

# PHA Name : Housing Authority Of Clackamas County

**PHA Code :** OR001

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2023

**PHA Program Type:** Combined

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Amended 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's 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 to 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 order to meet Housing Opportunity Through Modernization Act (HOTMA) implementation timelines, HACC is revising their MTW Supplement and requesting additional waivers which intersect with HOTMA changes mid-year in addition to the activities related to its obligations under the Asset Building cohort in this first fiscal year Supplement to the PHA Plan.

**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).**

<b>1. Tenant Rent Policies</b>	
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
<b>2. Payment Standards and Rent Reasonableness</b>	
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)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
<b>4. Landlord Leasing Incentives</b>	
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
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
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
<b>11. MTW Self-Sufficiency Program</b>	
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
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
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
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

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

<b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b>
<p><b>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</b></p> <p>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.</p> <p>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.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies to all family types</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>HACC will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls. properties it owns, manages, and controls.</p>
<p><b>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.</b></p> <p>N/A</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please explain or upload a description of the quality assurance method.</b></p> <p>HACC uses Nelrod's EZRRD software to compile, analyze, and validate its rent comparisons for rent</p>

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 both its Public Housing and Housing Choice Voucher programs. 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. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.
- 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. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household's income decreases

by 10% or more.

**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 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.**

N/A

**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?**

The hardship policy was modified due to the removal of waiver requests 1.g, 1.h, 1.r, 1.s. which were originally included with 3.a, 3.b in the hardship policy.

**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 allow households to request an interim if the household's income decreases by 10% or more.
- ii. HACC will apply the most recent payment standard and utility allowance during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.
- iii. HACC will allow a maximum of 2 interims per year.

### **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 both its Public Housing and Housing Choice Voucher programs. 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. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.
- 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. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household's income decreases by 10% or more.

**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



<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Other – another specifically defined target population or populations.</p>
<p><b>If Other Selected in Previous Question: Please describe this target population in the text box.</b></p> <p>HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>Applies to all tenant-based and project-based.</p>
<p><b>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.</b></p> <p>N/A</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Provided Already</p>
<p><b>What is the recertification schedule?</b></p> <p>Once every three years</p>
<p><b>How many interim recertifications per year may a household request?</b></p> <p>2 or more</p>
<p><b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b></p> <p>HACC interim policies are as follows:</p> <ul style="list-style-type: none"> <li>i. HACC will allow households to request an interim if the household's income decreases by 10% or more.</li> <li>ii. HACC will apply the most recent payment standard and utility allowance during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.</li> <li>iii. HACC will allow a maximum of 2 interims per year.</li> </ul>

<p><b>5.c. - Third-Party Requirement (HCV)</b></p>
<p><b>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</b></p> <p>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</p>

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.

**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.**

N/A

**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.

**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 to all assisted households

**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.**

N/A

**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.

**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 to all assisted households

**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.**

N/A

**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.

**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.**

N/A

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

No

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

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No</p>

E.2	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b> No</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
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
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

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	<b>Total Local, Non-Traditional Households</b>	<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<p><b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No</p> <p><b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b> MTW agency did not established a rent reform policy to encourage employment and self-sufficiency.</p>	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
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?
------------------------	--------	------	------	------	------	-------	-------------	------------------	------------------------------	--	---	---	--

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



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	<b>0</b>

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.

# IMPACT ANALYSIS FOR MTW WAIVERS 3.a, 3.b

Updated to align with HUD Conditional Approval 12/29/23

## Description of the Waiver – Alternative Re-examination Schedule for Households

The Housing Authority of Clackamas County (HACC) proposes to implement a triennial reexamination schedule for all Housing Choice Voucher (HCV) 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 stipulates 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	
<b>Triennials</b>		
- 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	$(g1 + h1)/3 - i1 - j1$
<b>Agency Impact</b>		
c - Annual cost savings due to reduction in number of reviews	\$28,142	$((g1 \times a) + (h1 \times b) - (i1 \times b) - (j1 \times a)) / 3$
d - Increase in HAP expenditures annually	\$64,506	$e1 + e2$
e - Total annual cost savings (loss)	<b>(\$36,364)</b>	$c - d$

### 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-	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.

#	Question	Answer	
	sufficiency, and/or housing choice	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.
5	Impact on the agency's ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	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/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.

## **MTW HARDSHIP POLICY (3.a, 3.b.)**

Updated to align with HUD Conditional Approval 12/29/23

### FINANCIAL HARDSHIP EXEMPTION FROM MTW RE-EXAMINATION POLICIES

For a PHA in the Moving to Work demonstration, HUD requires the agency to adopt a policy for addressing hardship cases caused by agency established rent reform initiatives.

Therefore, HACC is adopting the following hardship policy regarding the triennial exam schedule for elderly and disabled families on a fixed income in alignment with HOTMA final rule.

Families eligible for triennial examinations may request an interim examination in writing, if they are reporting a reduction in their household's income of 10% or more which might result in a decrease in their tenant rent payment. This policy is in alignment with the HOTMA ruling and also applies to families on a traditional annual schedule.

<p><b>E.</b></p>	<p><b>Agency-Specific Waivers.</b></p>
<p><b>E.1</b></p>	<p><b>Agency-Specific Waivers for HUD Approval:</b></p>
<p><b>(a)</b></p>	<p><b>Savings account deposits for downpayment assistance for Homeownership</b></p> <p>Name of activity: Matched Savings Homeownership Account – Cohort Specific Waiver</p> <p><b>A full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice)</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>HACC will measure the success of the program using the following factors:</p> <ul style="list-style-type: none"> <li>• Difference in credit score between initial baseline and current actual;</li> <li>• Difference in delinquent debt between initial baseline and current actual;</li> <li>• Percent of program participants who were successful in a home purchase.</li> </ul>

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

## Expansion of Existing Credit Reporting Program – Additional information

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

**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 **(07/01/2023)**, hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

**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).*

**Tootie Smith**  
**NAME OF AUTHORIZED OFFICIAL**

**Housing Authority Board Chair**  
**TITLE**

**10/05/2023**

**SIGNATURE**

**DATE**

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

**Attachment J:  
Resident Advisory Board Meeting Minutes**

Wednesday, January 25, 2023 ~ 10:00am – 1:00pm Via Zoom

<b>10am-10:10</b>	Welcome & Introductions	Toni Karter
<b>10:10-10:30</b>	Annual Plan New Activities & Progress Report Review	Toni Karter
<b>10:30-10:45</b>	Moving To Work (MTW) Supplement	Elizabeth Miller
<b>10:45-11:15</b>	Resident Services Overview	Jemila Hart
<b>11:15-11:30</b>	Family Self Sufficiency Overview	Hillary Merritt
<b>11:30-11:45</b>	<b>Break</b>	
<b>11:45-12:00</b>	Capital Fund Overview: Attachment H-I	Josh Teigen
<b>12:00-12:30</b>	Development Update (moved to before MTW)	Devin Ellin
<b>12:30-12:40</b>	Voucher Program Update - Review Attachment A	Toni Karter
<b>12:40-12:45</b>	Public Housing Update - Review Attachment B	Tanika Cutsforth
<b>12:45-1pm</b>	Questions and Answers	All

**RAB Board Members in attendance:** Laura Bales (HSP), Brian Henderson (S8), Irisa Hernandez (HSP), Ann Leenstra (Resident Commissioner – S8), Arnold Rodacker (HSP), Misty Pate (HSP), Jackie Fuller (SS), T. DeWeese (OCVM), Grace Essy (SS), Yelena Potoskaya (CH), Lisa Verlo (CH), Helen Sotriakis (S8) - All properties/programs represented. Members not in attendance: Gail Morgan (SS), Venus Barnes (CH), Charlene Hartley (OCVM), Darcy Lockhart (OCVM), Paul Reynolds (S8), Cathy Hasse (S8)

**Video recording of the meeting for more detail can be found at:**

<https://clackamascounty.zoom.us/rec/share/iOQj3aPvO7H9BCR3givGEDtHfi5XI3Ura1jeAcP29UvYhhAp-lhb2gJMSPbUFZJL.1Z2YvQJnv08awWzB>

**Introductions:** Introduced staff followed by introductions of the RAB members in attendance. Encouraged members to read the entire plan, but that staff would be highlighting content and answering questions.

