to public housing residents.

- Expanded the Resident Services team to include additional staff to expand program to add supports for Housing Choice Voucher participants including Foster Youth to Independence participants and to include peer support and a housing specialist, to help families navigate the housing continuum
- Partnered with Housing Services team to guide the expansion of available supportive services programing available in the community to meet the needs of residents.
- All locally funded RLRA vouchers come with supportive services including housing navigation and ongoing housing navigation.
- Utilization of flexible local funds to provide expanded housing stabilization services and eviction prevention services.
- The RLRA program is funding renter's insurance to participants wanting coverage in order to decrease landlord liability and increase housing stabilization for clients.
- Working to provide resident services programing to communities and development where there is a larger concentration of local and federal voucher participants.
- Added a federal voucher specific resident services coordinator to the resident services team focus efforts to expand programing.
- HACC was successfully awarded additional Family Self Sufficiency (FSS) funds to expand to two FSS coordinators.

PHA Strategy 3.c - Continued to offer a Credit Building Program for our Public Housing residents to support residents in their goals of becoming more financially stable and self-sufficient. Planned expansion of current Credit Building program and addition of a Savings account program as new Moving To Work (MTW) status as part of the Asset Building Cohort.

- Continued expansion of rent reporting credit building program that began in Public Housing to include residents at HACC owned or operated properties as a component of the agency designed MTW Asset Building Program.
- Started in January 2024 to select participants and fully implement the savings account program component of the agency designed MTW Asset Building Program.
- Continue to offer the Security Deposit Loan Program, through Community Lending Works, to report successful loan repayment to the Credit Bureau.

Fair Housing Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County

AFH Strategy 1.A. - Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition, reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units to ensure that those units will last for years to come.

- Continued expansion of locally funded RLRA program which has to date added over 600 new supportive housing vouchers to Clackamas County.
- Continued efforts as detailed in the repositioning of Public Housing strategy to replace aged out Public Housing units with new affordable housing units. Overall, this will result in an increase in affordable housing units.
- Partnering on affordable housing developments in high opportunity areas including West Linn, Lake Oswego and opening the first ever affordable housing development in Happy Valley, Good Shephard Village through support of local housing bond funds.

AFH Strategy 1.B - Maximize the number of households receiving long term and short-term rental assistance from local, state and federal programs.

- RLRA voucher programs continues expansion at a rate of more than 30 new families per month. The program is currently serving over 600 families with a goal to provide at least 1065 supportive housing vouchers with services in Clackamas County and 5000 within the Metro region. HACC is on pace to exceed these goals and may lease up as many as 1500 before funding is maximized.

	• HACC continues to apply for additional vouchers from HUD to continue to expand its HCV program. • Utilizing new state funding available, the HCDD Housing Services team is rapidly expanding options for short-term rental programs to county residents. **Fair Housing Goal 2: Expand fair housing outreach, education, and enforcement** *AFH Strategy 2.A. - Increase fair housing education for staff, landlords & community partners.* • Hold yearly fair housing training for all staff and landlords facilitated and led by the Fair Housing Council of Oregon. • Expanded fair housing training to include additional County employees within our new Housing and Community Development Division. • Provide insurance provider fair housing training for each new HACC staff member. *AFH Strategy 2.B. - Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions.* • Annually evaluate payment standards to align more closely with fair market rents. • Established higher payment standards by zip code to accommodate higher fair market rent areas. *AFH Strategy 2.C. - Work in collaboration with partners to enforce fair housing law.* • Refer clients with fair housing related concerns to community partners who enforce fair housing law including the Fair Housing Council or Oregon, Legal Aid Services of Oregon and the Oregon Law Center. **Fair Housing Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.** *AFH Strategy 3.A - Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.* • The Equity, Diversity and Inclusion (EDI) committee is working to systematically review all correspondence sent to clients. • Working to expand the role and frequency of meetings of the Resident Advisory Board to include additional opportunities to provide HACC operations feedback on items such as HACC correspondence to better inform the work of the EDI committee. • Working on diversifying representation on the RAB board beyond just minimum requirements to better include community members from marginalized groups. *AFH Strategy 3.B - Minimize barriers and ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes.* • Increased SHS funding to culturally specific providers from $2.68M in FY 22-23 to $3.62M in FY 23-24. • Additional training and coaching on diversity, equity, and inclusion for the housing services team. • Hired a dedicated equity and engagement specialist on the housing services team who will work to advance racial equity throughout all programs in our housing services continuum. • Continuing to implement a series of recommendations made by the Coalition of Communities of Color which will improve the Coordinated Entry process and assessment to ensure more equitable housing and service outcomes • Supportive Housing Services funding is providing specialized technical assistance free of charge to culturally specific providers to expand their organizational capacity. *AFH Strategy 3.C - Provide multiple ways for County residents to access services and information. Email, phone, text, in-person, etc. Ensure that outgoing messages are available in multiple languages and all staff have access to interpretation services quickly and efficiently.* • Website can be translated into multiple languages • Established ongoing contracts with culturally specific community providers to offer written and in person translation services. • HACC has an established Limited English Proficiency policy.
B.4	**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. **Capital Fund 5 Year Action Plan in EPIC approved by HUD on 8/21/2023** • Capital Fund Projects Summary provided in Attachment H • Capital Fund Budget provided in Attachment I

B.5	**Most Recent Fiscal Year Audit**. (a) Were there any findings in the most recent FY Audit? Y N ☒ ☐ (b) If yes, please describe: **Audit finding details are included in Attachment P.**
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y N ☒ ☐ (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. **RAB meeting comments are detailed in Attachment J**
C.2	**Certification by State or Local Officials.** Form HUD 5Man0077-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. **Form HUD 5Man0077-SL is included Attachment K.**
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** 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. **Form HUD 50077-ST-HCV-HP is included in Attachment K.**
C.4	**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. (a) Did the public challenge any elements of the Plan? Y N ☐ ☒ If yes, include Challenged Elements. **Public Comments are included in Attachment O**
C.5	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☐ ☒ (b) If yes, please describe: **This section is not applicable.**

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	**Affirmatively Furthering Fair Housing (AFFH).** **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 1: Increase and preserve affordable, accessible housing options throughout Clackamas County

Describe fair housing strategies and actions to achieve the goal

- **AFH Strategy 1.A.** - Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition, reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units to ensure that those units will last for years to come.
- **AFH Strategy 1.B** - Maximize the number of households receiving long term and short-term rental assistance from local, state and federal programs.

Fair Housing Goal 2: Expand fair housing outreach, education, and enforcement

Describe fair housing strategies and actions to achieve the goal

- **AFH Strategy 2.A.** - Increase fair housing education for staff, landlords & community partners.
- **AFH Strategy 2.B.** - Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions.
- **AFH Strategy 2.C.** - Work in collaboration with partners to enforce fair housing law.

Fair Housing Goal 3:

Describe fair housing strategies and actions to achieve the goal

- **AFH Strategy 3.A** - Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.
- **AFH Strategy 3.B** - Minimize barrier and ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes.
- **AFH Strategy 3.C** - Provide multiple ways for County residents to access services and information. Email, phone, text, in-person, etc. Ensure that outgoing messages are available in multiple languages and all staff have access to interpretation services quickly and efficiently.

Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled 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. All PHAs must complete this section.

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." (24 CFR §903.7)

☐ **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**. 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)) 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 maintain 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))

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☐ **Homeownership Programs**. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☒ **Community Service and Self Sufficiency Programs**. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) 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))

☒ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **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 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 or Choice Neighborhoods. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods 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 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))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1**) development name and number; **2**) designation type; **3**) application status; **4**) date the designation was approved, submitted, or planned for submission, **5**) the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note**: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☒ **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 Rental 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.

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☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR §903.7(e))

☒ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. 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 (24 CFR §903.7(b)).

☒ **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).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

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.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

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 in part 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.

Public reporting burden for this information collection is estimated to average 7.52 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 A:
Summary of Proposed Housing Choice Voucher Administrative Plan Policy Changes Effective Upon Board Approval

2023 Mid-Year Amended Annual Plan: Some of the policy changes requested in the Mid-year revision and conditionally approved by HUD as of 1/17/24 are included below to provide exact policy language and/or to adjust implementation dates. In addition, due to the denial of Safe Harbor waivers, the following MTW waivers will not be implemented for 7/1/24 as planned and have been removed from our Mid-year Revision. 1.g, 1.h and 1.r, 1.s for the simplification of rent calculations and 9.c regarding the elimination of PBV Selection Processes for PHA-owned Projects. These will be looked again for future consideration.

All policies below are effective 7/1/24 unless otherwise noted and will have varying implementation timelines noted in the last column.

Ch	Old Policy Language	New Policy Language	Summary
3	3-I.B. FAMILY AND HOUSEHOLD [24 CFR 5.403; FR Notice 02/03/12; Notice PIH 2014-20; and FR Notice 2/14/23] If the Head of Household's adult child has moved out of the unit and wishes to return within 6 months, he/she will be allowed to move back in only one time, pending passing HACC background screening. Adult is defined as 18 years or older at the time they wish to move back in. Any future move outs would be final. If it is the first move out but has been more than 6 months, they will not be permitted to move back in. No other adult household members may return after moving out. Waivers to this provision may be requested from HACC.	3-I.B. FAMILY AND HOUSEHOLD [24 CFR 5.403; FR Notice 02/03/12; Notice PIH 2014-20; and FR Notice 2/14/23] 3. If the Head of Household's adult child has moved out of the unit and wishes to return within 13 months, he/she will be allowed to move back in only one time, pending passing HACC background screening. Adult is defined as 18 years or older at the time they wish to move back in. Any future move outs would be final. If it is the first move out but has been more than 13 months, they will not be permitted to move back in. They will need to apply to a wait list.	General Policy Change Allowing return of prior existing adult child to return after 13 months departure instead of only 6 months. Implementing by 1/1/25
3	3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY Family Break-up [24 CFR 982.315; Notice PIH 2017-08]	3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY Family Break-up [24 CFR 982.315; Notice PIH 2017-08] (1) who originally was issued the assistance (6) if the voucher has a special population served requirement such as homeless, elderly or disabled; (7) vulnerability and risks of homelessness and availability of other housing options; and	General Policy Change Adding determinates of who will retain voucher during a breakup. Implementing by 1/1/25

3	General policy added.	Remaining Member of a Tenant Family [24 CFR 5.403] HACC Policy Essential family members do not qualify as a remaining family member unless meet all three criteria as verified by a medical professional: Must be elderly, disabled and at risk of homelessness.	General Policy Change Limiting the ability of an essential family member to "inherit" a voucher. Implementation to begin 7/1/24
4	4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36] When the waiting list is open, applications will be available on the HACC website electronically and paper applications will be provided upon request.	4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36] When the waiting list is open, applications will be available electronically and staff assistance will be provided upon request at HACC's Administrative Offices.	General Policy Change No longer accepting paper applications, assisting clients to apply online instead. Implementation to begin 7/1/24
4	4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205] HACC Policy HACC will maintain a waiting list for the HCV program including the Mainstream HCV program. Preferences will be well documented by maintaining a list of applications received by date before combining them in the general wait list with a local preference designation. SPC, FYI, EHV and RLRA wait lists are maintained through Coordinated Housing access (CHA) system managed by the Continuum of Care (CoC). Case management referrals coming to HACC through service providers who pull off this wait list system of referral. HACC maintains separate site-based wait lists for each PBV Property. The separate PBV wait lists will be listed on HACC website with descriptions of any population served and wait list status and when open how to apply.	4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205] HACC Policy HACC will maintain one waiting list for the tenant-based HCV program. Per regulations, initial lease up at any PBV property will require that all tenant-based HCV wait list applicants be given first opportunity to apply. Preferences will be well documented. The Coordinated Housing Access (CHA) system will manage the following unhoused preference voucher waitlists: Mainstream (MS), SPC, FYI, EHV and RLRA. When clients are pulled off of a CHA waitlist, they will be matched with case management services before being referred to HACC. The Portland Veteran's Administration will maintain the wait list for VASH PBV vouchers and will refer directly to HACC. HACC will maintain one PBV wait list and will utilize the CHA as the wait list to prioritize placement of unhoused individuals based on the population served at each property.	General Policy Change Simplify the wait list process and prioritize homeless or most vulnerable residents of Clackamas County using the Coordinated Housing Access (CHA) line. Implementation to begin 7/1/24

4	4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206] Closing the Waiting List <u>HACC Policy</u> HACC Policy HACC will close the waiting list when the estimated waiting period for housing assistance for applicants on the list exceeds 24 months. Where HACC has particular preferences or funding criteria that require a specific category of family, HACC may elect to continue to accept applications from these applicants while closing the waiting list to others.	4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206] Closing the Waiting List <u>HACC Policy</u> HACC will close the HCV waiting list when the estimated waiting period for housing assistance for applicants on the list exceeds 24 months. For special programs such as MS, SPC, FYI, EHV and RLRA that use the CHA as their wait list, the CHA guidelines as determined by the Continuum of Care (CoC) will be used.	General Policy Change Simplifying all wait lists and reducing administrative burden by using CHA to manage the waitlists. Implementation to begin 7/1/24
4	4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204] The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list. The family's response must be in through Yardi's Rent Café portal.	4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204] The update request will provide a deadline by which the family must respond in the online system and will state that failure to respond will result in the applicant's name being removed from the waiting list. The family's response must be through the online system. Upon request, HACC staff will assist applicants with updating information in the online system.	General Policy Change Administrative burden reduction for HACC requiring use of online updates for applicants. Implementation to begin 7/1/24
4	4-III.B. SELECTION AND HCV FUNDING SOURCES Mainstream HCV dedicated to non-elderly (must be over 18 or under 62 years of age) and disabled families.	4-III.B. SELECTION AND HCV FUNDING SOURCES Mainstream Voucher (MS): Preference is given to non-elderly (must be over 18 or under 62 years of age) and disabled families who are homeless or at risk of homelessness or exiting institutional care.	General Policy Change Adding a homeless and exiting institutional care preference as required for the new funding of Mainstream Vouchers to align with CHA systems. Implementation to begin 7/1/24
4	Local Preferences [24 CFR 982.207; HCV p. 4-16] 4-III.C. SELECTION METHOD 6. Maximum of 33 dedicated vouchers to serve homeless persons per fiscal year (FY) (July 1st to June 30th). Families must be homeless at the time	Local Preferences [24 CFR 982.207; HCV p. 4-16] 4-III.C. SELECTION METHOD All of preferences in old language removed.	General Policy Change Removed individual agency preference referrals to using the CHA to reduce

	of application. This preference can only come from direct referring agencies that have signed a Memorandum of Understanding (MOU) outlining the services to be offered to those referred. The referrals must originate from the Coordinated Housing Access (CHA) system and have an HMIS identification number to show an intake was completed. To be referred households must be actively engaged in services at time of voucher issue. Referring agencies are limited to no more than 5 referrals from July 1-December 31. Starting January 1 remaining available vouchers will be distributed first come, first served order. Unused Preference slots do not carry over to the next fiscal year. 7. Maximum of 17 dedicated vouchers within a fiscal year (July 1st to June 30th) for families referred by a domestic violence professional counseling organization and/or shelter, for victims of domestic violence that has occurred within the last 12 months and are certified as homeless by the agency and who continue to be in counseling or case management through the referring agency or other professionally recognized counseling organization. Referrals from agencies that have signed an MOU outlining the services to be offered to their referral families will only be accepted. The applicant must certify that the abuser will not reside with the applicant unless the PHA gives prior written approval. Applicants will be served on a first come, first served basis. Unused Preference slots do not carry over to the next fiscal year. 8. Maximum of 10 dedicated vouchers per year within a fiscal year (July 1st to June 30th) for households referred by a provider that has entered into a Supportive Services MOU with HACC and applicant has been deemed by the provider to be in		administrative burden and work with One County to end homelessness using the mechanism. Implementation to begin 7/1/24

	less need for supportive services. The household must be considered a candidate that is graduating off the PSH and that at time of entry into the PSH program were homeless and/or disabled. Unused Preference slots do not carry over to the next fiscal year. Referring agencies are limited to no more than 5 referrals from July 1-December 31. Starting January 1 remaining available vouchers will be distributed first come, first served order. Unused Preference slots do not carry over to the next fiscal year.		
4	Local Preferences [24 CFR 982.207; HCV p. 4-16] 4-III.C. SELECTION METHOD	Local Preferences [24 CFR 982.207; HCV p. 4-16] 4-III.C. SELECTION METHOD 6. Definition of Work-focused Household: Work-focused household is a household in which neither the head, spouse, nor cohead is a senior or a person with disabilities. All households that do not meet the definition of a senior and people with disabilities household are considered work-focused households. Work-focused households will be given preference when over 75% of households served are at or below 30% AMI. 7. Households residing in Clackamas County The term "residence" includes shelters and other dwelling places where homeless families may be living or sleeping. Applicants who are working or have been notified that they were hired to work in Clackamas County will be treated as residents of Clackamas County. Graduates of, or active participants in, education and training programs in Clackamas County will be treated as residents of Clackamas County if the education or training program is designed to prepare individuals for the job market. The PHA defines training program as "a learning process with goals and objectives, generally having a variety of	General Policy Change Adding preference for work focused households and Clackamas County residents and defining homeless preference for special purpose vouchers. Implementation to begin 7/1/24

		components, and taking place in a series of sessions over a period to time. It is designed to lead to a higher level of proficiency, and it enhances the individual's ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education". Employment, education, or training programs would include active participation in any of the following: GED or high school diploma, employment readiness programs, short term or long-term training programs that will result in a certification; or a degree-seeking program at a college or university with a minimum enrollment requirement of six credit hours. The previous list is not inclusive of all eligible employment, education, or training programs. Third-party verification of active participation or graduation from such program within the past year will be required to receive a preference. 11. Elderly and disabled homeless or at risk of homeless families that are extremely low income will be given preference for the following special purpose vouchers: MS, SPC, FYI, EHV and RLRA.	
4	4-III.E. THE APPLICATION INTERVIEW 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).	4-III.E. THE APPLICATION INTERVIEW If the family is unable to obtain the information or materials within the required time frame, the family may request one 10-day extension. Any additional requests for extensions will only be granted in cases of reasonable accommodation.	General Policy Change Clarifying the maximum time frame for extension requests. Implementation to begin 7/1/24

5	5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS HACC Policy HACC will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances. However, to avoid cutting families from the program due to insufficient funding, HACC will not absorb the cost of allowing an additional bedroom if other non-disabled family members are able to double up to give an extra bedroom for use by the disabled family member. The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size or reasonable accommodation payment standard and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability–related request for accommodation is readily apparent or otherwise known. The family's continued need for an additional bedroom due to special medical equipment may be re-verified at annual reexamination. HACC will notify the family of its determination within 14 business days of receiving the family's request. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.	5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS <u>HACC Policy</u> HACC will strictly enforce two per bedroom to avoid a financial burden. HACC will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances only if a "bedroom" specifically is required and other rooms within the unit cannot be used to meet the needs. During a housing crisis and/or while there is insufficient funding to serve our fully allotted number of vouchers congressionally approved (ACC), HACC will not absorb the cost of allowing an additional bedroom if other non-disabled family members are able to share bedroom or other rooms for sleeping to give an extra bedroom for use by the disabled family member. Additionally, HACC will not absorb the cost of allowing an additional bedroom if medical supplies or equipment can be stored in rooms other than a bedroom (living room, closet, corner of kitchen, etc.). The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size or reasonable accommodation payment standard and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability–related need for accommodation is readily apparent or otherwise known. The family's continued need for an additional bedroom due to special medical equipment may be re-verified at annual reexamination. No request will be considered prior to receiving verification of disability related need for an accommodation. HACC will notify the family of its determination within 14 business days of receiving the family's accommodation request and the verification of disability related need. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.	General Policy Change To serve as many families as possible HACC is strictly enforcing 2 per bedroom subsidy standards. Implementation to begin 7/1/24

5	5-II.D. VOUCHER ISSUANCE AND RESCISSIONS [24 CFR 982.302]	5-II.D. VOUCHER ISSUANCE AND RESCISSIONS [24 CFR 982.302] Category 3: Vouchers for whom there are no elderly or disabled family members.	General Policy Change If we ever had to rescind vouchers, clarifies nondisabled households would be removed before disabled households. Implementation to begin 7/1/24
6	6-I.B. HOUSEHOLD COMPOSITION AND INCOME Temporarily Absent Family Members <u>HACC Policy</u> Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.	6-I.B. HOUSEHOLD COMPOSITION AND INCOME Temporarily Absent Family Members <u>HACC Policy</u> Unless specifically excluded by the regulations, the income of all family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit (as confirmed by the state child welfare agency). An individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. An individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.	HOTMA Change Added language as to clarify all income of all household members are counted regardless of if temporarily absent. Implementation no later than 1/1/25
6	6-I.C. ANTICIPATING ANNUAL INCOME <u>HACC Policy</u> When EIV is obtained and the family does not dispute the EIV employer data, HACC will use current tenant-provided documents to project annual income. When the tenant provided documents are pay stubs, HACC will make every effort to obtain current and consecutive pay stubs dated within the last 60 days. HACC will obtain written and/or oral third-party verification in accordance with the verification	6-I.C. CALCULATING ANNUAL INCOME <u>HACC Policy</u> When EIV is obtained and HACC cannot readily anticipate income based upon current circumstances (e.g., in the case of temporary, sporadic, or variable employment, seasonal employment, unstable working hours, or suspected fraud), HACC will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.	HOTMA Change Simplified language to align with HOTMA regulations. Implementation no later than 1/1/25

	requirements and policy in Chapter 7 in the following cases: If EIV or other UIV data is not available, If HACC determines additional information is needed. In such cases, HACC will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how HACC annualized projected income. When HACC cannot readily anticipate income based upon current circumstances (e.g., in the case of seasonal employment, unstable working hours, or suspected fraud), HACC will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income. Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to HACC to show why the historic pattern does not represent the family's anticipated income.	Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to HACC to show why the historic pattern does not represent the family's anticipated income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.	
6	6-I.D. EARNED INCOME <u>HACC Policy</u> For persons who regularly receive bonuses or commissions, HACC will verify, and then average amounts received for the two years preceding admission or reexamination. If only a one-year history is available, HACC will use the prior year amounts. In either case the family may provide, and HACC will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, HACC will	6-I.D. EARNED INCOME <u>HACC Policy</u> The PHA will include in annual income the full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation. For people who regularly receive bonuses or commissions, HACC will verify, and then average amounts received for the two years preceding admission or interim reexamination. If only a one-year history is available, HACC will use the prior year amounts. In either case the family may provide, and HACC will consider, a	HOTMA Change Added policy language to align with HOTMA regulations. Implementation no later than 1/1/25

	count only the amount estimated by the employer. The file will be documented appropriately.	credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, HACC will count only the amount estimated by the employer. The file will be documented appropriately.	
6	6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9); Notice PIH 2015-21] All old language removed.	6-I.G. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27] HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)] <u>HACC Policy</u> If a student only receives financial assistance under Title IV of the Higher Education Act (HEA) and do not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family's annual income. The PHA will not calculate actual covered costs in this case. If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student's financial assistance from the student's actual covered costs. The PHA will include any amount of financial assistance in excess of the student's actual covered costs in the family's annual income. Example 1 • Actual covered costs: $20,000 • Other student financial assistance: $25,000 • Excluded income: $20,000 ($25,000 in financial assistance - $20,000 in actual covered costs) • Included income: $5,000 When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the	HOTMA Change Added policy language and clarification by adding examples. Implementation no later than 1/1/25

other student's financial assistance will be applied to any remaining actual covered costs.

If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance" would be excluded from income.

Example 2

- Actual covered costs: $25,000
- Title IV HEA assistance: $26,000
- Title IV HEA assistance covers the students' entire actual covered costs.
- Other Student Financial Assistance: $5,000
- Excluded income: The entire Title IV HEA assistance of $26,000
- Included income: All other financial assistance of $5,000

If the amount of assistance excluded under Title IV of the HEA is less than the actual covered costs, the PHA will exclude the amount of other student financial assistance up to the amount of the remaining actual covered costs.

Example 3

- Actual covered costs: $22,000
- Title IV HEA assistance: $15,000
- The remaining amount not covered by Title IV HEA assistance is $7,000 ($22,000 in actual covered costs - $15,000 in Title IV HEA assistance).
- Other Student Financial Assistance: $5,000
- $7,000 in remaining actual covered costs - $5,000 in other financial assistance
- Excluded income: $15,000 entire amount of the Title IV HEA Assistance + $5,000 in other financial assistance
- Included income: $0

Example 4

- Actual covered costs: $18,000

		• Title IV HEA Assistance: $15,000 • The remaining amount not covered by Title IV HEA assistance is $3,000 ($18,000 in actual covered costs - $15,000 in Title IV HEA Assistance) • Other student Financial Assistance: $5,000 • When other student financial assistance is applied, financial assistance exceeds actual covered costs by $2,000 ($3,000 in actual covered costs - $5,000 in other financial assistance). • Included income: $2,000 (the amount by which the financial aid exceeds the student's actual covered costs).	
6	New HOTMA policy added.	6-I.H. PERIODIC PAYMENTS <u>HACC Policy</u> HACC will include in annual income the full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts. Payments in lieu of earnings, such as unemployment and disability compensation, and severance pay are also counted as income if they are received in the form of periodic payments.	HOTMA Change Added policy language defining all payments included in the calculation of income. Implementation no later than 1/1/25
6	6-I.H. PERIODIC PAYMENTS Lump-Sum Payments for the Delayed Start of a Periodic Payment <u>HACC Policy</u> When a delayed-start payment is received and reported during the period in which HACC is processing an annual reexamination, HACC will adjust the family share and HACC subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with HACC.	6-I.H. PERIODIC PAYMENTS Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)] <u>HACC Policy</u> HACC will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance. If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 11. If not, the PHA will consider the amount when processing the family's next regular recertification.	HOTMA change Added policy language to align with the changes to examination schedules. Implementation no later than 1/1/25

6	New HOTMA policy added.	6-I.H. PERIODIC PAYMENTS Alimony and Child Support <u>HACC Policy</u> The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement. The PHA will count court-awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made. In order to verify that payments are not being made, the PHA will review child support payments over the last three months. If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made. At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income. If the PHA determines and can appropriately verify that the family in all likelihood will not receive a similar payment, then the amount will not be considered when projecting annual income. If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income. If no payments have been made in the past three months and there are no lump sums, the PHA will not include alimony or child support in annual income. Alternately, the PHA will only count alimony or child support if it can verify three months of payments.	HOTMA Change Added language that the PHA will consider alimony and child support in calculations only when 3 months of payments can be verified. Implementation no later than 1/1/25

6	PART II: ASSETS HACC Policy HACC will accept a family's declaration of the amount of assets less than $5,000 and the amount of income expected to be received from those assets. HACC's reexamination documentation, which is signed by all adult family members can serve as the declaration. Where the family has net family assets equal to or less than $5,000, HACC does not need to request supporting documentation (e.g. bank statements) for the family to confirm the assets or the amount of income expected to be received from those assets. Where the family has net family assets in excess of $5,000, HACC must obtain supporting documentation to confirm assets. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to HACC to show why the asset income determination does not represent the family's anticipated asset income.	PART II: ASSETS HACC Policy – 7/1/2024 HACC will allow families to self-certify assets do not exceed $50,000 per Chapter 7 of the Administrative Plan.	HOTMA Change Providing exact policy language. Allows families to self-certify assets under $50,000. Implementation no later than 1/1/25
6	6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505; 982.503(b)] HACC Policy If HACC changes its payment standard schedule resulting in a lower payment standard amount, during the term of a HAP contract, the PHA will reduce the payment standard at the family's second regular reexamination following the effective date of the decrease. HACC will not establish different policies for decreases in the payment standard for designated areas within their jurisdiction. Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination	6-IV.F. APPLYING PAYMENT STANDARDS [24 CFR 982.505; 982.503(b)] HACC Policy – Effective July 1, 2024 Revised payment standards will be applied to a family's rent and subsidy calculation at the first annual or interim reexamination that is effective after the payment standard is adopted. HACC will not do a re-exam solely for the purpose of implementing a new Payment Standard.	General Policy Change Updated to apply new payment standards at annuals and interims. Allows payment standards to increase in better alignment with rent increases. Implementation to begin 7/1/24

6	6-III.D. APPLYING UTILITY ALLOWANCES [24 CFR 982.517] HACC Policy Revised utility allowances will be applied to a family's rent and subsidy calculations at the next annual reexamination that is effective after the allowance is adopted. HACC will not do a re-exam solely for purposes of implementing a new Utility Allowance.	6-IV.G. APPLYING UTILITY ALLOWANCES [24 CFR 982.517] HACC Policy (MTW 3.b impacted)– Effective July 1, 2024 Revised utility allowances will be applied to a family's rent and subsidy calculation at the next examination that is effective after the allowance is adopted. HACC will not do a re-exam solely for purposes of implementing a new Utility Allowance.	General Policy Change Updated to align with MTW waiver 3.b -Alternate Re-examination Schedule change and to have the least impact on households with rent increases. Implementation to begin 7/1/24
7	New HOTMA policy added.	7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27] <u>HACC Policy</u> HACC will not use income determinations from federal assistance programs to determine the family's annual income as outlined above; therefore, HACC will not use streamlined income determinations where applicable.	HOTMA Change HACC is choosing not to use other assistance program income determinations in order to better control compliance with HACC policies. Implementation no later than 1/1/25
7	New HOTMA Policy added.	7.I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27] *Value of Assets and Asset Income [24 CFR 982.516(a)]* <u>HACC Policy (MTW) – Effective July 1, 2024</u> For families with net assets totaling $50,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets.	HOTMA Change Allows families to self-certify assets under $50,000. Implementation no later than 1/1/25

7	New HOTMA policy added.	<u>HACC Policy</u> When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to HACC. HACC may require a family to certify that a family member does <u>not</u> receive a particular type of income or benefit. HACC will not require families to provide self-certification for changes in bank accounts. The self-certification must be made in a format acceptable to HACC and must be signed by the family member whose information or status is being verified. All self-certifications will include the following language: *"I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. WARNING: Anyone who knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)."*	HOTMA Change Added required language that must be added to certification documents. Implementation no later than 1/1/25
8	New MTW policy added.	Inspection of HACC-Owned Units [24 CFR 982.352(b)] <u>HACC Policy (MTW 5.c) – Effective 7/1/24</u> The PHA opted to inspect its own units with HUD approval under Moving to Work authority. Where the PHA-owned units are managed by a third-party property manager, thus reducing the conflict of interest, the PHA will not require quality control inspections by a third-party outside agency.	MTW Waiver 5.c – Third-Party PBV Inspections included in 2023 Mid-Year HACC can now inspect HACC owned units operated by a third party. Implementation to begin 7/1/24

8	New MTW policy added.	PART III: RENT REASONABLENESS [24 CFR 982.507] HACC Policy (MTW 2.d) – Effective 7/1/24 The PHA opted to determine rent reasonableness for the PHA-owned units with HUD approval under Moving to Work authority. Where the PHA-owned units are managed by a third-party property manager, thus reducing the conflict of interest, the PHA will not require quality control testing of rent reasonableness determinations by a third-party outside agency.	MTW Waiver 2.d – Rent Reasonableness included in 2023 Mid-Year HACC can now do Rent Reasonableness on HACC owned units operated by a third party. Implementation to begin 7/1/24
8	New Required Policy Added	HQS will transition to NSPIRE by 10/1/24 + Required policy language to be added when it is available. This is a required change to replace current HQS inspections with new NSPIRE inspection protocols.	HUD required Change Added here to notify residents this change is coming. Implementation will be completed by 10/1/24
9	9-I.H. CHANGES IN LEASE OR RENT [24 CFR 982.308] HACC Policy Where the owner is requesting a rent increase, HACC will determine whether the requested increase is reasonable. The owner will be notified of the determination either by phone or in writing. Rent increases will go into effect on the first of the month following the 60-day period after the owner notifies HACC of the rent change or on the date specified by the owner, whichever is later.	9-I.H. CHANGES IN LEASE OR RENT [24 CFR 982.308] HACC Policy – Effective 7/1/2024 Where the owner is requesting a rent increase, HACC will determine whether the requested increase is reasonable. The owner will be notified of the determination either by phone or in writing. Where the owner is requesting a rent increase, the PHA will determine whether the requested increase is reasonable within 15 business days of receiving the request from the owner. The owner will be notified of the determination in writing. Rent increases will go into effect on the first of the month following the 60-day period after the owner notifies HACC of the rent change or on the date specified by the owner, whichever is later.	General Policy Change Added language to remove requirement for a new HAP contract and allow for an addendum instead. Implementation to begin 7/1/24

		The PHA will not execute a new HAP contract where there are changes in lease requirements governing tenant or owner responsibilities for utilities or appliances. If the owner and the family agree to such changes, the PHA will require a copy of the written agreement executed by the owner and the family. The PHA must receive a copy of the agreement at least 30 days before the changes go into effect. The PHA will not execute a new HAP contract where there are changes in lease provisions governing the term of the lease. The PHA must receive a copy of the new lease agreement at least 30 days before the date the lease starts.	
11	New MTW policy added.	11-I.B. SCHEDULING REGULAR TRIENNIAL REEXAMINATIONS PHA Policy (MTW 3.b) – Effective 7/1/24 For seniors and people with disabilities households, the PHA will conduct regular reexaminations triennially (once every three years). As a part of the regular reexamination process, the PHA will determine ongoing eligibility for previously determined household type (seniors and people with disabilities or work-focused). Changes in household type will be applied at the family's regular reexamination in accordance with policies in this chapter.	MTW Waiver 3.b – Alternate Re-Examination Schedule included in 2023 Mid-Year HACC will be streamlining reexaminations for elderly and disabled households. Implementation to begin 7/1/24
11	New HOTMA policy added.	11-II.C. CHANGES AFFECTING INCOME OR EXPENSES HACC Policy HACC will conduct an interim reexamination upon request any time the family's adjusted income has decreased. HACC Policy When a family reports an increase in their earned income between annual reexaminations, HACC will conduct an interim reexamination if there is a 10 percent increase and if there was a previous decrease since the family's last annual reexamination. The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income. The PHA will perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination	HOTMA Change Streamline workload and only doing interim if a household income change is 10% or more. Regardless of this, families must report all changes in family composition or income within 7 business days. Implementation no later than 1/1/25.

		effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with the PHA policies in Chapter 14. HACC Policy The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last three months of the certification period. Families must report changes in income within 7 business days of the date the change takes effect. The family must notify HACC of the changes in writing.	
11	General policy added.	11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES HACC Policy – Effective 7/1/24 If the payment standard amount changes during the term of the HAP contract, the new payment standard will be applied in accordance with policies in Chapter 6.	General Policy Change Clarification only to update at every reexamination. Implementation to begin 7/1/24
11	General policy added.	11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES HACC Policy – Effective 7/1/24 If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in the PHA's subsidy standards (see Chapter 5), the new family unit size will be used to determine the payment standard amount for the family in accordance with policies in Chapter 6.	General Policy Change Clarification only to update at every reexamination. Implementation to begin 7/1/24
14	New HOTMA policy added.	14-II.D. HACC-CAUSED ERRORS OR PROGRAM ABUSE De Minimis Errors [24 CFR 5.609(c)(4)] The PHA will not be considered out of compliance when making annual income determinations solely due to de minimis errors in calculating family income. A de minimis error is an error where the PHA determination of family income deviates from the correct income determination by no more than $30 per month in monthly adjusted income ($360 in annual adjusted income) per family.	HOTMA Change Added to explain handling of corrections of rent overpayments. Implementation no later than 1/1/25