**Notes on Information Highlighted by Staff – watch video for full information**

**Effective Dates, if approved (Cover Sheet):** 2023 Plan will go into effect July 1, 2023-June 30, 2024

**PHA information (HUD 50075):** Includes the number of Public Housing Units and Housing Choice Vouchers (HCV). Plan Elements - ones that are checked Yes are changing this year and ones marked No are staying the same as last year. This area references where the information is found in the Attachments.

**New Activities Checklist (HUD 50075):** Yes, to all the development options to leave the options open for our master planning and redevelopment projects.

**Administrative Changes (HUD 50075):** Outlined the change in the board bylaws that added the possibility for the Board to add an additional member. Currently the board is the 5 County Commissioners plus our Resident Commissioner, Ann Leenstra. This change would add another Housing Board Commissioner and we would like it to be someone with development and housing expertise.

**Development Update (HUD 50075 & slide show):** Devin presented her slide show which can be seen on the recording outlining all the projects in the new activities section as well as the progress development has made for 2022. Also gave a Metro Housing Bond update.

**Moving to Work Supplement (Attachment M & slide show):** Elizabeth Miller presented a slide show on what the Moving to Work status means, our requirements, and what we can do and what our plan is for our Asset Building Cohort this year. Encouraged members to fully read the MTW supplement and send in comments/suggestions.

**Resident Services Update (HUD 50075):** Jemila provided a summary of Resident Services activities this year and plans for next year including the addition of more staff for the resident services team.

**FSS Program (HUD 50075):** Hillary provided a summary of FSS program activities. 100 participants, in process of hiring a new FSS coordinator, have a waitlist of about 12 which should be cleared once another FSS coordinator is hired and trained.

**Capital Fund Update (Attachment H & I):** Josh reviewed projects completed for 2022, projects planned for 2023, and the Capital Fund Budget.

**Voucher Program Update (HUD 50075 & Attachment A):** Toni gave a general overview of the voucher programs new activities section. She then reviewed each policy change proposed in Attachment A, the purpose of the change and how it impacts the agency and/or residents.

**Public Housing Update (HUD 50075 & Attachment B):** Tanika read the information of new activities for Public Housing and then reviewed each policy change proposed in Attachment B

**Other Attachments Reviewed:** Toni reviewed the content and waitlist data in Attachment C, summarized content in Attachment D and E, explained changes proposed in Attachment F, noted that Attachment F was the HACC budget in detail and that other attachments were HUD forms and other required documents for the Annual Plan.

### **Paraphrased Comments, Questions & Answers collected throughout the meeting:**

Arnold – What is the timeline for Hillside Park? Is nothing going to happen until next year?

Devin – Application is with HUD now, we do not plan to start construction, relocations may start Summer 2023 once we have final approval – will relocated about 10 households a month. Timeline is the same as what we have shared in the newsletter.

Arnold – So are you not sure you will tear down Hillside Park units (phase I)?

Devin – Very high likelihood. We have federal funds supporting the project, support from HUD, you can count on this happening. We have not received the “final approval” but we are working through the process in good faith with our partners and HUD. We are planning all the buildings with our architect team, so things are moving forward.

Arnold – Have an issue with the laundry room flooding out/sewer. What is the feasibility to put in a portable trailer (for laundry)? Need resolution to problem.... There are safety concerns.... Maintenance has been trying to fix the problem but want the Housing Authority to hire a plumber or something. Want the property managers to help find a solution. When you remodeled Hillside Manor two washing machines were moved over to Hillside Park. There may be a sewer line problem but there could just be too much water pumping through too small of a line with the addition of the two machines. You may want to try removing the extra machines to see if that takes care of the flooding before sending out a plumber since there was to a problem before the extra machines were added. I have been working with Thomas on this. There could be build up in the lines over time (clogged) that could be cleaned out but



they have already snaked out all but one including the toilet. Maybe the sewer lines are just not big enough for the extra machines.

Devin – We have property managers and asset management listening and will work on addressing the flooding issue. But, yes, the laundry room will be torn down in Phase I and there will be a temporary solution for laundry and mail during construction – not in the manor for residents still living at Hillside Park.

Ariana – We will be working on a resolution to the laundry room flooding by the end of this week. I understand what you are saying and I will be out there this afternoon. I have been talking to Thomas and he shared your ideas and concerns. We are going to address it and resolve it hopefully by the end of the week.

Ann – For residents living in the north half of Hillside Park, what is the tentative completion date for Phase I?

Devin: Yes, hoping for end of 2026. Tighten up a bit with approval from HUD and closing on financing, etc. Will keep you updated as the year progresses, and we learn more. Want to be in construction for Bond Funds by 2026 for Phase II. HACC owned building C will be priority and complete first so anyone in Phase II who wants to move in will be given priority - late 2025 or early 2026.

Laura – Will number of bedrooms be grandfathered in when moving? Conflict is change in occupancy rates fairly recently. Currently she and her son live in a two bedroom would they be changed to one bedroom? Will their occupancy change when moving or stay the same?

Devin – Families relocating will be relocated at the current occupancy rates not just the same number of bedrooms they have before they move (not grandfathered in). Toni – Current occupancy rules are already being enforced. A parent and child is two bedroom – one for the parent and one for the child, it is possible for someone to have over the occupancy rate through reasonable accommodation. Accommodations will stay in place.

Laura – Will we need to file reasonable accommodations with the move?

Toni – The Housing Authority has the right to ask for a new reasonable accommodation at every annual. Suggestion is to be prepared to provide a new submission for a reasonable accommodation to prove you still have needs.

Laura – Since you say you are already enforcing the current occupancy rates already, what happened to people who had extra rooms when the new policy went into place? Did they get transitioned into smaller units?

Toni – We put everyone who was over on a transfer list, and we are slowly working through the transfer list because it changes all the time. A lot of what happens is that people with children have their children graduate and move out of housing, but they are still there. Constant growing and changing list, we are transferring people to smaller units or voucher assistance for a smaller unit.

Laura – I know it costs the Housing Authority money to transfer, is it worth it financially (them in a larger unit or transfer fees)?

Toni – It has a cost, but our mission is to house as many people as possible and it does a great job doing that. Our numbers have increase substantially and we are serving larger families that were on the waitlist for large units when we had a two-person family in a four bedroom. It has been fantastic on meeting our mission which is not to be frugal and spend less but to help as many people as possible.

Irisa – This is about what people are paying for rent and because we got a cost-of-living increase (social security). How can people be getting nearly 66% increase in rent when they only got a \$50 or \$80 raise? How can they? Property owners raise rents to accommodate property taxes increase and to make improvement, etc. Why are they raising the rents at such high rates? 66% is a pretty high rate for an \$80 dollar increase.

Toni – Public Housing is based on income; you are required to pay 30% of your income on rent. So, if you have an increase in your income you will have an increase in your rent but never more than 30% of your income. Section 8 on the open market, landlords have a Cap by Oregon law that they cannot increase rents by more than 14.6% this year (changes every year). Legislature is looking at that because 14.6% increase in rent is a lot of money, and landlords aren't just increasing because they have expenses, they are doing it because they can, and they want to make money. With Section 8, we have payment standards and fair market rents that cap how much subsidy we can give. So, with section 8 your rent is not frozen at 30%. You can end up absorbing full rent increases if the place you are staying at is so expensive that it exceeds the fair market rents that were given by HUD. Thankfully HUD has done a great job in this past year of increasing our fair market rates substantially because we argued that they were not keeping up with the current market – we are like San Francisco. We have huge rents that we never had before in Oregon, and they are getting worse. HUD increasing fair market rents and us increasing payment standards helps. If a person like a single person is trying to stay in a two bedroom in this market, I would generally say they may need to move for affordability. We can only pay a one-bedroom payment standard, but they have to pay the rent at the two-bedroom rate.