		PHAs must take corrective action to credit or repay a family if the family was overcharged rent, including when PHAs make de minimis errors in the income determination. Families will not be required to repay the PHA in instances where the PHA miscalculated income resulting in a family being undercharged for rent. PHAs state in their policies how they will repay or credit a family the amount they were overcharged as a result of the PHA's de minimis error in income determination. <u>HACC Policy</u> The PHA will reimburse a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error, staff program abuse, or a de minimis error.	
16	General policy added.	16-VI.B. RECORD RETENTION [24 CFR 982.158] <u>HACC Policy</u> The PHA will keep for at least three years records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act, the equal access final rule, or VAWA.	General Policy Change Clarification for VAWA record retention of at least three years. Implementation to begin 7/1/24
17	New MTW Policy added.	17-I.A. OVERVIEW [24 CFR 983.5; FR Notice 1/18/17; Notice PIH 2017-21] <u>HACC Policy (MTW 9.b) – Effective 7/1/24</u> The PHA opted to eliminate a 20 percent of budget authority cap on project-based voucher allocations under the Moving to Work authority.	MTW Waiver 9.b – Increase PBV Cap included in 2023 Mid-Year Allows the PHA to PBV more vouchers than normally allowed. Tool to encourage affordable housing development. Implementation to begin 7/1/24
17	New MTW policy added.	17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT 25 Percent per Project Cap [24 CFR 983.56, FR Notice 1/18/17, and Notice PIH 2017-21] <u>HACC Policy (MTW 9.b) – Effective 7/1/24</u> The MTW authority allows the PHA to exceed the traditional 25 percent or 25-unit limit on PBV units is a single project. The PHA	MTW Waiver 9.b – Increase PBV Cap included in 2023 Mid-Year

		allows project-based vouchers to be awarded to more than 25 units or 25 percent of units in a given project. Any projects with more than 25 PBV units or 25% of PBV units will create a service or support services plan that will include some or all of the following services: Transportation for activities such as grocery shopping, attending medical and dental appointments; Supervised taking of medications; Treatment for drug rehabilitation in the case of current abusers; Treatment for alcohol addiction in the case of current abusers; Eviction prevention and housing stabilization; Supportive living for people experiencing mental illness or other disabilities; Domestic violence counseling; Meals on Wheels; Training in housekeeping and homemaking activities; Family budgeting; Child care; Parenting skills; Life skills; Computer training; Work skills development and job training. The PHA will track services offered at the projects. The sponsor agencies may be required to submit a report to the PHA annually identifying the services received by each family. Exceptions to 25 Percent per Project Cap [FR Notice 1/18/17; Notice PIH 2017-21]	Allows us to exceed cap of PBV awards at properties that provide services to its clients. Implementation to begin 7/1/24
17	New MTW policy added.	17-III.D. INSPECTING UNITS <u>HACC Policy (MTW 5.c) – Effective 7/1/24</u> The PHA will inspect its own units managed by a third-party property manager. The PHA will contract an outside agency to conduct a five percent quality control test of the inspections conducted by the PHA when buildings are owned and managed by the PHA. This is for only the PHA-owned units that are managed by a third-party property manager, thus reducing the conflict of interest, the PHA will not require quality control inspections by a third-party outside agency.	MTW Waiver 5.c Third-Party Inspections for PBV included in 2023 Mid-Year Allows HACC to inspect its own PBV units rather than pay for a third-party contractor. Implementation to begin 7/1/24
17	General policy added.	17-VI.B. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)] <u>HACC Policy – 7/1/2024</u> The PHA will provide greater access to the PBV program to low-income families with barriers. Screening and eligibility criteria may be different from the requirements for the tenant-based	General Policy Change Reduced screening barriers at PBV properties. Implementation to begin 7/1/24

		voucher program. The PHA will determine an applicant family's eligibility for the PBV program based on the capacity of the service provider and specific population agreed to be served in HAP contract and Memorandum of Understanding for each specific property. Partnerships with service providers and specific requirements, as laid out in HAP contract and Memorandum of Understanding, will enable the PHA to provide housing assistance to otherwise ineligible applicants. The PHA will follow the regulations governing restrictions on assistance to noncitizens in accordance with policies in Section 3-II.B.	
17	General policy added.	17-VI.C. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)] <u>HACC Policy – 7/1/2024</u> HACC will establish one PBV wait list by utilizing the Coordinated Housing Access (CHA) wait list to house the most vulnerable that meet each properties unique Tenant Selection Plan (TSP) priority populations. 17-VI.D. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)] <u>HACC Policy – 7/1/2024</u> HACC as part of the Continuum of Care (CoC), HACC will rely on the CHA wait list prioritization for selection to house the most vulnerable that meet each properties unique Tenant Selection Plan (TSP) priority populations.	General Policy change Changing to one PBV wait list where all clients are referred through the CHA. Implementation to begin 7/1/24
17	New MTW policy added.	17-VII.C. MOVES HACC Policy (MTW 9.h) – Effective 7/1/2024 PBV voucher holders wishing to transfer to a tenant-based program will be placed on a waiting list after their first year of PBV residency. The PHA will not give preference or priority on the HCV waiting list, other than those general preferences given to all on the wait list. Exceptions for VAWA and reasonable accommodation will be honored after the first year of the lease. This policy will be implemented with all PBV placements on or after 7/1/2025. Those leased in a PBV unit prior to 7/1/2025 will be grandfathered to follow 24 CFR 983.261.	MTW Waiver 9.h – Limit Portability for PBV included in 2023 Mid-Year No additional preferences will be given for PBV resident status. Standard waitlist protocol will be applied for transfers to TBV. Implementing 7/1/24

17	General Policy Added.	PART VIII: DETERMINING RENT TO OWNER *Rent Increase* HACC Policy – Effective 7/1/2024 Rent increases will be applied to all tenants upon approval regardless of lease term.	General Policy Ease of administration and to ensure properties are made economically better off. Implementing 7/1/24
17	New MTW policy added.	PART VIII: DETERMINING RENT TO OWNER How to Determine Reasonable Rent HACC Policy (MTW 2.d) – Effective 7/1/2024 The PHA opted to determine the initial rent to the owner and the annual redetermination of rent for the PHA-owned units under the Moving to Work authority. The PHA will contract an outside agency to conduct a five percent quality control test of initial determination and annual redetermination of rent conducted by the PHA when buildings are owned and managed by the PHA. Where the PHA-owned units are managed by a third-party property manager, thus reducing the conflict of interest, the PHA will not require quality control testing of initial determination and annual redetermination of rent by a third-party outside agency.	MTW Waiver 2.d – Rent Reasonableness included in 2023 Mid-Year Allows HACC to determine its own rent reasonableness instead of paying a third-party. Implementing 7/1/24

ATTACHMENT B
Summary of Proposed Admissions and Continued Occupancy Plan Policy Changes

2023 Mid-Year Amended Annual Plan: Some of the policy changes requested in the Mid-year revision and conditionally approved by HUD as of 1/17/24 are included below to provide exact policy language and/or to adjust implementation dates. In addition, due to the denial of Safe Harbor waivers, the following MTW waivers will not be implemented for 7/1/24 as planned and have been removed from our Mid-year Revision. 1.g,1.h and 1.r, 1.s for the simplification of rent calculations and 9.c regarding the elimination of PBV Selection Processes for PHA-owned Projects. These will be looked again for future consideration.

All policies below are effective 7/1/24 unless otherwise noted and will have varying implementation timelines noted in the last column.
***Indicates alignment with Admin Plan.**

C	Old Policy Language	New Policy Language	Summary
3	New General Policy added.	Remaining Member of a Tenant Family [24 CFR 5.403] <u>HACC Policy</u> Essential family members do not qualify as a remaining family member unless meet all three criteria as verified by a medical professional: Must be elderly, disabled and at risk of homelessness.	General Policy Change* Limiting essential family members ability to "inherit" assistance. Implementation to begin 7/1/24
3	3-I.B. FAMILY AND HOUSEHOLD [24 CFR 5.105(a)(2), 24 CFR 5.403, FR Notice 02/03/12, Notice PIH 2014-20, Notice PIH 2023-27, and FR Notice 2/14/23] Other Family Definitions: A child who is temporarily away from the home because of placement in foster care is considered a member of the family; HACC will not permit others who are currently living in independent circumstances and have done so for a period of more than six months to move in with the participating family. Such persons may apply for housing by joining the wait list for any HACC housing program when the waiting lists are open.	3-I.B. FAMILY AND HOUSEHOLD [24 CFR 5.105(a)(2), 24 CFR 5.403, FR Notice 02/03/12, Notice PIH 2014-20, Notice PIH 2023-27, and FR Notice 2/14/23]3. Other Family Definitions: A child who is temporarily away from the home because of placement in foster care is considered a member of the family; HACC will not permit others who are currently living in independent circumstances and have done so for a period of more than thirteen months to move in with the participating family. Such persons may apply for housing by joining the wait list for any HACC housing program when the waiting lists are open.	General Policy Change Allowing return of prior existing adult child to return after 13 months departure instead of only 6 months. Implementing by 1/1/25

4	4-I.B. APPLYING FOR ASSISTANCE [Notice PIH 2009-36] When the waiting list is open, applications will be available on the HACC website electronically and paper applications will be provided upon request.	4-I.B. APPLYING FOR ASSISTANCE [Notice PIH 2009-36] When the waiting list is open, applications will be available electronically and staff assistance will be provided upon request at HACC's Administrative Offices.	General Policy Change* No longer accepting paper applications but assisting clients to apply online in person. Implementation to begin 7/1/24
4	4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206] Closing the Waiting List HACC Policy HACC Policy HACC will close the waiting list when the estimated waiting period for housing assistance for applicants on the list exceeds 24 months. Where HACC has particular preferences or funding criteria that require a specific category of family, HACC may elect to continue to accept applications from these applicants while closing the waiting list to others.	4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206] Closing the Waiting List HACC Policy HACC will close the waiting list when the estimated waiting period for housing applicants on the list reaches 24 months for the most current applicants. Where HACC has particular preferences or other criteria that require a specific category of family, HACC may elect to use the CHA as their wait list, the CHA guidelines as determined by the Continuum of Care (CoC) will be used.	General Policy Change* Simplifying all wait lists to rely on the CHA relieving HACC of the administrative burden of maintaining the wait lists. Implementation to begin 7/1/24
4	4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204] The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list. The family's response must be in through Yardi's Rent Café portal.	4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204] The update request will provide a deadline by which the family must respond in the online system and will state that failure to respond will result in the applicant's name being removed from the waiting list. The family's response must be through the online system. Upon request, HACC staff will assist applicants with updating information in the online system.	General Policy Change* Administrative burden reduction for HACC requiring use of online updates for applicants. Implementation to begin 7/1/24
4	4-III.E. THE APPLICATION INTERVIEW 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	4-III.E. THE APPLICATION INTERVIEW If the family is unable to obtain the information or materials within the required time frame, the family may request one 10-day extension and any additional requests for extensions will only be granted in cases of reasonable accommodation.	General Policy Change* Clarifying the maximum time frame for extension requests. Implementation to begin 7/1/24

	required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).		
5	5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS HACC will notify the family of its determination within 14 business days of receiving the family's request. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.	5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS HACC will notify the family of its determination within 14 business days of receiving the family's 504 request and the 504 verification of disability related need. No request will be considered prior to receiving a 504 verification of disability related need for an accommodation. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.	General Policy Change* Clarifying the need for a 504 Verification of disability related need to request a reasonable accommodation. Implementation to begin 7/1/24
5	5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS HACC Policy HACC will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances. However, to avoid cutting families from the program due to insufficient funding, HACC will not absorb the cost of allowing an additional bedroom if other non-disabled family members are able to double up to give an extra bedroom for use by the disabled family member. The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size or reasonable accommodation payment standard and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability–related request for accommodation is readily apparent or otherwise known. The family's continued need for an additional bedroom due to special	5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS <u>HACC Policy</u> HACC will strictly enforce two per bedroom to avoid a financial burden. HACC will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances only if a "bedroom" specifically is required and other rooms cannot be used to meet the needs. During a housing crisis and/or while there is insufficient funding to serve our currently subsidized population, HACC will not absorb the cost of allowing an additional bedroom if other non-disabled family members are able to share bedroom or other rooms for sleeping to give an extra bedroom for use by the disabled family member. Additionally, HACC will not absorb the cost of allowing an additional bedroom if medical supplies or equipment can be stored in rooms other than a bedroom (living room, closet, corner of kitchen, etc.). The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size or reasonable accommodation payment standard, and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability–related need for accommodation is readily apparent or otherwise known. The family's continued need for an	General Policy Change* To serve as many families as possible HACC is strictly enforcing 2 per bedroom subsidy standards. Implementation to begin 7/1/24

	medical equipment may be re-verified at annual reexamination. HACC will notify the family of its determination within 14 business days of receiving the family's request. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.	additional bedroom due to special medical equipment may be re-verified at annual reexamination. HACC will notify the family of its determination within 14 business days of receiving the family's 504 request and the 504 verification of disability related need. No request will be considered prior to receiving a 504 verification of disability related need for an accommodation. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.	
6	6-I.C. ANTICIPATING ANNUAL INCOME <u>HACC Policy</u> When EIV is obtained and the family does not dispute the EIV employer data, HACC will use current tenant-provided documents to project annual income. When the tenant provided documents are pay stubs, HACC will make every effort to obtain current and consecutive pay stubs dated within the last 60 days. HACC will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases: If EIV or other UIV data is not available, If HACC determines additional information is needed. In such cases, HACC will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how HACC annualized projected income. When HACC cannot readily anticipate income based upon current circumstances (e.g., in the case of seasonal employment, unstable working hours, or suspected fraud), HACC will review and analyze historical data for patterns of employment, paid benefits, and receipt of	6-I.C. CALCULATING ANNUAL INCOME <u>HACC Policy</u> When HACC cannot readily anticipate income based upon current circumstances (e.g., in the case of temporary, sporadic, or variable employment, seasonal employment, unstable working hours, or suspected fraud), HACC will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income. Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to HACC to show why the historic pattern does not represent the family's anticipated income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.	HOTMA Change* Providing exact policy language. Simplified language to align with new HOTMA regulations. Implementation no later than 1/1/25

	other income and use the results of this analysis to establish annual income. Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to HACC to show why the historic pattern does not represent the family's anticipated income.		
6	6-I.D. EARNED INCOME <u>HACC Policy</u> For persons who regularly receive bonuses or commissions, HACC will verify, and then average amounts received for the two years preceding admission or reexamination. If only a one-year history is available, HACC will use the prior year amounts. In either case the family may provide, and HACC will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, HACC will count only the amount estimated by the employer. The file will be documented appropriately.	6-I.D. EARNED INCOME <u>HACC Policy</u> The PHA will include in annual income the full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation. For people who regularly receive bonuses or commissions, HACC will verify, and then average amounts received for the two years preceding admission or interim reexamination. If only a one-year history is available, HACC will use the prior year amounts. In either case the family may provide, and HACC will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, HACC will count only the amount estimated by the employer. The file will be documented appropriately.	HOTMA Change* Providing exact policy language. Added policy language to align with HOTMA changes. Implementation no later than 1/1/25
6	6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9); Notice PIH 2015-21] Had to completely overhaul from old language for HOTMA and this was just a new decision point within HOTMA. Nothing to compare to as all old language gets deleted.	6-I.G. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27] HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)] <u>HACC Policy</u> If a student only receives financial assistance under Title IV of the HEA and does not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family's annual income. The PHA will not calculate actual covered costs in this case. If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student's financial assistance from the student's actual covered costs. The PHA will include any amount of	HOTMA Change* Providing exact policy language. Added policy language to align with HOTMA changes and simplification of language. Implementation no later than 1/1/25

		financial assistance in excess of the student's actual covered costs in the family's annual income. **Example 1** • Actual covered costs: $20,000 • Other student financial assistance: $25,000 • Excluded income: $20,000 ($25,000 in financial assistance - $20,000 in actual covered costs) • Included income: $5,000 When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the other student's financial assistance will be applied to any remaining actual covered costs. If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance" would be excluded from income. **Example 2** • Actual covered costs: $25,000 • Title IV HEA assistance: $26,000 • Title IV HEA assistance covers the students' entire actual covered costs. • Other Student Financial Assistance: $5,000 • Excluded income: The entire Title IV HEA assistance of $26,000 • Included income: All other financial assistance of $5,000 If the amount of assistance excluded under Title IV of the HEA is less than the actual covered costs, the PHA will exclude the amount of other student financial assistance up to the amount of the remaining actual covered costs. **Example 3** • Actual covered costs: $22,000 • Title IV HEA assistance: $15,000 • The remaining amount not covered by Title IV HEA assistance is $7,000 ($22,000 in actual covered costs - $15,000 in Title IV HEA assistance). • Other Student Financial Assistance: $5,000	

		• $7,000 in remaining actual covered costs - $5,000 in other financial assistance • Excluded income: $15,000 entire amount of the Title IV HEA Assistance + $5,000 in other financial assistance • Included income: $0 Example 4 • Actual covered costs: $18,000 • Title IV HEA Assistance: $15,000 • The remaining amount not covered by Title IV HEA assistance is $3,000 ($18,000 in actual covered costs - $15,000 in Title IV HEA Assistance) • Other student Financial Assistance: $5,000 • When other student financial assistance is applied, financial assistance exceeds actual covered costs by $2,000 ($3,000 in actual covered costs - $5,000 in other financial assistance). • Included income: $2,000 (the amount by which the financial aid exceeds the student's actual covered costs).	
6	New HOTMA policy added.	6-I.H. PERIODIC PAYMENTS <u>HACC Policy</u> HACC will include in annual income the all periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts. Payments in lieu of earnings, such as unemployment and disability compensation, and severance pay are also counted as income if they are received in the form of periodic payments.	HOTMA Change* Providing exact policy language. Added language defines all payments included in calculation of income to align with HOTMA regulations. Implementation no later than 1/1/25
6	6-I.H. PERIODIC PAYMENTS Lump-Sum Payments for the Delayed Start of a Periodic Payment <u>HACC Policy</u> When a delayed-start payment is received and reported during the period in which HACC is processing an annual reexamination, HACC will	6-I.H. PERIODIC PAYMENTS Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)] <u>HACC Policy</u> HACC will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.	HOTMA Change* Providing exact policy language. Added policy language to align with the changes to examination schedules.

	adjust the family share and HACC subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with HACC.	If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 11. If not, the PHA will consider the amount when processing the family's next annual recertification.	Implementation no later than 1/1/25
6	New HOTMA policy added.	6-I.H. PERIODIC PAYMENTS Alimony and Child Support <u>HACC Policy</u> The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement. The PHA will count court-awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made. In order to verify that payments are not being made, the PHA will review child support payments over the last three months. If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made. At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income. If the PHA determines and can appropriately verify that the family in all likelihood will not receive a similar payment, then the amount will not be considered when projecting annual income. If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income.	HOTMA Change* Added language that the PHA will consider alimony and child support in calculations only when 3 months of payments can be verified. Implementation no later than 1/1/25

		If no payments have been made in the past three months and there are no lump sums, the PHA will not include alimony or child support in annual income. Alternately, the PHA will only count alimony or child support if it can verify three months of payments.	
6	PART II: ASSETS HACC Policy HACC will accept a family's declaration of the amount of assets less than $5,000 and the amount of income expected to be received from those assets. HACC's reexamination documentation, which is signed by all adult family members can serve as the declaration. Where the family has net family assets equal to or less than $5,000, HACC does not need to request supporting documentation (e.g. bank statements) for the family to confirm the assets or the amount of income expected to be received from those assets. Where the family has net family assets in excess of $5,000, HACC must obtain supporting documentation to confirm assets. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to HACC to show why the asset income determination does not represent the family's anticipated asset income.	PART II: ASSETS HACC Policy – 7/1/2024 HACC will allow families to self-certify assets do not exceed $50,000 per Chapter 7 of the Administrative Plan.	HOTMA Change* Providing exact policy language. Allows families to self-certify assets under $50,000. Implementation no later than 1/1/25
6	6-IV.C. UTILITY ALLOWANCE REVISION [24 CFR 965.507] HACC Policy Unless HACC is required to revise utility allowances retroactively, revised utility	6-IV.C. UTILITY ALLOWANCE REVISION [24 CFR 965.507] HACC Policy (MTW 3.a impacted)– Effective July 1, 2024 Unless HACC is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first	General Policy Change Updated to align with MTW waiver 3.a - Alternate Re-examination Schedule change and to

	allowances will be applied to a family's rent calculations at the first annual reexamination after the allowance is adopted. HACC will not do a re-exam solely for purposes of implementing a new utility allowance.	reexamination after the allowance is adopted. HACC will not do a re-exam solely for purposes of implementing a new utility allowance.	have the least impact on households with rent increases. Implementation to begin 7/1/24
7	New HOTMA policy added.	7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27] <u>HACC Policy</u> HACC will not use income determinations from federal assistance programs to determine the family's annual income as outlined above; therefore, HACC will not use streamlined income determinations where applicable.	HOTMA Change* HACC is choosing not to use other assistance program income determinations in order to better control compliance with HACC policies. Implementation no later than 1/1/25
7	New HOTMA policy added.	7.I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27] *Value of Assets and Asset Income [24 CFR 982.516(a)]* <u>HACC Policy (MTW) – Effective July 1, 2024</u> For families with net assets totaling $50,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets	HOTMA Change* Providing exact policy language. HACC is choosing to allow families to self-certify assets under $50,000. Implementation no later than 1/1/25
7	New HOTMA policy added.	<u>HACC Policy</u> When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to HACC. HACC may require a family to certify that a family member does <u>not</u> receive a particular type of income or benefit. HACC will not require families to provide self-certification for changes in bank accounts.	HOTMA Change* Providing exact policy language. Added required language that must be added to

		The self-certification must be made in a format acceptable to HACC and must be signed by the family member whose information or status is being verified. All self-certifications will include the following language: *"I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. WARNING: Anyone who knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)."*	certification documents. Implementation no later than 1/1/25
8	New Required Policy Added	HQS will transition to NSPIRE by 10/1/24 + Required policy language to be added when it is available. This is a required change to replace current HQS inspections with new NSPIRE inspection protocols.	HUD required Change* Added here to notify residents this change is coming. Implementation will be completed by 10/1/24
9	<u>HACC Policy</u> Generally, HACC will schedule annual reexaminations to coincide with the family's anniversary date. HACC will begin the annual reexamination process approximately 90 days in advance of the scheduled effective date. *Anniversary date* is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission). If the family transfers to a new unit, HACC will perform a new annual reexamination, and the anniversary date will be changed. HACC may also conduct an annual reexamination for completion prior to the anniversary date for administrative purposes.	<u>HACC Policy</u> HACC will begin the annual reexamination process 90 days in advance of its scheduled effective date. Generally, HACC will schedule annual reexamination effective dates to coincide with the family's anniversary date. Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission). The PHA also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.	General Policy Change* Change proposed to keep Tenant's Reexamination date the same even in the event of a move/unit transfer. Change proposed to eliminate administrative burdens that have a high potential to lead to error. Implementation to begin 7/1/24
11	New MTW policy added.	11-I.B. SCHEDULING REGULAR TRIENNIAL REEXAMINATIONS	MTW Waiver 3.a – Alternate Re-examination

		The PHA must establish a policy to ensure that the annual reexamination for each family is completed within a 12-month period and may require reexaminations more frequently [HCV GB p. 12-1]. PHA Policy (MTW 3.a) – Effective 7/1/2024 For seniors and people with disabilities households, the PHA will conduct regular reexaminations triennially (once every three years). As a part of the regular reexamination process, the PHA will determine ongoing eligibility for previously determined household type (seniors and people with disabilities or work-focused). Changes in household type will be applied at the family's regular reexamination in accordance with policies in this chapter.	Schedule included in 2023 Mid-Year* Providing exact policy language. HACC will be streamlining reexaminations for elderly and disabled households. Implementation to begin 7/1/24
11	New HOTMA policy added.	11-II.C. CHANGES AFFECTING INCOME OR EXPENSES HACC Policy HACC will conduct an interim reexamination any time the family's adjusted income has decreased by 10 percent. <u>HACC Policy</u> When a family reports an increase in their earned income between annual reexaminations, HACC will conduct an interim reexamination if there is a 10 percent increase and if there was a previous decrease since the family's last annual reexamination. The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income. The PHA will perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with the PHA policies in Chapter 14. <u>HACC Policy</u> The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income,	HOTMA* Providing exact policy language. Streamline workload and only doing interim if a household income change is 10% or more. Regardless of this, families must report all changes in family composition or income with 7 business days. Implementation no later than 1/1/25

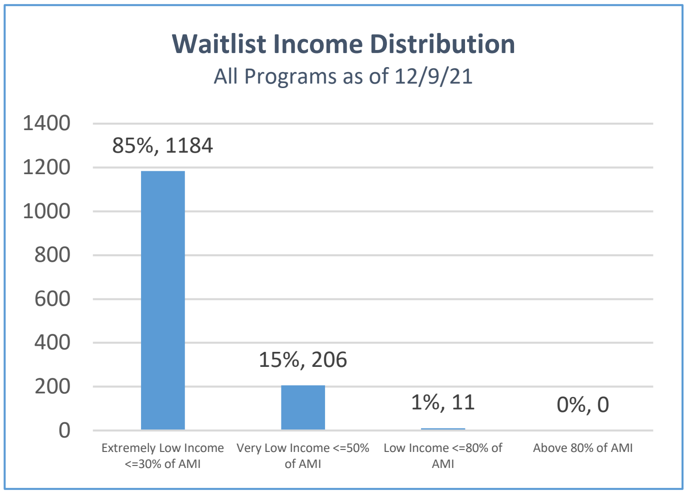
		or if the change occurred during the last three months of the certification period. Families must report changes in income within 7 business days of the date the change takes effect. The family must notify HACC of the changes in writing.	
11	New General Policy added.	11-III.B. CHANGES IN FLAT RENTS AND UTILITY ALLOWANCES • HACC Policy If the flat rent amount changes during the term of the HAP contract, the new flat rent will be applied in accordance with policies in Chapter 6.	General Policy Change Added for clarification. Implementation to begin 7/1/24
11	New General Policy added.	11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES HACC Policy If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in the PHA's subsidy standards (see Chapter 5), the new family unit size will be used to determine the payment standard amount for the family in accordance with policies in Chapter 6.	General Policy Change Added for policy clarification. Implementation to begin 7/1/24
13	<u>HACC Policy</u> For families whose income exceeds the over-income limit for 24 consecutive months, HACC will not terminate the family's tenancy and will charge the family the alternative non-public housing rent, as well as require the family to sign a new non-public housing lease in accordance with the continued occupancy policies below.	<u>HACC Policy</u> (To be implemented January 1, 2024, subject to change dependent on HUD guidance) HACC's continued occupancy policy for over-income families, states that if the household's income continues to exceed the over-income limit for 24 consecutive months after the date that the Household is initially determined to be over-income, then HACC must provide a final written notice to the household. HACC's written notice must inform the household that • The Household's income has exceeded the over-income limit for 24 total and consecutive months, HACC will terminate the household's tenancy with an End of Participation date that is effective no less than 30 days from the notice date and no more than 6 months from the date of the final determination, and;	HOTMA Change Providing exact policy language. Implemented 1/1/2024

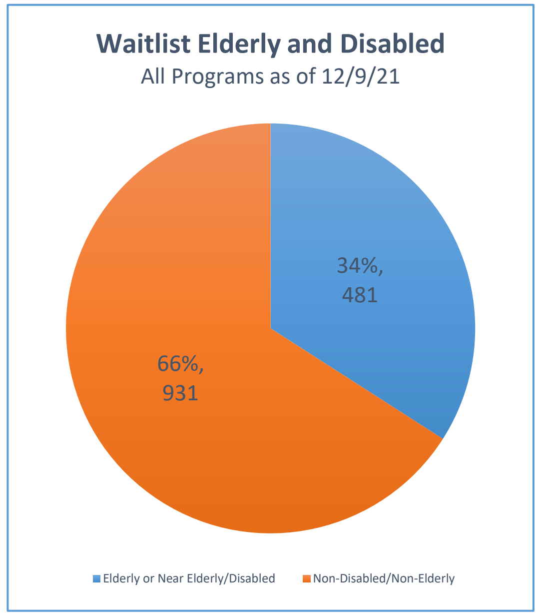
Attachment C:
Statement of Housing Needs and
Strategy for Addressing Housing Needs

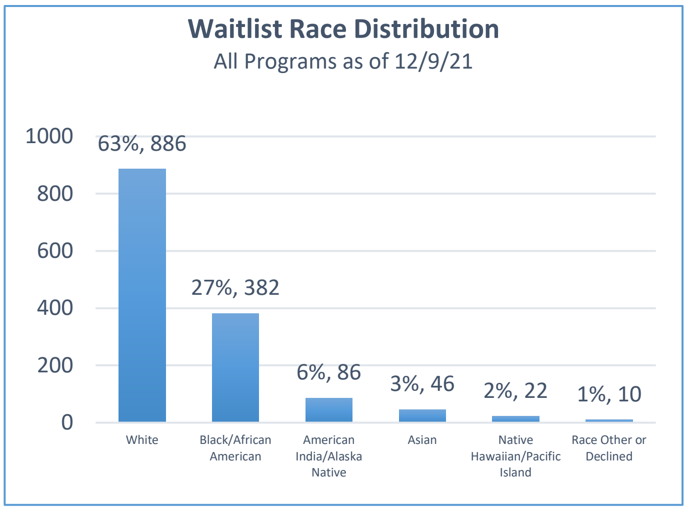
Statement of Housing Needs

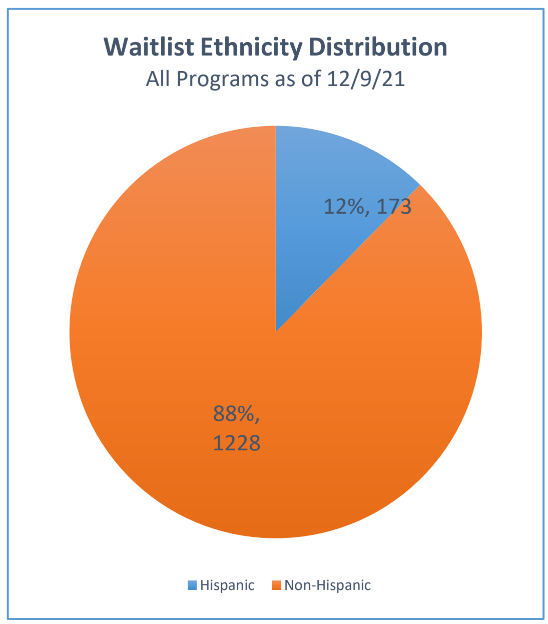
Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

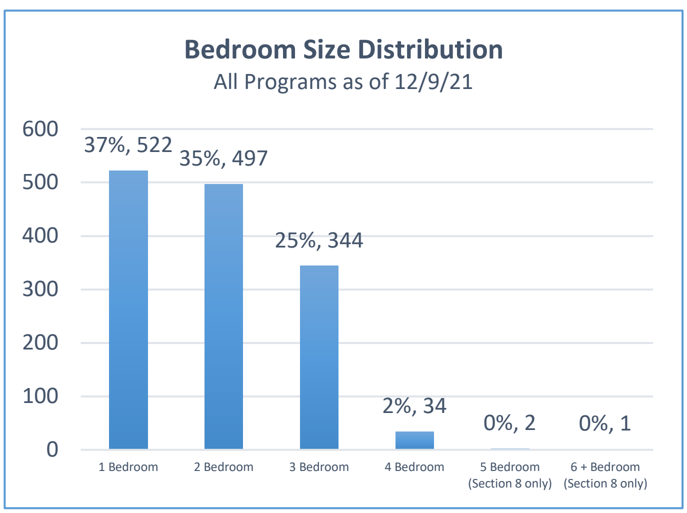
Waitlist Demographics – Combined as of 12/9/21		
	Number of HH	Percentage of HH
Waiting list total	1401	100%
Voucher Programs	722	52%
Public Housing	679	48%
Extremely Low Income <=30% of AMI	1184	85%
Very Low Income <=50% of AMI	206	15%
Low Income <=80% of AMI	11	1%
Above 80% of AMI	0	0%
Elderly or Near Elderly/Disabled	470	34%
Non-Disabled/Non-Elderly	931	66%
White	886	63%
Black/African American	382	27%
American India/Alaska Native	86	6%
Asian	46	3%
Native Hawaiian/Pacific Island	22	2%
Race Other or Declined	10	1%
Hispanic	173	12%
Non-Hispanic	1228	88%
1 Bedroom	522	37%
2 Bedroom	497	35%
3 Bedroom	344	25%
4 Bedroom	34	2%
5 Bedroom (Section 8 only)	2	0%
6 + Bedroom (Section 8 only)	1	0%


Waitlist Income Distribution
All Programs as of 12/9/21
1400
1200
1000
800
600
400
200
0
85%, 1184
15%, 206
1%, 11
0%, 0
Extremely Low Income <=30% of AMI
Very Low Income <=50% of AMI
Low Income <=80% of AMI
Above 80% of AMI


Waitlist Elderly and Disabled
All Programs as of 12/9/21
34%, 481
66%, 931
Elderly or Near Elderly/Disabled
Non-Disabled/Non-Elderly


Waitlist Race Distribution
All Programs as of 12/9/21
1000
800
600
400
200
0
63%, 886
27%, 382
6%, 86
3%, 46
2%, 22
1%, 10
White
Black/African American
American India/Alaska Native
Asian
Native Hawaiian/Pacific Island
Race Other or Declined


Waitlist Ethnicity Distribution
All Programs as of 12/9/21
12%, 173
88%, 1228
Hispanic
Non-Hispanic


Bedroom Size Distribution
All Programs as of 12/9/21
600
500
400
300
200
100
0
37%, 522
35%, 497
25%, 344
2%, 34
0%, 2
0%, 1
1 Bedroom
2 Bedroom
3 Bedroom
4 Bedroom
5 Bedroom (Section 8 only)
6 + Bedroom (Section 8 only)

Strategy for Addressing Housing Needs

Introduction

The Housing Authority of Clackamas County (HACC), a division of Clackamas County Health, Housing and Human Services (H3S) is committed to affirmatively furthering fair housing and contributing to the elimination of impediments to fair housing choice as described in 24 CFR Part 570.601 and the Furthering Fair Housing Executive Order 11063, as amended by Executive Order 12259.

The Fair Housing Act was enacted in 1968. Recent changes to the Affirmatively Furthering Fair Housing Rule 24 CFR Parts 5, 91, 92, 570, 574, 576 and 903 restoring certain definitions and certifications were finalized by HUD on June 31, 2021. The 2016 Assessment of Fair Housing (AFH) in Clackamas County relied on census data provided by the U.S. Department of Housing and Urban Development (HUD), local information and community feedback through surveys and public meetings. The AFH was conducted jointly by the Housing Authority of Clackamas County and the Community Development Division.