Irisa - So is 66% an average then of increase of what they are paying?

Toni – No, from our records over 75% of our families are at 30% or below of their income towards rent.

Brian – Got a notice that rent is going up by \$50, at first rent went down moving to Section 8 from Public Housing but he is in a two bedroom. Will he need to pay the full \$50 increase? What about COLA increase?

Toni – For your case you have an accommodation for the two-bedroom so you will have a two-bedroom payment standard. Your rent increase notice should go to your occupancy specialist, and they will do what is called an “interim” on your section 8. They will take into consideration your utility allowance, new payment standard and contract rent and likely your rent portion won't change much if your income hasn't changed much. COLA increases income so will impact rent payment some.

Brian – Hillside Manor renovation – Counters too low, cabinets high and not deep enough to fit a plate. Will the new buildings in Hillside Park be Section 8 or public housing? Would like to look at what the new ones will be like to see about moving back to that area.

Devin – Hillside Manor is now Section 8. Through the remodel, architects are required to build units to ADA standards. Counters and such are an effect of the building requirements. Thanks for the feedback on the Manor design.

Grace – Questions about the scattered sites plan, just moved to scattered sites about two years ago and am really happy here. Kids are happy and live in a nice safe area. Don't have any drug use around for once and I had no idea you were thinking about developing this. I live in a four bedroom with five children and have a nice sized yard in front and back, would there be something like it available on a voucher or would I have to downsize? I don't want to live in a tiny home as that is what I moved away from.

Devin – We are not planning to develop the scattered sites; we are trying to either preserve some of the homes or sell some of the homes. The timeline on this is realistically about three years until there are actually transactions happening.

Jemila – Everyone would be offered a voucher if moved from scattered sites.

Devin – Yes, everyone currently living in scattered sites, if required to relocate would be given Housing Choice Voucher, relocation services (consulting) assistance. Working with a relocation consultant. Tenants will be helped in finding a new home using the voucher. Tenants would also have the option to move into properties in our existing portfolio as there will be new Metro Bond projects being built.

Toni – Your voucher would be based on your family size. If you are a single mom, you get one bedroom for that, and kids are two per room so a four-bedroom voucher would be given. These are not typically apartments available for four-bedroom size so likely you would relocate to a house, duplex, townhome, or something like that on a voucher. With relocation they also guarantee that your rent will be approximately the same as what you are paying on Public Housing and that you would have similar amenities such as accommodations needed. They work to find housing to meet the particular needs of the family in relocations.

Bernadette (staff) – Will the decision on the scattered sites happen before the next RAB meeting? Does a decision like this require a meeting like this to tell residents what is happening, or will it just happen? Are we looking more than a year out?

Devin – Any plan, any disposition, because it requires a Section 18 disposition, there is a requirement that we come to the RAB and inform residents. We do not want to surprise anyone. We know this is where folks live, and they have commitments and attachments to their home and want to provide as much advance notice as possible. We would not do anything with Oregon City View Manor until Clackamas Heights is done and folks would be given the opportunity to relocate there and stay in the same neighborhood.

Lisa – At Clackamas Heights would you be redeveloping into apartments or like actual houses? Would they be for sale also?

Devin – We are looking at options right now. We are looking at a kind of cottage cluster model and there may be a mix of some apartments, smaller apartments (20-40), maybe some townhomes surrounding a courtyard with about 12 to a cluster, maybe some standalone single-family homes depending on the zoning codes. Most likely I would guess that more like townhomes would be the smallest. There is potential for some to be for sale, but we would have to explore it a bit, most likely they would be apartments or rentals. These things will be decided through the master planning process with lots of outreach to the neighborhood and current residents about what they would like to see there.

Laura – Will we have access to the Moving to Work slide show?

Elizabeth – Yes, I can email it out. (No specific questions were asked of the MTW presentation)

Laura – Can you repeat that last part (during the FSS presentation)?

Hillary – Yes, FSS coordinators can now continue to help folks that have graduated from FSS on things like accessing their IDA. Before the new FSS action plan, FSS coordinators were not able to assist participants who had graduated from FSS.

Laura – Will FSS have extensions of the five years with Covid?

Hillary – There has always been the opportunity for a two-year extension for participants if there is a good cause reason, they need two years in the program through a written request to the FSS coordinator, so there is a possibility of extending to seven years.

Bryant (staff) – What is the difference between “suitably employed” and “full time employed” for the FSS program?

Hillary – Previously it was a mandate of being full time employed to graduate successfully; however, it is now changed to suitable employment, because we know that families are unique and different. Suitable employment for some families may be part-time employment if they have additional income such as social security benefits or other income source. There is no longer the hourly (full-time) mandate.

Irisa – How long is the wait list for the FSS program?

Hillary – Right now it is between 12-14 families, but we usually don’t have a waitlist, so we don’t have an average wait time on the waitlist. Once we have a new FSS coordinator hired and trained we should be able to move those on the waitlist at once.

Grace – How long do you have to purchase a home when you graduate from the FSS program? If your goal is homeownership, then do you make the check out to the participant at graduation or toward the purchase?

Hillary – You don’t have to purchase a home if that is not one of your goals. You have to meet your goals to receive your check pretty quickly after graduation. If one of your goals is home ownership, you would need to be in the purchasing process at graduation to receive funds. Proof would be required to show you are in the home buying process for a specific home to complete a goal of homeownership and receive funds. The checks are made out to the participant. FSS is different than the match savings account. With FSS you get an escrow account which is separate from an IDA. There is the option to do both.

Lisa – What is the reason for redoing the entire house on Leslie?

Josh – The tenant relocated to a smaller unit, was there for a very long time, so it was a turnover time. We evaluate units at turnover for larger upgrades and work. The unit was tired and needed flooring, cabinets, insulation upgrades, new furnace, and septic system (which had failed). The septic system failure was one reason the tenants were relocated. With the unit vacant it was a good time to do all the work.

Grace – How do you choose which units get asbestos and air monitoring? I have lived in other units with mold so how do you choose since nothing was done for those units?

Josh – Complaints come through maintenance to the property management. For asbestos abatement those are usually in vacant units with work being done like Leslie. For example, if the flooring was being replaced and under the flooring at the second layer (not the top where you are walking) there was encapsulated asbestos from years ago it would need removed when the new flooring was being done – we would have it abated.

Allison – Tenants should report mold concerns to maintenance line at 503-650-3535 and then maintenance would come to inspect. Maintenance would treat it first and make sure moisture is not coming from outside from roof leak, gutter, siding. They would fix that if that was the problem. Often it is moisture that is inside from lack of ventilation. If that is the case, we would counsel the tenant on proper ventilation to reduce inside moisture. Resolutions are different for each unit depending on what we find. We work to resolve the problem. We certainly don’t want people living with mold. There is an addendum in the lease that speaks to mold directly outlining resident and Housing Authority responsibilities. If you feel your issue is not being

addressed (mold or otherwise), contact your property manager. Property managers are here to troubleshoot issues.

Laura – when you say ventilate, ventilate, I don't know how I could not ventilate as I can feel wind blow through the framing of my windows at Hillside Park. I run two de-humidifiers constantly so I doubt the inside moisture is all tenant based.

Allison – Yes, in some cases it is a problem coming from outside.

Toni – Yes, Laura, you are highlighting one of the reasons we are redeveloping Hillside Park.

Laura – Regarding air quality, I noticed I got a HEPA air filter and when I run my heater, it drops air quality on my filter gauge. Is it drawing air from under the house or something? I think it is weird.