HUD's AFH process has four nationwide fair housing goals:

1. Reduce segregation, and build on the nation's increasing racial, geographic and economic diversity.
2. Eliminate racially and ethnically concentrated areas of poverty.
3. Reduce disparities in access to important community assets such as quality schools, job centers, and transit.
4. Narrow gaps that leave families with children, people with disabilities, and BIPOC with more severe housing problems, aka, disproportionate housing needs.

Beginning in September 2021, H3S staff also considered results from the following recently completed plans and studies before proposing and adopting the 2021-2027 Fair Housing goals and strategies for Clackamas County:

- Clackamas County Metro Bond Local Implementation Plan
- 2021 County DTD Expanding Housing Choice Survey
- 2019 Homelessness and Housing Affordability
- Performance Clackamas Managing for Results
- 2018 State of Oregon Fair Housing Report
- 2018 County Housing Needs Assessment
- 2021 Coalition of Communities of Color Community Engagement Report

Based on the information in these housing surveys and reports, historical data and feedback from the County's Housing Rights and Resources Program, comments during public meetings, community survey data and local housing data. Representatives of the Legal Aid Services of Oregon, the Fair Housing Council of Oregon, the Housing Authority of Clackamas County (HACC) and the Community Development Division the following list of contributing factors was determined for Clackamas County.:

Contributing Factors to fair housing conditions listed in priority order include:

- Lack of affordable, accessible housing in a range of unit sizes.
- Availability of affordable units in a range of sizes.
- Displacement of residents due to economic pressures.
- Community Opposition (to affordable housing developments).

- Site selection policies, practices and decisions for publicly supported housing.
- Lack of assistance for housing accessibility modifications.
- Private Discrimination.
- Lack of public fair housing enforcement.
- Lack of resources for fair housing agencies and organizations.
- Land Use and Zoning Laws.
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure.

After internal and community engagement, including a community survey which was distributed in 3 languages. 306 persons responded, and analysis of Portland metro region reports, local data and census data, the following Fair Housing Goals were selected and reported to HUD for approval. The following 2021-2027 Fair Housing Goals and Strategies were approved by HUD in priority order:

Goal 1: Increase and preserve affordable, accessible housing options throughout ClackamasCounty.

Strategies:

1.A: Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition, reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units and ensure that those units will last for years to come.
1.B: Maximize the number of households receiving long term and short-term rental assistance from local, state and federal programs.
1.C: Evaluate zoning changes & incentives for building affordable housing including rezoning of vacant commercial properties into mixed-use buildings or using eminent domain or other methods to buy vacant properties to be used for housing programs.

Goal 2: Expand fair housing outreach, education, and enforcement.

Strategies:

2.A: Increase fair housing education for staff, landlords & community partners.
2.B: Review payment standards by area to be sure choices are not limited and to study FairMarket Rent to be accurate with market conditions.
2.C: Work in collaboration with partners to enforce fair housing law.
2.D: Continue operating the Housing Rights and Resources line, which is a partnership between Clackamas County Social Services, Clackamas County Community Development,Legal Aid Services of Oregon, and Fair Housing Council of Oregon to provide informationabout fair housing law to landlords and tenants in Clackamas County.

Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.

Strategies:

3.A: Ensure all housing forms including forms and letters sent by HACC to residents andvoucher recipients are trauma-informed, racially equitable and accessible.

3.B: Minimize barriers to ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes.

These AFH goals have become part of planning and performance reporting documents for the Housing Authority and the Community Development Division for the 2022 through 2026 program years.

Since 2017 the significant changes that have impacted Clackamas County include a sharp increase in housing demand due to the number of new residents moving to the Portland metro area including Clackamas County. In 2020 alone numerous factors have impacted our county including: the 2020 COVID pandemic causing health and economic difficulties, a Forest Fire destroying numerous homes in a rural town, an Ice Storm and a Heat Dome hot weather event that caused some deaths in the metro area. The impacts of the COVID pandemic have caused employment losses that have put many households in danger of eviction and homelessness. County and state programs have provided some rent assistancehowever many people are still not able to access stable housing. Inflation and rental rent increases at over 14% are also contributing to a rise in homelessness while social security and employment income are not keeping up with these disproportionate increase in basic needs. However, the Metro region has put unprecedented financial resources into supporting the building of more affordable housing, construction takes years, and the need is immediate.

Attachment D:
Deconcentration Policy

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2] HACC's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of HACC's deconcentration policies must be in included in its annual plan [24 CFR 903.7(b)]. HACC's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c) (5)]. Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by HACC with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by HACC with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c) (1)]. To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, HACC must comply with the following steps: Step 1. HACC must determine the average income of all families residing in all HACC's covered developments. HACC may use the median income, instead of average income, provided that HACC includes a written explanation in its annual plan justifying the use of median income. **HACC Policy - HACC will determine the average income of all families in all covered developments on an annual basis. Step 2. HACC must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, HACC has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD. HACC Policy - HACC will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis. Step 3. HACC must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (30% of median income). HACC has added a preference for the Family Self Sufficiency program for work ready families living in our covered family developments.**

Attachment E:

Violence Against Women (VAWA) Statement

Housing Authority of Clackamas County (HACC) addresses VAWA in the Section 8 Housing Choice Voucher Administrative Plan and the Public Housing Admissions and Continued Occupancy Policy. The responsibility of not terminating families from housing for reasons that fall under the VAWA regulation is particularly addressed. We conduct emergency transfers for victims of domestic violence in our housing programs.

We offer a local preference in the Housing Choice Voucher program for victims of Domestic Violence working with case management. We partner with several community partners like Clackamas Women's Services, A Safe Place and Northwest Housing Alternatives to administer the Domestic Violence preference vouchers.

In addition, we are in continuous contact with County and City agencies, including the various law enforcement agencies, for current tenant's experiencing Domestic Violence.

HACC also partners with Clackamas County Social Services and Behavioral Health as well as the State Department of Human Services to use funds in a transitional housing program and Shelter + Care program under the Continuum of Care, where many victims of Domestic Violence are housed and provided services.

In summary, we follow the VAWA program policies and regulations with the goal of providing safeguards for the families falling under the VAWA related program requirements and refer households, as needed, to local domestic violence service provider partners. HACC has amended all its policies to comply with VAWA.

Toni Karter

Toni Karter, Interim Executive Director	12/05/2022 Date

Attachment F:
Definition of Substantial Deviation and Significant Amendment or Modification

Definition of Substantial Deviation and Significant Amendment

It is the intent of the Housing Authority of Clackamas County (HACC) to adhere to the mission, goals and objectives outlined in the PHA Annual Plan, PHA 5-Year Plan and Capital Fund Program 5-Year Action Plan. These Plans, however, will be modified and re-submitted to HUD should a substantial deviation from program goals and objectives occur as defined below:

A. Definition of Substantial Deviation from the PHA Annual Plan and PHA 5-Year Plan

- Any collective change in the planned or actual use of federal funds for activities that would prohibit or redirect HACC's strategic goals or mission of sustaining or increasing the availability of decent, safe and affordable housing while promoting self-sufficiency and asset development of families and individuals from being implemented as identified in Plans. This includes elimination or major changes in any activities proposed, or policies provided in the Plans that would momentously 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.
- Any single or cumulative annual change in the planned or actual use of federal funds as identified in the Plans that exceeds 35% of the of HACC's annual program budgets for Housing Choice Voucher (Section 8) or Public Housing activities.
- A need to respond immediately to Natural Disasters or Declarations of Emergency beyond the control of the Housing Authority, such as earthquakes, flooding, landslides, or other unforeseen significant event.
- A mandate from local government officials, specifically the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.
- A substantial deviation does not include any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein.

As provided in PIH Notice 2012-32 (HA), Rev. 3 – the following is excluded from the definition of Substantial Deviation: The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;

1. 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;
2. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
3. Changes to the financing structure for each approved RAD conversion.

B. Definition of Significant Amendment or Modification to the PHA Annual Plan and PHA 5-Year Plan

- Changes of a significant nature to the rent or admissions policies that have a negative impact on households served, or the organization of the waiting list that negatively prolong the wait times, which are not required by federal regulatory requirements that effect a change in the Section 8 Administrative Plan or the Public Housing Admissions and Continued Occupancy Policy (ACOP).
- Changes to HACC's plans effecting the demolition or disposition of public housing, designation of senior or disabled housing, and a plan to convert public housing units to other than assisted housing.
- Changes of a significant nature would include the elimination or major changes to any activities proposed, or policies provided in the agency plan within the agency's control that would momentously affect or negatively impact the services or programs provided to residents. This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, policy changes to improve customer service and offerings to tenants or minor policy clarifications or adjustments for better implementation of a policy intention.

C. Definition of Significant Amendment or Modification to the Capital Fund Program 5-Year Action Plan

- A change in the planned use or use of Capital Fund that have a total expense in excess of $500,000 in any single year.
- A proposed demolition, disposition, homeownership, RAD conversion, Capital Fund Financing, development, or mixed finance proposal are considered by HUD to be significant amendments to the Capital Fund Program 5-year Action Plan.
- A need to respond immediately to Natural Disasters or Declarations of Emergency beyond the control of the Housing Authority, such as earthquakes, flooding, landslides, or other unforeseen significant event.
- A mandate from local government officials, specifically the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.
- A substantial deviation does not include any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein.

As provided in PIH Notice 2012-32 (HA), Rev. 3 – the following is excluded from the definition of Substantial Deviation: The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;

1. 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;
2. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
3. Changes to the financing structure for each approved RAD conversion.

Attachment G:
Financial Resources

Housing Authority of Clackamas County

All Programs Budget
Fiscal Year 2024-2025

	Public Housing	Housing Vouchers	Local Projects	Central Office	Development	Supportive Housing	Grants	FY24 Total	FY 2023 6/30/2023 Budget	FY 2022 6/30/2022 Budget	FY 2021 6/30/2021 Budget	$ Change from Prior Year Budget	% Change from Prior Year Budget
Revenue:													
Dwelling rent	2,052,050		590,204					2,642,254	2,367,372	1,938,344	2,039,290	274,882	11.61%
Vacancy loss	(43,000)		(3,800)					(46,800)	(51,123)	(47,561)	(55,817)	4,323	-8.46%
Other tenant income	185,100		37,300					266,450	141,270	143,670	143,670	125,180	88.61%
Operating subsidy	2,383,348	1,744,616						3,960,426	4,070,841	3,757,186	3,468,120	(110,415)	-2.71%
Housing assistance payments		21,807,699					1,228,833	23,036,532	22,469,045	19,206,368	16,169,002	567,487	2.53%
Mgmt fees				467,625				467,625	414,225	397,650	397,650	53,400	12.89%
Interest income	500	-	-	-				500	500	500	500	-	0.00%
County contribution			-	-	-		-	-	-	150,000	240,960	-	0.00%
Grant revenue	295,000	176,209		127,186	38,306,351	13,808,030	1,650,416	54,363,192	37,907,180	45,968,327	2,271,161	16,456,012	43.41%
Other/In-kind	-			-	2,342,522			2,342,522	2,571,663	3,190,994	2,408,531	(229,141)	-8.91%
TOTAL REVENUE	4,749,510	**23,728,524**	**623,704**	**594,811**	**40,648,873**	**13,808,030**	**2,879,249**	**87,032,701**	**69,890,974**	**74,705,477**	**27,083,067**	**17,141,727**	**24.53%**
ADMINISTRATIVE EXPENSE:													
Salaries	745,026	1,179,493	74,974	787,267	591,408	719,059	1,018	4,039,245	3,743,579	3,027,329	2,402,504	295,667	7.90%
Employee benefits	491,463	848,942	52,444	468,497	341,774	550,750	508	2,754,379	2,407,995	1,862,137	1,441,247	346,384	14.38%
Legal fees	7,900	1,200	200	-	5,000	5,000		19,300	31,900	26,900	26,900	(12,600)	-39.50%
Staff training/travel	11,200	7,800	300	12,000	7,000	16,500	-	54,800	52,300	45,200	46,200	2,500	4.78%
Auditing fees	12,695	10,155	6,096	10,329	3,731	11,194		54,200	49,699	49,267	47,857	4,501	9.06%
Other administrative expenses	280,830	291,004	61,586	152,832	29,927	188,892	-	1,005,070	1,011,461	2,006,967	1,921,983	(6,391)	-0.637%
Management fee expense	414,225	-	-	-	-		-	414,225	414,225	397,650	397,650	-	0.00%
TOTAL ADMINISTRATIVE	**1,963,339**	**2,338,594**	**195,600**	**1,371,925**	**978,840**	**1,491,396**	**1,526**	**8,341,219**	**7,711,158**	**7,415,449**	**6,284,341**	**630,061**	**8.17%**
TENANT SERVICES:													
Salaries	21,308	138,770		101,469		112,671	131,114	505,332	132,515	126,287	128,388	372,816	281.34%
Benefits	13,953	110,772				101,469	101,469	326,963	97,303	93,152	75,311	229,660	236.03%
Other	12,600	-		-				12,600	39,600	39,600	49,416	(27,000)	-68.18%
TOTAL TENANT SERVICES	**47,861**	**248,842**	**-**	**101,469**	**-**	**214,140**	**232,583**	**844,895**	**269,418**	**259,039**	**253,115**	**575,476**	**213.60%**
UTILITIES:													
Water	180,029		5,100				-	185,129	183,800	184,100	174,600	1,329	0.72%
Sewer	318,559		20,000				-	338,559	393,200	393,500	380,700	(54,641)	-13.9%
Electricity	24,679		6,000				-	30,679	53,800	45,900	44,300	(23,121)	-42.98%
Gas	2,166	-	3,000				-	5,166	9,700	7,700	7,500	(4,534)	-46.74%
TOTAL UTILITIES	**525,433**	**-**	**34,100**		**-**	**-**	**-**	**559,533**	**640,500**	**631,200**	**607,100**	**(80,967)**	**-12.64%**
MAINTENANCE:													
Labor	751,574		27,626	-			-	779,200	745,732	645,005	680,096	33,468	4.49%
Benefits	493,864		15,034	-			-	508,898	498,347	442,425	478,834	10,552	2.12%
Materials	165,000		3,700	-			-	168,700	157,300	180,300	136,800	11,400	7.25%
Garbage contracts	200,000		2,000	-			-	202,000	169,800	169,900	161,800	32,200	18.96%
Other contracts	398,680	-	48,200	47,000			-	493,880	364,900	361,600	255,600	128,980	35.35%
												-	
TOTAL MAINTENANCE	**2,009,119**	**-**	**96,560**	**47,000**	**-**	**-**	**-**	**2,152,679**	**1,936,078**	**1,799,230**	**1,713,130**	**216,600**	**11.19%**

Housing Authority of Clackamas County
All Programs Budget
Fiscal Year 2024-2025

	Public Housing	Housing Vouchers	Local Projects	Central Office	Development	Supportive Housing	Grants	FY23 Total	FY 2023 6/30/202 Budget	FY 2022 6/30/2022 Budget	FY 2021 6/30/21 Budget	$ Change from Prior Year Budget	% Change from Prior Year Budget
GENERAL EXPENSES:													
Insurance	148,620	10,174	11,900	3,500		7,800	-	181,994	124,625	122,925	116,525	57,369	46.03%
Payment in Lieu of Taxes	86,000							86,000	86,000	86,000	86,000	-	0.00%
TOTAL GENERAL EXPENSES	**234,620**	**10,174**	**11,900**	**3,500**	**-**	**7,800**	**-**	**267,994**	**210,625**	**208,925**	**202,525**	**8,100**	**4.00%**
OTHER EXPENSES:													
Housing Assistance Payments		21,207,699				11,682,537	1,228,833	34,119,069	22,469,045	19,206,368	16,613,002	11,650,024	51.84%
Mortgage Payments			13,100				-	13,100	13,100	13,700	13,700	-	0.00%
Grant Expense					38,294,833			38,294,833	35,325,258	43,487,403	-	2,969,575	8.41%
Supp Svcs, in-kind, child care						530,041	-	530,041	-	-	-	530,041	100.00%
Central office							127,186	127,186	127,186	127,186	122,559	-	0.00%
Capital Expenditures	-	-	91,330	-	-		1,416,308	1,507,638	1,200,605	1,200,605	1,234,615	307,033	-2.75%
TOTAL OTHER EXPENSES	**-**	**21,207,699**	**104,430**	**-**	**38,294,833**	**12,212,578**	**2,772,327**	**74,591,867**	**59,135,194**	**64,035,262**	**17,983,876**	**15,456,673**	**26.14%**
												-	
TOTAL EXPENSES	**4,780,371**	**23,805,309**	**442,590**	**1,523,894**	**39,273,673**	**13,925,914**	**3,006436**	**86,758,186**	**69,902,973**	**74,349,105**	**27,044,088**	**16,855,213**	**24.11%**
OPERATING SURPLUS (DEFICIT)	**(30,861)**	**(76,785)**	**181,114**	**(929,083)**	**1,375,200**	**(117,884)**	**(127,187)**	**274,514**	**(12,000)**	**356,372**	**38,980**	**(38,979)**	**-100.00%**
												-	
TRANSFERS												-	
Easton Ridge								-					
Development								-					
Local Projects		76,785	(76,785)					-					
												-	
OPERATING SURPLUS (DEFICIT) CONTINGENCY AFTER TRANSFERS	**(30,861)**	**0**	**(104329)**	**929,083**	**(1,375,200)**	**117,884**	**127,187**	**(274,514)**				-	
Estimated Change in Fund Balance/Cash													
Public Housing	30,861												
Development													
Local Project Fund		0											
Budgeted Balance	-	-	-	-	-	-	-	0	-				

Health, Housing & Human Services
CLACKAMAS COUNTY

Toni Karter, *Executive Director*
Housing Authority of
Clackamas County

EQUAL HOUSING OPPORTUNITY

January 17, 2024

2023 Capital Fund Completed Projects

- AMP Wide Flooring $101,502.22 (12 Units)
- AMP Wide Cabinets $56,063.00 (5 Units)
- AMP Wide Moving Services $6,812.85 (5 Units)
- AMP Wide Asbestos Abatement Services $4,539.05 (2 Units)
- AMP Wide Air Monitoring Services $3,696.85 (4 Units)
- On Demand Flatwork Project $476,000.00 (35 Units)
- OCVM & Scattered Sites Roof Project $215,000.00 (20 Units)
- Operations Office HVAC Upgrade $5,712.00
- Modernization of 7281 Drew Street $216,000.00 (1 Unit)
- Relocation Expenses and Costs $200,000.00

2024 Proposed Capital Fund Projects

- In alignment with HACC's plan for reposition of the PH portfolio, the majority of the Capital Funds will be allocated to redevelopment efforts.
  - Relocation Expenses and Costs $500,000
  - Redevelopment Expenses and Costs $441,988.75

Healthy Families. Strong Communities.
P.O. Box 1510, 13930 S. Gain Street, Oregon City, OR, 97045-0510 • Phone (503) 655-8267 • Fax (503) 655-8676
TDD 503-655-8639 **www.clackamas.us/housingauthority**

Attachment I: Capital Fund Annual Statement

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

"Public reporting burden for this collection of information is estimated to average 2.2 hours. This includes the time for collecting, reviewing, and reporting the data. The information requested is required to obtain a benefit. This form is used to verify allowable and reasonableness of grant expenses. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

PHA Name	Grant Type and Number	FFY of Grant:
OR 001	Capital Fund Program Grant No: OR16R00150124 Replacement Housing Factor Grant No:	FFY of Grant Approval: FY2024

Type of Grant

☒ Original Annual Statement ☐ Reserve for Disasters/Emergencies ☐ Revised Annual Statement (revision no:
☐ Performance and Evaluation Report for Period Ending: ☐ Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	**Revised[2]**	**Obligated**	**Expended**
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) [3]	$386,918.75			
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 15)	$154,767.50			
5	1480 General Capital Activity	$64,000.00			
6	1492 Moving to Work Demonstration	$441,988.75			
7	1495 Resident Relocation	$500,000.00			
8	1501 Collaterization Expense / Debt Service Paid by PHA				
9	1503 RAD-CFP				
10	1504 RAD Investment Activity				
11	1505 RAD-CPT				
12	9000 Debt Reserves				
13	9001 Bond Debt Obligation paid Via System of Direct Payment				
14	9002 Loan Debt Obligation paid Via System of Direct Payment				
15	9900 Post Audit Adjustment				

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant:
OR 001	Capital Fund Program Grant No: OR16R00150124 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: FY2024

Type of Grant

[X] Original Annual Statement   [ ] Reserve for Disasters/Emergencies   [ ] Revised Annual Statement (revision no:

[ ] Performance and Evaluation Report for Period Ending: [ ] Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)	$1,547,675.00			
16	Amount of line 15 Related to LBP Activities				
17	Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 15 Related to Security - Soft Costs				
19	Amount of line 15 Related to Security - Hard Costs				
20	Amount of line 15 Related to Energy Conservation Measures				

Signature of Executive Director *	Date	Signature of Public Housing Director	Date

* I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

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U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

Part II: Supporting Pages		
PHA Name: OR001	Grant Type and Number Capital Fund Program Grant No: OR16R00150124 CFFP (Yes/ No): Replacement Housing Factor Grant No:	Federal FFY of Grant: 2024

Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated[2]	Funds Expended[2]	
AMP Wide Operations	Operations	1406	1	$386,918.75				
AMP Wide Mgmt. Improve.	Software: Operating Systems & Office Software	1408	1	$500.00				
AMP Wide Admin.	Central Office Cost Center (COCC) Salary & Benefits	1410	1	$154,767.50				
AMP Wide Relocation Costs	Relocation due to Redevelopment	1495	1	$500,000.00				
AMP Wide Redevelopment	MTW Redevelopment	1492	1	$441,988.75				
AMP Wide	Force Account	1480		$64,000.00				

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

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Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

Part II: Supporting Pages		
PHA Name: OR001	Grant Type and Number Capital Fund Program Grant OR16R00150124 No: CFFP (Yes/ No): Replacement Housing Factor Grant No:	Federal FFY of Grant: 2024

Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated[2]	Funds Expended[2]	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (07/2014)

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Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: OR001					Federal FFY of Grant: 2024
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates [1]
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406					
1408					
1410					
1480					
1492					
1501					
1503					
1504					
1505					
9000					
9001					
9002					
9900					
1499					

[1] Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

form HUD-50075.1 (07/2014)

Attachment I: Capital Fund Annual Statement

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: OR001					Federal FFY of Grant: 2024
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates [1]
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

[1] Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Attachment J:
Resident Advisory Board Meeting Minutes

Thursday, January 25, 2024 ~ 10:00am – 1:00pm Via Zoom

10am-10:15 Welcome & Introductions (15 min)		Toni Karter
10:15-10:30 2023 Mid-Year Revision (15 min)		Toni Karter
10:30-10:45 New Activities & Progress report Overview (15 min)		Toni Karter
10:45-11:30 Updates for Voucher Programs & Public Housing (45 min)		Toni Karter
11:30-11:45 **Break (15 min)**		
11:45-11:55 Financials & Capital Fund Overview (10 min)		Darren Chilton/Josh Teigen
11:55-12:05 Resident Services & Family Self Sufficiency Overview (10min)		Jemila Hart/Hillary Merritt
12:05-12:15 Moving To Work (MTW) Asset Building Activities (10 min)		Elizabeth Miller
12:15-12:45 Development Update (30 min)		Devin Ellin
12:45-1pm Questions and Answers		All

RAB Board Members attendance: 1 new member added
Resident Commissioner, Ann Leenstra (HCV) -Y, Brian Henderson (HCV) – Y, Carol Smith (HCV) - *new member added*, Helen Sotriakis (HCV) – N, Paul Reynolds (HCV) – Y, Cathy Hasse (HCV) – N, Arnold Rodacker (HSP) – Y, Irisa Hernandez (HSP) – Y, Laura Bales (HSP) – Y, Misty Pate (HSP) – Y, Lisa Verlo (CH) – Y, Venus Barnes (CH) – N, Yelena Potoskaya (CH) – Y, Charlene Hartley (OCVM) – N, Darcy Lockhart (OCVM) – N, Tiffany DeWeese (OCVM) – Y, Jackie Fuller (SS) – Y, Gail Morgan (SS) – Y, Grace Essy (SS) - N
All properties/programs represented.

Video recording of the meeting for more detail can be found at:
https://clackamascounty.zoom.us/rec/share/tIALes55dsrRDKw_zilwr0d74ZNa9opij8e3aZ8z4OwfvzjvTQFRb4oej0fraFTC.1xi_zuHkvePAUv5t Passcode:!c5F&f@&

Introductions: Residents introduced themselves and shared one thing the Housing Authority does well and one thing that could be improved. Toni Karter – stared with an example – she is the director and lives in Porland. She thinks HACC does a good job listening to residents and could improve communication and resident involvement. Resident comments from introductions are included in the Comment section. Staff members present introduced themselves and their position with the agency.

Paraphrased Comments, Questions & Answers collected throughout the meeting:

What is Housing Authority doing well (from introductions)?

Brian – Getting people in and explaining things – has not had many problems

Ann - Represent who and what residents are to the commissioners

Misty – Thankful for the organization – without it would be homeless. Choosing people that care and teamwork.

Carol – Communicating with Residents and keeping properties clean and neat.

Laura – RAB meetings – continuation of them and getting answers.

Gail – meeting the needs of clients in crisis or needing things like tablets.

Yelana – Been a resident about 20 years and everything is good.

Irisa – Includes residents and outside people to help with all of this.

Lisa – Supporting people in crisis and do anything they can to help keep people in their homes.

Jackie – Great job communicating

Tiffany – Community activities and events especially for children like the backpack event

What can the Housing Authority improve (from introductions)? Responses include information shared during the meeting and added responses from staff after the meeting.

Arnold – increase understanding of rent calculations for those transitioning from PH to vouchers. Improve paperwork and get correct information from staff for residents. Inspections can cause people to lose a housing option when it doesn't pass when trying to transition from PH to vouchers.

> Staff – we are working on rent simplification waivers but the ones from the mid-year were not approved but not giving up. Inspections are important to ensure unit is suitable housing and meets the needs of the resident.

Misty – Relocation is scary looking forward to learning more today.

> Staff – change is hard but all residents being relocated due to the reposition will receive a voucher and assistance in finding housing.

Carol – More warning time on annual rent increases. Need more time prior to new payment due.

> Staff – this will be reviewed by staff to see if we can make improvements.

Laura – Improve Annual Paperwork and haven't heard much about the moves yet.

> Staff – sharing information in presentations later in the meeting.

Gail – connection with maintenance they are stretched thin for SS.

> Staff - difficulty in maintaining SS locations is one reason we are repositioning SS PH units.

Jackie – Cleaning gutters and cutting grass in the yards when it is needed for SS.

> Staff - difficulty in maintaining SS locations is one reason we are repositioning SS PH units.

Tiffany – Want monthly rent statements and a list of extra charges like what extra garbage costs.

> Staff – Working to implement Rent Café that will make these accessible online. Implementation starting July 1, 2024 with a roll out by property. Not yet available.

Presenter information, Comments and Questions (Paraphrased):

Note: Staff Responses include information shared during the meeting and added responses from staff after the meeting.

Review of the Mid-Year Revision feedback from HUD – Toni Karter

Some MTW safe harbor waivers submitted in the Mid-year revision were not approved by HUD so the following Waivers are not all policy changes requested will be implemented such as those associated with the simplification of rent. (see top of Attachments A & B for full details)

Annual Plan Draft:

An Annual Plan is required every year as well as a 5 year plan every 5th year. This year we are only required to do an Annual Plan.

B.1 Revision of Existing PHA Plan Elements:

Many things are staying the same and a few things are changing. We indicated Y to each element we had a change to including:

Deconcentration and other Policies that Govern Eligibility – updates to policies for HCV and Public Housing in Attachments A and B.

Financial Resources – this is checked because we have included an updated budget

Rent Determination –updates to the policies for HCV and Public Housing in Attachments A and B.

Community Service and Self-Sufficiency Programs –growth and expansion of our resident services team.

Asset Management –changes to our Asset management team and focus.

B.2 – New Activities

We check all boxes for activities we think we might do this year. These are mostly checked due to our development activities. More information on development activities during the later presentation. Quick overview of section with highlights on:

- Exceeding expectations on our developments and adding more PBV to new developments
- Communicating more to residents about available units in new developments.
- The voucher program grew some through new awards, but growth of additional housing units will come mostly through the repositioning of Public Housing. 56 Tenant Protection vouchers, 16 Fair Share, 25 VASH were awarded, and we will continue to apply for more.
- Additional Resident Services staff with support of SHS funding to improve housing stabilization, provide financial education and connect residents with community resources.
- Adding resident services to cover federal voucher program participants.
- The reposition is getting us out of the business of public housing and expanding voucher programs.

B.3 - Progress Report

Included steps taken toward our goals in carrying out the strategies included in our 5-year plan. Encouraged residents to review our progress.

B.4 – Capital Improvements

Staff walked through Attachments H and I to give an overview of the Capitol fund projects completed as well as plans for this coming fiscal year. Funding will be focused on projects required for high performer status and development activities. Grant to be confirmed in Feb so additional adjustments may be made.

Q – Chris (staff) – Where should a resident report or make a recommendation about improvements to units? A: Josh – the property manager

B.5 – C.5 – Required items in our annual plan.

D. Plan to Affirmatively Further Fair Housing – includes listing of the goals in the County plan. Not all the plan goals apply to the Housing Authority but may be done by groups within the County. The Plan is done by the County in collaboration with other partners (including HACC) every 5 years. This section has not changed this Annual Plan.

Attachment A – Admin Plan - Policy Changes for HCV program (Section 8) - Staff reviewed all changes. Many changes were included in concept in the Mid-year revision and come from MTW waivers or HOTMA. This provided the detailed policy language on those changes from the Mid-year and added other changes that were needed. Some topics that generated more discussion or of special note by staff – questions and comments are below by category:

- Deductions and Rent Calculations –
  - Q: Arnold – for people being relocated (and moved to vouchers from PH will they still get deductions? What if they think their rent is miscalculated? Who should they contact? A: Yes, they still get deductions and if they have questions, they should discuss that with their occupancy specialist.
- Family Break-ups and inheriting vouchers
  - Q: Brian – Can spouses still inherit? A: Toni – yes. Spouses are different than essential family members and live-in aids.
- Online applications instead of paper
  - Q: Bernadette (staff): When will applications go online? A: Toni – slow roll out starting 2024.
  - Q: Carol – Is rent café already available? A: Staff – not yet. We will begin implementing starting in July 2024 and will get more information when it is available.
- Stricter bedroom size based on family size
  - Q: Laura and others: If an adult son moves back in with a mother would they still be in a 2 bedroom or would they have to share a bedroom? Many were concerned about them having to share and policy about multiple children. A: Toni – A single mother will still get a separate bedroom from children. Children would share 2 to a bedroom. Voucher holders are not limited by the bedroom size in the unit they choose, just the subsidy amount is limited to the bedroom size.
  - Q: Laura – Can you repeat the financial part (asked later)? A: Toni - Although a voucher is limited to a bedroom size for the subsidy, the voucher holder can live in larger bedroom sizes.
- Income calculation changes including students and self-certification
  - Q: Tiffany? – what about college students? A: You should be sure to read this policy language carefully as examples have been added for clarification of the policy. It is dependent on student aid.
  - Q: Arnold – Estate income -onetime thing – is it counted as income? – Need to report as income but you can now self-certify if it is less than 50,000.
- Updating Payment standards and Utility standards
  - Q: Laura – updating them at interims would benefit the client? Toni – yes.
- NSPIRE – new inspection protocol includes whole property not just unit – info noted by staff
- Triennial schedules – were approved for elderly and disabled
  - Q: Ann – What age is considered elderly? Toni – 62
- Income changes – Must still be reported in 7 days but interim only if over 10% change - info noted by staff.
- Waiver regarding PBV Caps for overall amount and by project –was approved – info noted by staff
- Removal of preference for PBV to transfer to Tenant based
  - Q: Arnold – If they move would they pay a security deposit. A: Toni – yes.

Attachment B – ACOP – Policy Changes for Public Housing - Staff reviewed all changes. Many are in alignment with the Admin Plan changes already reviewed. The detailed over-income policy language was provided which only applies to Public Housing.

- Online applications instead of paper – in alignment with Admin Plan

    - Q: Arnold – If you have to do everything online, what if people don't know how? A: Toni – people can come into the office and get assistance with the online application or call the office for assistance as well.
- Stricter bedroom size based on family size – in alignment with Admin Plan
    - Questions asked was regarding Voucher discussion earlier – moved to that section.
- Over-income for 2 years to graduate from assistance
    - Q: Brian – hypothetical – Work your way up to graduate over two years, are they given any financial education to be able to prepare and plan, money management? I recommend they get financial education otherwise they might end up with bills like a car payment they can't afford when they move to market rate rents. A: Toni – thank you for the recommendation. We do offer financial education opportunities and we could increase that effort with this change, but we can't require it.

MTW Activities (Attachment M):

Elizabeth Miller presented information regarding the MTW asset building program designed by HACC and updated residents on timelines. Credit building is expanding to additional people in PBV at properties owned by HACC and managed by Quantum. This is underway at the Manor and will expand soon to other properties. Resident services staff is working on selection of the 25 families for the savings account component and have already selected 22 families and are working to fill the final spots.

Savings Accounts

Q: Laura – is HACC putting the money into the accounts? Can this be done in conjunction with IDA?A: Elizabeth – yes, HACC is putting the money into an account and tracking the amount for each family and yes it can be in conjunction with IDA and other savings programs.

Credit Building

Q: Carol - How do people enroll? A: Elizabeth – Reach out to Jemila on the Resident Services team

Q: Irisa – If we move to another property managed by Quantum would we have to reenroll? A: Elizabeth – it would depend on the property you are moving into. We are expanding to properties such as Easton Ridge.

Q: Brian – Is it expanding to Easton Ridge.? A: Elizabeth - Yes, it is expanding to Easton Ridge.

Resident Services

Jemila Hart presented on the expansion and activities of the Resident Services team by walking through the newsletter "Catch All Chronicle" just published days prior to the meeting and highlighting items. In addition, Elizabeth Miller shared an org chart of all the new staff with pictures so residents could identify new staff. All staff with contact information was also included in the newsletter to residents.

- Newsletter
    - Q: Irisa – Are we all getting these? A: Jemelia – yes it went to all residents.
- Employees
    - Q: Laura – Are they all employees sometimes there is too much change with interns and other things? A: Some are new HACC employees and other contractors through non-profit organizations like Impact NW, MHAAO and HomeForward, interns through PSU and Americorp volunteers. We have though expanded the HACC staff due to funding from SHS dollars and the award of an additional FSS coordinator by HUD.
    - Comment – Brian – That is great. Jemila was really stretched.
- FSS Program – Ashely Fischer (new FSS coordinator for Hillary Merritt who was promoted) gave a quick update on the FSS program. Residents seemed familiar with it. There are about 100

enrolled and they are working to hire an additional FSS coordinator and work through the waitlist to add to about 150 soon. Link to FSS video given in the chat: https://vimeo.com/338260366

  - No questions?

Development Update (New Activities and Progress Report)

Devin Ellin gave a update on all development plans and activities. Most interest was on Hillside Park Redevelopment project and the Redevelopment of Clackamas Heights and Oregon City View Manor for the Repositioning strategy. Devin shared why PH was being repositioned, timelines and goals as well as opportunities for further resident engagement. Slide details can be seen on the recording Below are items of note from staff as well as questions and responses.

- Links to properties opening soon provided in the chat:

  https://www.goodshepherdvillageapts.com/
  https://www.hfdpartners.com/properties/molalla-apartments
  https://www.livelasflores.com/
  https://www.mercyhousing.org/northwest/greenbrae/
- Displacement of Residents – Devin assured folks that all residents being displaced by the repositioning would receive a voucher as well as relocation assistance and no one would be made to be homeless to do this work.
  - Laura – Hillside Park(HSP) timeline – when will the next group be displaced? A: Likely early 2026 when the first buildings are fully completed – those still at HSP during this construction being displaced by the next construction phase as well as those already being displaced will have first priority option to move into the newly constructed buildings at HSP.
- RAB will soon receive through Ann Leenstra, the resident commissioner, an offer of sale for Clackamas heights. They will have xx days to respond to the letter if they wish to purchase the property.
- Clackamas Heights (CH) – goal of 250 units to replace the 100 there and the 100 at Oregon City View Manor.
- Oregon City View Manor (OCVM) – will be given the option to relocate to new construction at Clackamas Heights. Looking at disposition and still looking at options for the site as Board expressed interest yesterday to use it for more homeownership opportunities. More information to come on this.
- Scattered Sites (SS) – 145 units – Board expressed interest in maximizing homeownership opportunities with the disposition as well as including ones for recovery/care focused housing opportunities through community organizations.
- Laundry
  - Q: Arnold – laundry room at Hillside Park – There was damage during the storm last week and it is scheduled for demo soon. What is the timeline for starting the redevelopment? What is being done about the laundry room? Are you building a temporary one now? A: Devin – Development can't put in a new one until we break ground on the redevelopment around June 1. Ariana – we are working on a solution right now to the recent events. She and her team will follow up with Arnold after the meeting.
  - Q: Brian – Do any of the new developments have units with their own washer and dryer in the unit except Easton Ridge? A: Devin – I think Fuller Station may but I know the majority will have a laundry facility on each floor.
- Garden Area at Easton Ridge

- Q: Brian – Is there any funding to update the garden area at Easton Ridge? A: Devin - You would need to reach out to the property management on that.
- Opportunities for Resident Engagement for Clackamas Heights Redevelopment
    - Q: Burnadette – What will residents get to give input on? A: Devin – lots of things – physical and funding constraints in mind, residents will be able to give input on gardens, playgrounds, unit concepts, building color, etc. The engagement sessions will be advertised soon for residents and there will be interactive activities at the meetings and a professional engagement specialist running the meetings.
- Murphy Lumberyard
    - Q: Arnold – Rumor is that you bought Murphy Lumberyard? Did you? A: Devin: No it was not us.

Toni's Retirement Announcement & Division news

Toni discussed that she will be retiring soon, and her position is now posted for recruitment. This will likely be her last Annual Plan meeting. Toni currently has the dual title of Interim Housing and Community Development Director and Executive Director of the Housing Authority. With a new director the Executive Director title will likely be moved to a Deputy Director position under the Director. Chris Aiosa is currently acting as an interim Deputy Director, and they are working on the transition plan for the Division and HACC leadership during this transition. More information will come as her retirement gets closer.

- Thanks to Toni – Many expressed thanks to Toni for her service and appreciated how she had stepped up these RAB meetings to make them more meaningful to be involved in. They wished her luck and again gave thanks for her service over the years.

Additional Questions/Comments/Items from Chat and after the meeting:

- Lost Mail Key
    - Q: Laura – Where do I go to get a replacement for the mail key? A: Ariana – from the post office. It is a challenging process but controlled by the USPS and not by HACC.
- Rent Café
    - Q: Carol – So we will get access to Rent Café this year? Hillside Manor does not have access that I know of and will we get a copy of this booklet? Will Rent Well classes be included in the financial management graduation plan? A: Arianna – you will get a link from the property manager (Quantum) but it is not yet available Erin – Packets were mailed last week but there may be delays due to the ice storm. They were also emailed to all members with an email. We will send you one after the meeting as you were a newly added member and may not have been on the list used to send packets last week. Elizabeth: Yes, the County still offers Rent Well.
- Mercy Greenbrae
    - Q: Lisa – I live in a 3-bedroom house in Clackamas Heights and am on the transfer list for a two bedroom. Mery Greenbrae is now accepting applications and internal referrals. I have left a message with CHA but haven't heard back yet. Am I on the right track with this? Staff: Mercy Greenbrae is a Metro Bond project that was called Marylhurst Commons - https://www.clackamas.us/housingauthority/marylhurst-commons

List of items to send out to RAB attendees after the meeting: minutes & slides, Carol Smith packet

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** **Attachment K**

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

I, Tootie Smith, the Housing Authority Board Chair
Official's Name *Official's Title*

certify that the Annual PHA Plan for fiscal year 2024-2025 of the

Housing Authority of Clackamas County 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

Clackamas County
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

The Housing Authority of Clackamas County's Annual Plan is consistent with the Clackamas County Consolidated Plan and Assessment of Fair Housing Plan in aiming to preserve affordable housing for all residents and especially low-income residents. The Housing Authority, situated as a component unit of the Housing and Development Division of Clackamas County, continues to collaborate with Clackamas County in all plans to address the housing needs of Clackamas County residents.

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: Commissioner Tootie Smith	Title: Board Chair
Signature: Tootie Smith	Date: 04/04/2024

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.

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.

form **HUD-50077-SL** (3/31/2024)

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** **Attachment L**

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 _X_ 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 2024 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).

Housing Authority of Clackamas County___	OR001________________________________
PHA Name	PHA Number/HA Code

__X___Annual PHA Plan for Fiscal Year 2024

_____ 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: Toni Karter		Name Board Chairman: Commissioner Tootie Smith, Chair	
Toni Karter	2/5/24	Tootie Smith	04/04/2024
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.

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PHA Name: Housing Authority of Clackamas County

PHA Code: OR001
MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 7/1/2024
PHA Program Type: Combined
MTW Cohort Number: Asset Building
MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of Clackamas County (HACC) plans to use its MTW flexibility to align the needs of the community and residents with the three (3) MTW statutory objectives in ways that help transform operations, encourage self- sufficiency, and better utilize the funding it receives. After receiving notice of its selection to the Asset Building Cohort of the MTW Expansion, the HACC management team went through a visioning exercise to localize the MTW Statutory Objectives into language that fits both the agency and the community's "business objectives" for the MTW program. These business objectives will be used to guide staff through its waiver/activity selection and the application of its MTW funding flexibility.

They are:
1. Efficiencies gained will be used to redirect staff toward activities that have a higher value for the client, such as building trusting relationships, connecting clients to resources, and educating clients on the impacts of financial decisions.
2. Priority will be given to activities that seek a balance between reduced staff time and benefit HACC's clientele in order for HACC to serve more families and provide its services more equitably.
3. HACC seeks to impact the homelessness crisis in the County and recognizes that the first step to do this is through eviction and termination prevention measures, requiring innovative programmatic approaches to common problems seen in housing.

In the first year of activities, HACC focused on establishing and launching Asset Building MTW cohort activities. With Housing Opportunity Through Modernization Act (HOTMA) effective dates and implementation timelines, HACC requested additional waivers which intersected with HOTMA changes through a mid-year revision of their Annual Plan and MTW Supplement with a plan to implement additional MTW activities by July 1, 2024, in conjunction with HOTMA. Due to the extension of HOTMA implementation timelines, HACC is pushing back implementation timelines of MTW activities that intersect with HOTMA to no later than January 1, 2025.

The MTW Waivers listed below were conditionally approved; amended supplement for FYB 7/1/23 was approved by the field office on 3/28/24.
• Cohort Specific Waiver - Savings Account Component Updates – Savings Account participants only
• MTW Waivers 3.a, 3.b. - Alternate Re-examination schedule – HCV & PH
• MTW Waiver 5.c - Inspection Process – HCV only
• MTW Waiver 2.d - Rent Reasonableness 3rd Party Requirements – HCV only
• MTW Waiver 9.a, 9.b - Increase PBV Cap and Project Cap – PBV only
• MTW Waiver 9.h - Limit Portability for PBV - PBV only

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented

n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Currently Implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented

c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Housing Authority of Clackamas County Plans to Implement in the Submission Year or Is Currently Implementing

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HACC proposes waiving certain provisions of 24 CFR 982.352(b) and 983.303, eliminating the requirement that the PHA use a third-party entity to perform rent-reasonableness determinations for units and properties the agency owns, manages, or controls.

Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency. Instead, HACC will apply its current rent reasonableness process for non-owned/managed units to units it owns and manages. This process has adequate controls in place to ensure uniformity, auditability, transparency, and fairness of the determination.

*This activity does not require an impact analysis or hardship policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

HACC will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The projected implementation date has been delayed to no later than January 1, 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload a description of the quality assurance method.

HACC uses Nelrod's EZRRD software to compile, analyze, and validate its rent comparisons for rent reasonableness. Using a third-party system for objective market analysis adds an element of quality control into HACC's process. In addition, HACC will follow the SEMAP guidelines (SEMAP Indicator 2) for reviewing rent reasonableness determinations.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

HACC relies on the Rent Reasonable Nelrod EZRRD Model, which offers a third-party database of rents to determine rent reasonableness of all County units. This analysis is based on the unit amenities, age, location, and other factors. EZRRD uses its five-method analysis system to compare multiple features per unit for a more in-depth analysis, and automatically identifies the three best comparables based on the system's objective market analysis.

No document is attached.

3.a. - Alternative Reexamination Schedule for Households (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HACC proposes waiving certain provisions of the following policies:
i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act
ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

Waiving these provisions will allow HACC to implement a triennial recertification policy for all elderly and disabled households on fixed incomes in its Public Housing program. This will benefit the client and the PHA by reducing the burden of the regular review cycle. Under this waiver, the impacted households will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:

i. If a utility allowance or flat rent adjustment is made, HACC may process the change without reviewing the household's income.
ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
iii. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
iv. An interim with a review of the household's income will be conducted if a household is reporting a decrease of 10% or more in the household's gross income.
v. HACC will limit the number of interims conducted to 2 per year. If additional interims beyond the 2 per year are requested, HACC will request the household file for a Hardship exemption from this MTW activity.
vi. Although all income changes are still to be reported to HACC by households in accordance with the Public Housing Admissions and Continued Occupancy Policies (ACOP). Interims will not be conducted for increases in earned or unearned income. Increases in income will only be reviewed every three years.
vii. Households may file a Hardship exemption for this MTW activity in accordance with the agency's MTW hardship policy

at any time.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The projected implementation date has been delayed to no later than January 1, 2025.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

Yes

What considerations led the MTW agency to modify the hardship policy?

Added additional detail to better explain the policy based on feedback from HUD and alignment with Hardship policy requirements set by HUD. Added detail about what constitutes a hardship and how to receive more than the limit of interims. Also adds clarifying language to encompass better explain situations that might lead to a hardship. It better outlines the review of hardship exemptions and process for approval and denial. Language added to clarify that grievances will follow the current HACC program policies and records retention.

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

HACC interim policies are as follows:
i. HACC will conduct an interim at household request, if the household’s gross income decreases by 10% or more.
ii. If utility allowances or flat rent adjustment is made, HACC may process the change without reviewing the household’s income.
iii. HACC will conduct no more than 2 interims per year. Households requesting more than 2 interims per year will be asked to file a Hardship exemption from this MTW activity.

3.b. - Alternative Reexamination Schedule for Households (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HACC proposes waiving certain provisions of the following policies:
i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act
ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

Waiving these provisions will allow HACC to implement a triennial recertification policy for all elderly and disabled households on fixed incomes in its Housing Choice Voucher program. This will benefit the client and the PHA by reducing the burden of the regular review cycle. Under this waiver, the impacted households will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:
i. HACC will conduct an interim if there is an approved rent increase. At such interim, HACC will apply the most current payment standard and utility allowance but will not review household income.
ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
iii. If a family moves into a new unit, HACC will process the change without reviewing the household’s income.
iv. An interim will be conducted if a household is reporting a decrease of 10% or more in the household’s gross income.
v. HACC will limit interims to 2 per household per year. If a household would like more than 2 interims per year, HACC will request the household file for a Hardship exemption from this MTW activity.
vi. Although all income changes are still to be reported to HACC by households in accordance with the Administrative Plan. Interims will not be conducted for increases in earned or unearned income. Increases in income will only be reviewed every three years.
vii. Households may file a Hardship exemption for this MTW activity in accordance with the agency’s MTW hardship policy

at any time.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The projected implementation date has been delayed to no later than January 1, 2025.

Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

HACC interim policies are as follows:
i. HACC will conduct an interim at household request, if the household’s gross income decreases by 10% or more.
ii. HACC will conduct an interim if there is an approved rent increase. At such interim, HACC will apply the most current payment standard and utility allowance but will not review household income, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.
iii. HACC will conduct no more than 2 interims per year. Households requesting more than 2 interims per year will be asked to file a Hardship exemption from this MTW activity.

5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HACC proposes waiving certain provisions of Section 8(o)(11) of the 1937 Act, 24 CFR Part 982.352(b)(iv), and 24 CFR Part 983.103(f). Waiving these provisions will allow HACC to eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, or controls.

Procuring and overseeing a third-party contractor for HQS inspections services is costly and time-consuming for the agency. Instead, HACC will utilize its in-house HQS inspection team and the policies and procedures governing HQS inspections for the Housing Choice Voucher program. The HQS inspection process has built-in quality control measures in place that will help to ensure the inspections performed at properties owned or managed by HACC are uniform fair and that the process is transparent and auditable.

In order to further ensure quality control, participants may request an interim inspection, in writing in accordance with the HACC Administrative Plan.

*This activity does not require an impact analysis or hardship policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

HACC will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The projected implementation date has been delayed to no later than January 1, 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method
HACC will apply the SEMAP standards and methods (SEMAP Indicator 5) to select PBV inspections performed during the year by HACC staff. HACC will conduct Quality Assurance inspections on the selected units to ensure consistency and transparency.

No document is attached.

9.a. - Increase PBV Program Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HACC proposes waiving certain provisions of section 8(o)(13)(B) of the 1937 Act and 24 C.F.R. 983.6(a)-(b), as superseded by the Housing Opportunity through Modernization Act of 2016 (HOTMA) Implementation Notices at 82 FR 5458 and 82 FR 32461. Waiving these provisions will allow HACC to increase the Project Based Voucher program cap to 50% of the lower of either HACC's total authorized units or HACC's annual budget authority.

Project-based vouchers (PBVs) are an important resource in the community and increasing the program cap will allow the agency to coordinate with local property owners, developers, service coordinators, and jurisdictional partners to provide housing for targeted populations.

*This activity does not require an impact analysis or hardship policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all properties with project-based vouchers

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The projected implementation date has been delayed to no later than January 1, 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HACC proposes waiving certain provisions of section 8(o)(13)(D) of the 1937 Act and 24 C.F.R. 983.56(a)-(b), as superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. Waiving these provisions will allow HACC to increase the Project Based Voucher project cap to 100%. This will allow HACC to project-base 100% of the units in future housing developments.

Project-based vouchers (PBVs) are an important resource in the community and having the ability to project base all of the units in a project will help HACC and its partners secure additional financing and leverage its resources to better meet the needs of the local community.

*This activity does not require an impact analysis or hardship policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all properties with project-based vouchers

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The projected implementation date has been delayed to no later than January 1, 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.h. - Limit Portability for PBV Units (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HACC proposes waiving certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will allow the HACC to waive the requirement that PHA's provide a tenant- based voucher to project-based households after being on a project-based voucher for twelve (12) months. Instead, HACC proposes to limit portability to twenty-four (24) months. Waiving the 12-month portability requirement will:

i. Lower the cost of turning units for households moving to a tenant- based voucher.
ii. Help the project-based voucher project to cash flow by continuing to assist the household.
iii. Decrease the administrative burden associated with program unit transfers.
iv. Ensure that households on HACC waitlists, some of whom are currently unhoused and have been waiting their chance for a voucher, are offered a tenant-based voucher first.

HACC will require a tenant to live in a PBV unit for 24 months before requesting to transfer to a Project-based voucher. HACC will only make an exception to the 24-month requirement for those requesting a move due to VAWA or other reasonable accommodation.

All such requests must be submitted in writing to the housing authority and will be reviewed by the Program Manager. All households in program compliance who have requested a move to a tenant-based voucher will be added to the bottom of the tenant-based voucher waitlist. The household will be offered a tenant-based voucher when their name reaches the top of the waitlist, and a voucher becomes available. The household will not receive priority based on being part of the project-based program. If a request to transition to a tenant-based voucher is denied, the household would have the right to an informal review through the hearing process.

*This activity does not require an impact analysis or hardship policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all properties with project-based vouchers

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The projected implementation date has been delayed to no later than January 1, 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

D.	**Safe Harbor Waivers.**
D.1	**Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?** No Safe Harbor Waivers are being requested.

E.	**Agency-Specific Waiver(s).**
E.1	**Agency-Specific Waiver(s) for HUD Approval:** The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I. In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable. For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement. **Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?** No
E.2	**Agency-Specific Waiver(s) for which HUD Approval has been Received:** **Does the MTW agency have any approved Agency-Specific Waivers?** No

F.	**Public Housing Operating Subsidy Grant Reporting.**
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2024	$1,176,859	$1,025,967	$150,892	2032-09-30
2023	$1,306,533	$1,197,157	$109,376	2031-09-30
2022	$0	$0	$0	2030-09-30
2021	$0	$0	$0	2029-09-30

G.	MTW Statutory Requirements.
G.1	**75% Very Low Income – Local, Non-Traditional.** HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	**0**

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.

Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?
No

Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.
MTW agency has not yet established a rent reform policy to encourage employment and self-sufficiency.

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	**0**

H.	Public Comment

Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

I.	Evaluations.

No known evaluations.

E.	Cohort Specific Waiver – Previously approved

(a)

Savings account deposits for downpayment assistance for Homeownership

Name of activity: Matched Savings Homeownership Account – Cohort Specific Waiver

A full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice)

As an MTW-designee under the Asset Building cohort, HACC has elected to implement a PHA Designed asset building activity titled Matched Savings Homeownership Account. The primary goal of the Savings Account Component of the HACC's proposed asset building initiative is to increase the number of households who are "banked" and to partner with local financial institutions willing to provide savings accounts to low-income families, without the restrictions that often lead to low-income households remaining unbanked. Low-income households without bank accounts pay high fees to cash their paychecks or to obtain money orders, which are often required for rent and utility payments when a household does not have access to a bank account. Evidence suggests that when a low-income household is banked, they establish credit, their credit scores increase, their likelihood of default is reduced, and they have lower amounts of delinquent debt.

In 2021, HACC started the environmental review process required to dispose of its 145 scattered sites. HACC's scattered site portfolio consists of 2-, 3-, and 4-bedroom units in single-family homes, duplexes, triplexes, and 4-plexes throughout the County. These units can be up to thirty-five (35) miles apart from each other and each unit costs an average of $2,000 more to operate than other units in the Public Housing portfolio. HACC is looking at the potential to sell the single-family scattered sites as affordable homes under a Community Land Trust model. HACC's hope is that the timeline of the disposition and relocation of the scattered site portfolio aligns with the 24-month reporting period for the demonstration.

HACC's vision for the savings account component of the MTW asset-building program is to offer downpayment assistance to program participants who are ready for homeownership. Selection for program participation will be based on aptitude for homeownership using the criteria described below.

HACC will partner with Proud Ground, DevNW, and CASA of Oregon, all who were selected based on their ability to provide savings accounts free of many of the restrictive characteristics of accounts typically offered to lower-income families, such as high annual fees, high penalties, and no over-draft protection. In addition, many banks offer "second chance accounts" and HACC will work to partner local banks with households to help them bridge the banking gap and become banked. Each household will be required to establish an account and HACC will deposit funds into their account equal to 20% of their current Public Housing rent payment each month for twenty-four (24) months. The preliminary analysis shows that even the households with higher incomes rarely report having assets, such as checking or savings accounts. In fact, only four (4) of the 25 households with incomes over $50,000 reported having any assets at all.

HACC will measure the success of the program using the following factors:
Difference in credit score between initial baseline and current actual;
Difference in delinquent debt between initial baseline and current actual;
Percent of program participants who were successful in a home purchase.

Per HUD PIH Notice 2022-11, the "opt-out" aspect of this savings account program will require HACC to waive certain provisions of the following regulations: sections 23(b)-(f), and (n)(1) of the 1937 Act and 24 CFR 984.101-105, 984.201-204, 984.301-306 and 984.401.

PIH Notice 2022-11 also lists the Safe Harbors required for the opt-out savings account, which include:

i. The PHA must continue to follow all requirements of 2 CFR part 200.
ii. 24 CFR 984.305(a) on accounting and reporting must be retained.
iii. The PHA must contribute at least $10 per month for the benefit of each assisted household participating in the savings program.
iv. The PHA must not contribute more per month for the benefit of each assisted household participating in the savings program than the applicable fair market rent of the unit in which they reside.
v. The PHA must provide an opportunity for households to opt-out of this activity.

How the initiative achieves one or more of the 3 MTW statutory objectives

- **Cost effectiveness**: In 2021, HACC started the environmental review process required to dispose of its 145 scattered sites. HACC's scattered site portfolio consists of 2-, 3-, and 4-bedroom units in single-family homes, duplexes, triplexes, and 4-plexes throughout the County. These units can be up to thirty-five (35) miles apart from each other and each unit costs an average of $2,000 more to operate than other units in the Public Housing portfolio. This activity will give HACC the opportunity to sell the single-family scattered sites as affordable homes to the current occupants, benefiting the housing authority by reducing the cost to operate its Public Housing portfolio.

- **Self-sufficiency**: The model proposed by HACC in this activity will enable qualifying households to purchase a home under more favorable terms than traditionally available, helping these households build wealth through homeownership.

A description of which population groups and household types that will be impacted by this activity

HACC will use the following selection criteria to prioritize households interested in the savings account program:

1. Interest in homeownership in general
2. Currently participating in the IDA homeownership matched savings program
3. Household income above $30,000/year
4. Debt less than $40,000
5. Credit Score of 700 or more, or actively working on getting it above 700
6. Completion of Financial Foundations and Homebuying workshops offered through Dev NW.
7. Completion of Proud Ground land trust orientation.

In addition, HACC is able to refer residents to DevNW financial education programs and cover the cost through a partnership with Clackamas County Social Services.

Any cost implications associated with the activity

Depending on the decision on the percentage of rent to contribute, HACC estimates that this program will cost between $130,00 and $210,000 over two (2) years. These funds will come from HACC's HCV Housing Assistance Payment reserves.

An implementation timeline for the initiative

The implementation timeline is still being developed and this document will be updated when it is ready.

An impact analysis

1. Agency finances – No projected impact to agency finances; funds will come from HUD-held agency HAP reserves.
2. Affordability of housing costs – No projected impact.

3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals – This activity will help families become self-sufficient
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No project impact.

A description of the hardship policy for the initiative

Not applicable

A copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

See attachment O & J of Annual Plan

Additional information on Cohort Activity - Expansion of Existing Credit Reporting Program

Name of activity: Expansion of Existing Credit Building Program – **No waiver required**

A full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice)

HACC currently operates the Rent Reporting for Credit Building program. The goal of this program is to educate program participants of the importance of establishing credit and helping them establish credit by regularly reporting rent payments to the credit bureaus. This program has the following attributes:

- HACC partners with financial capability providers to provide credit coaching and workshops to HACC Public Housing residents;
- HACC has a contract with Esusu, a company that collects rent payment data from property owners and submits the data to the credit bureau, enabling the households to gain credit.

HACC pays for the services provided by Esusu and can only report payments made to HACC, which is why the program has traditionally only been offered to Public Housing residents. However, HACC proposes to expand these services beyond Public Housing to households residing in properties owned by HACC or in which HACC has a controlling interest. In addition, HACC proposes expanding its credit counseling services to include Housing Choice Voucher participants and residents in the affordable housing portfolio interested in financial literacy and building credit. HACC will offer the program to all participants initially but may need to randomly select applicants if the level of interest makes it cost-prohibitive.

Below are some of the policy decisions HACC has made regarding the operation of the credit reporting program. These new and expanded program will follow these same guidelines.

1. HACC can report up to two years of rent payment history as a part of a participant's initial enrollment. If a resident is more than 30 days late on a rent payment or missed a rent payment in the previous two years, HACC will report rent payment history beginning the month following the missed monthly payment.
2. HACC will check both rent payments and rent amounts on a monthly basis.
3. Rent will be reported as "on-time" with the credit bureaus as long as the resident is not over 30 days late.
4. Residents will be dis-enrolled if they miss a monthly payment. Residents are eligible to re-enroll if they make 3 months of on-time payments.
5. If a resident misses a rent payment, Resident Services will contact them immediately to determine if they wish to dis-enroll.
6. If resident decides to dis-enroll, they may elect to re-enroll after 3 months of on-time rental payments.
7. Residents who are dis-enrolled because of a loss of income related to being laid off can be re-enrolled immediately upon returning to their job or receiving unemployment.

HACC will measure success of the program using the following factors:

- Increase in the percentage of residents enrolled in rent reporting
- Additional number of HACC-owned properties managed by third parties

- Number of landlords agreeing to initiate a rent reporting program for their property(s)
- Difference in credit score between initial baseline and current actual
- Correlation between participation in credit counseling services and credit score increase
- Increased enrollment over time
- Regular long-term participation in the program
- Number of credit-invisible households who now have a credit score
- Other factors to be defined

How the initiative achieves one or more of the 3 MTW statutory objectives

- **Cost effectiveness**: encouraging households to pay their rent on time through incentive-based programs like credit reporting will likely increase the amount of on-time rent payments, reducing the need for late fee processing, Public Housing eviction proceedings, and Housing Choice Voucher terminations.
- **Self-sufficiency**: better credit scores are directly related to increased buying power, which will allow households to pay lower interest rates and associated debt service and/or pay-day-loan fees, increasing their ability to secure loans and take advantage of traditional financing tools.
- **Housing Choice**: households with better credit have more financial opportunities when it comes to finding a home.

A description of which population groups and household types that will be impacted by this activity

Through the HACC newsletters and Property Management and Resident Services staff, residents will be informed of the value of building credit through rent reporting and will be instructed on how to enroll in the program. Households will be selected for the program based on their history of making on-time rent payments and their level interest in increasing their credit score.

As part of the enrollment process, resident services staff will meet with the resident to provide enrollment paperwork and discuss how to access and review their credit report. When residents have complex financial situations, such as high amounts of debt or debt in collections, Resident Services staff will make referrals to community partners who can help them find and use tools to improve their financial position.

Below are the general requirements that HACC will use when determining eligibility for the rent reporting program:

1. Resident must be paying a minimum of $10 in rent
2. Residents must have no late payments in the previous three (3) months.
3. Residents with late payments in the previous three months, will be required to make three months of on-time rent payments to become eligible to enroll in Rent Reporting.
4. Residents enrolling in Rent Reporting must be over the age of 18 and be on the lease.

Any cost implications associated with the activity

HACC estimates that 5% of households living in one of its properties will choose to participate in the program. Due to the landlord's required involvement in the HCV program, HACC estimates around 3% of HCV households will choose to participate. This equates to about 80 households, which will cost the agency $8,000 over the two-year reporting period.

An implementation timeline for the initiative

The implementation timeline is still being developed and this document will be updated when it is ready.

An impact analysis

1. Agency finances – No projected impact.
2. Affordability of housing costs – No projected impact.
3. Agency waitlist – No projected impact.
4. Termination rate – No projected impact.
5. Occupancy / Utilization – No projected impact.
6. MTW Statutory Goals – This activity will help families become self-sufficient and increase housing choice through the increased opportunities that good credit can bring.
7. Statutory Requirements – No projected impact.
8. Hardship requests – No projected impact.
9. Protected classes / Disparate impact – No project impact.

A description of the hardship policy for the initiative

Not applicable

A copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.

See attachment O & J of Annual Plan

IMPACT ANALYSIS for MTW Waivers 3.a and 3.b

DESCRIPTION OF WAIVER – Alternative Re-examination Schedule – HCV & PH

The Housing Authority of Clackamas County (HACC) proposes to implement a triennial reexamination schedule for all households on a fixed income households who are elderly or disabled. Under this waiver, the impacted households 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. This will not result in an income review.
2. HACC will not conduct an interim reexamination when a new household member is added, regardless of work/income status, age, or disability.
3. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
4. Interims due to decreases in income will follow HOTMA rules, which stipulate an interim will be done if the household's income decreases by 10% or more.

Definitions Used in this Analysis

- Work able: household does not receive an elderly/disabled allowance.
- Race and ethnicity: race and ethnicity apply 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

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 standard HUD impact analysis questions identified in the MTW Operations Notice were derived from these analyses. Note that HACC does not anticipate the policy changes to have a negative impact on any specific households. Therefore, HACC 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

Financial Impact to the Agency

Based on its analysis, HACC determined that this policy change will have a negative impact to the agency's HAP expenses, increasing annual HAP expenditures by $64,506 per year (row "e" in the chart below). This is measured by looking at the increases in income that have 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 also shows that HACC will be able to offset some of this increase in HAP by eliminating the staff time needed to complete annual reviews and interims for increases in income. This savings is estimated to be $28,142 annually (row "c" in the chart below).

	Population	Scenario	Formula
	Elderly/Disabled on Fixed Income	Triennial	
	Households with Earned Income	Annual	
	Households on TANF	Annual	
	Households with Zero Income	Annual	
	Other Work Able Households	Annual	
	Triennials		
	- Total Households	2,290	
a1	- Average increase in income last 3 years	$2,001	
b1	- Average decrease in income last 3 years	$3,624	
c1	- Number of households with increase in income last 3 years	1,257	
d1	- Number of households with decrease in income last 3 years	247	
e1	- Reduction in HAP due to income increases	$64,506	
f1	- Increase in HAP due to income decreases	$52,411	
g1	- Number of interims last 3 years	1,323	
h1	- Number of annuals last 3 years	2,303	
i1	- Number of annuals under new policy	768	h1 / 3
j1	- Number of interims under new policy	247	d1 / 3
k1	- Reduction in number of reviews	194	(g1 + h1)/3 - i1 - j1
	Agency Impact		
c	- Annual cost savings due to reduction in number of reviews	$28,142	((g1 x a) + (h1 x b) - (i1 x b) - (j1 x a)) / 3
d	- Increase in HAP expenditures annually	$64,506	e1 + e2
e	- Total annual cost savings (loss)	**($36,364)**	c - d

Demographic Impact

To measure the demographic impact, HACC 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.

- Elderly/disabled on fixed income = Triennials
- All others = Annuals

Metric	African American	Asian	Native HI/Pacific	Native Amer.	White	Hispanic	Non-Hispanic	Large Family	Disabled	Elderly	ELI	VLI	LI	Formula
a. Total Population (# annuals + move-ins)	25	136	14	92	2,102	153	2,150	176	1,509	1,050	1,981	302	18	
b. Households with Increase in Income	17	75	5	53	1,422	80	1,450	83	1,065	811	1,317	195	16	
c. Percent of Population with Increase	68%	55%	36%	58%	68%	52%	67%	47%	71%	77%	66%	65%	89%	b / a
d. Average Income Increase	$2,045.18	$2,818.99	$6,419.00	$1,463.28	$1,975.31	$5,117.88	$1,828.89	$7,798.64	$1,322.35	$899.30	$1,099.06	$5,975.74	$20,352.94	
e. Total Work Able Population (# annuals + move-ins)	0	0	0	0	0	0	0	0	0	0	0	0	0	
f. Work Able Households with Increase in Income	0	0	0	0	0	0	0	0	0	0	0	0	0	
g. Percent of Population with Increase - Work Able	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	f / e
h. Average Income Increase - Work Able	0	0	0	0	0	0	0	0	0	0	0	0	0	
j. Work Able Households with Increase in Earned Income	0	0	0	0	0	0	0	0	0	0	0	0	0	
k. Percent of Work Able HH's with Increase in Earned Income	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	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), HACC 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)	HACC 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 (AMI>80%), whose increases in income were the largest over the last three years ($20,352 vs. $1,099 for ELI families). These households represent less than 1% 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, HACC 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	HACC analysis shows that by reducing the number of annuals and interims, this policy change will save the agency $28,142 per year in administrative expenses.
		Self-sufficiency	HACC 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	HACC does not anticipate any impact on housing choice.

#	Question	Answer	
5	Impact on the agency'ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	HACC 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, HACC 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, HACC will be able to serve fewer households. The agency will still meet its STS requirement and the reduction in households served will be offset by administrative efficiencies gained and other 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	HACC 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 for Waiver 3.a,3.b

HACC 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.

Housing Authority of Clackamas County
MTW HARDSHIP POLICY

PURPOSE OF HARDSHIP POLICY

As a Moving to Work (MTW) housing authority, the Housing Authority of Clackamas County (HACC) may request to waive certain HUD policies. Some of the policies that HACC could request require a hardship policy be provided in order to mitigate possible unintended negative impacts on specific households.

HACC anticipates the waivers they are implementing will overall have positive impacts for client households Although in case there are unforeseen significant negative consequences to specific households, HACC is adopting the following hardship policy to allow impacted households to request relief.

MTW agencies may choose to have separate hardship policies for each MTW waiver or a single hardship policy that covers all waivers. HACC is choosing to implement this Hardship policy for all its MTW activities, however, HACC may implement additional hardship policies or revise this policy in the future, as they request additional waivers requiring hardship policies.

This policy currently applies to MTW waivers 3.a, 3.b. regarding an adjusted reexamination schedule for Public Housing and for the Housing Choice Voucher Program for a specific population eligible for a triennial reexamination schedule.

ELIGIBILITY FOR A HARDSHIP EXEMPTION

A family qualifies for a financial hardship exemption if a significant increase in expenses, a significant decrease in earned or unearned income or other circumstance result in their total family share exceeding 50% of the gross income used to determine a household's rent subsidy. Total family share is defined as the family's portion of rent plus the family's utility allowance, if applicable.

Exceptions to this policy include the following circumstances:

- When the family's share exceeds 50% of gross income due to the family's choice to rent a unit with more bedrooms than the household's voucher size; or
- When the household has not been negatively impacted by any MTW waivers.

SUBMISSION OF A HARDSHIP EXEMPTION

Hardship requests must be received in writing by the 15th of each month to be eligible for a revised rent effective on the first of the next month. Hardship exemption requests and adjustments will not be retro-active.

Once the Hardship exemption request has been received by HACC. HACC staff will request any applicable documentation needed to determine if the hardship is due to the MTW activity and that the request for exemption meets the criteria of a financial hardship outlined above.

PROCESS FOR AGENCY REVIEW AND DETERMINATION

The program manager will review the request and determine if the request meets the eligibility requirements for a hardship exemption and is due to the MTW activity.

- If the request does not meet the hardship eligibility or is not due to the MTW waiver activity, there will not be any adjustments made.
- If the request does meet the hardship eligibility or is determined due to MTW waiver activities, the agency will conduct an examination even if beyond the limit and will assign the family to an annual reexamination schedule moving forward.

HOUSEHOLD NOTIFICATION

HACC will take the following actions in order to promote this policy among its applicants and program participants:

- Include a copy of the hardship policy on their website
- Notify applicants of this hardship policy at intake
- Review this hardship policy with families at recertifications including those who will be assigned to the alternate reexamination schedule.
- Consider if a family qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

GRIEVANCE PROCEDURE

If HACC denies a hardship request, the family may file a grievance according to the grievance policies found in HACC's ACOP and Administrative Plan.