Josh – Yes, that is something to address with your property manager through the process Allison explained.

Toni – What is flat work (Capital Fund proposed projects)?

Josh – Flat work is hard surfaces around a unit like driveways, walkways, patios, and concrete ramps, any type of asphalt or concrete surfaces on the exterior of the building around the unit.

Laura – Regarding the relocation of Hillside Park, because you are tearing them down would we have to clean everything really good like a normal move out or does it matter?

Toni – I don't think it is going to be a big concern, but we will need it cleaned out and no furniture or things left behind.

Arnold – Wondering why you don't increase the amount of money you give to the maintenance department seems like it has been reduced and staff taken away. There are so many things to do here but they are shorthanded. Why don't you get them more help? When hiring someone new can you find someone with plumbing experience as it could save you a lot of money instead of hiring someone to come in to put cameras down a few lines. You could just get the equipment and have staff that can do it. Seems like common sense to stay on budget.

Josh – Budget for capital funds is different than the operations budget which pays for maintenance staff.

Allison – We are adding someone hopefully soon. The hiring process take a bit of time, but we are doing interviews hopefully next week. We can't hire a plumber only a generalist.

Toni – There are several parts to this. First, the Housing Authority housing is getting older and older and starting to collapse on us and then funding from Congress is going down. Need is going in the opposite direction of the funding. Next, when we take a project offline for redevelopment, like Hillside Manor, HUD wants us to reduce our in-house budget - saying we have less units to maintain so why keep staffing so high. Another part is we are required to pay a prevailing wage for all repairs on our public housing properties. Often the wages we can afford to pay for maintenance staff would not meet what a plumber could get on the outside job market. We are very budget constrained and actually HUD says we should use outside workers, pushing us to hire outside electricians and plumbers. We do a great job hiring generalists and they do their best and when it gets beyond that we go outside.

Irisa – Does Oregon have building standards like California and Washington regarding earthquakes for the new buildings that are going up for construction? I am not sure if our buildings are up to earthquake standards. If there isn't a standard, what can we do to get Congress to provide funding for earthquake codes especially for taller buildings? Maybe wind resistance with climate change and all.

Toni – Yes, Oregon does have an Earthquake Code. With older buildings being rehabbed it is not as good though as new construction for earthquakes.

Laura – Regarding the redevelopment of Hillside Park Phase II, which end are you starting with? Are you starting at 32<sup>nd</sup> Ave. or the one at the area closer to Hillside Manor? Since they are doing like 10 households a month are they starting at one end or the other my neighbor wants to know if there is an order. Also, they won't start construction before everyone is relocated, right?

Toni – I think what you are asking is if relocation would be delayed depending on where in Hillside Park, one end or the other. They will begin working with every unit in that Phase to get everyone relocated before construction starts. They have not decided yet if they are starting with one area or another yet. Yes, construction will not begin until after everyone is relocated.

Brian – Regarding the policy change for specialized vouchers when a household splits, is it possible to make it so that in such a case as you mentioned the spouse, if she still has a need herself can be prioritized to get a Section 8 voucher when the voucher goes to her spouse because it is VASH and he is the veteran?

Toni – Unfortunately we don't have that policy because we have a waitlist. That person would get a voucher before everyone else on the waitlist.

Grace – Agreed they should not jump the waitlist.

Toni – The solution for those families is to call the Coordinated Housing Access immediately when they are having a problem to get a risk of homelessness assessment – going to lose their housing. Then they are on the waitlist for the county right away. Literally homeless is prioritized for immediate assistance.

Bernadette – Can you explain again the situation about a veteran having the vulnerability? What if that same kind of couple was sort of reverse where the woman doesn't have any disabling condition and then as a boyfriend is the veteran. If they are divorced, who gets the voucher? What if say she has lived there like 10 years and he only one year? Does it matter who has been there longer? Is the policy just that we look at who is most vulnerable? Should people be cautious about adding people to their vouchers as it could jeopardize their voucher? We do warn them that they are giving them equal rights, but it is a gamble.

Toni – If there is a legal document that says where the voucher goes, we follow that, otherwise if it is a special population voucher it goes to the person that meets the criteria. If the husband, is the veteran and wife is not, it would go with him. If they are both veterans, it would go to the most vulnerable. If it's not a specialized voucher, it just goes to the most vulnerable without a legal document specifying where it goes. I would hope our resident services team would let us know too if they are both veterans. Yes, adding people on the voucher is a gamble.

Laura – Regarding previous behavior policy change, I want to verify I understand that with the new policy. If someone is kicked out of housing and it was over three years ago you might consider them for housing again, is that correct? And these policies go into place next July is that 2023 or 2024? Also, does this apply to new applicants or also to adding significant others?

Toni – First, this is for the rent assistance program (not public housing). Yes, you are correct, that is correct and if approved it will be in effect July 2023.

Lisa – So in 2021, I got a letter for a phone intake appointment to activate my voucher from being on the Section 8 waitlist however no one ever called me. Nothing happened. I think things were on lock-down. I am happy where am at but it depends on what's available. I was available for the phone call, but no one called at the time on the date. The office was closed.

Toni – Are you still interested in a voucher? Let's talk offline about it. I can work with you on that but if you were given an appointment letter with a date and time and you were a no show (even if online), then there is no option.

Brian – How much notice does a tenant need to give when leaving a unit?

Toni – The law requires that a person give a 30-day notice.

Arnold – When we are up for reevaluation (Annual), you send a letter giving 10 days to complete the paperwork. My suggestion is you give additional time. 10 days with mailing delay and mail pick up delay is not enough time to get things.

Toni – I have a better one – one of the policies we are proposing that I haven't gotten to yet is changing so that your annual date will not change when you move. You will always have the same annual date every year forever.

Arnold – So when you do an interim with this new policy, your annual date stays the same? So, if your regular annual was in July, even after an interim, it would still stay July?

Toni – Yes. It will stay the same even when you move, do interim, etc. Before it was always changing, and it was confusing, and people were forgetting. This way you will know a year in advance to start gathering documents for that annual date. This reduces multiple notices and the 10-day notice. We were very lenient on people getting things in late with the 10 days. I can definitely look at more days than 10 because I agree that is pretty fast turnaround. I made a note to look at making it longer like 14 business days or like three weeks or something.

Brian – I just got that notice at the end of December and they wanted things by January 5<sup>th</sup> but I'm like wait that is less than two weeks away, what's going on?

Bernadette – Consider mailing time and that maybe it took four days to get there. Maybe give a notice that it will be coming in email that way folks are looking for it in their mail.

Brian – I check my mail just once a week.

Toni – Those are excellent ideas.

Brian – Regarding inspections for Section 8, do they come in and do annual inspections? Because they missed a couple things when I moved in

Toni – You should write a letter to your landlord about the things they missed at move in. The intent of our inspections is not to find everything that is wrong with the unit. The intent is to make sure it is safe and livable. It is a bare minimum bar.

Bernadette – Are inspections done the same month as annuals? I think this would be a good plan.

Toni – Yes and no. Inspections for Section 8 are biennial, which is every other year, and because of COVID and us having waived doing inspections, we are in catch-up mode, so the schedule is wonky right now. We are trying to get them back on track but instead of alignment with the annual they will be scheduled by geographic location, such as Mt Hood area during the summer, June or July. So, there is some consistency based on location.

Bernadette – By geographic location is cool but this is only for Section 8, right?

Allison – Yes, Public Housing is still inspected annually.

Brian – A few months after moving in, my water heater broke, they damaged the wall and the kitchen linoleum which have not been fixed. I have sent emails and have talked to the landlord, but they just keep saying they are working on it, but nothing is being done.

Toni – So I can tell you the linoleum is an issue as it is a trip and fall hazard and makes your unit unsafe. You could reach out to your occupancy specialist and request a special inspection. By doing that you are asking us to come out and we would likely fail the unit and then that would start the clock on their repairs. It is a stick and carrot thing. By doing this we will be hitting them with a stick. They have to do repairs in time or rent will not be paid.