RECORDS RETENTION

HACC will preserve all records of hardship requests, determinations and appeals for the duration of its MTW participation and will comply with all other applicable records retention regulations.

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 (07/01/2024), 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 at24 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 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.

(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.

Housing Authority of Clackamas County
MTW PHA NAME

OR001
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).

Commissioner Tootie Smith
NAME OF AUTHORIZED OFFICIAL

Chair
TITLE

Tootie Smith
SIGNATURE

04/04/2024
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.***

Attachment N:
Annual Plan Resolution

BEFORE THE BOARD OF COMMISSIONERS
OF THE HOUSING AUTHORITY OF CLACKAMAS COUNTY, OREGON

In the Matter of Approving the Housing Authority of Clackamas County's Annual Plan	Resolution No. 1982 *Page 1 of 2*

Whereas, the Housing Authority of Clackamas County ("HACC") is required to submit an Annual Plan, together with all attachments thereto, including the Moving to Work ("MTW") Supplement to the US Department of Housing and Urban Development ("HUD"). The Annual Plan is required for HACC to receive annual funding and approval from HUD; and

Whereas, the Annual was developed using the required HUD templates and instructions; and

Whereas, the Resident Advisory Board Meeting, Public Hearing and availability of the draft for comment was advertised in the Oregonian on January 12, 2024; and

Whereas, the Resident Advisory Board meeting, Public Hearing and availability of the draft for comment was advertised to residents through the Housing Authority Resident Services newsletter and by personal invitation to members; and

Whereas, the Annual Plan and its certifications and attachments including the MTW Supplement were informed by input and recommendations from an established Resident Advisory Board ("RAB") at their meeting on January 25, 2024; and

Whereas, the Annual Plan and its attachments including the MTW Supplement drafts were made available for public review and comment from January 30, 2024 through March 15, 2024, online and in hard copy form at various locations listed in the plan; and

Whereas, the Annual Plan and its attachments were discussed, and testimony was taken and recorded at a public hearing in front of the Housing Authority Board of Commissioners on February 22, 2024; and

Whereas, HUD requires the Housing Authority Board of Commissioners to approve the Annual Plan and its attachments including the MTW Supplement by a board resolution before submission to HUD; and

Attachment N:
Annual Plan Resolution

BEFORE THE BOARD OF COMMISSIONERS
OF THE HOUSING AUTHORITY OF CLACKAMAS COUNTY, OREGON

In the Matter of Approving the Housing Authority of Clackamas County's Annual Plan	Resolution No. 1982 *Page 2 of 2*

Whereas, the Annual Plan and its related attachments including the MTW Supplement are to be submitted to HUD no later than April 17, 2024, at least 75 days prior to the effective date of July 1, 2024;

NOW THEREFORE, IT IS HEREBY RESOLVED that the Board of Commissioners of the Housing Authority of Clackamas County reviewed HACC's Annual Plan, and all attachments thereto;

NOW THEREFORE, IT IS FURTHER RESOLVED that the Board of Commissioners of the Housing Authority of Clackamas County hereby approves the Annual Plan, and all attachments thereto;

NOW THEREFORE IT IS FURTHER RESOLVED that the Board of Commissioners of the Housing Authority of Clackamas County hereby authorizes Commissioner Tootie Smith, Chair, to sign all documents on behalf of HACC as may be reasonably required to for submission of the Annual Plan to HUD, no later than April 17, 2024.

DATED this 4th day of April, 2024.

BOARD OF COMMISSIONERS OF THE
HOUSING AUTHORITY OF CLACKAMAS COUNTY, OREGON

Tootie Smith
____
Chair

____
Recording Secretary

PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the *Streamlined Annual PHA Plan*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the streamlined Annual PHA Plan for PHA fiscal year beginning ***July 1, 2024****, hereinafter referred to as the Streamlined Annual Plan, of which this document is a part and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of the Streamlined Plan and implementation thereof:*

1. The streamlined Annual Plan is consistent with the applicable comprehensive housing affordability strategy (or any streamlined Plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, and provided this Board or Boards an opportunity to review and comment on any program and policy changes since submission of the last Annual Plan.
3. The PHA made the proposed streamlined Annual Plan, including policy and program revisions since submission of the last Annual 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 streamlined Plan and invited public comment.
4. The PHA will carry out the streamlined Annual Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work 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.
6. For streamlined Annual Plans that include a policy or change in policy for site-based waiting lists:
The PHA regularly submits required data to HUD's MTCS in an accurate, complete and timely manner (as specified in PIH Notice 99-2);
· 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 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 waiting list is consistent with affirmatively furthering fair housing;
· 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 part 903.7(b)(2).
7. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
8. 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.
9. 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.
10. The PHA has submitted with the streamlined Plan a certification with regard to a drug-free workplace required by 24 CFR Part 24, Subpart F.
11. The PHA has submitted with the streamlined Plan a certification 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
and implementing regulations at 49 CFR Part 24.
12. 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.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
15. 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.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).
19. The PHA will undertake only activities and programs covered by the streamlined Annual Plan in a manner consistent with its streamlined Annual Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its streamlined Plan.
20. All certifications and attachments (if any) to the streamlined Plan have been and will continue to be available at all times and all locations that the PHA streamlined Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the streamlined 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 streamlined Annual Plan and will continue to be made available at least at the primary business office of the PHA.
21.The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):

_ 903.7a Housing Needs
X 903.7b Eligibility, Selection, and Admissions Policies
X 903.7c Financial Resources
X 903.7d Rent Determination Policies
X 903.7h Demolition and Disposition
_ 903.7k Homeownership Programs
X 903.7r Additional Information
- X A. Progress in meeting 5-year mission and goals
- _ B. Criteria for substantial deviation and significant amendments
- X C. Other information requested by HUD
  - X 1. Resident Advisory Board consultation process
  - X 2. Membership of Resident Advisory Board
  - X 3. Resident membership on PHA governing board

22. The PHA provides assurance as part of this certification regarding its streamlined annual PHA Plan 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.

Housing Authority of Clackamas County	**OR001**
PHA Name	PHA Number

Annual PHA Plan for Fiscal Year: **2024-2025**

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
Commissioner Tootie Smith	Housing Authority Board Chair
Signature X Tootie Smith	Date 04/04/2024

Attachment O:

Public Notice & Comments

Public Notice - January 12, 2024

Housing Authority of Clackamas County – FY 2024-25 Annual Plan & Moving to Work Supplement
A resident meeting to review the Plan & Supplement is scheduled for 1/25/24 at 10am via Zoom https://clackamascounty.zoom.us/j/81052766990?pwd=WWluSnc3TTFIZ3Z0czhLNWF2NExrdz09. Resident Advisory Board members and residents are encouraged to attend. In addition, a Public Hearing is scheduled for 2/22/24 at 10am in person and via zoom. All residents are welcome to provide comment by registering prior to the meeting online or in person. Meeting links, registration and additional information can be found at https://www.clackamas.us/bcc#weeklyschedule. The meeting will be livestreamed and archived on the County YouTube Channel. Written comments may be submitted via email to: EFernald@clackamas.us with the subject line Annual Plan. HACC developed its Plan and Supplement in compliance with the Quality Housing and Work Responsibility Act of 1998 and Federal Register, Docket No. FR-4829-N-01. Drafts of the Plan & Supplement will be available for review from 1/30/24-3/15/24 online at https://www.clackamas.us/housingauthority/plansandreports.html. Hard copies will also be available for review at HACC's Admin Office located at 13930 S. Gain Street, Oregon City, OR, Monday through Thursday, 8AM to 6PM and the Clackamas County Library at 16201 SE Mcloughlin, Milwaukie, OR 97267.

Public Comments from Public Hearing on February 22, 2024

Video of the hearing can be found at: https://www.youtube.com/watch?v=9DcWsCdlDQg

Toni presented a high-level review of HACC programs and progress and pointed to specific sections of the plan with the most changes since the last annual plan submission.

Shull – Are there any federal policy changes that will reduce HUD funding that may require an alternative funding source here in the county or the reduction of one of our current programs.

Toni – No and in fact we are looking for an increase in funding for the coming year.

Shull – I thought HUD was in a situation where they are going to see reduced funding coming out. No?

Toni – They renew us at the rate we got the prior year and then give us a COLA (cost of living adjustment) for inflation every year and they are still projecting to do that.

Shull – Okay thank you very much.

Schrader – Thank you for all you do, it is always a pleasure to see you here. What I wanted to ask, and I may just have my staff contact your staff, to get a sense of all the HUD dollars just on a white paper sheet list of what we are normally getting from HUD for these programs. The reason I am asking is I am chairing the committee that does most of the lobbying on the hill and make sure those funds stay intact and available to us and not just for our county but for counties across the nation. It would be good for me to have that information on hand so I can explain to people that action at that level of government and being there and talking to those legislators at the federal level is essential for these programs in order to get those revenues streams. So, would you guys' mind doing that?

Toni – Yes, absolutely we can do that.

Administrator Schmidt – Please provide that to all commissioners.

Open for PUBLIC testimony – blue card or on zoom by raised hand.

No public testimony received in person or online during the meeting.

Closed PUBLIC testimony time.

Chair Smith – Are you good on this Resident Commissioner Ann Leenstra.

Leenstra – I am good on this.

Chair Smith – Staff please take any comments received today under consideration. The final plan will be submitted to the board for approval at a future business meeting. Thank you for all your good work on this and I like the term that you used that HUD said we were front runners in this area.

Additional comments received during public review period including those from staff:

Public Housing Staff – After reviewing the proposed changes in Attachment A, concerning sections 6-IV.G. APPLYING UTILITY ALLOWANCES, which changes when utility allowance amounts are updated and 3-I.B. FAMILY AND HOUSEHOLD, which allows adult household members to return to the Household for up to 13 months instead of 6 months, the Property Management team believes it is in the best interest of Public Housing residents for these changes to be mirrored in the ACOP. Would we be able to align the ACOP with the Admin changes proposed before Board and HUD submission.

Response – Yes, as the plan is still in draft form, we will still be able to make the changes. We also informed the RAB when reviewing the policy changes, we were working to continue to align our policies across programs whenever possible and they were supportive of that effort. Changes to Attachment B will be updated in the final draft for board approval and the RAB will be notified of the change.

MTW workgroup – Adding the additional information and cohort specific waiver included in the last MTW supplement even though they do not print from HIP could be helpful to include in the full Annual Plan PDF for transparency.

Response – They have been merged back into the MTW supplement in the printed PDF full version.

HOUSING AUTHORITY OF CLACKAMAS COUNTY

(A component unit of Clackamas County, Oregon)

Component Unit Financial Statements
and Supplementary Information

For the Fiscal Year Ended June 30, 2023

Prepared by:

Housing Authority of Clackamas County
Finance Department

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

TABLE OF CONTENTS

INTRODUCTORY SECTION

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

CLACKAMAS COUNTY, OREGON
2051 Kaen Road
Oregon City, Oregon 97045

COMMISSIONERS AS OF JUNE 30, 2023

Name	Term Expires
Tootie Smith, Chair 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2024
Ben West, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2026
Paul Savas, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2026
Martha Schrader, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2024
Mark Shull, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2024

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

CLACKAMAS COUNTY, OREGON
2051 Kaen Road
Oregon City, Oregon 97045

ADMINISTRATIVE OFFICES
Housing Authority of Clackamas County
13930 South Gain Street
Oregon City, Oregon 97045

LEGAL COUNSEL
Steven Madkour
Office of County Counsel
Clackamas County, Oregon
2051 Kaen Road
Oregon City, Oregon 97045

County Administrator
Gary Schmidt
2051 Kaen Road
Oregon City, Oregon 97045

FINANCIAL SECTION

REPORT OF INDEPENDENT AUDITORS

MOSSADAMS

Report of Independent Auditors

Board of County Commissioners of
Clackamas County, Oregon, as Governing Body of
Housing Authority of Clackamas County
Oregon City, Oregon

Report on the Audit of the Financial Statements

Opinions

We have audited the financial statements of the governmental activities and the aggregate discretely presented component units of the Housing Authority of Clackamas County, Oregon (the Authority), a component unit of Clackamas County, Oregon, as of and for the year ended June 30, 2023, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements as listed in the table of contents.

In our opinion, based on our audit and the reports of other auditors, the accompanying financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities and the aggregate discretely presented component units of the Housing Authority of Clackamas County, Oregon as of June 30, 2023, and the respective changes in financial position and cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

We did not audit the financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP, the discretely presented component units of the Authority, which represents 100% of the assets, 100% of the net position, and 100% of the revenues of the discretely presented component units of the Authority. Those financial statements were audited by other auditors, whose reports thereon has been furnished to us, and our opinion, insofar as it relates to the amounts included for Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP, is based solely on the report of the other auditors.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards (Government Auditing Standards)*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinions. The financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP were not audited in accordance with *Government Auditing Standards*.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Authority's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Autority's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control–related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis and the schedules of OPEB and Pension information, as listed in the table of contents, be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Supplementary Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the Authority's basic financial statements. The supplementary information, as listed in the table of contents, and the schedule of expenditures of federal awards, as required by Title 2 U.S. *Code of Federal Regulations (CFR) Part 200*, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, are presented for purposes of additional analysis and are not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the accompanying supplementary information and the schedule of expenditures of federal awards are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Information

Management is responsible for the other information included in the annual report. The other information comprises the introductory section but does not include the basic financial statements and our auditor's report thereon. Our opinions on the basic financial statements do not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the basic financial statements, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the basic financial statements, or the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated April 30, 2024 on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Authority's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control over financial reporting and compliance.

Other Reporting Required by Minimum Standards for Audits of Oregon Municipal Corporations

In accordance with the *Minimum Standards for Audits of Oregon Municipal Corporations*, we have issued our report dated April 30, 2024, on our consideration of the Authority's compliance with certain provisions of laws, regulations, contracts, and grant agreements, including the provisions of Oregon Revised Statutes as specified in Oregon Administrative Rules 162-010-000 through 162-010-0330 of the *Minimum Standards for Audits of Oregon Municipal Corporations*. The purpose of that report is to describe the scope of our testing of compliance and the results of that testing and not to provide an opinion on compliance.

Ashley Osten

Ashley Osten, Partner
For Moss Adams LLP
Portland, Oregon
April 30, 2024

MANAGEMENT'S DISCUSSION AND ANALYSIS

The Management of the Housing Authority of Clackamas County (the Authority) offers readers of our financial statements this narrative overview and analysis of the financial activities of the Authority for the fiscal year ended June 30, 2023. All amounts, unless otherwise indicated, are expressed in thousands of dollars.

Financial Highlights

- Our assets exceeded our liabilities (net position) at the close of the fiscal year by $91,372, an increase of $29,787 over the prior fiscal year. Of this amount, $74,647 (unrestricted net position) may be used to meet our ongoing obligations to provide low-cost housing.
- The Authority's total assets were $155,740, a net decrease of $17,740 from the prior fiscal year, primarily due to collecting the entire balance of $25,117 in construction loans for the completed Hillside Manor and Webster Road projects.
- Total liabilities were $64,791, a decrease of $46,367 from the prior fiscal year primarily due to paying off the entire $31,139 balances of construction bonds for the completed Hillside Manor and Webster Road projects. In addition, as the Authority spent down Metro affordable housing bond program funds during 2023, unearned revenue decreased by $16,490 since the prior year.
- Net Position increased by $29,787, due to recognizing $16,490 from the Metro affordable housing bond program, voucher income revenue increasing in 2023 by $4,061,444, and investment returns increasing by $3,610 from higher interest rates in 2023.
- Total operating revenues were $66,555, an increase of $10,927, based on recognizing Metro affordable housing bond program dollars in 2023.
- Total operating expenses were $39,399, an increase of $4,844. With higher voucher income revenue in 2023, the Authority increased housing assistance payments by $5,385 in 2023.

Overview of the Financial Statements

The discussion and analysis are intended to serve as an introduction to the Authority's basic financial statements. The basic financial statements consist of the Statement of Net Position, Statement of Revenues, Expenses and Changes in Net Position and Statement of Cash Flows along with the notes to the basic financial statements. We encourage readers to consider the information presented here in conjunction with these financial statements.

Overview of the Financial Statements (Continued)

Complementing these statements and notes is the supplementary information, which provides additional detail about the Authority's operations.

The Statement of Net Position presents information on all the Authority's assets, deferred outflows of resources, liabilities and deferred inflows of resources, with the differences reported as net position. Over time, increases or decreases in net position may serve as a useful indicator of whether our financial position is improving or deteriorating.

The Statement of Revenues, Expenses and Changes in Net Position present information showing how the Authority's net position changed during the year. All changes in net position are reported as soon as the underlying event giving rise to the change occurs, regardless of the timing of the related cash flows.

The Statement of Cash Flows is an analysis of the change in the Authority's cash balance during the year.

The basic financial statements include the following four discretely presented component units: Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP and Webster Road Housing LP. Discretely presented component unit information can be found in the notes to the basic financial statements. Complete financial statements can be obtained from the Authority at PO Box 1510, 13930 S. Gain St., Oregon City, OR 97045.

Authority Financial Analysis

Net Position

The following provides summary of the Authority's net position for 2023 and 2022:

	2023	2022
Assets:	$(000's)	
Assets, excluding capital assets	$ 141,981	$ 159,474
Capital assets	13,759	14,006
Total assets	155,740	173,480
Deferred outflows of resources	1,666	1,889
Liabilities:		
Current liabilities	11,111	25,323
Noncurrent liabilities	53,680	85,835
Total liabilities	64,791	111,158
Deferred inflows of resources	1,243	2,626
Net position:		
Net investment in capital assets	10,528	10,112
Restricted	6,197	25,900
Unrestricted	74,647	25,573
Total net position	$ 91,372	$ 61,585

Authority Financial Analysis (Continued)

As noted earlier, net position may serve over time as a useful indicator of whether a government's financial condition is improving or declining. In the case of the Authority, assets exceeded liabilities by $91,372 at the close of the most recent fiscal year.

Twelve percent of the Authority's net position, $10,528, reflects its net investment in capital assets, primarily housing, less any related debt used to acquire those assets that are still outstanding. Seven percent of the Authority's net position, $6,179, consists of cash for capital replacement and cash restricted for future HAP payments. These cash reserves are producing interest revenue. The remaining unrestricted net position of the Authority is available for future use to provide program services and the remaining debt service.

The total net position of the Authority increased by $29,787 during the current fiscal year. Restricted net position decreased by $19,703, which was primarily due to spending Metro affordable housing bond program funds in support of several new projects. The Authority's unrestricted net position increased by $49,074, which was the result of current year operating income of $27,156 and restrictions released through the spend down of the restricted Metro dollars in 2023. There was no significant change in net investment in capital assets since the prior year.

Changes in Net Position

The following provides a summary of the Authority's change in net position for 2023 compared to 2022:

	2023	2022
Operating revenues:	$(000's)	
Intergovernmental revenues	$ 48,549	$ 33,152
Rental income	3,018	2,676
Other revenue	14,988	19,800
Total operating revenues	66,555	55,628
Expenses:		
Housing assistance payments	28,642	23,257
Other operating expenses	10,757	11,298
Non-operating expense, net	(2,057)	755
Total expenses	37,342	35,310
Net income before contributions	29,213	20,318
Capital contributions	574	563
Change in net position	29,787	20,881
Net position, beginning of year	61,585	40,704
Net position, end of year	$ 91,372	$ 61,585

Authority Financial Analysis (Continued)

Operating revenues increased by $10,927 or 20% over the prior year. Increases over the prior year's revenues resulted primarily from the Metro program and an increase in Voucher rental income since the prior year. Total operating expenses increased by $4,844 primarily due to higher HAP payments made in 2023.

Capital Asset and Debt Analysis

The Authority's dollars invested in capital assets totaled $13,759, which remained consistent with the prior year. With the payoff of Hillside Manor and Webster Road construction bonds, long-term debt decreased by $32,333.

Additional information relating to capital assets and long-term debt may be found in Notes 5 and 6, respectively.

Economic Factors

A majority of the Authority's programs are dependent on federal funding. The Housing Choice voucher program (the "Program") has two primary funding components: The Housing Assistance Payment (HAP) which can only be used for rent assistance payments to landlords and the administrative fee funding to cover the costs of administering the Program. The administrative fee was funded at only ~90% of fee eligibility during the fiscal year and are further limited to the number of vouchers leased. During this fiscal year, the Program was authorized to serve 2,201 families but due to average rental assistance needed per family exceeding the HAP funding received on average per family, the Authority utilized 100% of its rental assistance dollars and was only able to serve 1,919 vouchers or 87% of its vouchers. The Authority has increased caseloads with reduced staff and streamlined operations, but still has been forced to subsidize administrative costs with funds from local projects which do not have federal restrictions on their use. The Authority continues to receive new awards of funding and expects relatively flat funding for HUD existing programs in the coming year. New awards with no increases in staffing would equate to more stable program cost coverage with increased administrative fees.

In May of 2020, voters in the Metro region passed the Supportive Housing Services (SHS) measure (Measure 26-210). The measure raises money for supportive housing services for people experiencing homelessness or at risk of experiencing homelessness. Clackamas County is receiving 21.33% of the total revenue generated by Measure 26-210 to provide services such as: rent assistance, mental health services, addiction and recovery services, employment assistance, and peer support services. The Authority is

Economic Factors (Continued)

working in conjunction with Clackamas County and Clackamas County's department of Health, Housing and Human Services to implement Measure 26-210. In 2023, there was an unanticipated increase in projected funding for the SHS program and these metro funds moved to the County's new Housing Division. HACC receives grant funds from SHS through the County to expand its rent assistance offerings with this funding with a total goal to serve 1,065 families or more in the coming year.

Financial Contact

The financial statements are designed to present users (citizens, taxpayers, customers, investors and creditors) with a general overview of the Authority's finances and to demonstrate the Authority's accountability. If you have any questions about the report or need additional information, please contact the Housing Authority of Clackamas County at PO Box 1510, 13930 S. Gain St., Oregon City, OR 97045.

BASIC FINANCIAL STATEMENTS

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

STATEMENT OF NET POSITION

JUNE 30, 2023

	Housing Authority of Clackamas County	Discretely Presented Component Units
ASSETS:		
Current assets:		
Cash and cash equivalents	$ 7,914,249	$ 3,073,877
Investments	1,921,576	-
Accounts receivable, net of allowance for doubtful accounts of $230,755	3,412,951	292,027
Accrued interest on notes receivable, net of allowance of $2,302,351	3,616,044	-
Inventory	20,136	-
Notes receivable	811,865	-
Other assets	1,433,822	1,172,924
Total current assets	19,130,643	4,538,828
Restricted assets:		
Cash	6,210,861	5,057,266
Investments with fiscal agent	140,702	-
Non-current assets:		
Notes receivable	116,498,535	-
Other assets	-	275,695
Capital assets not being depreciated	4,076,534	7,146,652
Capital assets being depreciated	9,682,643	128,072,266
TOTAL ASSETS	155,739,918	145,090,707
DEFERRED OUTFLOW OF RESOURCES	1,666,440	-
TOTAL ASSETS AND DEFERRED OUTFLOW OF RESOURCES	157,406,358	145,090,707
LIABILITIES:		
Current liabilities:		
Accounts payable and accrued expenses	3,374,778	1,025,689
Accrued interest payable	421,012	-
Tenant deposits payable from restricted assets	154,804	238,054
Unearned revenue	5,321,438	48,151
Other current liabilities payable from restricted assets	-	4,973,184
Due to Clackamas County	934,979	-
Current portion of long-term liabilities	903,698	6,302,177
Total current liabilities	11,110,709	12,587,255
Non-current liabilities:		
Other - notes payable	-	99,153,752
Long-term liabilities, net of current	53,680,531	-
TOTAL LIABILITIES	64,791,241	111,741,007
DEFERRED INFLOW OF RESOURCES	1,242,988	-
NET POSITION:		
Net investment in capital assets	10,527,939	35,943,110
Restricted	6,196,759	5,044,366
Unrestricted	74,647,431	(7,637,776)
TOTAL NET POSITION	$ 91,372,129	$ 33,349,700

See notes to basic financial statements

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION

YEAR ENDED JUNE 30, 2023

	Housing Authority of Clackamas County	Discretely Presented Component Units
OPERATING REVENUES:		
Rental income	$ 3,018,069	$ 7,057,387
HUD PHA operating grants	2,879,954	-
Voucher income	25,738,448	-
Other government grants	19,930,415	-
Other income	14,988,108	127,334
Total operating revenues	66,554,994	7,184,721
OPERATING EXPENSES:		
Housing assistance payments	28,642,255	-
Administrative expenses	4,122,162	1,194,015
Tenant services	962,312	-
Utilities	1,126,226	788,092
Ordinary maintenance and operations	1,981,497	1,146,764
General expenses	378,613	394,136
Other expenses	1,353,974	-
Depreciation and amortization	831,807	3,724,785
Total operating expenses	39,398,845	7,247,792
OPERATING INCOME (LOSS)	27,156,149	(63,071)
NON-OPERATING REVENUE (EXPENSE):		
Investment return	3,575,462	5,717
Interest expense	(1,518,464)	(3,291,517)
Other	-	(272,157)
Total non-operating expense	2,056,998	(3,557,957)
NET INCOME (LOSS) BEFORE CAPITAL CONTRIBUTIONS	29,213,147	(3,621,028)
Capital contributions	573,925	10,078,115
CHANGE IN NET POSITION	29,787,072	6,457,087
NET POSITION, June 30, 2022	61,585,057	26,892,613
NET POSITION, June 30, 2023	$ 91,372,129	$ 33,349,700

See notes to basic financial statements

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

STATEMENT OF CASH FLOWS

YEAR ENDED JUNE 30, 2023

	Housing Authority of Clackamas County
CASH FLOWS FROM OPERATING ACTIVITIES:	
Received from grants	$ 36,728,713
Received from tenants	2,427,501
Payments to suppliers	(3,209,897)
Payments for housing subsidies	(28,642,255)
Payments to employees	(6,120,081)
Other	8,641,597
NET CASH FROM OPERATING ACTIVITIES	9,825,578
CASH FLOWS FROM NONCAPITAL FINANCING ACTIVITIES:	
Payments received from notes	33,916,707
Purchase of notes	(28,017,318)
NET CASH FROM NONCAPITAL FINANCING ACTIVITIES	5,899,389
CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES:	
Purchases of capital assets	(584,725)
Capital grants received	573,925
Principal payments on long-term debt	(32,522,451)
Proceeds received from long-term debt	189,437
Interest paid on long-term debt	(1,518,464)
NET CASH FROM CAPITAL AND RELATED FINANCING ACTIVITIES	(33,862,278)
CASH FLOWS FROM INVESTING ACTIVITIES:	
Interest received from investments	1,685,462
Proceeds from sale of investments	997,034
NET CASH FROM INVESTING ACTIVITIES	2,682,496
NET DECREASE IN CASH AND CASH EQUIVALENTS	(15,454,815)
CASH AND CASH EQUIVALENTS, June 30, 2022	29,579,926
CASH AND CASH EQUIVALENTS, June 30, 2023	$ 14,125,110
RECONCILIATION OF OPERATING INCOME TO NET CASH FROM OPERATING ACTIVITIES:	
Operating income	$ 27,156,149
Adjustments to reconcile operating income (loss) to net cash from operating activities:	
Depreciation	831,807
OPEB and pension	(470,235)
Change in assets and liabilities:	
Decrease in inventory	1
Increase in other assets	(1,151,311)
Increase in accounts receivable	(1,817,191)
Increase in accounts payable and accrued expenses	1,091,308
Increase in Due to Clackamas County	934,979
Increase in tenant deposits	20,044
Decrease in compensated absences	(280,171)
Decrease in unearned revenue	(16,489,802)
NET CASH FROM OPERATING ACTIVITIES	$ 9,825,578

See notes to basic financial statements

NOTES TO BASIC FINANCIAL STATEMENTS

1. REPORTING ENTITY AND DESCRIPTION OF OPERATIONS

The Housing Authority of Clackamas County (the Authority) is a municipal corporation established under Oregon Revised Statutes Chapter 456 to provide low-cost housing to individuals meeting criteria established by the U.S. Department of Housing and Urban Development (HUD). As provided by statute, the Clackamas County Board of County Commissioners (the Board) is the governing body of the Authority. HUD provides the Authority with funding for the construction of low-income housing through the purchase of notes and bonds issued by the Authority and guarantees payment of the notes and bonds through grants. In addition, HUD provides rental subsidies and administrative fees for the operation of most of the programs.

The Authority, under the criteria of the Government Accounting Standards Board (GASB), is considered a component unit of Clackamas County, Oregon (the County) because the Board of County Commissioners also governs the Authority. This relationship allows the County to impose its will on the Authority. The County reports the Authority as a blended component unit since the County's H3S Department management has operational responsibility for the Authority.

The Authority is a partner in four discretely presented component unit tax credit projects:

1) Easton Ridge, LLC - Easton Ridge Apartments is a 264-unit apartment complex located in Clackamas, Oregon. Easton Ridge Apartments was financed with proceeds from bonds issued by the Authority and an equity contribution made by the Enterprise Development Corp on March 6, 2013. The Project's fiscal year-end is December 31, and its fiscal year ended December 31, 2022 is included in these basic financial statements.

2) Pedcor Investments 2016-CLV LP - Rosewood Terrace is a 212-unit apartment in complex located in Happy Valley, Oregon. Rosewood Terrace is financed with proceeds from bonds issued by the Authority and an equity contribution made by Pedcor Investments 2016-CLV LP. Rosewood Terrace's fiscal year end is December 31, and its fiscal year ended December 31, 2022 is included as part of these basic financial statements.

3) Hillside Manor LP – Hillside Manor is a 100-unit apartment building in Milwaukie, Oregon. Hillside Manor is the Authority's first conversion from Public Housing under HUD's Rental Assistance Demonstration Program (RAD) and became effective June 1, 2020. Hillside Manor LP's fiscal year end is December 31, and its fiscal year ended December 31, 2022 is included in these basic financial statements.

4) Webster Road Housing LP – Webster Road is a 48-unit apartment complex located in Gladstone, Oregon. Webster Road is financed with proceeds from various sources, including tax-exempt bonds, OHCS, Metro Housing Bond, HACC, and HOME funds. Webster Road Housing LP's fiscal year end is December 31, and its fiscal year ended December 31, 2022 is included in these basic financial statements.

These projects are considered a component unit and included in the Authority because, under GASB 61 guidelines, in management's professional judgment, the projects exclusion would

1. REPORTING ENTITY AND DESCRIPTION OF OPERATIONS (Continued)

render the financial statements misleading due to its close financial relationship to the Authority. Discrete presentation, as opposed to blended presentation, is appropriate as the projects are not fiscally dependent on the Authority. Certain information may be presented differently in these financial statements to conform to the presentation of the primary government than in those of separately issued component unit financial statements because the limited partnerships do not follow government accounting standards for reporting purposes. Complete financial statements may be obtained from the Authority at PO Box 1510, 13930 S. Gain St., Oregon City, OR 97045.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Measurement Focus and Basis of Accounting

The basic financial statements are reported using the economic resources measurement focus and accrual basis of accounting. Revenues are recorded when earned, and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows. Non-exchange transactions, in which the Authority receives value without giving equal value in exchange, include grants and entitlements. Revenue from grants and entitlements is recognized when earned.

The Authority distinguishes operating revenues and expenses from non-operating items. Operating revenues and expenses generally result from providing services in connection with the Authority's ongoing operations. The principal operating revenues are rental charges and grant revenue. Operating expenses include housing assistance payments, tenant services, administrative expenses, and depreciation on capital assets. All revenues and expenses not meeting this definition are reported as non-operating revenues and expenses.

Cash, Cash Equivalents and Investments

The Authority's cash and cash equivalents consist of cash on hand, deposits, and short-term investments with original maturities of three months or less. ORS 294.035 authorizes the Authority to invest in general obligations of the United States and its agencies, debt obligations of the state of Oregon, California, Idaho, and Washington and their political subdivisions, banker's acceptances, corporate indebtedness, commercial paper, repurchase agreements, time certificates of deposit, fixed or variable life insurance contracts, and the State Treasurer's Local Government Investment Pool (LGIP).

Restricted cash and investments include bond fund deposits, replacement reserves, and Public Housing disposition proceeds. Bond fund deposits are held in trust by the bond trustee and are restricted for the payment of interest and principal on the bonds. Replacement reserves are held by a trustee or the Authority and are restricted for the payment of capital expenditures deemed necessary by the Authority. Disposition proceeds are held in an escrow account and are restricted to the replacement of Public Housing or project-based Vouchers. These investments are stated at amortized cost, which approximates fair value.

Accounts Receivable

Accounts receivable represent amounts due from HUD and tenants. Based on historical information, the Authority estimates the amounts due from tenants, may be uncollectible. No allowance for doubtful accounts is considered necessary for HUD receivables. Accounts

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

receivable subject to the allowance for doubtful accounts was $3,643,706.

Capital Assets

Capital assets are recorded at the original or estimated original cost. Donated capital assets are recorded at their acquisition value on the date donated. The Authority defines capital assets as assets with an initial cost of more than $5,000 and an estimated useful life in excess of one year. Maintenance and repairs that do not add to the asset's value or materially extend the assets' lives are not capitalized. Capital assets are depreciated using the straight-line method over the estimated useful lives (ranging from five to thirty years) of the related assets.

Unearned Revenue

Unearned revenue is recorded for transactions for which revenue recognition has not yet occurred. The Authority's unearned revenue consists of grants, developer fees and certain amounts related to voucher utilization for HUD rent assistance programs.

Accrued Compensated Absences and Sick Pay

Compensated absences are recorded as a liability on the Statement of Net Position. Sick pay is not accrued as it does not vest and is paid when leave is taken.

Bond Premium, Discount, and Issuance Costs

Bond premiums and discounts are amortized on a method that approximates the effective interest method over the related bond repayment period. The unamortized bond premium is added to bonds payable. Bond issuance costs are expensed.

Long-Term Debt

Long-term debt consists of loans, notes and bonds issued to finance the construction and acquisition of low-income housing.

Deferred Inflows and Outflows of Resources.

In addition to assets, the statement of net position will sometimes report a separate section for deferred outflows of resources. This separate financial statement element, *deferred outflows of resources*, represents a consumption of net assets that applies to a future period and, so, will not be recognized as an outflow of resources (expense/expenditure) until then.

In addition to liabilities, the statement of net position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element, *deferred inflows of resources*, represents an acquisition of net assets that applies to a future period and, so, will not be recognized as an inflow of resources (revenue) until then.

Pensions

For purposes of measuring the net pension liability, deferred outflows of resources and deferred inflows of resources related to pensions, and pension expense, information about the fiduciary net position of the Oregon Public Employees Retirement System (OPERS) and additions to/deductions from OPERS's fiduciary net position have been determined on the same basis as they are reported by OPERS. For this purpose, benefit payments (including refunds of employee contributions) are recognized when due and payable in accordance with the benefit terms. Investments are reported at fair value.

3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Other Post-Employment Benefits Obligations

The Authority's total OPEB liability is recognized as a long-term liability in the proprietary fund statements. The OPEB liability is actuarially determined.

Budgets

The Authority does not have an annual appropriated budget for the year ended June 30, 2023. Budgets are created for each HUD grant to meet financial management and control objectives. The Authority utilizes these budgets as operational tools but is not required to and does not adopt a legally appropriated budget as defined by GASB. Therefore, budgetary comparisons are not reported in these financial statements.

Net Position

Net Investment in Capital Assets – This represents the Authority's investment in capital assets, net of depreciation and outstanding debt obligations related to those capital assets. To the extent debt has been incurred but not yet expended for capital assets, such amounts are not included as a component of invested in capital assets, net of related debt.

Restricted – This represents resources for which the Authority is legally or contractually obligated to spend in accordance with restrictions imposed by third parties.

Unrestricted – Resources used for the Authority's general operations, which aren't restricted by third parties. When an expense is incurred that can be paid using either restricted or unrestricted resources, the Authority's policy first applies expense toward restricted resources.

Use of Estimates

The preparation of basic financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the basic financial statements and reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Statement of Cash Flows

For purposes of the Statement of Cash Flows, the Authority considers cash and cash equivalents with remaining maturities of three months or less at the time of purchase to be cash or cash equivalents. The Authority does not consider LGIP or fiscal agent investments to be cash equivalents since the funds own investments with maturities of over three months.

Adoption of new GASB pronouncements

During the fiscal year ended June 30, 2023 the Authority implemented the following GASB pronouncements:

GASB Statement No. 96, Subscription-Based Technology Arrangements, Issued May 2020

The Authority implemented GASB 96, Subscription-Based Technology Arrangements for the year ended June 30, 2023. The Authority has no material agreements in excess of one year and there was no effect on the Authority's financial statements due to the adoption of this standard.

3. CASH, CASH EQUIVALENTS AND INVESTMENTS

Cash, cash equivalents and investments are comprised of:

	Unristericted	Restricted	Total
Deposits	$ 7,914,249	$ 6,210,861	$ 14,125,110
Investments with Fiscal Agent	-	140,702	140,702
Oregon Treasurer's Local			
Local Government Investment Pool	1,921,576	-	1,921,576
	$ 9,835,825	$ 6,351,563	$ 16,187,388

Deposits with Financial Institutions

Custodial credit risk on deposits is the risk that in the event of a bank or credit union failure, the Authority's deposits may not be returned. The Authority does not have a formal policy addressing custodial credit risk. In order to minimize the risk, state statutes require bank and credit unions holding public funds become members of the Oregon Public Funds Collateralization Program (PFCP), a multiple institution collateral pool created by the Office of the State Treasurer. To qualify, participating banks and credit unions must pledge collateral against any public fund deposits in excess of deposit insurance. The amount of collateral is set by the PFCP between 10% and 110% of each bank's public fund deposits based on their net worth and level of capitalization. Although the PFCP creates a shared liability structure for participating bank and credit union depositories, it does not guarantee that all funds are 100% protected. At June 30, 2023, the bank balance was $13,742,545. Of the Authority's June 30, 2023 bank balance deposit, $316,869 was covered by the FDIC and the remainder was collateralized by the PFCP.

At June 30, 2023, investments include the Oregon Treasurer's Local Government Investment Pool (LGIP). The investment in the LGIP is stated at fair value, which approximates cost and is the same as the value of its pool shares. Pool shares are not subject to leveling requirements.

The Oregon State Treasurer administers the LGIP. The LGIP is an open-ended no-load diversified portfolio offered to any agency, political subdivision or public corporation of the State who by law is made the custodian of, or has control of, any fund. The LGIP is commingled with the State's short-term funds. In seeking to best serve local governments in Oregon, the Oregon Legislature established the Oregon Short-Term Fund Board, which is not registered with the U.S. Securities and Exchange Commission as an investment company. The purpose of the Board is to advise the Oregon State Treasurer in the management and investment of the LGIP. The LGIP is not currently rated by an independent rating agency.

Investments Measured at Fair Value

Per GASB Statement No. 72, Fair Value is described as an exit price. Fair Value measurements assume a transaction takes place in a government's principal market or a government's most advantageous market in the absence of a principal market. The fair

3. CASH, CASH EQUIVALENTS AND INVESTMENTS (Continued)

value also, should be measured assuming that general market participants would act in their economic best interest. Fair value does not take into consideration transaction costs.

Securities classified in Level 1 of the fair value hierarchy are valued using prices quoted in active markets for those securities. Securities classified in Level 2 of the fair value hierarchy are valued using a variety of pricing techniques, including but not limited to fundamental analytical data related to the securities, values of baskets of securities, market interest rates, matrix calculated prices, and purchase price. Level 3 fair value is determined using significant unobservable inputs.

Cash and cash equivalents and the Oregon Short-Term funds investment pool are not measured at fair value and thus are not subject to the fair value disclosure requirements. Investments with fiscal agent are recorded at amortized cost and as such are also not subjected to leveling requirements.

The Authority's investment policy limits investment maturities to three years as a means of managing its exposure to fair value losses arising from increasing interest rates. For purposes of this schedule, 100% of the amounts in Oregon's local government investment pool are considered to be less than 3 years to maturity.

Maturity	Minimum %	Actual %
Less than 1,080 days	100%	100%

Credit Risk

Oregon Revised Statutes limit the types of investments that the Authority may have. The Authority is in compliance with these statutes at June 30, 2023. The Authority is also in compliance with its investment policy. The Authority follows the County's credit risk policy which minimizes credit risk by limiting exposure to poor credits and concentrating the investments in the safest types of securities; pre-qualifying the financial institutions, broker/dealers, intermediaries, and advisors with which the Authority will do business; diversifying the investment portfolio so that potential losses on individual securities will be minimized; and actively monitoring the investment portfolio holdings for ratings changes, changing economic/market conditions, etc.

Custodial Credit Risk

Custodial risk is the risk that, in the event of failure of the counterparty, the Authority will not be able to recover the value of its investments that are in the possession of an outside party. At June 30, 2023, none of the Authority's investments are subject to custodial credit risk.

4. NOTES RECEIVABLE

The notes receivable balance at June 30, 2023 is $117,310,400, and the related accrued interest receivable balance, net of an allowance of $2,302,351, at June 30, 2023 is $3,616,044. This balance resulted from the Easton Ridge asset sale to Easton Ridge, LLC, amounts related to Pedcor/Rosewood Station construction, the conversion of Hillside Manor from Public Housing to a Low-Income Housing Tax Credit (LIHTC) property, construction of the Webster Road Project, and Metro bonds loaned for projects, which include: Fuller Road Station Apartments, Good Shepherd Village, Las Flores Maple Apartments, and Marylhurst Commons.

The Authority accrues interest on these notes and records an allowance against accrued interest when the collectability of interest is based on the operating results of the property, subject to other priority liens. Notes and interest receivable as of June 30, 2023 are as follows:

	Beginning Balance	Additions	Reductions	Ending Balance
Easton Ridge LLC, notes receivable	$ 14,748,342	$ -	$ (209,818)	$ 14,538,524
Easton Ridge LLC, mortgage loan receivable	12,235,000	-	-	12,235,000
Easton Ridge LLC, accrued interest mortgage loan	4,028,395	356,309	-	4,384,704
Rosewood Station Disposition, notes receivable	1,757,475	-	(152,475)	1,605,000
Rosewood Station Disposition, accrued interest	-	109,878	-	109,878
Rosewood Station, notes receivable	33,427,558	-	(1,289,117)	32,138,441
Hillside Manor LLC, construction loan #1	6,079,146	-	(6,079,146)	-
Hillside Manor LLC, sponsor loan #1	3,102,768	2,573,240	-	5,676,008
Hillside Manor LLC, seller loan	-	5,747,500	-	5,747,500
Hillside Manor LLC, construction loan #2	14,531,861	-	(14,531,861)	-
Hillside Manor LLC, accrued interest seller note	-	223,016	-	223,016
Hillside Manor LLC, accrued interest sponsor note	-	133,016	-	133,016
Webster Road LLC, Metro bond	2,939,209	-	-	2,939,209
Webster Road LLC, accrued interest Metro bond	-	123,444	-	123,444
Webster Road LLC, PSH funds	1,069,472	-	(1,069,472)	-
Webster Road LLC, HACC seller loan	1,770,056	-	-	1,770,056
Webster Road LLC, accrued interest HACC seller loan	-	76,052	-	76,052
Webster Road LLC, construction loan	10,584,818	-	(10,584,818)	-
Las Flores Maple Apartments	8,834,070	6,273,780	-	15,107,850
Las Flores Maple Apartments, accrued interest	-	565,469	-	565,469
Fuller Road Station	4,500,000	4,070,000	-	8,570,000
Fuller Road Station, accrued interest	-	126,175	-	126,175
Good Shepherd	7,630,014	6,502,798	-	14,132,812
Good Shepherd, accrued interest	-	154,075	-	154,075
Marylhurst Commons	-	2,850,000	-	2,850,000
Marylhurst Commons, accrued interest	-	22,566	-	22,566
	$ 127,238,184	$ 29,907,318	$ (33,916,707)	$ 123,228,795

4. NOTES RECEIVABLE (Continued)

	Gross Notes and Interest Receivable	Uncollectible Allowance Rate	Uncollectible Allowance	Notes and Interest Receivable, net
Easton Ridge LLC, notes receivable	$ 14,538,524	0.00%	$ -	$ 14,538,524
Easton Ridge LLC, mortgage loan receivable	12,235,000	0.00%	-	12,235,000
Easton Ridge LLC, accrued interest mortgage loan	4,384,704	52.51%	2,302,351	2,082,353
Rosewood Station Disposition, notes receivable	1,605,000	0.00%	-	1,605,000
Rosewood Station Disposition, accrued interest	109,878	0.00%	-	109,878
Rosewood Station, notes receivable	32,138,441	0.00%	-	32,138,441
Hillside Manor LLC, sponsor loan #1	5,676,008	0.00%	-	5,676,008
Hillside Manor LLC, seller loan	5,747,500	0.00%	-	5,747,500
Hillside Manor LLC, accrued interest seller note	223,016	0.00%	-	223,016
Hillside Manor LLC, accrued interest sponsor note	133,016	0.00%	-	133,016
Webster Road LLC, Metro bond	2,939,209	0.00%	-	2,939,209
Webster Road LLC, accrued interest Metro bond	123,444	0.00%	-	123,444
Webster Road LLC, HACC seller loan	1,770,056	0.00%	-	1,770,056
Webster Road LLC, accrued interest HACC seller loan	76,052	0.00%	-	76,052
Las Flores Maple Apartments	15,107,850	0.00%	-	15,107,850
Las Flores Maple Apartments, accrued interest	565,469	0.00%	-	565,469
Fuller Road Station	8,570,000	0.00%	-	8,570,000
Fuller Road Station, accrued interest	126,175	0.00%	-	126,175
Good Shepherd	14,132,812	0.00%	-	14,132,812
Good Shepherd, accrued interest	154,075	0.00%	-	154,075
Marylhurst Commons	2,850,000	0.00%	-	2,850,000
Marylhurst Commons, accrued interest	22,566	0.00%	-	22,566
	$ 123,228,795		$ 2,302,351	$ 120,926,444

The Authority loaned $16,603,341 of proceeds from its 2013 Series A Bond financing to Easton Ridge, LLC. Easton Ridge, LLC has agreed to pay the Authority amounts equal to the principal and interest requirements on the 35-year 2013 Series A Bonds of $862,600 per year. Principal payments totaled $209,818 in 2023. The County has provided a contingent loan agreement in the event earnings from the project and the principal and interest reserve fund are not sufficient to pay required annual amounts. The Authority has a mortgage loan to the Project in the amount of $12,235,000 as part of the sale agreement. The mortgage earns 3.1% interest on the outstanding balance. The mortgage repayment is contingent on available excess revenue of the project and does not have specific payment amounts or repayment time terms.

Rosewood Station was constructed, initially funded with a loan from the Authority of disposition funds in the amount of $1,605,000 accruing simple interest at 3.0%. As of June 30, 2023 Rosewood Station had drawn down $33,427,558 for construction which is included in the note receivable balance, and $1,289,117 was repaid during fiscal year 2023.

Hillside Manor was converted from Public Housing through a sale to Hillside Manor Limited Partnership. Hillside Manor LLC is a single member LLC owned by HACC as the general partner in the partnership. Upon sale Hillside Manor Limited Partnership has issued: 1) Sponsor Loan #1 of $5,676,008 with 1% simple interest, and 2) Seller Loan of $5,747,500 with interest compounded annually of 1.15%, and the note is due on December 31, 2070. The construction loans that were drawn down to $6,079,146 and $14,531,861 as of June 30, 2022 were fully collected during fiscal year 2023.

4. NOTES RECEIVABLE (Continued)

Webster Road, which is under construction, was funded with a loan from the Authority of Metro Housing Bond funds in the amount of $2,939,209 accruing interest at 2.08% compounded annually, and a seller note in the amount of $1,770,056 accruing interest at 2.08% compounded annually. The construction loan that was drawn down to $10,584,818 as of June 30, 2022 was fully collected during fiscal year 2023.

Maple Apartments - Metro Bond Project under construction that is partially funded by Metro Housing Bond funds, issued a loan from first Regional Affordable Housing bond fund NOFA, and has drawn down $15,107,850 of the $15,903,000 accruing interest at 3.75% per annum compounding annually.

Fuller Road – Metro Bond Project under construction that is partially funded by Metro Housing Bond funds, issued as a loan from HACC. As of June 30, 2023, the entire $8,570,000 of Metro Bond funds was drawn down for the project with simple interest accruing at a rate of 1.0%.

Good Shepherd Village - Metro Bond Project under construction that is partially funded by Metro Project Housing Bond funds, issued a loan from first Regional Affordable Housing bond fund NOFA, and has drawn down $14,132,812 of the $18,330,000 accruing interest of 1% per annum compounding annually.

Marylhurst Commons – Metro Bond Project under construction that is partially funded by Metro Project Housing Bond funds, issued as a loan from HACC. As of June 30, 2023, the entire $2,850,000 of Metro Bond funds was drawn down for the project with simple interest accruing at a rate of 1.0%.

5. CAPITAL ASSETS

Capital assets activity for the year was as follows:

	Balance July 1, 2022	Increases	Decreases	Balance June 30, 2023
Capital Assets not being depreciated:				
Land	$ 3,898,984	$ 30,000	$ -	$ 3,928,984
Construction in progress	-	147,550	-	147,550
Total capital Assets not being depreciated	3,898,984	177,550	-	4,076,534
Capital Assets being depreciated:				
Buildings & Improvements	41,085,689	243,455	-	41,329,144
Furniture and equiptment	779,718	163,720	-	943,438
Total Capital Assets being depreciated:	41,865,407	407,175	-	42,272,582
Less Accumulated depreciation:				
Building and Improvements	(31,088,558)	(809,330)	-	(31,897,888)
Furniture and Equiptment	(669,574)	(22,477)	-	(692,051)
Total Accumulated depreciation	(31,758,132)	(831,807)	-	(32,589,939)
Total capital Assets being depreciated, net	10,107,275	(424,632)	-	9,682,643
Total Capital Assets, net	$ 14,006,259	$ (247,082)	$ -	$ 13,759,177

Depreciation expense for the Authority was $831,807 for the year ended June 30, 2023.

6. LONG-TERM LIABILITIES

The Authority's long-term debt is comprised of mortgage notes, loans and bonds. Mortgage notes payable were incurred to purchase low income housing and are payable from rents received and the net cash flows from operations.

Loans payable totaling $37,076 include amounts due to Farmers Home Administration and the State of Oregon for the purchase, construction, repair and improvement of property. Under terms of the agreements with the State of Oregon, a certain portion of the loans are forgiven yearly as long as the Authority operates the facilities as low-income housing. If the Authority ceases to operate these facilities as low-income housing, the loans become payable when the Authority sells the property.

The Authority has received deferred payment loans from Clackamas County for various residential rehabs of low-income properties. If the loans are defaulted by failing to conform to any covenants or conditions of the agreements, all principal and interest and all other amounts are due immediately. The loans payable to Clackamas County of $1,547,711 were obtained to construct and purchase low-income housing units. $1,357,078 of this balance is noninterest bearing and requires no payments as long as the Authority operates the facility as low-income housing.

6. LONG-TERM LIABILITIES (Continued)

The Authority issued 2013 Series A revenue bonds in the original amount of $16,550,000 to finance the rehabilitation of the Easton Ridge Apartments (the Project). The Series A bonds have maturities and/or mandatory redemption dates ranging from September 1, 2015 to September 1, 2049, and bear interest ranging from 1.75% to 4.0%. Interest payments are due on March 1 and September 1 of each year until the entire principal balance is retired and all accrued interest is paid. The Project's assets, all net operating income and certain other revenues of the Authority, are pledged as collateral, in an amount equal to the sum of outstanding principal and interest, or $23,337,700. The pledge will remain in effect until the revenue bonds are paid in full. As of June 30, 2023, pledged debt service was $866,375 for the coming year. The Authority received pledged interest in the amount of $568,175 for 2013 Series A bond interest at June 30, 2023. Pursuant to the bond documents, the Authority is subject to certain restrictive covenants related to the use of bond proceeds and other funds provided by operations of the Project. The contingent loan agreement with the County requires Easton Ridge, LLC to maintain a 1.10 to 1.00 debt service coverage once the project achieves stabilization. The operating agreement requires that in order to eliminate the operating deficit contribution requirement, the Authority establish and collect rents sufficient to produce a required debt service coverage on the Series A bonds of at least 1.20 to 1.00 for two consecutive years, beginning at least three years after project stabilization. A failure to maintain the above ratios does not constitute a default. Amount outstanding on the 2013 Series A revenue bonds was $14,538,525 as of June 30, 2023.

Rosewood Station construction continued with draws against the construction bonds up until the fiscal year ended June 30, 2022. These bonds bear interest at 2.25%, per annum through April 1, 2022. Commencing May 1, 2021, the interest rate is the Secured Overnight Financing Rate (SOFR) plus 0.75% provided the rate shall never be less than 3.00% or greater than 8.00%, per annum. Amount outstanding at June 30, 2023 was $32,138,441.

Hillside Manor is a 100-unit Public Housing conversion underwent an occupied rehabilitation. Draws against the construction loans occurred through June 30, 2022. With construction completed, the entire $14,775,006 construction loan balance was paid off as of June 30, 2023.

Webster Road began construction in June 2021 and had draws against the construction loans through June 30, 2022. With construction completed, the entire $16,363,555 construction loan balance was paid off as of June 30, 2023.

Clayton Mohr Commons is 24 units of veteran housing has a mortgage of $2,415,448 bearing an interest rate of 5.5%, and a loan balance of $2,186,451 as of June 30, 2023. Principal and interest are due monthly based on a 30-year amortization. The mortgage has a 20-year term and is due in July 2040.

6. LONG-TERM LIABILITIES (Continued)

Changes in long-term debt are as follows:

	Beginning Balance	Additions	Reductions	Ending Balance
Loans Payable (Interest 0% to 1%)	$ 54,282	$ -	$ (17,206)	$ 37,076
Clayton Mohr Commons Mortgage Notes Payable (Interest 2% to 11%)	1,997,014	189,437	-	2,186,451
Loans Payable to Clackamas County	1,613,796	-	(66,085)	1,547,711
Rosewood Station Construction Bonds	33,427,558	-	(1,289,117)	32,138,441
Hillside Manor Construction Bonds	14,775,006	-	(14,775,006)	-
Webster Road Construction Bonds	16,363,555	-	(16,363,555)	-
2013 Easton Ridge A Bonds				
Payable (Interest 1.75% to 4.0%)	14,510,000	-	(10,000)	14,500,000
Bond Premium	40,007	-	(1,482)	38,525
	14,550,007	-	(11,482)	14,538,525
Total	$ 82,781,218	$ 189,437	$ (32,522,451)	$ 50,448,204

Future maturities are as follows:

Fiscal Year	Loans Payable	Clayton Mohr Commons Mortgage Notes Payable	Loan Payable to Clackamas County	2018 A Rosewood Bonds Payable	2013 A Easton Ridge Bonds Payable	Total	Interest
2024	$ 11,941	$ 35,892	$ 44,000	$ 516,865	$ 295,000	$ 903,698	$ 1,480,928
2025	12,410	37,908	42,824	529,935	310,000	933,077	1,453,255
2026	8,176	40,036	43,687	543,337	320,000	955,236	1,424,631
2027	4,549	42,284	44,570	557,077	335,000	983,480	1,395,101
2028		44,658	15,552	571,164	345,000	976,374	1,364,898
2029-2033	-	263,836	-	3,079,926	1,935,000	5,278,762	6,360,753
2034-2038	-	346,699	-	3,489,559	2,315,000	6,151,258	5,479,393
2039-2043	-	455,586	-	3,953,674	2,805,000	7,214,260	4,396,866
2044-2048	-	598,672	-	4,479,518	3,410,000	8,488,190	3,108,637
2049-2053	-	320,880	-	5,075,298	2,468,525	7,864,703	1,600,852
2054-2058	-	-	-	5,750,319	-	5,750,319	821,832
2059-2063	-	-	-	3,591,769	-	3,591,769	132,448
Undetermined	-	-	1,357,078	-	-	1,357,078	-
	$ 37,076	$ 2,186,451	$ 1,547,711	$ 32,138,441	$ 14,538,525	$ 50,448,204	$ 29,019,594

6. LONG-TERM LIABILITIES (Continued)

None of the above agreements are subject to federal arbitrage regulations.

Changes in long-term liabilities:

	Beginning Balance	Additions	Reductions	Ending Balance	Due Within One Year
Compensated Absences	$ 757,641	$ -	$ (280,171)	$ 477,470	$ -
Total OPEB Liability	263,740	-	(1,886)	261,854	-
Net Pension Liability	2,656,131	740,570	-	3,396,701	-
Loans & Notes Payable	3,665,092	189,437	(83,291)	3,771,238	91,833
Bonds Payable	79,116,126	-	(32,439,160)	46,676,966	811,865
Total	$ 86,458,730	$ 930,007	$ (32,804,508)	$ 54,584,229	$ 903,698

7. PENSION PLAN

General Information about the Pension Plan
Name of the pension plan: The Oregon Public Employees Retirement System (OPERS) is a cost-sharing multiple-employer defined benefit plan.

Plan description. Employees of the Authority are provided with pensions through OPERS. All the benefits of OPERS are established by the Oregon legislature pursuant to Oregon Revised Statute (ORS) Chapters 238 and 238A. OPERS issues a publicly available financial report

that can be obtained at https://www.oregon.gov/pers/Documents/Financials/ACFR/2022-ACFR.pdf.

Benefits provided under Chapter 238-Tier One / Tier Two

Pension Benefits. The OPERS retirement allowance is payable monthly for life. It may be selected from 13 retirement benefit options. These options include survivorship benefits and lump-sum refunds. The basic benefit is based on years of service and final average salary. A percentage (2.0 percent for police and fire employees, 1.67 percent for general service employees) is multiplied by the number of years of service and the final average salary. Benefits may also be calculated under either a formula plus annuity (for members who were contributing before August 21, 1981) or a money match computation if a greater benefit results.

A member is considered vested and will be eligible at minimum retirement age for a service retirement allowance if he or she has had a contribution in each of five calendar years or has reached at least 50 years of age before ceasing employment with a participating employer (age 45 for police and fire members). General service employees may retire after reaching age 55. Police and fire members are eligible after reaching age 50. Tier One general service employee benefits are reduced if retirement occurs prior to age 58 with fewer than 30 years

7. PENSION PLAN (Continued)

of service. Police and fire member benefits are reduced if retirement occurs prior to age 55 with fewer than 25 years of service. Tier Two members are eligible for full benefits at age 60.

The ORS Chapter 238 Defined Benefit Pension Plan is closed to new members hired on or after August 29, 2003.

1. *Death Benefits.* Upon the death of a non-retired member, the beneficiary receives a lump-sum refund of the member's account balance (accumulated contributions and interest). In addition, the beneficiary will receive a lump-sum payment from employer funds equal to the account balance, provided one or more of the following conditions are met:

- Member was employed by a OPERS employer at the time of death,
- Member died within 120 days after termination of OPERS-covered employment,
- Member died as a result of injury sustained while employed in a OPERS-covered job, or
- Member was on an official leave of absence from an OPERS-covered job at the time of death.

2. *Disability Benefits.* A member with 10 or more years of creditable service who becomes disabled from other than duty-connected causes may receive a non-duty disability benefit. A disability resulting from a job-incurred injury or illness qualifies a member (including OPERS judge members) for disability benefits regardless of the length of OPERS-covered service. Upon qualifying for either a non-duty or duty disability, service time is computed to age 58 (55 for police and fire members) when determining the monthly benefit.

3. *Benefit Changes After Retirement.* Members may choose to continue participation in a variable equities investment account after retiring and may experience annual benefit fluctuations due to changes in the market value of equity investments.

Under ORS 238.360 monthly benefits are adjusted annually through cost-of-living changes. Under current law, the cap on the COLA in fiscal year 2015 and beyond will vary based on

1.25 percent on the first $60,000 of annual benefit and $750 plus 0.15 percent on annual benefits above $60,000.

Benefits provided under Chapter 238A-OPSRP Pension Program (OPSRP DB).

This portion of the OPSRP provides a life pension funded by employer contributions. Benefits are calculated with the following formula for members who attain normal retirement age:

1. *Pension Benefits.* The ORS 238A Defined Benefit Pension Program provides benefits to members hired on or after August 29, 2003.

Police and fire: 1.8 percent is multiplied by the number of years of service and the final average salary. Normal retirement age for police and fire members is age 60 or age 53 with 25 years of retirement credit. To be classified as a police and fire member, the individual must have been employed continuously as a police and fire member for at least five years immediately preceding retirement.

7. PENSION PLAN (Continued)

General service: 1.5 percent is multiplied by the number of years of service and the final average salary. Normal retirement age for general service members is age 65, or age 58 with 30 years of retirement credit.

A member of the OPSRP pension program becomes vested on the earliest of the following dates: the date the member completes 600 hours of service in each of five calendar years, the date the member reaches normal retirement age, and, if the pension program is terminated, the date on which termination becomes effective.

2. *Death Benefits.* Upon the death of a non-retired member, the spouse or other person who is constitutionally required to be treated in the same manner as the spouse, receives for life 50 percent of the pension that would otherwise have been paid to the deceased member.

3. *Disability Benefits.* A member who has accrued 10 or more years of retirement credits before the member becomes disabled or a member who becomes disabled due to job-related injury shall receive a disability benefit of 45 percent of the member's salary determined as of the last full month of employment before the disability occurred.

4. *Benefit Changes After Retirement.* Under ORS 238A.210 monthly benefits are adjusted annually through cost-of-living changes. Under current law, the cap on the COLA in fiscal year 2015 and beyond will vary based on 1.25 percent on the first $60,000 of annual benefit and $750 plus 0.15 percent on annual benefits above $60,000.

Contributions:

OPERS funding policy provides for monthly employer contributions at actuarially determined rates. These contributions, expressed as a percentage of covered payroll, are intended to accumulate sufficient assets to pay benefits when due. This funding policy applies to the PERS Defined Benefit Plan and the Other Postemployment Benefit Plans.

Employer contribution rates during the period were based on the December 31, 2019 actuarial valuation. The rates based on a percentage of payroll, first became effective July 1, 2021. The state of Oregon and certain schools, community colleges, and political subdivisions have made lump sum payments to establish side accounts, and their rates have been reduced.

Employer contributions for the year ended June 30, 2023 were $721,169.

Actuarial Valuations:

The employer contribution rates effective July 1, 2021, through June 30, 2023, were set using the entry age normal actuarial cost method. For the Tier One/Tier Two component of the PERS Defined Benefit Plan, this method produced an employer contribution rate consisting of (1) an amount for normal cost (the estimated amount necessary to finance benefits earned by the employees during the current service year), (2) an amount for the amortization of unfunded actuarial accrued liabilities, which are being amortized over a fixed period with new unfunded actuarial accrued liabilities being amortized over 20 years. For the OPSRP Pension Program component of the PERS Defined Benefit Plan, this method produced an employer

7. PENSION PLAN (Continued)

contribution rate consisting of (a) an amount for normal cost (the estimated amount necessary to finance benefits earned by the employees during the current service year), (b) an amount for the amortization of unfunded actuarial accrued liabilities, which are being amortized over a fixed period with new unfunded actuarial accrued liabilities being amortized over 16 years.

Actuarial Methods and Assumptions:

Valuation Date	December 31, 2020
Measurement Date	June 30, 2022
Experience Study Report	2020, published July 20, 2021
Actuarial Cost Method	Entry Age Normal
Asset Valuation Method	Market value of assets
Actuarial Assumptions:	
Inflation Rate	2.40 percent
Long-term expected rate of return	6.90 percent
Discount rate	6.90 percent
Projected salary increases	3.40 percent
Cost of living adjustments (COLA)	Blend of 2.00% COLA and graded COLA (1.25%/0.15%) in accordance with *Moro* decision; blend based on service.
Mortality	***Healthy retirees and beneficiaries:*** Pub-2010 Healthy Retiree, sex-distinct, generational with Unisex, Social Security Data Scale, with job category adjustments and set-backs as described in the valuation. ***Active members:*** Pub-2010 Employee, sex-distinct, generational with Unisex, Social Security Data Scale, with job category adjustments and set-backs as described in the valuation. ***Disabled retirees:*** Pub-2010 Disable retiree, sex-distinct, generational with Unisex, Social Security Data Scale, with job category adjustments and set-backs as described in the valuation.

Actuarial valuations of an ongoing plan involve estimates of the value of projected benefits and assumptions about the probability of events far into the future. Actuarially determined amounts are subject to continual revision as actual results are compared to past expectations and new estimates are made about the future. Experience studies are performed as of December 31 of even numbered years. The methods and assumptions shown above are based on the 2020 Experience Study, which reviewed experience for the four-year period ending on December 31, 2020.

Discount Rate:
The discount rate used to measure the total pension liability was 6.90 percent for the Defined Benefit Pension Plan. The projection of cash flows used to determine the discount rate assumed that contributions from plan members and those of the contributing employers are made at the contractually required rates, as actuarially determined. Based on those assumptions, the pension

7. PENSION PLAN (Continued)

plan's fiduciary net position was projected to be available to make all projected future benefit payments of current plan members. Therefore, the long-term expected rate of return on pension plan investments for the Defined Benefit Pension Plan was applied to all periods of projected benefit payments to determine the total pension liability.

Depletion Date Projection:
GASB 68 generally requires that a blended discount rate be used to measure the Total Pension Liability (the Actuarial Accrued Liability calculated using the Individual Entry Age Normal Cost Method). The long-term expected return on plan investments may be used to discount liabilities to the extent that the plan's Fiduciary Net Position (fair value of assets) is projected to cover benefit payments and administrative expenses. A 20-year high quality (AA/Aa or higher) municipal bond rate must be used for periods where the Fiduciary Net Position is not projected to cover benefit payments and administrative expenses. Determining the discount rate under GASB 68 will often require that the actuary perform complex projections of future benefit payments and asset values. GASB 68 (paragraph 67) does allow for alternative evaluations of projected solvency, if such evaluation can reliably be made. GASB does not contemplate a specific method for making an alternative evaluation of sufficiency; it is left to professional judgment.

The following circumstances justify an alternative evaluation of sufficiency for Oregon PERS:

- Oregon PERS has a formal written policy to calculate an Actuarially Determined Contribution (ADC), which is articulated in the actuarial valuation report.
- The ADC is based on a closed, layered amortization period, which means that payment of the full ADC each year will bring the plan to a 100% funded position by the end of the amortization period if future experience follows assumption.
- GASB 68 specifies that the projections regarding future solvency assume that plan assets earn the assumed rate of return and there are no future changes in the plan provisions or actuarial methods and assumptions, which means that the projections would not reflect any adverse future experience which might impact the plan's funded position.

Based on these circumstances, it is PERS independent actuary's opinion that the detailed depletion date projections outlined in GASB 68 would clearly indicate that the Fiduciary Net. Position is always projected to be sufficient to cover benefit payments and administrative expenses.

7. PENSION PLAN (Continued)

Assumed Asset Allocation:

Asset Class/Strategy	Target Allocation	
Cash	0.0	%
Debt Securities	20.0	
Public Equity	30.0	
Private Equity	20.0	
Real Estate	12.5	
Real Assets	7.5	
Diversifying Strategies	7.5	
Risk Parity	2.5	
Total	100.0	%

Long-Term Expected Rate of Return:

To develop an analytical basis for the selection of the long-term expected rate of return assumption, in June 2021 the PERS Board reviewed long-term assumptions developed by both Milliman's capital market assumptions team and the Oregon Investment Council's (OIC) investment advisors. The table below shows Milliman's assumptions for each of the asset classes in which the plan was invested at that time based on the OIC long-term target asset allocation. The OIC's description of each asset class was used to map the target allocation to the asset classes shown below. Each asset class assumption is based on a consistent set of underlying assumptions and includes adjustment for the inflation assumption. These assumptions are not based on historical returns, but instead are based on a forward-looking capital market economic model.

7. PENSION PLAN (Continued)

Long-Term Expected Rate of Return [1]

Asset Class	Target Allocation	Annual Arithmetic Return [2]	20-Year Annualized Geometric Mean	Annual Standard Deviation
Global Equity	30.62 %	7.11 %	5.85 %	17.05 %
Private Equity	25.50	11.35	7.71	30.00
Core Fixed Income	23.75	2.80	2.73	3.85
Real Estate	12.25	6.29	5.66	12.00
Master Limited Partnerships	0.75	7.65	5.71	21.30
Infrastructure	1.50	7.24	6.26	15.00
Commodities	0.63	4.68	3.10	18.85
Hedge Fund of Funds - Multistrategy	1.25	5.42	5.11	8.45
Hedge Fund Equity - Hedge	0.63	5.85	5.31	11.05
Hedge Fund - Macro	5.62	5.33	5.06	7.90
US Cash	-2.50 [3]	1.77	1.76	1.20
Assumed Inflation - Mean			2.40 %	1.65 %

[1] Based on the OIC Statement of Investment Objectives and Policy Framework for the Oregon Public Employees Retirement Fund, including revisions adopted at the OIC meeting on June 2, 2021.
[2] The arithmetic mean is a component that goes into calculating the geometric mean. Expected rates of return are presented using the geometric mean, which the Board uses in setting the discount rate.
[3] Negative allocation to cash represents levered exposure from allocation to Risk Parity strategy.

Sensitivity of the Authority's proportionate share of the net pension liability to changes in the discount rate. The following presents the Authority's proportionate share of the net pension liability calculated using the discount rate of 6.90 percent, as well as what the Authority's proportionate share of the net pension liability would be if it were calculated using a discount rate that is 1-percentage point lower (5.90 percent) or 1-percentage-point higher (7.90 percent) than the current rate:

	Rate 1% Decrease (5.90%)	Discount Rate (6.90%)	Rate 1% Increase (7.90%)
Proportionate share of the net pension liability	$6,023,755	$3,396,701	$1,197,978

Pension plan fiduciary net position. Detailed information about the pension plan's fiduciary net position is available in the separately issued OPERS financial report.

Pension Liabilities, Pension Expense, and Deferred Outflows of Resources and Deferred Inflows of Resources Related to Pensions

7. PENSION PLAN (Continued)

At June 30, 2023, the Authority reported a liability of $3,396,701 for its proportionate share of the net pension liability. The net pension liability was measured as of June 30, 2022, and the total pension liability used to calculate the net pension asset was determined by an actuarial valuation as of December 31, 2020 and rolled forward to June 30, 2022.