Brian – Regarding the policy change allowing overlap of same month rental assistance during moves. That is perfect. I think I brought that up last RAB meeting.

Toni – I think you did, and we wrote it down and that is why we are proposing to change it this year. The RAB meeting and hearing from tenants is very helpful.

Irisa – Question on the changes to calendar days, do they include holidays in the number of calendar days?

Toni – In calendar days, holidays are included but in business days they are not. Seven business days can sometimes stretch to over two weeks. This was confusing so moving all to calendar days.

Brian – A friend on Section 8 has leaky windows and mold that her landlord is not treating. They are keep telling her they are not going to replace all the windows in the whole complex. What advise should I give her?

Toni – We do not test for mold. We would want to see water seeping in so she should take photos/video on a rainy day when it is leaking for her property management as well as landlord. The final thing is when having trouble with a landlord is Housing Rights and Resources and if it is a bad problem, they will give a direct connection to Legal Aid.

Irisa – If a person comes up on the Section 8 waitlist and they need to attend the class but miss their window due to a medical condition, do they lose their place on the list? Do you do virtual classes?

Toni – Sounds like there are multiple things going on there, they do have to come to an orientation and intake, then they are issued a voucher and given 120 days to search for a home. If they can't find a home in 120 days for a medical condition, they can ask for a 30-day extension and we would give it. They do need to do the orientation and intake when they come up on the list and we started doing them virtually during COVID.

**Items to send out to RAB attendees after the meeting:**

Minutes from the RAB meeting, presentation slides, summary of the policy changes to share with other tenants, and the link Elizabeth mentioned from Proud Ground with land trust model information. Email PDF version of the full plan to Brian.



# Resident Advisory Board Meeting Minutes

Tuesday, August 8, 2023 10am – 1pm

Via Zoom: Zoom link:

<https://clackamascounty.zoom.us/j/86461775181?pwd=Z05ZQmE0K3prOVJoWkRkUk9Zb2lhQT09>

Meeting ID: 864 6177 5181 Passcode: 735191 One tap mobile +13462487799,86461775181# US

<b>10am-10:10</b>	Welcome & Introductions	Toni Karter
10:10-10:40	Development Update (30 min)	Devin Elin
10:40-10:50	Policy Summary Intro - Background & Overview	Toni Karter
10:50-11:00	MTW Asset Building Program Updates – Asset building Participants only	Elizabeth Miller
11:00-11:15	Simplified Rent Calculations – MTW waivers – HCV & PH	Toni Karter
11:15-11:30	Updated Income Calculation Changes – HOTMA changes – HCV & PH	Toni Karter
<b>11:30-11:40</b>	<b>Break (10 minutes)</b>	
11:40-11:50	Alternate Re-Examination Schedule HCV & PH	Toni Karter
11:50-12:00	Inspection Process Change HCV	Toni Karter
12:00-12:15	Project Based Voucher Program Changes – HCV PBV only	Toni Karter
12:15-12:30	Tenant Based HCV Waitlist Changes – HCV	Toni Karter
12:30-12:45	Project Based Voucher Waitlist Changes – HCV PBV only	Toni Karter
12:45-1pm	Additional Questions and Answer Time	All

**Residents in attendance - RAB Board Members are indicated with a \*:** Candice Brown (HCV), Ann Gibson (HCV), Tami Romero (HCV), Laura Bales\* (HSP), Brian Henderson\* (S8), Irisa Hernandez\* (HSP), Ann Leenstra\* (Resident Commissioner – S8), Jeremy Pinkham (CH), Arnold Rodacker\* (HSP), Misty Pate\* (HSP), Jackie Fuller\* (SS), Tiffany DeWeese\* (OCVM), Grace Essy\* (SS), Yelena Potoskaya\* (CH), Lisa Verlo\* (CH), Janice Ross (HCV), Monica Ferguson (HCV), Steve Thompson (HCV), Helen Sotriakis\* (HCV), Linette Miletti (HCV), Karetha DellGrottaglia (HCV), Douglas Roland (HCV), Sara Cooper (HCV), Venus Barnes\* (CH), Darcy Lockhart\* (OCVM) - All properties/programs represented.  
RAB members not in attendance – Gail Morgan (SS), Charlene Hartley (OCVM), Paul Renalds (S8), Cathy Hasse (S8)

**Video recording of the meeting for more detail can be found at:**

<https://clackamascounty.zoom.us/rec/share/FZgGToljgse97Wb4bS2zb9sJB0alumZPL12BDY8HtuHp-kgbq-AvhxFrMO75BcN.-zD309pgXtWiMB11>

Passcode: !c5F&f@&

**Introductions:** Introduced staff followed by introductions of the RAB members in attendance. Encouraged members to read the entire plan, but that staff would be highlighting content and answering questions.

## **Notes on Information Highlighted by Staff – watch video for full information**

**Effective Dates, if approved (Cover Sheet):** 2023 Plan will go into effect July 1, 2023-June 30, 2024

**Development Update:** Good Shepherd Village: 143 units are scheduled to open in early to mid-October. Accepting applications now: [taylah@gresinc.com](mailto:taylah@gresinc.com) or [goodshepherd@quantumres.com](mailto:goodshepherd@quantumres.com) for leasing inquiries and rent information. Las Flores Apartments, formally Maple Apartments, has electrical issues that have delayed leasing (2024 rather than Fall 2023). Marylhurst Commons in Lake Oswego, 100 units are on track to open this Spring 2024. Updates on the development projects for the Metro Bond will be

presented to BCC for a 121 mixed used development in Wilsonville, 55-unit development in Lake Oswego, 15-unit project in Milwaukie. 812 unit goal is being accomplished.

HACC received approval from HUD 54 unit disposition in HSP. Section 8 Tenant Protection Vouchers will be issued. Phase 1 resident relocated with HCV. Assistance from relocation specialist, no one will be displaced. All relocated residents in Phase 1 will have option to return to new unit once completed or remain with HCV. Demolition of old units and 275 new units, begins June 2024. Waitlist priority given to those relocating.

Remaining Public Housing will be repositioned from Section 9 (Public Housing) to Section 8 (Voucher). Public Housing funds have been trending downward for years. Leveraging funds: metro bonds, tax credits. Primary objective to make sure residents are provided opportunities to relocate. Applying for 2040 Planning Grant from Metro – provides stipends, virtual/in-person forums, accessible materials, and more.

In coming weeks working with Ann Leenstra, Clackamas County Housing Commissioner, HACC Staff, to create Resident Planning Committee contact Devin if interested in participating:

[CHRedevInfo@clackamas.us](mailto:CHRedevInfo@clackamas.us). Available opportunity for all HACC clients, not project specific.

Devin read letter for Metro 2040 Grant Committee. Ann motioned to approve acceptance of letter and to sign it on behalf of RAB members. Motion 2<sup>nd</sup> by Brian. Opened for discussion. No further discussion on the letter. No objections. Support of the letter and of Ann signing, passed unanimously.

**Policy Summary Intro – Background & Overview:** Moving to work allows us to pull Federal Money without the restrictions that are in place now. Money remains the same but unlocks some of the fund restrictions with the Moving-to-Work status. Submit to HUD a Waiver request when want to make a change to the program. Impact analysis on resident, budget, and other impacts.

Better utilize funds, for example, let everyone work remotely to save rent costs on building and use those funds for program. We can't serve less people with more money, must serve the same number of clients with thoughtfulness and mission with the same amount of funding. Our County is different from Multnomah and Washington County we need to utilize funds to forward the mission of Clackamas County.

We are changing more policies than originally planned due to HOTMA, Housing Opportunities through Modernization Act. As agency we were rushed to align MTW Waivers and HOTMA Final Rule. Changes must be in Admin Plan and ACOP by January 1, 2024. We won't implement all of them until July 1, 2024. Fiscal year is July 1 – June 30 for HACC. For ease and to strategize implementation we need this additional time.

**MTW Asset Building Program Updates:** Elizabeth Miller shared a slide show to review information regarding the Asset Building Program. HUD provided 3 options, Asset Building Program, Rent Reporting option, Housing Authority designed option. We opted for the Housing Authority designed option since we already have the rent reporting program in place.

We already operate a rent reporting (credit building program) which we will be working on expanding to project-based vouchers for properties HACC owns but may not be operating. The homeownership savings account portion will serve 25 clients, there will be eligibility requirements (i.e., annual income, financial education, credit score). Informational Sessions will be held this Fall. Savings account will be similar to Family Self-Sufficiency Escrow Account. Enrollment activities are anticipated to begin by January 2024.

Elizabeth reviewed changes from the original submission of the MTW supplement that were also provided in the Summary document.

**Simplified Rent Calculations – MTW Waivers:** 400 clients per caseload at this time. Not sufficient funding for more Occupancy Specialists. This causes delays in processes and communication.

Simplifying rent calculations will benefit clients. Currently rent is calculated at 30% of income for rent and utilities. If HACC removes deductions, client's burden on this would be a 2% increase, so HACC is reducing amount to 28.5%. Deductions will be removed such as: elderly/disabled allowance, dependent allowance, and medical expenses. Rent eligibility at move-in will be 28.5% – 40% of income. This applies to Public Housing and Voucher clients.

**Updated Income Calculation Changes – HOTMA changes:** Clients sign every year that they don't have assets over \$5,000. Benchmark is now \$50,000. Clients can self-certify assets if they are under \$50,000. This applies to Public Housing and Voucher clients.

Families will not be allowed to receive assistance if they have over \$100,000 in total assets or property ownership in real property where the family could live. This is not an option, a new rule.

Over-income households in Public Housing will be provided a notice to vacate (this will be implemented January 1, 2024). HUD will no longer assist for units where an over-income household is occupying. Currently, HACC has 3 households that will be receiving these notices, and they have been aware of their over-income status.

Earned Income Disallowance (EID) will be ending – effective January 1, 2024. Those who currently have an active EID can utilize the remaining months of the exclusion (safe harbor). This is not an option.

**Alternate Re-Examination Schedule:** For clients where their entire household is on a fixed income and who are elderly/disabled, will be on a triennial review schedule (re-examination). Interims (i.e. rent increases) will be processed, but annual income will not be reviewed until the 3<sup>rd</sup> year.

**Inspection Process Change:** We pay an outside consultant currently to inspect units that we own. With this change we will save money by being able to use an in-house inspector.

#### **Project-Based Voucher (PBV) Program Changes:**

Rent Reasonableness - Removing the costs from having outside consultants complete rent reasonable for units that we own. We will be able to utilize staff to complete this evaluation, a third-party system is utilized for this – the same system used by the consultants.

Limiting Portability - Clients who have a Project-Based Voucher will need to remain in the unit for 24 months before requesting to relocate. There will be exceptions to this rule such as domestic violence or reasonable accommodation.

Eliminating PBV Selection Process - We will have more flexibility in awarding PBVs to our own properties without as much process.

**Tenant Based Voucher Waitlist Changes (general policy change):** HACC has been given special purpose vouchers for several different programs (i.e., RLRA, SPC, FYI). We partner with the Continuum of Care Coordinated Housing Access (CHA), who receive calls from those at risk of homeless or facing homelessness. In aligning these special purpose vouchers with CHA, we will be able to remove the preferences on the waitlist. These preferences will be assisted through the CHA rather than through the tenant based voucher waitlist, and will allow clients who have been on this waitlist to have the opportunity for housing.

HACC will be removing many preferences and adding new preferences to the waitlist, including work-focused households (those who will need less subsidy) and a local preference (those residing in Clackamas County to reduce ports). Will be reviewing the impacts of these preference changes and looking to be sure there are no desperate impacts.

### **Project Based Voucher (PBV) Waitlist Changes:**

Changing from Property general waitlists. PBVs give opportunity to the property but we set criteria for how they can be used. We were finding that having a general waitlist for all the properties was not working well to serve household needs. Some properties are designed to meet the needs of a specific population and it is best to match households to that property that meet the criteria of the population the property is intended to serve. Will be working with referral-based waitlists and site-based waitlists now to help better match households with housing opportunities that meet their needs.

### **Next Steps:**

All comments will be included in RAB attachment and will go to Annual Plan Revision. We will bring it to the Housing Authority Board and for a Public Hearing. All comments will be taken into consideration and the Plan will be revised throughout the engagement period. Final Annual Plan and MTW Revision will go to board approval for final approval and then to HUD for approval.

### **Attachments to the Summary:**

Waivers details, Impact analysis, Hardship policies and Safe Harbor waivers are attached and will be part of the MTW Supplement, Attachment "M" in the Annual Plan.

### **Additional Questions and Answer Time:**

Staff remained to allow residents to ask questions as they would like or folks could also leave if they needed to.

### **Paraphrased Comments, Questions & Answers collected throughout the meeting:**

**Jeremy – Were the office hours reduced? I noticed the email says 6pm but the office door states 5pm close time.**

Erin – Some staff work until 6pm, but the lobby closes at 5pm.

**Misty – Would like to participate but doesn't utilize email, asked for correspondence to be mailed to her.**

Erin - Materials were mailed to RAB members but will send another copy of the materials when sending out the minutes.

**Arnold – Where are you in the review process for the tenant protection vouchers?**

Devin – Hopefully will be receiving feedback from HUD soon granting those vouchers.

**Grace – Where are you at on repositioning the scattered sites and will they be redeveloped or sold?**

Devin – Early phases of planning, creating homeownership opportunities with Resident Services (approx. 25% sell through Community Land Trust). Clients developing IDAs and savings accounts, hoping to allow clients time to save for opportunity of homeownership. Biggest burden on HACC because distance between units, they will be sold, not re-developed. Proceeds will be going towards a new development for housing.

**Jeremy – Are the Clackamas Heights units going to be removed and replaced, if so, will we be relocated?**

Devin – Increase overall number of units, existing units removed and replaced with 200-250 new units. You will have opportunity to relocate with voucher and receive assistance with the process of relocation/cost.

**Darcey – Is OCVM going to be affected by any of this?**

Devin – HACC will be able to provide some of the new units at CH to those that will be relocated when work starts at OCVM. Reposition all of PH, which includes OCVM. It will be the last site to reposition.

**Irisa – Will these relocation vouchers be able to port?**

Devin – Yes, you can port with the voucher.

Toni – Confirmed that this is true, you can port within the entire US.

**Ann – I have a question about the new requirement to work....**

Toni – Clarified that there is not a requirement to work, the title can be deceiving. Will explain more in next portion of meeting.

**Darcey – Concerned about moving and then sharing a wall with someone who is distributing/making drugs.**

Toni – Contact PM/LE if issue so they can address it properly.

**Darcey – Can't we drug test clients?**

Toni – Housing First model through HUD, you house people first. Dry housing is available among specific properties. All must be tested, Fair Housing issue.

**Sara – Shared feedback about how she needs help as she returns to work and has income, she would rather just quit because she can't get ahead, but she has goals to provide home for children.**

Toni – As we go along in this meeting you will hear how you will be helped by these new policies.

Grace – Reach out to Jemila, I was able to pay off debt to HACC by working in the garden and delivering flyers.

**Brian – Will rent reporting be available to voucher clients as well?**

Elizabeth – Yes, some specific sites will participate in rent reporting. Contact Resident Services for more information or if interested.

**Venus – 25 clients per year (Saving Asset Program)?**

Toni – 25 total, we have to see how this goes before expanding it.

**Venus – Can an IDA be coupled with this savings program?**

Toni – Yes, you can combine resources.