The Authority's proportion of the net pension liability was based on the Authority's projected long-term contribution effort as compared to the total projected long-term contribution effort of all employers.

Rates of every employer have at least two major components:

1. Normal Cost Rate: The economic value, stated as a percent of payroll, for the portion of each active member's total projected retirement benefit that is allocated to the upcoming year of service. The rate is in effect for as long as each member continues in OPERS-covered employment. The current value of all projected future Normal Cost Rate contributions is the Present Value of Future Normal Costs (PVFNC). The PVFNC represents the portion of the projected long-term contribution effort related to future service.

2. UAL Rate: If system assets are less than the actuarial liability, an Unfunded Actuarial Liability (UAL) exists. UAL can arise in a biennium when an event such as experience differing from the assumptions used in the actuarial valuation occurs. An amortization schedule is established to eliminate the UAL that arises in a given biennium over a fixed period of time if future experience follows assumption. The UAL Rate is the upcoming year's component of the cumulative amortization schedules, stated as a percent of payroll. The present value of all projected UAL Rate contributions is simply the Unfunded Actuarial

3. Liability (UAL) itself. The UAL represents the portion of the projected long-term contribution effort related to past service.

Looking at both rate components, the projected long-term contribution effort is just the sum of the PVFNC and the UAL. The PVFNC part of the contribution effort pays for the value of future service while the UAL part of the contribution effort pays for the value of past service not already funded by accumulated contributions and investment earnings.

The UAL has Tier 1/Tier 2 and OPSRP pieces. The Tier 1/Tier 2 piece is based on the employer's Tier 1/Tier 2 pooling arrangement. If an employer participates in one of the two large Tier 1/Tier 2 rate pools [State & Local Government Rate Pool (SLGRP) or School Districts Rate Pool], then the employer's Tier 1/Tier 2 UAL is just their pro-rata share of their pool's UAL. The pro-rata calculation is based on the employer's payroll in proportion to the pool's total payroll. For example, if the employer's payroll is one percent of the pool's total payroll, the employer will be allocated one percent of the pool's UAL. The OPSRP piece of the UAL follows a parallel pro-rata approach, as OPSRP experience is mandatorily pooled at a state-wide level. Employers that do not participate in a Tier 1/Tier 2 pooling arrangement, who are referred to as "Independent Employers", have their Tier 1/Tier 2 UAL tracked separately in the actuarial valuation.

7. PENSION PLAN (Continued)

An employer's PVFNC depends on both the normal cost rates charged on the employer's payrolls, and on the underlying demographics of the respective payrolls. For OPERS funding, employers have up to three different payrolls, each with a different normal cost rate: (1) Tier 1/Tier 2 payroll, (2) OPSRP general service payroll, and (3) OPSRP police and fire payroll.

The employer's Normal Cost Rates for each payroll are combined with system-wide present value factors for each payroll to develop an estimated PVFNC. The present value factors are actuarially determined at a system level for simplicity and to allow for the PVFNC calculations to be audited in a timely, cost-effective manner.

Since many governments in Oregon have sold pension obligation bonds and deposited the proceeds with OPERS (referred to as side accounts or transitional liability or surplus), adjustments are required. After each employer's projected long-term contribution effort is calculated, that amount is reduced by the value of the employer's side account, transitional liability/surplus, and pre-SLGRP liability/surplus (if any). This is done as those balances increase/decrease the employer's projected long-term contribution effort because side accounts are effectively pre-paid contributions.

At June 30, 2023, the Authority's proportion was 0.0221 percent, which was the same percentage at June 30, 2022 .

For the year ended June 30, 2023, the Authority recognized pension expense of $424,337. On June 30, 2023, the Authority reported deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	$ 164,882	$ 21,182
Changes of assumptions	532,961	4,869
Net difference between projected and actual earnings on investments	-	607,264
Changes in proportionate share	89,291	235,799
Differences between employer contributions and proportionate share of system contributions	144,990	252,371
Total (prior to post-measurement date contributions)	932,124	1,121,485
Contributions made subsequent to measurement date	721,169	-
Total Deferred Outflows/Inflows of Resources	$1,653,293	1,121,485
Net Deferred Outflows/(Inflows) of Resources		$531,808

7. PENSION PLAN (Continued)

$721,169 reported as deferred outflows of resources related to pensions resulting from the Authority's contributions subsequent to the measurement date will be recognized as a reduction of the net pension liability in the year ending June 30, 2024. Other amounts reported as deferred outflows of resources and deferred inflows of resources related to pensions will be recognized in pension expense as follows:

Employer subsequent fiscal years	Deferred Outflow/(Inflow) of Resources (prior to post-measurement date contributions)
Fiscal Year 2024	$(21,713)
Fiscal Year 2025	(76,751)
Fiscal Year 2026	(301,383)
Fiscal Year 2027	231,198
Fiscal Year 2028	(20,712)
Total	$(189,361)

Defined Contribution Plan

OPSRP Individual Account Program (OPSRP IAP)

Pension Benefits
Participants in OPERS defined benefit pension plans also participate in their defined contribution plan. An IAP member becomes vested on the date the employee account is established or on the date the rollover account was established. If the employer makes optional employer contributions for a member, the member becomes vested on the earliest of the following dates: the date the member completes 600 hours of service in each of five calendar years, the date the member reaches normal retirement age, the date the IAP is terminated, the date the active member becomes disabled, or the date the active member dies.

Upon retirement, a member of the OPSRP Individual Account Program (IAP) may receive the amounts in his or her employee account, rollover account, and vested employer account as a lump-sum payment or in equal installments over a 5-, 10-, 15-, 20-year period or an anticipated life span option. Each distribution option has a $200 minimum distribution limit.

Death Benefits
Upon the death of a non-retired member, the beneficiary receives in a lump sum the member's account balance, rollover account balance, and vested employer optional contribution account balance. If a retired member dies before the installment payments are completed, the beneficiary may receive the remaining installment payments or choose a lump-sum payment.

Contributions
The Authority has chosen to pay the employees contributions to the plan. 6 percent of covered payroll is paid for general service employees and 9 percent of covered payroll is paid for firefighters and police officers. Contributions for the year were $168,281.

7. PENSION PLAN (Continued)

Recordkeeping
PERS contracts with VOYA Financial to maintain IAP participant records.

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS

A. General Information about the OPEB Plan

Plan name: Retiree Implicit Medical Benefit Plan

Plan description: The Authority administers a single-employer defined benefit healthcare plan per the requirements of a collective bargaining agreement. Per Oregon State law, the plan provides the opportunity for post-retirement healthcare insurance for eligible retirees and their spouses through the Authority's group health insurance plans which cover both active and retired participants. The Authority does not pay any portion of the retiree's healthcare insurance; however, the retired employee receives an implicit benefit of a lower healthcare premium which is spread among the cost of active employee premiums.

The Authority has not established a trust fund to supplement the costs for the other post-employment benefit (OPEB) liability related to this implicit benefit. The Authority pays none of the premium of health insurance coverage for retirees from age 58 to age 65. The Authority's regular healthcare benefit providers underwrite the retirees' policies. Retirees may not convert the benefit into an in-lieu payment to secure coverage under independent plans.

The Authority's annual OPEB cost is calculated based on an amount actuarially determined in accordance with the guidance of GASB Statement No. 75. The Authority is included in the Clackamas County Actuarial Valuation report.

Total OPEB Liability

The Authority's total OPEB liability of $261,854 was measured as of June 30, 2023, and was determined by an actuarial valuation as of that date.

Actuarial assumptions and other inputs. The total OPEB liability in the June 30, 2021 actuarial valuation was determined using the following actuarial assumptions and other inputs, applied to all periods included in the measurement, unless otherwise specified.

Discount rate	3.86%
Salary increases	3.00%
General inflation rate	2.50%

The discount rate was based on the Fidelity High Grade 20 Year General Obligation Municipal Bond Index.

The demographic actuarial assumptions used in the valuation are based on the 2022 experience study of the Oregon Public Employees Retirement System, except for the different basis used to project future mortality improvements.

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS (Continued)

Mortality rates were based on the MacLeod Watts Scale 2022.

Changes in the Total OPEB Liability and related ratios

		Total OPEB Liability
Balance at 6/30/22		$ 263,740
Changes during year		
	Service cost	17,262
	Interest	10,173
	Differences between expected and actual experience	(18,853)
	Changes in assumptions	134
	Benefit payments	(10,602)
Balance at 6/30/23		$ 261,854

Total OPEB liability as a percentage of covered employee payroll was 10.69%.

Sensitivity of Liabilities to Changes in the Discount Rate and Healthcare Cost Trend Rate. The following presents the total OPEB liability of the Authority, as well as what the Authority's total OPEB liability would be if it were calculated using a discount rate that is 1% lower or 1% higher than the current discount rate. The discount rate used for the fiscal year end 2023 is 3.86%. Healthcare cost trend rate was assumed to start at 7.0% (effective January 2024) and arrive an ultimate rate of 3.9% for years 2075 and later. The impact of a 1% increase or decrease in these assumptions is shown in the chart below:

Change in Discount Rate	1% Decrease (2.86%)	Current Discount Rate (3.86%)	1% Increase (4.86%)
Total OPEB Liability	$271,238	$261,854	$229,206

Change in Healthcare Cost Trend Rate	1% Decrease In Current Trend	Current Trend	1% Increase In Current Trend
Total OPEB Liability	$222,134	$261,854	$281,238

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS (Continued)

Deferred Inflows and Outflows as of Fiscal Year End and Expected Future Recognition

The table below shows deferred resources as of the fiscal year end June 30, 2023.

HACC Members Implicit	Deferred Outflows of Resources	Deferred Inflows of Resources
Changes of Assumptions	$ 13,147	$ 25,295
Differences Between Expected and Actual Experience	-	96,208
Total	$ 13,147	$ 121,503

In addition, future recognition of these deferred inflows and outflows of resources is shown below.

For the fiscal year ending June 30	Deferred Outflow/(Inflow) of Resources
2024	$(14,525)
2025	(14,525)
2026	(14,442)
2027	(14,332)
2028	(14,327)
Thereafter	(36,205)
Total	$(108,356)

B. Retirement Health Insurance Account (RHIA)

Due to the immaterial nature of GASB Statement No. 75 as it relates to the Authority's exposure under the Oregon Public Employees Retirement System (OPERS) RHIA, the Authority has chosen not to disclose RHIA under this GASB Statement.

The Authority contributes to the Retirement Health Insurance Account (RHIA) for each of its eligible employees. RHIA is a cost-sharing multiple-employer defined benefit other post-employment benefit plan administered by OPERS. RHIA pays a monthly contribution toward the cost of Medicare companion health insurance premiums of eligible retirees.

Oregon Revised Statute (ORS) 238.420 established this trust fund. Authority to establish and amend the benefit provisions of RHIA resides with the Oregon Legislature. The plan is closed to new entrants after January 1, 2004. OPERS issues a publicly available financial report that includes financial statements and required supplementary information. That report may be obtained by writing to Oregon Public Employees Retirement System, P.O. Box 23700, Tigard, Oregon 97281-3700.

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS (Continued)

Because RHIA was created by enabling legislation (ORS 238.420), contribution requirements of the plan members and the participating employers were established and may be amended only by the Oregon Legislature. ORS require that an amount equal to $60 or the total monthly cost of Medicare companion health insurance premiums coverage, whichever is less, shall be paid from the Retirement Health Insurance Account established by the employer, and any monthly cost in excess of $60 shall be paid by the eligible retired member in the manner provided in ORS 238.410. To be eligible to receive this monthly payment toward the premium cost the member must: (1) have eight years or more of qualifying service in PERS at the time of retirement or receive a disability allowance as if the member had eight years or more of creditable service in PERS, (2) receive both Medicare Parts A and B coverage, and (3) enroll in a PERS-sponsored health plan. A surviving spouse or dependent of a deceased PERS retiree who was eligible to receive the subsidy is eligible to receive the subsidy if he or she (1) is receiving a retirement benefit or allowance from PERS or (2) was insured at the time the member died and the member retired before May 1, 1991.

For fiscal year 2023, participating employers are contractually required to contribute to RHIA at a rate assessed each year by OPERS. The Authority's contributions to RHIA for the years ended June 30, 2023 were $719, which equaled the required contribution for the year.

9. RISK MANAGEMENT

The Authority is exposed to various risks of loss related to torts; theft or damage to and destruction of assets; errors and omissions; and natural disasters for which the Authority carries commercial insurance. The Authority does not engage in risk financing activities where the risk is retained (self-insurance) by the Authority. For the past three years, insurance coverage has been sufficient to cover any losses.

10. COMMITMENTS

The Authority has no significant construction or legal commitments under contracts at June 30, 2023.

11. DISCRETELY PRESENTED COMPONENT UNITS

Combining financial information for the discretely presented component units at December 31, 2022 are as follows:

	Easton Ridge LLC	Pedcor Investments 2016-CLV LP	Hillside Manor LP	Webster Road Housing LP	Total
ASSETS:					
Current assets:					
Cash and cash equivalents	$ 1,980,854	$ 272,626	$ 578,564	$ 241,833	$ 3,073,877
Accounts receivable	89,918	-	94,178	107,931	292,027
Other assets	196,420	487,542	191,002	297,960	1,172,924
Total current assets	2,267,192	760,168	863,744	647,724	4,538,828
Restricted assets:					
Cash	3,857,445	765,992	433,829	-	5,057,266
Non-current assets:					
Other assets	-	264,015	11,680	-	275,695
Capital assets not being depreciated depreciated	3,229,376	3,917,276	-	-	7,146,652
Capital assets being depreciated	26,586,305	56,945,596	26,605,673	17,934,692	128,072,266
TOTAL ASSETS	35,940,318	62,653,047	27,914,926	18,582,416	145,090,707
LIABILITIES:					
Current liabilities:					
Accounts payable and accrued expenses	74,500	730,587	188,059	32,543	1,025,689
Tenant deposits payable from restricted assets	146,265	78,889	12,900	-	238,054
Unearned revenue	35,902	-	11,857	392	48,151
Other current liabilities payable	4,924,331	-	-	48,853	4,973,184
Current portion of long-term debt	295,000	510,451	122,056	5,374,670	6,302,177
Total current liabilities	5,475,998	1,319,927	334,872	5,456,458	12,587,255
Other - notes payable	27,036,274	41,602,539	20,396,283	10,118,656	99,153,752
TOTAL LIABILITIES	32,512,272	42,922,466	20,731,155	15,575,114	111,741,007
NET POSITION:					
Net investment in capital assets	2,779,407	19,260,333	6,087,334	7,816,036	35,943,110
Restricted	3,857,445	765,992	420,929	-	5,044,366
Unrestricted	(3,208,806)	(295,744)	675,508	(4,808,734)	(7,637,776)
TOTAL NET POSITION	$ 3,428,046	$ 19,730,581	$ 7,183,771	$ 3,007,302	$ 33,349,700

11. DISCRETELY PRESENTED COMPONENT UNITS (Continued)

	Easton Ridge LLC	Pedcor Investments 2016-CLV LP	Hillside Manor LP	Webster Road Housing LP	Total
OPERATING REVENUES:					
Rental income	$ 2,907,597	$ 2,724,161	$ 1,082,977	$ 342,652	$ 7,057,387
Other income	37,667	85,986	2,432	1,249	127,334
Total operating revenues	2,945,264	2,810,147	1,085,409	343,901	7,184,721
OPERATING EXPENSES:					
Administrative expenses	441,873	404,591	236,214	111,337	1,194,015
Utilities	387,913	197,643	178,263	24,273	788,092
Ordinary maintenance and operations	479,735	474,101	144,756	48,172	1,146,764
General expenses	174,921	114,112	74,249	30,854	394,136
Depreciation and amortization	932,444	1,724,468	792,700	275,173	3,724,785
Total operating expenses	2,416,886	2,914,915	1,426,182	489,809	7,247,792
OPERATING INCOME (LOSS)	528,378	(104,768)	(340,773)	(145,908)	(63,071)
NON-OPERATING REVENUE (EXPENSE):					
Interest income	5,163	-	-	554	5,717
Interest expense	(1,097,882)	(1,311,870)	(561,571)	(320,194)	(3,291,517)
Other	(1,646)	(146,524)	(29,763)	(94,224)	(272,157)
Total non-operating revenue (expense)	(1,094,365)	(1,458,394)	(591,334)	(413,864)	(3,557,957)
LOSS BEFORE CAPITAL CONTRIBUTIONS	(565,987)	(1,563,162)	(932,107)	(559,772)	(3,621,028)
Capital contributions	-	635,000	7,143,115	2,300,000	10,078,115
CHANGE IN NET POSITION	(565,987)	(928,162)	6,211,008	1,740,228	6,457,087
NET POSITION at beginning of the year	3,994,033	20,658,743	972,763	1,267,074	26,892,613
NET POSITION at end of the year	$ 3,428,046	$ 19,730,581	$ 7,183,771	$ 3,007,302	$ 33,349,700

12. SUBSEQUENT EVENTS

On September 13, 2023, the Authority’s Board provided the preliminary award of Metro Affordable Housing Bond funds to three projects:

- Hillside Park Redevelopment with 275 units at $40M – will include 2 loans to the tax credit partnership, and construction closing is expected in the Summer of 2024.
- Wilsonville transit-oriented development with 121 units at $8M – will include 1 loan to the tax credit partnership, and construction closing is expected in the Summer of 2024.
- Shortstack Milwaukie 15 energy efficient homeownership units requested a $700,000 funding gap, which will include a grant to Proud Ground, and construction closing is expected in the Summer of 2024.

REQUIRED SUPPLEMENTARY INFORMATION

REQUIRED SUPPLEMENTARY INFORMATION
FOR THE YEAR ENDED JUNE 30, 2023

Schedule of Changes in the Authority's Total OPEB Liability and Related Ratios:

Total OPEB Liability	**FY 2023**	**FY 2022**	**FY 2021**	**FY 2020**	**FY 2019**	**FY 2018**
Service Cost	$ 17,262	$ 21,997	$ 21,929	$ 19,623	$ 14,746	$ 14,498
Interest	10,173	5,624	9,053	10,893	12,563	12,408
Changes of benefit terms		-	-	-	-	-
Differences between expected and actual experience	(18,853)	-	(99,869)	-	(22,343)	-
Changes of assumptions	134	(30,861)	(525)	8,095	20,023	(1,150)
Benefit payments	(10,602)	(7,849)	(6,711)	(32,128)	(25,641)	(29,342)
Total OPEB Liability - Beginning	263,740	274,829	350,952	344,469	345,121	348,707
Total OPEB Liability - Ending (a)	$ 261,854	$ 263,740	$ 274,829	$ 350,952	$ 344,469	$ 345,121
Plan fiduciary net position						
Contributions - employer	$ -	$ -	$ -	$ -	$ -	$ 29,342
Net investment income	-	-	-	-	-	-
Benefit payments	-	-	-	-	-	(29,342)
Net change in plan fiduciary net postion	-	-	-	-	-	-
Plan fiduciary net position - Beginning	-	-	-	-	-	-
Plan fiduciary net position - Ending (b)	$ -	$ -	$ -	$ -	$ -	$ -
Total OPEB liability - ending (a)-(b)	$ 261,854	$ 263,740	$ 274,829	$ 350,952	$ 344,469	$ 345,121
Covered-employee payroll	$ 2,449,738	$ 3,416,860	$ 3,002,516	$ 2,774,135	$ 2,458,570	$ 2,164,052
Total OPEB liability as a percentage of covered-employee payroll	10.69%	7.72%	9.15%	12.65%	14.01%	15.95%

This schedule is presented to illustrate the requirements to show information for 10 years. However, until a full 10-year trend is compiled, the Authority is showing two year presentation.

REQUIRED SUPPLEMENTARY INFORMATION
FOR THE YEAR ENDED JUNE 30, 2023

Schedule of Authority's Pension Contributions

	FY 2023	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Contractually required contribution	$ 721,169	$ 588,815	$ 636,600	$ 623,700	$ 416,000	$ 446,991
Contributions to the contractually required contribution	(721,169)	(588,815)	(636,600)	(623,700)	(416,000)	(446,991)
	$ -	$ -	$ -	$ -	$ -	$ -
Authority's covered payroll	$ 3,409,000	$ 3,296,000	$ 2,934,000	$ 2,442,000	$ 2,459,000	$ 2,450,000
Contribution as a percentage of covered payroll	21.2%	17.9%	21.7%	25.5%	16.9%	18.2%

	FY 2017	FY 2016	FY 2015	FY 2014
Contractually required contribution	$ 348,000	$ 309,000	$ 273,000	$ 278,000
Contributions to the contractually required contribution	(348,000)	(309,000)	(273,000)	(278,000)
	$ -	$ -	$ -	$ -
Authority's covered payroll	$ 2,353,000	$ 2,058,000	$ 2,025,000	$ 2,087,000
Contribution as a percentage of covered payroll	14.8%	15.0%	13.5%	13.3%

REQUIRED SUPPLEMENTARY INFORMATION
FOR THE YEAR ENDED JUNE 30, 2023

Schedule of Authority's Proportionate Share of Net Pension Liability

	FY 2023	FY 2022	FY 2021	FY 2020	FY 2019
Authority's proportion of the net pension liability (asset)	0.02218325%	0.02219643%	0.02384254%	0.02242230%	0.02415869%
Authority's proportionate share of the net pension liability (asset)	$ 3,396,701	$ 2,656,131	$ 5,203,262	$ 3,878,521	$ 3,659,723
Authority's covered payroll	$ 3,296,000	$ 2,934,000	$ 2,442,000	$ 2,459,000	$ 2,450,000
Authority's proportionate share of the net pension liability (asset) as a percentage of its covered payroll	103.1%	90.5%	213.1%	157.7%	149.4%
Plan fiduciary net position as a percentage of the total pension liability	84.5%	75.8%	75.8%	80.2%	82.1%

	FY 2018	FY 2017	FY 2016	FY 2015
Authority's proportion of the net pension liability (asset)	0.02640814%	0.02813710%	0.03017175%	0.02879496%
Authority's proportionate share of the net pension liability (asset)	$ 3,559,827	$ 4,224,032	$ 1,732,299	$ (652,700)
Authority's covered payroll	$ 2,353,000	$ 2,058,000	$ 2,142,000	$ 2,025,000
Authority's proportionate share of the net pension liability (asset) as a percentage of its covered payroll	151.3%	205.2%	80.9%	-32.2%
Plan fiduciary net position as a percentage of the total pension liability	81.1%	80.5%	91.9%	103.6%

SUPPLEMENTARY INFORMATION

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2023

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Pedcor Rosewood Station	Hillside Manor LLC	Webster Road LLC
ASSETS:									
CURRENT ASSETS:									
Cash - unrestricted	$ 1,476,092	$ (1,691)	$ 1,255,915	$ 3,697,220	$ -	$ 572,493	$ -	305,547	$ -
Investments	507,286	-	-	330,471	-	1,021,968	-	-	-
Accounts receivable:									
PHA projects	-	-	-	-	-	-	-	-	-
HUD other programs	-	-	-	-	5,712	-	-	-	-
Other governments	-	-	-	-	-	-	-	-	-
Miscellaneous	32,417	2,084	48	109,523	-		-	1,076,613	1,007,792
Tenants - rent/misc	211,633	19,104	692,057	-	-	-	-	-	-
Tenants - fraud	-	-		-	-	-	-	-	-
Allowance for doubtful accounts:									
Rents	(4,312)	-	(209,939)	-	-	-	-	-	-
Other	-	-	(16,504)	-	-	-	-	-	-
Fraud recovery	-	-		-	-	-	-	-	-
Notes receivable	-	-	-	-	-	295,000	516,865	-	-
Accrued interest	-	-	109,878	868,285	-	4,384,705	-	356,032	199,496
Allowance for Accrued Interest	-	-	-	-	-	(2,302,352)	-	-	-
	239,738	21,188	575,540	977,808	5,712	2,377,353	516,865	1,432,645	1,207,288
Prepaid expenses and other assets	30,192	6,975	213,551	81,069	-	1,082,936	-	-	-
Inventory	-	-	86,136	-	-	-	-	-	-
Allowance for obsolete inventory	922	-	(66,922)	-	-	-	-	-	-
Due from other funds	-	-	-	-	-	-			
TOTAL CURRENT ASSETS	2,254,230	26,472	2,064,220	5,086,568	5,712	5,054,750	516,865	1,738,192	1,207,288
RESTRICTED CASH AND INVESTMENTS:									
Other than security deposits	38,995	143,342	76,199	5,205,162	-	431,544	-	-	-
Security deposits	11,914	1,869	103,930	-	-	-	-	-	-
	50,909	145,211	180,129	5,205,162	-	431,544	-	-	-
NONCURRENT ASSETS:									
Notes receivable	-	-	1,605,000	40,660,662	-	26,478,524	31,621,576	11,423,508	4,709,265
Capital Assets:									
Land	827,388	78,500	2,552,548	-	-	-	-	-	-
Buildings and improvements	3,614,120	1,190,433	23,459,175	-	1,031,072	-	-	-	-
Furniture and equipment - dwellings	-	-	313,965	-	-	-	-	-	-
Furniture and equipment - administration	44,037	-	433,967	37,316	27,150	-	-	-	-
Site improvements	-	-	4,725,935	-	33,198	-	-	-	-
Construction in progress	-	-	-	-	147,550	-	-	-	-
Accumulated depreciation	(3,205,785)	(1,108,782)	(26,229,627)	(37,316)	(96,393)	-	-	-	-
Total Capital Assets	1,279,761	160,151	5,255,963	-	1,142,577	-	-	-	-
TOTAL ASSETS	3,584,900	331,834	9,105,312	50,952,392	1,148,289	31,964,818	32,138,441	13,161,700	5,916,553
DEFERRED OUTFLOWS OF RESOURCES	156,672	18,042	450,601	345,628	-	-	-	-	-
TOTAL ASSETS and DEFERRED OUTFLOWS OF RESOURCES	3,741,572	349,876	9,555,913	51,298,020	1,148,289	31,964,818	32,138,441	13,161,700	5,916,553

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2023

Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program (ROSS)	Shelter Plus Care	Metro Supportive Housing Program	Eliminations	Total
$ 177,069	$ 403,717	$ 48,483	$ (559)	$ 161	$ -	$ -	$ (20,198)	$ -	$ 7,914,249
-	-	-	-	60,014	-	-	1,837	-	1,921,576
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	(5,712)	-
-	-	-	-	-	-	-		-	-
66,537	-	-	32,680	15,248	-	-	261,311	-	2,604,253
75,730	11,667	-	-	10,503	-	2,779	4,767	-	1,028,240
11,212	-	-	-	-	-	-	-	-	11,212
		-							-
-	-	-	-	-	-	-	-	-	(214,251)
-	-	-		-	-	-	-	-	(16,504)
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	811,865
-	-	-	-	-	-	-	-	-	5,918,396
-	-	-	-	-	-	-	-	-	(2,302,352)
153,479	11,667	-	32,680	25,751	-	2,779	266,078	(5,712)	7,840,860
9,260	-	-	6,716	255		-	2,868	-	1,433,822
-	-	-	-	-	-	-	-	-	86,136
-	-	-	-	-	-	-	-	-	(66,000)
						-	-	-	-
339,808	415,384	48,483	38,837	86,181	-	2,779	250,585	(5,712)	19,130,643
288,817	1,237	-	111,453	131,753	-	-	(217,641)	-	6,210,861
1,560	-	-	5,348	16,081	-	-	-	-	140,702
290,377	1,237	-	116,801	147,834	-	-	(217,641)	-	6,351,563
-	-	-	-	-	-	-	-	-	116,498,535
-	-	-	380,548	90,000	-	-	-	-	3,928,984
-	-	-	5,906,842	1,368,369	-	-	-	-	36,570,011
-	-	-	-	-	-	-	-	-	313,965
57,702	-	-	23,064	6,237	-	-	-	-	629,473
-	-	-	-	-	-	-	-	-	4,759,133
-	-	-	-	-	-	-	-	-	147,550
(57,702)	-	-	(502,199)	(1,352,135)	-	-	-	-	(32,589,939)
-	-	-	5,808,255	112,471	-	-	-	-	13,759,177
630,185	416,621	48,483	5,963,893	346,486	-	2,779	32,944	(5,712)	155,739,918
313,535	14,378	-	-	21,725		-	345,859	-	1,666,440
943,720	430,999	48,483	5,963,893	368,211	-	2,779	378,803	(5,712)	157,406,358

(Continued)

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2023

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Pedcor Rosewood Station	Hillside Manor LLC	Webster Road LLC
LIABILITIES:									
CURRENT LIABILITIES:									
Accounts payable	$ 59,192	$ 1,050	$ 200,140	$ 72,184	$ -	$ -	$ -	-	$ -
Accrued wages	-	-	144,185	132,247	-				
Accrued interest payable	-	-	-	-	-	421,012	-	-	-
Accounts payable HUD PHA programs	-	-	211,217	-	-	-	-	-	-
Tenant security deposits	13,814	2,669	115,830	-	-	-	-	-	-
Unearned revenue	188,344	848	8,434	5,142,338	-	-	-	-	-
Current portion of long-term debt	4,043	7,899	-	-	-	295,000	516,865	-	-
Other current liabilities	143,768	62,249	193,826	1,093,964	-	934,979	-	-	-
Accrued liabilities	-	-	100,778	32,807	5,712	-	-	-	-
TOTAL CURRENT LIABILITIES	409,161	74,715	974,410	6,473,540	5,712	1,650,991	516,865	-	-
NONCURRENT LIABILITIES:									
Long-term debt, net of current portion	13,099	12,036	-	-	-	14,243,524	31,621,576	-	-
Long-term debt, payable to Clackamas County	317,078	540,000	-	-	-	-	-	-	-
Accrued compensated absences - noncurrent	374,925	-	102,545	-	-	-	-	-	-
Net pension and total OPEB liabilities	336,116	37,068	1,000,020	775,053	-	-	-	-	-
	-								
TOTAL NONCURRENT LIABILITIES	1,041,218	589,104	1,102,565	775,053	-	14,243,524	31,621,576	-	-
TOTAL LIABILITIES	1,450,379	663,819	2,076,975	7,248,593	5,712	15,894,515	32,138,441	-	-
DEFERRED INFLOWS OF RESOURCES	113,099	12,239	341,257	265,592	-	-	-	-	-
NET POSITION:									
Net investment in capital assets	945,541	140,216	5,255,963	-	1,142,577	-	-	-	-
Restricted	37,095	142,542	64,299	5,205,162	-	431,544	-	-	-
Unrestricted	1,195,458	(608,940)	1,817,419	38,578,673	-	15,638,759	-	13,161,700	5,916,553
TOTAL NET POSITION	$ 2,178,094	$ (326,182)	$ 7,137,681	$ 43,783,835	$ 1,142,577	16,070,303	-	13,161,700	5,916,553

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2023

Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program	Shelter Plus Care 2002	Metro Supportive Housing Program	Eliminations	Total
$ 40,676	$ (1,889)	$ -	$ 84,842	$ 20,406	$ -	$ 547	$ 30,590	$ -	$ 507,738
96,546	-	-	-	-	-	-	53,339	-	426,317
-	-	-	-	-	-	-	-	-	421,012
-	-	-	-	-	-	-	-	-	211,217
1,560	-	-	6,057	14,874	-	-	-	-	154,804
478	(33,434)	-	11,043	3,341	-	-	46	-	5,321,438
-	-	-	79,891	-	-	-	-	-	903,698
297,121	3,635	3,432	264,889	31,544	-	-	691	-	3,030,098
-	-	-	-	803	-	-		(5,712)	134,388
436,381	(31,688)	3,432	446,722	70,968	-	547	84,666	(5,712)	11,110,710
-	-	-	2,150,559	-	-	-	-	-	48,040,794
-	-	-	646,634	-	-	-	-	-	1,503,712
-	-	-	-	-	-	-	-	-	477,470
725,555	29,540	-	-	44,633	-	-	710,570	-	3,658,555
725,555	29,540	-	2,797,193	44,633	-	-	710,570	-	53,680,531
1,161,936	(2,148)	3,432	3,243,915	115,601	-	547	795,236	(5,712)	64,791,241
251,703	9,753	-	-	14,737	-	-	234,608	-	1,242,988
-	-	-	2,931,171	112,471	-	-	-	-	10,527,939
288,817	1,237	-	110,744	132,960	-	-	(217,641)	-	6,196,759
(758,736)	422,157	45,051	(321,937)	(7,558)	-	2,232	(433,400)	-	74,647,431
$ (469,919)	$ 423,394	$ 45,051	$ 2,719,978	$ 237,873	$ -	$ 2,232	$ (651,041)	$ -	$ 91,372,129

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF REVENUES, EXPENSES AND CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE)

YEAR ENDED JUNE 30, 2023

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Pedcor Rosewood Station	Hillside Manor LLC
REVENUES:								
Tenant rental revenue	$ 474,649	68,638	1,848,333	$ -	$ -	$ -	$ -	$ -
Tenant revenue - other	2,664	18,317	130,382	-	-	-	-	-
Total Tenant Revenue	477,313	86,955	1,978,715	-	-	-	-	-
HUD PHA operating grants	-	-	2,193,565	-	580,055	-	-	-
HUD PHA capital grants	-	-	-		573,925	-	-	-
Mgmt fee	-	-	-	353,362		-	-	-
Asset mgmt fee	-	-	-	48,950	-	-	-	-
Bookkeeping fee	-	-	-	39,443	-	-	-	-
Other Fees	-	-	-	1,588,495	-	-	-	-
Other government grants	-	-	-	19,700,072	-	-	-	-
Voucher income	-	-	-	-	-	-	-	-
Investment income	40,583	13	119,617	943,050	-	1,097,931	810,314	356,032
Fraud recovery	-	-	9,095	400	-	-	-	-
Other revenue	577,039	-	-	1,053,925	-		-	7,058,168
Investment income restricted	-	-	222		-	-	-	-
Gain(Loss) on sale of fixed assets	-	-	-	-	-	-	-	-
TOTAL REVENUES	1,094,935	86,968	4,301,214	23,727,697	1,153,980	1,097,931	- 810,314	- 7,414,200
OPERATING EXPENSES:								
Administrative:								
Salaries	63,083		348,320	1,015,154	-	-	-	-
Employee benefit contributions	32,795		116,673	518,507	-	-	-	-
Audit fees	2,697	-	38,932	33,093		-	-	-
Management fees	-	-	353,362	-	-	-	-	-
Bookkeeping fee	262	-	39,443	5,503	-	-	-	-
Office expense	1,205	3,600	167,837	142,357	2,703	-	-	-
Legal expense	1,673	-	6,917	11,425	-	-	-	-
Travel expense	65	-	436	3,972	-	-	-	-
Asset mgmt fee	-	-	53,400	-	-	-	-	-
Other	-	11,005	111,700	451,385	-	-	-	-
Tenant Services:								
Salaries	-	-	108,141	-	-	-	-	-
Relocation costs	-	-	4,844	213	-	-	-	-
Employee benefit contributions	-	-	67,421	-	-	-	-	-
Other expenses	-	100	7,612	-	-	-	-	-
Utilities:								
Water	12,278	3,638	232,342		-	-	-	-
Electricity	9,117	9,858	39,196	14,250	-	-		-
Gas	838	-	6,904	4,220	-	-	-	-
Sewer	28,819	13,614	426,270		-	-	-	-
Trash	10,433	2,459	210,698					
Ordinary Maintenance and Operations:								
Labor	37,739	6,989	593,377	12,708	-	-	-	-
Employee benefit contributions	36,844	3,596	422,040	6,399	-	-	-	-
Materials	38,987	12,428	240,811	1,729	-	-	-	-
Contract costs	81,459	5,475	233,335	1,150	36,596	-	-	-
Protective Services:								
Contract costs	15,678	-	237	51,248	-	-	-	-
General Expenses:								
Property insurance	29,246	6,089	192,617	-	-		-	
Liability insurance	4,490	642	22,075	5,751	-	-	-	-
Workers' compensation	12,147		31,887	3,087	-	-	-	-
All other insurance	777	-	10,738	185	-	-	-	-
Other expenses	272	15,083	105,079	14,328	154,501	-	-	-
Payment in lieu of taxes	-	-	113,121	-	-	-	-	-
Bad debt - tenant rents	-		109,914	-	-	-	-	-
Bad debt - other	-		1,000	-	-	-	-	-
Severance expense	-	-		-	-	-		-
Interest expense	1,678	302	-	-	-	579,575	810,314	-
TOTAL OPERATING EXPENSES	422,582	94,878	4,416,679	2,296,664	193,800	579,575	810,314	-
INCOME (LOSS) BEFORE OTHER EXPENSES	672,353	(7,910)	(115,465)	21,431,033	960,180	518,356	-	7,414,200

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF REVENUES, EXPENSES AND CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE

YEAR ENDED JUNE 30, 2023

Webster Road LLC	Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program (ROSS)	Shelter Plus Care Program	Metro Supportive Housing Program	Eliminations	Total
$ -	$ -	$ -	$ -	$	$ 200,812	$ -	$ -	$ -	$ -	$ 2,592,432
-	-	-	-	274,274	-	-	-	-	-	425,637
-	-	-	-	274,274	200,812	-	-	-	-	3,018,069
-	-	-	-	-	-	106,334	-	-	-	2,879,954
-	-	-	-	-	-	-	-	-	-	573,925
6,125	-	-	-	-	-	-	-	-	(353,362)	6,125
-	-	-	-	-	-	-	-	-	(48,950)	-
-	-	-	-	-	-	-	-	-	(39,443)	-
-	-	-	-	-	-	-	-	-	(1,836,216)	(247,721)
-	-	-	-	-	-	-	-	230,343	-	19,930,415
-	21,984,573	2,829,983	494,632	-	-	-	429,260	-	-	25,738,448
199,496	3,566	2,078	862	-	1,698	-	-	-	-	3,575,240
-	98,235	13,268	-	-	-	-	746	-	-	121,744
5,710,932	700,348	3,172		-	4,377	-	-	-	-	15,107,961
-	-	-	-	-	-	-	-	-	-	222
-	-	-	-	-	-	-	-	-	-	-
	-	-								
- 5,916,553	22,786,722	2,848,501	495,494	274,274	206,887	106,334	430,006	230,343	(2,277,971)	70,704,382
-	802,063	54,762	54,762	27,288	31,037	102,945	27,000	440,921	-	2,967,335
-	470,511	29,732	29,011	1,289	9,996	-	-	231,396	-	1,439,910
-	27,642	1,885	1,885	-	-	-	-	10,988	-	117,122
-	-	-	-	14,682		-	-	-	(353,362)	14,682
-	4,043	276	276	1,545	-	-	-	1,609	(39,443)	13,514
-	171,711	7,971	16,706	22,955	7,890	-	-	72,333	-	617,268
-	95	7	7	199	2,185	-	-	2,760	-	25,268
-	477	19	52	1,282	2,451	3,389	-	640	-	12,783
-		-	-	-	19,864	-	-	65,846	(48,950)	90,160
-	61,443	13,312		8	11,483	-	-		(1,836,216)	(1,175,880)
-	32,632	-	-	-	-	-	-	4,184	-	144,957
-	-	-	-	-	-		-	39,443	-	44,500
-	14,761	-	-	-	-	-	-	43,579	-	125,761
-	7,347	-	33	-	-	-	-	632,002	-	647,094
			-							
-	-	-	-	18,991	40,813	-	-	-	-	308,062
-	581	-	-	5,097	8,030	-	-	-	-	86,129
-	78	-	-	2,071		-	-	-	-	14,111
-	-	-	-	14,018		-	-	-	-	482,721
				2,620	8,993					235,203
-	-	-	-	16,576	25,679	-	-	-	-	693,068
-	-	-	-	-		-	-	-	-	468,879
-	1,759	39	34	8,073	30,222	-	-	-	-	334,082
-	47,289	65	65	29,172	28,225	-	-	22,637	-	485,468
-	-	-	-	-	-	-	-	-	-	67,163
-	-	-	-	-		-	-	-	-	227,952
-	7,509	566	571	26,879		-	-	3,534	-	72,017
-	2,241	139	139	-	320	-	-	131	-	50,091
-	2,148	98	3,343	-		-	-	11,264	-	28,553
-	236,112	114	10,591	9,609	76	-	-	513,919	-	1,059,684
-	-	-	-		-	-	-	-	-	113,121
-	-	51	-		-	-	-	-	-	109,965
-	3,041	-	-	-	-	-	-	-	-	4,041
	-	-	-	-	-	-	-	-	-	-
-	-	-	-	126,595	-	-	-	-	-	1,518,464
-	1,893,483	109,036	117,475	328,949	227,264	106,334	27,000	2,097,186	(2,277,971)	11,443,247
5,916,553	20,893,239	2,739,465	378,019	(54,675)	(20,377)	-	403,006	(1,866,843)	-	59,261,135

(Continued)

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF REVENUES, EXPENSES AND CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE)

YEAR ENDED JUNE 30, 2023

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Pedcor Rosewood Station	Hillside Manor LLC
OTHER EXPENSES:								
Extraordinary maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Casualty losses recovered	-	-	-	-	-	-	-	-
Grant Expense	-	-	-	-	-	-		-
Housing assistance payments	-	-	-	-	-	-	-	-
Housing assistance payments - port-in	-	-	-	-	-	-	-	-
Depreciation	90,217	39,913	390,705	-	62,169	-	-	-
TOTAL OTHER EXPENSES	90,217	39,913	390,705	-	62,169	-	-	-
NET INCOME (LOSS)	582,136	(47,823)	(506,170)	21,431,033	898,011	518,356	-	7,414,200
OPERATING TRANSFER	-	-	597,438	-	(597,438)	-	-	-
INCREASE (DECREASE) IN NET POSITION	582,136	(47,823)	91,268	21,431,033	300,573	518,356	-	7,414,200
NET POSITION, June 30, 2022	1,595,958	(278,359)	7,046,413	22,352,802	842,004	15,551,947	-	5,747,500
NET POSITION, June 30, 2023	$ 2,178,094	(326,182)	7,137,681	43,783,835	1,142,577	16,070,303	-	13,161,700
OTHER INFORMATION:								
Debt principal payment	$ 3,706	$ 7,801	$ -	$ -	$ -	$ 295,000	$ 1,289,117	$ -

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)
CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE)

YEAR ENDED JUNE 30, 2023

	Webster Road LLC	Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program	Shelter Plus Care Program	Metro Supportive Housing Program	Eliminations	Total
	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-
	-	21,074,849	2,425,034	474,787	-	-	-	400,774	4,266,811	-	28,642,255
	-		-	-	-	-	-	-	-	-	-
	-	2,980	-	-	200,880	44,943	-	-	-	-	831,807
	-	21,077,829	2,425,034	474,787	200,880	44,943	-	400,774	4,266,811	-	29,474,062
	5,916,553	(184,590)	314,431	(96,768)	(255,555)	(65,320)	-	2,232	(6,133,654)	-	29,787,073
	-	-	-	-	-	-	-	-	-	-	-
	5,916,553	(184,590)	314,431	(96,768)	(255,555)	(65,320)	-	2,232	(6,133,654)	-	29,787,073
	-	(285,329)	108,963	141,819	2,975,533	303,193	-	-	5,482,613	-	61,585,057
	5,916,553	(469,919)	423,394	45,051	2,719,978	237,873	-	2,232	(651,041)	$ -	$ 91,372,129
	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ 1,595,624

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

FINANCIAL DATA SCHEDULE - COMBINING SCHEDULE OF NET POSITION - PUBLIC HOUSING DETAIL

JUNE 30, 2023

	AMP 1	AMP 2	AMP 3	AMP 4	Total Low Rent Public Housing and Capital Grant Program
ASSETS:					
CURRENT ASSETS:					
Cash:					
Cash - unrestricted	$ 96,092	$ 296,925	$ 683,824	$ 179,074	$ 1,255,915
Cash - security deposits	22,890	37,609	18,081	25,350	103,930
Total Cash	118,982	334,534	701,905	204,424	1,359,845
Accounts Receivable:					
Tenants	197,580	251,053	85,527	157,897	692,057
Miscellaneous	5,712	48	-	-	5,760
Allowance for doubtful accounts:					
Tenants	(54,406)	(63,612)	(22,167)	(69,754)	(209,939)
Miscellaneous	(3,354)	(12,316)	(833)	(1)	(16,504)
Accrued interest receivable	-	109,878	-	-	109,878
Total Accounts Receivable	145,532	285,051	62,527	88,142	581,252
Prepaid expenses and other assets	45,791	87,314	34,472	45,974	213,551
Inventory	86,136	-	-	-	86,136
Allowance for obsolete inventories	(66,922)	-	-	-	(66,922)
TOTAL CURRENT ASSETS	329,519	706,898	798,904	338,540	2,173,862
RESTRICTED CASH AND INVESTMENTS	3,752	53,813	5,882	12,752	76,199
NONCURRENT ASSETS:					
Notes receivable	-	1,605,000	-	-	1,605,000
Capital Assets:					
Land	19,541	2,425,542	10,772	66,693	2,522,548
Buildings and improvements	5,132,033	13,893,505	2,425,828	3,252,668	24,704,034
Furniture and equipment - administration	447,064	62,451	27,121	54,659	591,295
Site and leasehold improvements	783,911	1,406,016	1,271,525	1,297,681	4,759,133
Construction in progress	2,700	74,200	-	70,650	147,550
Accumulated depreciation	(5,814,772)	(12,995,865)	(3,484,850)	(4,030,533)	(26,326,020)
TOTAL NONCURRENT ASSETS	570,477	4,865,849	250,396	711,818	6,398,540
TOTAL ASSETS	903,748	7,231,560	1,055,182	1,063,110	10,253,601
DEFERRED OUTFLOWS OF RESOURCES	95,858	163,808	75,063	115,872	450,601
TOTAL ASSETS and DEFERRED OUTFLOWS OF RESOURCES	999,606	7,395,368	1,130,245	1,178,982	10,704,202
LIABILITIES:					
CURRENT LIABILITIES:					
Accounts payable	63,860	48,927	27,822	59,531	200,140
Accrued wages	44,123	41,196	18,403	40,463	144,185
Accounts payable HUD PHA programs	155,705	49,278	34	6,200	211,217
Tenant security deposits	25,390	42,109	19,081	29,250	115,830
Unearned revenue	1,450	5,183	844	957	8,434
Accrued liabilities	65,701	132,107	32,162	70,346	300,316
TOTAL CURRENT LIABILITIES	356,229	318,800	98,346	206,747	980,122
NONCURRENT LIABILITIES:					
Accrued compensated absences - noncurrent	16,602	44,567	24,610	16,766	102,545
Net pension and total OPEB liabilities	212,113	350,785	183,421	253,701	1,000,020
TOTAL NONCURRENT LIABILITIES	228,715	395,352	208,031	270,467	1,102,565
TOTAL LIABILITIES	584,944	714,152	306,377	477,214	2,082,687
DEFERRED INFLOWS OF RESOURCES	72,297	118,152	64,709	86,099	341,257
NET POSITION:					
Net investment in capital assets	570,477	4,865,849	250,396	711,818	6,398,540
Restricted	1,252	49,313	4,882	8,852	64,299
Unrestricted	(229,364)	1,647,903	503,881	(105,001)	1,817,419
TOTAL NET POSITION	$ 342,365	$ 6,563,065	$ 759,159	$ 615,669	$ 8,280,257

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

FINANCIAL DATA SCHEDULE - COMBINING SCHEDULE OF REVENUES AND EXPENSES - PUBLIC HOUSING DETAIL

YEAR ENDED JUNE 30, 2023

	AMP 1 :: 501			AMP 2 :: 502			AMP 3 :: 503		
	Operating	Capital Fund	Total	Operating	Capital Fund	Total	Operating	Capital Fund	Total
REVENUES:									
Tenant rental revenue	$ 403,273	$ -	$ 403,273	$ 815,678	$ -	$ 815,678	$ 290,280	$ -	$ 290,280
Tenant revenue - other	47,906	-	47,906	30,192	-	30,192	16,735	-	16,735
HUD PHA grants	202,539	93,555	296,094	277,805	150,866	428,671	183,847	88,701	272,548
HUD PHA capital grants	86,124	9,131	95,255	126,142	330,593	456,735	86,994	28,211	115,205
Investment income	892	-	892	2,439	-	2,439	4,961		4,961
Fraud recovery	6,173	-	6,173	-	-	-	549	-	549
Other revenue	264,835	-	264,835	462,168	-	462,168	254,416	-	254,416
TOTAL REVENUE	1,011,742	102,686	1,114,428	1,714,424	481,459	2,195,883	837,782	116,912	954,694
EXPENSES:									
Administrative:									
Administrative salaries	82,953	-	82,953	118,314	-	118,314	47,829	-	47,829
Auditing fees	9,715	-	9,715	13,405	-	13,405	5,990	-	5,990
Employee benefit contributions	30,390	-	30,390	41,164	-	41,164	13,120	-	13,120
Office expense	69,592	2,703	72,295	93,828	-	93,828	59,044	-	59,044
Legal expense	2,707	-	2,707	1,112	-	1,112	687	-	687
Travel expense	150	-	150	95	-	95	60	-	60
Other	11	86,124	86,135	37	126,143	126,180	12	86,994	87,006
	195,518	88,827	284,345	267,955	126,143	394,098	126,742	86,994	213,736
Tenant services:									
Salaries	24,143	-	24,143	35,309	-	35,309	24,344	-	24,344
Relocation costs	-	-	-	-	-	-	-		-
Employee benefit contributions	14,372	-	14,372	22,835	-	22,835	15,744	-	15,744
Other expenses	2,508	-	2,508	4,194	-	4,194	2,288	-	2,288
	41,023	-	41,023	62,338	-	62,338	42,376	-	42,376
Utilities:									
Water	52,975	-	52,975	85,640	-	85,640	39,580	-	39,580
Electricity	13,352	-	13,352	2,473	-	2,473	7,440	-	7,440
Gas	1,188	-	1,188	3,362	-	3,362	1,278	-	1,278
Sewer/Other utilities	107,982	-	107,982	135,592	-	135,592	73,783	-	73,783
	175,497	-	175,497	227,067	-	227,067	122,081	-	122,081
Ordinary maintenance and operations:									
Labor	126,562	-	126,562	248,793	-	248,793	91,639	-	91,639
Materials	47,561	-	47,561	96,556	-	96,556	42,649	-	42,649
Contracts	106,327	4,729	111,056	136,751	24,723	161,474	77,082	1,707	78,789
Employee benefits	68,306	-	68,306	137,843	-	137,843	71,985	-	71,985
	348,756	4,729	353,485	619,943	24,723	644,666	283,355	1,707	285,062
Protective services:									
Contract costs	17,846	-	17,846	-	146	146	-	-	-
General:									
Property insurance	32,842	-	32,842	80,676	-	80,676	39,010	-	39,010
Liability insurance	5,008	-	5,008	7,505	-	7,505	4,469	-	4,469
Workers' compensation	15,538	-	15,538	8,290	-	8,290	3,668	-	3,668
All other insurance	2,408	-	2,408	3,461	-	3,461	2,408	-	2,408
Payments in lieu of taxes	22,483	-	22,483	58,218	-	58,218	16,558	-	16,558
Bad Debt - rent	34,408	-	34,408	20,487	-	20,487	12,860	-	12,860
Bad debt - other	-	-	-		-	-	-	-	-
Management fee	78,952	-	78,952	115,568	-	115,568	79,354	-	79,354
Accounting fee	8,813	-	8,813	12,900	-	12,900	8,857	-	8,857
Asset management fee	12,000	-	12,000	17,400	-	17,400	12,000	-	12,000
	212,452	-	212,452	324,505	-	324,505	179,184	-	179,184
Other:									
Casualty losses recovered	(24,337)	-	(24,337)	(44,210)	-	(44,210)	-	-	-
Grant Expense	-	-	-	-	-	-	-	-	-
Depreciation expense	44,862	11,546	56,408	269,445	36,158	305,603	24,334	2,369	26,703
Unrestricted miscellaneous payments	(80)	-	(80)	(258)	-	(258)	-	-	-
FSS escrow payments	6,672	-	6,672	31,192	-	31,192	(6)	-	(6)
	27,117	11,546	38,663	256,169	36,158	292,327	24,328	2,369	26,697
TOTAL EXPENSES:	1,018,209	105,102	1,123,311	1,757,977	187,170	1,945,147	778,066	91,070	869,136
EXCESS (DEFICIENCY) OF OPERATING REVENUES OVER OPERATING EXPENSES	(6,467)	(2,416)	(8,883)	(43,553)	294,289	250,736	59,716	25,842	85,558
OTHER FINANCING SOURCES (USES):									
Operating transfers in	86,124	-	86,124	126,143		126,143	86,994	-	86,994
Equity transfers	155,706	(155,706)	-	36,546	(36,546)	-	-	-	-
Operating transfers out	-	(86,124)	(86,124)	-	(126,143)	(126,143)	-	(86,994)	(86,994)
	241,830	(241,830)	-	162,689	(162,689)	-	86,994	(86,994)	-
EXCESS (DEFICIENCY) OF REVENUE OVER EXPENSE	$ 235,363	$ (244,246)	$ (8,883)	$ 119,136	$ 131,600	$ 250,736	$ 146,710	$ (61,152)	$ 85,558

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

FINANCIAL DATA SCHEDULE - COMBINING SCHEDULE OF REVENUES AND EXPENSES - PUBLIC HOUSING DETAIL

YEAR ENDED JUNE 30, 2023

AMP 4 :: 504 Operating	AMP 4 :: 504 Capital Fund	AMP 4 :: 504 Total	Low Rent Public Housing and Capital Grant Program Total
$ 339,102	$ -	$ 339,102	$ 1,848,333
44,738	-	44,738	139,571
249,229	92,431	341,660	1,338,973
86,994	58,439	145,433	812,628
1,448		1,448	9,740
2,373	-	2,373	9,095
315,435	-	315,435	1,296,854
1,039,319	150,870	1,190,189	5,455,194
83,813	-	83,813	332,909
9,821	-	9,821	38,931
22,418	-	22,418	107,092
72,484	-	72,484	297,651
2,411	-	2,411	6,917
132	-	132	437
97	86,997	87,094	386,415
191,176	86,997	278,173	1,170,352
24,344	-	24,344	108,140
-	-	-	-
14,470	-	14,470	67,421
3,468	-	3,467	12,457
42,282	-	42,281	188,018
54,147	-	54,147	232,342
15,931	-	15,931	39,196
1,076	-	1,076	6,904
108,913	-	108,913	426,270
180,067	-	180,067	704,712
126,382	-	126,382	593,376
54,045	-	54,045	240,811
91,248	5,437	96,685	448,004
70,761	-	70,761	348,895
342,436	5,437	347,873	1,631,086
17,846	-	17,846	35,838
40,089	-	40,089	192,617
5,093	-	5,093	22,075
4,390	-	4,390	31,886
2,461	-	2,461	10,738
15,861	-	15,861	113,120
42,159	-	42,159	109,914
1,000	-	1,000	1,000
79,488	-	79,488	353,362
8,873	-	8,873	39,443
12,000	-	12,000	53,400
211,414	-	211,414	927,555
-	-	-	(68,547)
-	-	-	-
52,064	12,096	64,160	452,874
(151)	-	(151)	(489)
6,912	-	6,912	44,770
58,825	12,096	70,921	428,608
1,044,046	104,530	1,148,576	5,086,169
(4,727)	46,340	41,613	369,025
86,994	-	86,994	386,255
-	-	-	-
-	(86,994)	(86,994)	(386,255)
86,994	(86,994)	-	-
$ 82,267	$ (40,654)	$ 41,613	$ 369,025

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF REVENUES, EXPENSES AND CHANGES IN NET POSITION FOR RENTAL ASSISTANCE VOUCHERS

YEAR ENDED JUNE 30, 2023

REVENUES:	
HUD administrative fee	$ 1,825,139
Fraud revenue (half of $98,235in UNP)	49,118
Other	703,913
Total revenues	2,578,170
EXPENSES:	
Administrative salaries	834,695
Employee benefits	485,272
Other administrative costs	488,065
Insurance	11,898
Other general (Port-In)	-
Total expenses	1,819,930
EXCESS OF REVENUES OVER EXPENSES	758,240
TRANFERS AND ADJUSTMENTS:	
Equity adjustment	(2,399,824)
UNRESTRICTED NET POSITION, June 30, 2022	882,849
UNRESTRICTED NET POSITION, June 30, 2023	$ (758,735)
HAP REVENUE:	
HUD Housing Assistance Payments revenue	$ 20,159,434
Fraud revenue (half of $49,600 in RNP)	49,118
Total HAP revenue	20,208,552
HAP EXPENSES	22,971,312
EXCESS OF EXPENSES OVER REVENUES	(2,762,760)
TRANFERS AND ADJUSTMENTS:	
Equity adjustment	1,197,038
RESTRICTED NET POSITION, June 30, 2022	1,854,539
RESTRICTED NET POSITION, June 30, 2023	$ 288,817

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF CLACKAMAS APARTMENTS CASH BALANCE

JUNE 30, 2023

Cash:	
Cash and cash equivalents - unrestricted	$ (1,691)
Cash and cash equivalents - restricted	145,211
Total	143,520
Less current obligations:	
Trust deed interest payable (15 days of interest)	54
Accounts payable (due within 30 days)	1,050
Accrued expenses	-
Tenant/resident security deposits	2,669
Unearned revenue	848
Total current obligations	4,621
Cash balance in excess of current obligations	$ 138,899

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF CAPITAL FUND PROGRAM

YEAR ENDED JUNE 30, 2023

	Capital Fund Program Grant Approved	Capital Fund Program Grant Expended
Public Housing Capital Fund 2019	$ 1,153,980	$ 1,153,980

<u>SINGLE AUDIT SECTION</u>

MOSSADAMS

Report of Independent Auditors on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards*

Board of County Commissioners of
Clackamas County, Oregon, as Governing Body of
Housing Authority of Clackamas County
Oregon City, Oregon

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States (*Government Auditing Standards)*, the financial statements of the governmental activities and the aggregate discretely presented component units of the Housing Authority of Clackamas County, Oregon (the Authority), a component unit of Clackamas County, Oregon, as of and for the year ended June 30, 2023, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, and have issued our report thereon dated April 30, 2024. Our report includes a reference to other auditors who audited the financial statements of the aggregate discretely presented component units as described in our report on the Authority's financial statements. The financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP were not audited in accordance with *Government Auditing Standards*, and accordingly, this report does not include reporting on internal control over financial reporting or compliance and other matters associated with the aggregate discretely presented component units or that are reported on separately by those auditors who audited the financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We did identify a certain deficiency in internal control, described in the accompanying scheduling of findings and questioned costs as item 2023-001 that we consider to be a significant deficiency.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

The Authority's Response to the Finding

Government Auditing Standards requires the auditor to perform limited procedures on the Authority's response to the finding identified in our audit and described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Moss Adams LLP

Portland, Oregon
April 30, 2024

MOSSADAMS

Report of Independent Auditors on Compliance for Each Major Federal Program and Report on Internal Control Over Compliance Required by the Uniform Guidance

Board of County Commissioners

Clackamas County, Oregon, as a Governing Body of

Housing Authority of Clackamas County

Oregon City, Oregon

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the Housing Authority of Clackamas County, Oregon's (the Authority), a component unit of Clackamas County, Oregon, compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of the Authority's major federal programs for the year ended June 30, 2023. The Authority's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, the Authority complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2023.

Basis for Opinion on Each Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States *(Government Auditing Standards)*; and the audit requirements of Title 2 U.S. *Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of the Authority's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to the Authority's federal programs.

Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Authority's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Authority's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards,* and the Uniform Guidance, we

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the Authority's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the Authority's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Report on Internal Control Over Compliance

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Moss Adams LLP

Portland, Oregon
April 30, 2024

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

YEAR ENDED JUNE 30, 2023

Federal Grantor / Program Title	Assistance Listing Number	Expenditures
DIRECT FROM:		
U.S. Department of Housing and Urban Development:		
Public and Indian Housing	14.850	$ 2,193,565
Public Housing Capital Fund	14.872	1,153,980
Housing Choice Vouchers	14.871	21,822,260
Family Self Sufficiency - Section 8 Escrow	14.871	162,313
		21,984,573
Mainstream Vouchers	14.879	2,829,983
Housing Voucher Cluster		24,814,556
Residential Opportunity and Supportive Services - Service Coordinators	14.870	106,434
Shelter Plus Care	14.238	429,260
Emergency Housing Vouchers	14.EHV	494,632
Total U.S. Department of Housing and Urban Development		29,192,427
TOTAL EXPENDITURES OF FEDERAL AWARDS		$ 29,192,427

The accompanying notes are an integral part of this schedule.

NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

YEAR ENDED JUNE 30, 2023

Note 1. Basis of Presentation

The accompanying schedule of expenditures of federal awards (the "Schedule") includes the federal grant activity of the Housing Authority of Clackamas County, Oregon (the "Authority"), a component unit of Clackamas County, Oregon, under programs of the federal government for the year ended June 30, 2023. The information in this schedule is presented in accordance with the requirements of Title 2 U.S. *Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principle, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the schedule presents only a selected portion of the operations of the Authority, it is not intended to and does not represent the financial position, changes in net position or cash flows of the Authority.

Note 2. Summary of Significant Accounting Policies

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in 2 CFR 200, Subpart E (Cost Principles), wherein certain types of expenditures are not allowable or are limited as to reimbursement. The Authority did not elect to use the 10% de minimis indirect cost rate allowed under the Uniform Guidance.

Note 3. Subrecipients

All expenditures reported on the Schedule were for the federal award activity of the Authority and no related funds for any of the programs were provided to subrecipients for the year ended June 30, 2023.

Section I - Summary of Auditor's Results

Financial Statements

Type of report the auditor issued on whether the financial statements audited were prepared in accordance with GAAP: *Unmodified*

Internal control over financial reporting:

- Material weakness(es) identified? ☐ Yes ☒ No
- Significant deficiency(ies) identified? ☒ Yes ☐ None reported

Noncompliance material to financial statements noted? ☐ Yes ☒ No

Federal Awards

Internal control over major federal programs:

- Material weakness(es) identified? ☐ Yes ☒ No
- Significant deficiency(ies) identified? ☐ Yes ☒ None reported

Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? ☐ Yes ☒ No

Identification of major federal programs and type of auditor's report issued on compliance for major federal programs:

Assistance Listing Number	*Name of Federal Program or Cluster*	*Type of Auditor's Report Issued on Compliance for the Major Federal Program*
14.872	Public Housing Capital Fund	*Unmodified*
14.871, 14.879	Housing Voucher Cluster	*Unmodified*

Dollar threshold used to distinguish between type A and type B programs: $ 875,773

Auditee qualified as low-risk auditee? ☐ Yes ☒ No

Section II - Financial Statement Findings

FINDING 2023-001—Significant Deficiency in Internal Control over Financial Reporting – Timeliness and Accuracy of Reconciliations

Criteria – Account reconciliation should be prepared timely and accurately and include all relevant transactions that have occurred. In doing so, general ledger balances would then be accurate and complete and meet the requirements of generally accepted accounting principles (GAAP) by following financial reporting standards of the Governmental Accounting Standards Board (GASB).

Condition – Due to a software conversion, the Authority prepared reconciliations for audit months later, which required significant edits and multiple versions. In addition, management has not properly updated the financial close and reporting schedule following the software conversion.

Context – The Authority is tasked with submitting unaudited financial statements to the US Department of Housing and Urban Development (HUD) by August 31, and filing the audited financial statements to the State of Oregon by December 31. The HUD deadline was not met, and the State deadline was extended to April 30, 2024. If the reconciliations were prepared in a complete and accurate manner, the State of Oregon extension would not be necessary.

Cause – The Authority completed a software conversion in July 2023, which required a lot more time than expected and delayed the reconciliation and financial close process.

Effect – Additional time was needed for Authority staff to complete the reconciliations.

Recommendation – We recommend the Authority update the financial close and reporting schedule to ensure all reconciliation are prepared timely and accurately.

Views of Responsible Officials – Management agrees with the recommendation.

Section III - Federal Award Findings and Questioned Costs

None reported.

Housing Authority Clackamas County (HACC).

A component unit of Clackamas County, Oregon

Corrective Action Plan for Finding 2023-001

Thank you for bringing to our attention the finding from the recent financial audit that indicates Significant Deficiency in Internal Control over Financial Reporting – Timeliness and Accuracy of Reconciliations. This finding stems from challenges in performing timely reconciliations following the conversion and implementation of a new enterprise resource planning (ERP) system. The Authority concurs with the finding and understands the significance of this issue in ensuring the accuracy and efficiency of our financial processes. Please find our response and proposed corrective action plan below.

Response to Audit Finding 2023-001:

- **Identification of Root Causes:** Our analysis indicates that the delays in completing monthly reconciliations are primarily attributed to challenges encountered during the implementation of the new YARDI ERP system. These challenges included mass data migration issues from the prior system to YARDI, insufficient training and familiarization with the new software, and unexpected system configuration challenges.

- **Impact Assessment:** We recognize that the inefficiencies resulting from software implementation issues can have far-reaching implications, such as inaccurate financial reporting, increased risk of errors, and diminished stakeholder confidence. It is imperative that we address these issues promptly to mitigate their impact on our operations.

Corrective Action Plan:

1. **Comprehensive Support and Training:** We will prioritize providing comprehensive support and training to all staff involved in the reconciliation process to ensure they are proficient in using YARDI efficiently and effectively. This will include hiring a new IT programmer analyst to support the ERP system, tailored training sessions with YARDI representatives (already scheduled for a one week, on-location training), user

manuals, and access to support resources to address any questions or challenges encountered.

2. **Data Migration Review:** We will continue to conduct a thorough review of the data migration process and changes made to identify and rectify any discrepancies or incomplete data sets that may have affected the reconciliation process. This will involve collaborating closely with YARDI representatives to ensure data integrity and accuracy.

3. **System Optimization and Testing:** We commit to optimizing the performance of the new ERP system through rigorous testing and troubleshooting to identify and resolve any underlying technical issues or bugs. This may involve working closely with the software vendor to implement patches, updates, or customization to better suit our organization's needs. We have also committed to hiring an IT programmer analyst that will be our resident expert and point source for YARDI issues. First round of interviews for this position are scheduled for April 30th, 2024.

4. **Enhanced Communication and Collaboration:** We will improve communication and collaboration channels between relevant programs at the Authority to facilitate the timely resolution of issues and alignment of objectives. Regular meetings and status updates will be instituted to ensure transparency and accountability throughout the software implementation process.

5. **Monthly Reconciliations:** Recognizing the inherent risks associated with the timing, the data has been migrated and data integrity assured we have already begun to reconcile monthly and will continue to monitor this process closely in order to mitigate the impact of any unforeseen challenges or disruptions on the reconciliation process.

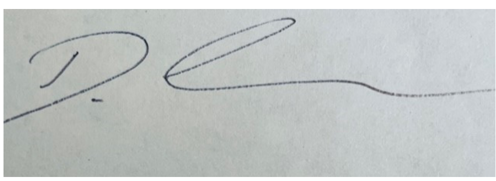
6. **Hiring of Finance Supervisor:** March 18th, 2024, the Authority hired a new Finance Supervisor with many years of experience as a comptroller.

7. **Timeline for Implementation**: We understand the urgency of addressing these issues and aim to implement the corrective action plan *immediately* and progress will be ongoing. We will provide regular updates on our progress and milestones achieved to the Auditors and senior management.

In conclusion, we are fully committed to resolving the software implementation issues affecting the timeliness of monthly reconciliations and enhancing our financial management processes. Additionally, we are currently contracting with a financial consultancy firm who specifically work with Public Housing Authorities (PHA's) to assess, analyze, and recommend improvements to their current financial practices, internal controls, and procedures, and to serve in a technical capacity to consult, train, and assist Finance staff. We are confident that the engagement with this consultant will improve the Authority's financial management. We appreciate the insights provided through the audit process and welcome any further guidance or support from the Audit Committee in this endeavor.

Darren Chilton, Finance Manager, Housing Authority Clackamas County (HACC)

SIGNATURE:



SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS
FOR THE YEAR ENDED JUNE 30, 2023

FINDING 2022-001—Significant Deficiency in Internal Control over Financial Reporting – Financial Statement Preparation: **Resolved**

REPORT OF INDEPENDENT AUDITORS REQUIRED BY OREGON STATE REGULATIONS

MOSSADAMS

Report of Independent Auditors Required by Oregon State Regulations

Board of County Commissioners of
Clackamas County, Oregon, as Governing Body of
Housing Authority of Clackamas County
Oregon City, Oregon

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the governmental activities and the aggregate discretely presented component units of the Housing Authority of Clackamas County, Oregon (the Authority), a component unit of Clackamas County, Oregon, as of and for the year ended June 30, 2023, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, and have issued our report thereon dated April 30, 2024. We did not audit the financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, or Webster Road Housing LP which represent 100% of the assets, net position, and revenues of the aggregate discretely presented component units as of June 30, 2023. Those statements were audited by other auditors whose report has been furnished to us, and our opinions, insofar as it relates to the amounts included for Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP, are based solely on the report of the other auditors.

Compliance

As part of obtaining reasonable assurance about whether the Authority's basic financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, including provisions of Oregon Revised Statutes (ORS) as specified in Oregon Administrative Rules (OAR) 162-010-0000 to 162-010-0330, of the Minimum Standards for Audits of Oregon Municipal Corporations, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion.

We performed procedures to the extent we considered necessary to address the required comments and disclosures which included, but were not limited to, the following:

- Accounting records and internal control
- Public fund deposits
- Indebtedness
- Insurance and fidelity bonds
- Programs funded from outside sources
- Investments
- Public contracts and purchasing

In connection with our testing, nothing came to our attention that caused us to believe the Authority was not in substantial compliance with certain provisions of laws, regulations, contracts, and grant agreements, including the provisions of ORS as specified in OAR 162-010-0000 through 162-010-0330 of the Minimum Standards for Audits of Oregon Municipal Corporations.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We did identify a certain deficiency in internal control, described in the accompanying scheduling of findings and questioned costs as item 2023-001 that we consider to be a significant deficiency.

The Authority's Response to the Finding

The Authority's response to the finding identified in our audit is described in the accompanying schedule of findings and responses. The Authority's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. Accordingly, this communication is not suitable for any other purpose.

This report is intended solely for the information and use of the Board of County Commissioners and management of the Authority and the Oregon Secretary of State and is not intended to be and should not be used by anyone other than these parties.

Ashley Osten

Ashley Osten, Partner,
For Moss Adams LLP
Portland, Oregon
April 30, 2024