**Irisa – It is difficult to find employers that will hire me, and I can only work part-time, are there opportunities for me in these program?**

Toni – Yes, the Family Self-Sufficiency Program has changed and allows for those who can't work full-time to successfully participate.

**Brian – How do I find employment?**

Toni – There are agencies that can assist with job search.

**Brian – Will I still get the money for my electric?**

Toni – Yes, you will still receive an utility allowance.

**Grace – Is this a universal change for all clients in agency? I’m a large household and have multiple children with a disability, removal of the deduction scares me.**

Toni – Yes, it is a universal change. You’ll be included in the hardship (automatic not requested).

**Ann – Finding the term “Moving-to-Work” is confusing. Double checked, found that there are no work requirements so you can scratch that off your worry list.**

Irisa – Perfect.

**Irisa – If I leave Clackamas County by porting, would I lose these changes?**

Toni – It depends on the County you are moving to, you would need to ask them.

**Tami – Can I get a packet mailed to me?**

Toni – Yes, please put your name in the chat if you would like a packet mailed, if you would like it emailed, please note that in the chat.

**Jeremy – So I wouldn’t need to document all of the medical expenses anymore?**

Toni – Correct, it makes it easier for the clients with paperwork.

**Tami – What about moving costs for those who are over-income (Public Housing)?**

Toni – We will be unable to assist with funds to move. Resident Services are working with them to prepare them for the transition.

**Tami – If the head of household has a fixed income (Social Security) but their adult child has wages, can the household be eligible for the triennial review?**

Toni – No, the entire household has to be fixed income.

**Tami – My annual is in September, will that change?**

Toni – No, we made that change last year. Annuals remain the same for Voucher clients.

**Venus – Why are there third-party inspectors now?**

Toni – Many years ago there were landlords that weren’t keeping up their properties and pocketing the funds.

**Brian – Is there a way to make the client stay in Clackamas County with the Voucher for 12 months before porting?**

Toni – Already our policy.

**Venus – Is there outreach to all populations?**

Toni – We have a requirement under RLRA to show statistics that we are making a difference and that our outreach to BIPOC is strong. We are trying to make our systems universal and adding better BIPOC engagement for our programs as well.

**Arnold – When are the Hillside rent statement going to be resumed correctly?**

Toni – Yardi reporting should now be corrected but encouraged residents not to rely on rent statements to remind them to pay their rent as they are not normally provided by market rate landlords.

**Arnold– Do we have a solution for laundry room in the Hillside Park redevelopment plan?**

Toni – We are still working out the location of where it will be located at the site but there is a plan to provide the laundry facilities to residents with a portable laundry truck system.

**Arnold – How quickly will households at Hillside Park be relocated? Is it 5 a month?**

Toni – We are working toward 10 spots at a time or 59 families in first phase of redevelopment so it will take about 5 or 6 months relocate all the families for Phase I.

**Helen – Will the food market continue at Hillside Park during redevelopment?**

Toni – Yes, it will just be moved more towards Hillside Manor.

**Misty - What is timeline of Phase 2?**

Toni – Demolition of phase 1 first also laundry room to be demolished. Phase one will be completely built and then those relocating for phase 2 will have the option of moving into the new units completed in Phase 1.

**Brian – Is Easton Ridge owned by the Housing Authority?**

Toni – Yes, we own it, but a third-party property management company operates it (Quantum). It is a mixed income project that we try to keep affordable in our local property portfolio.

**Brian – Unhappy with the neighborhood he is living in and the Portland creep he sees close to Easton Ridge. Where can he go to get a good rent amount in a better neighborhood? Do you have properties in better neighborhoods.**

Toni – Easton Ridge is located on the boundary with Portland. You may want to look into other Project based opportunities coming online soon such as Good Shepard Village in Happy Valley, Las Flores in Oregon City, development in Lake Oswego or Bear Creek.

**Laura – Concerned about an inspector that made her feel uncomfortable taking pictures of her family room at her unit at Hillside Park. She thought it was creepy.**

Toni – We can and do take pictures if we feel like we have to, but don't typically. HUD takes pictures of everything when they are doing inspections. Taking pictures can show if work has been done or needs to be done.

**Erin to provide materials to those who request by email or by mail along with minutes to all.**

## Attachment O:

### Public Notice & Comments

#### Public Notice - January 6, 2023

A resident meeting to review the **Housing Authority of Clackamas County's (HACC) FY 2023 Annual Plan and Moving to Work (MTW) Supplement 2023** is scheduled for January 25, 2023 at 10am via Zoom (<https://clackamascounty.zoom.us/j/81456406707?pwd=dHZRTXpOa0ZpaGEzRi93ZFNxZm4wZz09>). Resident Advisory Board members and residents are encouraged to attend. In addition, a Public Hearing regarding the Annual Plan & MTW Supplement 2023 is scheduled for March 16, 2023 at 10am in person and via zoom. All residents are welcome to provide comment by registering 5 minutes prior to the meeting time online or in person. Meeting links and additional information can be found at <https://www.clackamas.us/housingauthority/housing-authority-of-clackamas-county-board>. Written comments may be submitted via email to: [EFernald@clackamas.us](mailto:EFernald@clackamas.us). The meeting will be livestreamed and archived on the County YouTube Channel. 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 Annual Plan & MTW Supplement will be available for review from January 30 – March 20, 2022 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 March 16, 2023

*Video of the hearing can be found at: <https://youtu.be/ZCyvAIAptM8>*

Toni Karter, Interim Executive Director, gave a presentation regarding the 2023 Annual Plan and MTW Supplement which is lightly summarized below – see video for full detail.

Outlined the Requirements from HUD for the Annual Plan and Supplement.

Explained the purpose of the Annual Plan and Supplement

The Plan highlights achievements and new activities.

Reviewed the timeline for Annual Plan and where the draft plan was posted. Comment period to end 3/20/22.

Resident engagement and comments are detailed in the plan attachments

Policy changes are detailed in the plan. Highlighted changes towards our goals of:

- Reducing screening barriers and compliance requirements for clients – reduce need of “original documents”
- Reduce risk of homelessness between moves – allowing limited overlap of rent during moves.
- Increase housing stability overall - mostly in Public Housing through HOTMA option using an alternate rent. If over income, they will pay a higher rent. Even if at 80% AMI, folks are at risk of homelessness. This allows the households to stay housed in our difficult market and provides additional income for the Housing Authority.



Capital Fund spending outlined in attachments

Audit – will be updated from the posted draft to the newest audit which was just completed recently (after this was posted). Findings will be added, and the information about our plan of action included.

MTW – MTW status adds more funding flexibility. Discussed with our residents and drafted the MTW supplement to start slow on implementing changes. Focused on self-sufficiency activities - credit building and savings accounts (for our Asset Building Cohort) this year. We will be reviewing more policies and engaging with residents before adding more changes for MTW until next year.

Next steps:

Open for additional comments and questions until 4/20/23.

New regulations (HOTMA) – may require revisions of our plan mid-year. We will bring it back later as needed once we understand the impacts of the new regulations fully.

Bringing back April 4<sup>th</sup> and then for approval on consent agenda April 6<sup>th</sup>.

Submission to HUD by April 13<sup>th</sup>.

*Questions and staff answers summarized. Text in () was added for clarification or from staff after the hearing.*

(Public hearing opened).

Commissioner comments/questions were called for first.

**Q: With the ~ 30M in funding from HUD, have we targeted rural area?**

Staff A:– the Housing Choice Voucher allows anyone in the program to choose where they want to live so they can use them in the rural areas. If we look at our stats, majority of clients are not living in the rural areas.

**Q: Is any of the money being used in the southern cities such as Sandy Estacada, Molalla, Sandy, Colton or even Canby.**

Staff A: We are using money in all those areas, yes.

**Q: There are a lot of apartment buildings coming online in those areas (Sandy, Estacada, Molalla, Sandy, Canby) but are all those market rate?**

Staff A: We have a new complex called Molalla apartments that will be affordable housing and there are some units in those that we will be subsidizing.

**Q: Is that on Highway 211?**

Staff A: I am not sure of the exact address.

**C: That is okay. That is good to know though as there is a great need for that.**

**Q: You say you are subsidizing some of those units and that is fine as it reduces homelessness but is rent assistance part of this too?**

Staff A: Yes.

**C: Rent Assistance is a very worthy goal, too.**

Staff A: (Staff agrees)

**Q: We are moving from owning public housing, is that correct?**

Staff A: Yes

**Q: We build units but they are only affordable for a certain number of years and then they revert back to market rat, correct?**

Staff A: Yes, there is a 30 year required affordability period and then you can renew that. As a Housing Authority and our mission, we would renew for all our properties. There are some properties that are not Housing Authority owned that are coming up for renewal, they have met their 30-year term. There is a first right of refusal for those if they stay affordable, someone else like a non-profit, buys it to keep it affordable or go back to private market which is tracked through the state.

**Q: So you as the owner of those properties, will renew. Do we track how many (of these properties) move into the unaffordable category (back to the private market)?**

Staff A: The state does that.

**Q: Is it possible to get that information and is that happening in our County to a great degree or not?**

Staff A: It happens in all counties, and we have gotten notices from the state when they think one is coming up to the deadline (30 years). They usually give us a few years in advance so everyone has the opportunity to think about do we have the funds, how do we get the funds, can we take over on this property. They also notify us if they have a good lead on someone. Notices come to the Housing Authority, and they notify us if they think they have someone who wants to keep it affordable so we don't have to take it on, we can just support that entity.

**C/Q: You mentioned the new plan will reduce screening barrier, how will that effect our Clackamas County residents/citizens who are in need of housing support. Also let me add: This last month, the Oregon Health Authority mentioned that are 62,000 people in Oregon needing food support that were not federally recognized and therefore the State could not give them that support. Question is, we have a considerable amount of poverty in Clackamas County and we have a lot of people who need housing support, so does the reduction of screening barriers like you mentioned, will that harm or help the residents of this county?**

Staff A: That will help. Right now, we are denying clients who cannot meet basic document requirements, we are denying clients because of criminal background screening criteria and the federal government really only requires us to deny someone if they are a sex offender, have manufactured meth in public housing before and we are going down to that bar. We are also required to screen out someone if they have been assisted in other federal assistance and have done program violations – up to 7 years is what our policy was and we are reducing that to 3 years so if they haven't done anything wrong in the past 3 years we are not denying them. We are opening the door wider instead of making it more narrow.

**Q: Is there a waitlist for affordable housing and supportive housing? And how long is it?**

Staff A: Each property is different --- (for Housing Authority properties)

**C: No, I want total amount in Clackamas County. I heard it at one time it was 8000 people and that is very dated.**

Staff A: Yes, and it has been 3-5 years that people sit without assistance.

**Q: Will this 30M (annual funding from HUD to the Housing Authority) reduce the time on the waitlist?**

We hope so.

**Q: Are there other projects online, coming aboard that will help reduce the time on the waitlist for people and how many units is that?**

Staff A: Absolutely. All of our developments in the pipeline, our goal is to get 1500.

**C/Q: So there is probably 800-500 online to help reduce that.**

Staff A: Correct and by the end of next year almost 500 new ones are coming online.

**C: Great thank you.**

**C/Q: Conversations like this remind me how much paperwork and administration it costs to manage these programs and dollars and I am not looking for an answer, but I always wonder what the cost is to administer every federal dollar and cost to administer every state dollar, and local dollars when it come to these. supportive housing services or whatever it may be. Contract administration requires people and time and dollars. I am anxiously awaiting the numbers on the Point in Time Count to see if we are gaining any traction. I would think it would be. hopefully it looks hopeful that we are making ground. If the point and time count shows our housing population growing when we are building and buildings throughout the region, I am not sure what we are going to do.**

Staff A: Meeting yesterday with Vahid Brown draft numbers (not final numbers but preliminary) are down.

**C: Okay good**

Staff A: We are very excited about that.

**Q: When will we be privy to that information?**

Staff A: I am not sure, but they are looking over the numbers now and it is a draft

**Q: That is interesting and barres a larger conversation that I have been having regionally and statewide, so I need to know that. Thank you very much.**

**Call for other public commenters in the room that want to speak**

No additional people in the room to speak regarding the Annual Plan or Supplement

No additional people online to speak regarding the Annual Plan or Supplement

Public hearing closed

**Additional comments/questions collected from the public comment period ending 3/20/23:**

**C: No comments received by email or phone. No further comments from residents.**

A: Would like to work on further public engagement activities next year.

**Staff feedback:**

**Q: How many changes will come with MTW this first year?**

A: We are taking it slowly this year and just doing the minimum for our cohort. We will engage with stakeholders, staff, residents, etc. more over the next year to incorporate more waivers in following years. We need to fully understand our options and there was not enough time in our short time frame for the Annual Plan cycle.

**Q: An audit was completed between draft posting and final submission to HUD. Will we be updating the plan to include the new audit findings and action plan.**

A: Yes, the new audit information will be updated for the final version of the Annual Plan and Supplement is submitted for board approval. The change was mentioned in the public hearing, as well.

**Q: Double check the HOTMA required changes that take effect for Public Housing on June 14 – have we chosen alternate rent or termination option for over income families.**

A: We included language in the draft, in our presentation to the RAB, and in the public hearing saying we would use the alternate rent option and would adopt the final rule language in our ACOP. Staff is working on fully updating the ACOP for changes required in section 103 and will post the fully updated to HOTMA requirements version by June 14, 2023 implementation.

---

**2023 Annual Plan and MTW Supplement Mid-year Revision**

**July 28, 2023 – Public Notice in the Oregonian**

**Public notice for 2023-24 Annual Plan Revision Meetings**

A resident meeting to review the Housing Authority of Clackamas County's (HACC) revisions to the 2023 Annual Plan and Moving to Work (MTW) Supplement is scheduled for August 8, 2023 at 10am via Zoom. Resident Advisory Board members, residents and the public are encouraged to attend. Email [efernald@clackamas.us](mailto:efernald@clackamas.us) to register. In addition, a Public Hearing regarding the revisions to the 2023 Annual Plan & MTW Supplement is planned for 9/21/23 at 10am in person and via zoom. Meeting links, materials, and any schedule changes may be found at: <https://www.clackamas.us>. All residents and the public are welcome to attend both meetings and to provide comment for consideration. Written comments may be submitted to: [efernald@clackamas.us](mailto:efernald@clackamas.us). 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 Revisions of the 2023 Annual Plan & MTW Supplement will be available for review from 8/10/23-9/25/23 at: <https://www.clackamas.us/housingauthority/plansandreports>, 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 during open hours.

## **Public Comments from Public Hearing on September 21, 2023**

*Video of the hearing can be found at: <https://youtu.be/hlOoxNcaCiE>*

Q: Shull – With these changes you mentioned there would be a cost savings on money paid out to contractors, but can you do that without adding additional FTE?

Answer: Yes

Q: Shull – How do you go about ensuring Clackamas County residents get priority on housing placement?

Answer: When doing an application or coordinated housing access entry they are asked where they are from and where they are coming from. That is the place we would check on the Clackamas County residency.

No additional comments/questions from the public hearing were received.

### **Other Feedback received during public comment period ending 9/25/23:**

Note: The public was invited and encouraged to attend the RAB meeting as well as the public hearing. Notes from the RAB meeting are included in Attachment J.

Q: Attachment F: Substantial Deviation and Significant Amendment was confusing about which circumstances pertained to which type of plan and required Capital Fund Program language was missing.

A: Staff reorganized the structure and updated language for the Capital Fund Program section for clarity and added new required language in Attachment F.