

March 31, 2022

Housing Authority Board of Commissioners  
Clackamas County

Members of the Housing Authority Board:

Adoption of Resolution #1963 approving the Housing Authority of Clackamas County (HACC) 5-Year Plan for FY 2022-2027 and the authorization of HACC to submit the plan to the United States Department of Housing and Urban Development (HUD) in compliance with HUD regulations.  
County General Funds are not involved.

<b>Purpose/Outcomes</b>	Adoption of Resolution #1963 approving the HACC 5-Year Plan for submission to HUD. The 5-Year Plan is required for ongoing HUD funding of HACC programs.
<b>Dollar Amount and Fiscal Impact</b>	HUD funding of HACC programs is approximately \$24 Million annually
<b>Funding Source</b>	United States Department of Housing and Urban Development (HUD)
<b>Duration</b>	July 1, 2022-June 30, 2027
<b>Previous Board Action/Review</b>	3/3/22 – Memo sent to Board members with draft plans for review 3/8/22 – Notice of Public Hearing at Issues 3/24/22 – Public Hearing
<b>Strategic Plan Alignment</b>	1. Build Public Trust through good government – The 5-Year Plan provides transparency regarding the goals of the Housing Authority.
<b>Counsel Review</b>	N/A
<b>Procurement Review</b>	1. Was the item processed through Procurement? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> 2. If no, provide brief explanation: This item does not require procurement. It is only a reporting requirement for HUD.
<b>Contact Person</b>	Toni Karter, Interim Executive Director, Housing Authority 503-650-3139
<b>Contract No.</b>	Resolution #1963

**BACKGROUND:**

The Housing Authority of Clackamas County (HACC), a Division of the Health, Housing and Human Services Department, requests the adoption of Resolution #1963 to approve the submission of HACC’s 5-Year Plan for FY 2022-2027 and ensure ongoing HUD funding for HACC programs.

Every five years, HUD requires Housing Authorities to complete a 5-Year Plan to outline the goals the Authority for the next five years. These goals are used to measure the progress of the Authority in meeting their mission in subsequent Annual Plans.

Elements of the 5 Year Plan for a Public Housing Authority (PHA):

- General information regarding the PHA
- Mission Statement
- Goals and Objectives

- Progress Report
- Violence Against Women Act (VAWA) Statement
- Affirmatively Furthering Fair Housing (AFFH) goals
- Resident Advisory Board Engagement
- Public Hearing Attachment
- Other required certifications and documentation
- Additional optional attachments for supporting documentation

The Housing Authority 5-Year Plan Timeline:

- Fall/Winter 2021 – Plan Development
- January 2, 2022 – Public Notice in the Oregonian regarding our resident Advisory Board Meeting, Plan Draft availability, and Public Hearing.
- January 11, 2022 – Resident Advisory Board Meeting
- January 17 - March 6, 2022 – Draft Plans available for Public Review
- March 8, 2022 – Notice of Public Hearing at Issues session
- March 24, 2022 – Public Hearing
- March 31, 2022 – Consent Agenda - adopt Resolution #1963 to approve the HACC 5-Year Plan for FY 2022-2027 and authorize HACC to submit the plan to HUD.
- April 14, 2022 – the last business day of the Housing Authority for submission of the plan, to allow the required HUD comment period of 45 days prior to the plan effective date of July 1, 2022.

**RECOMMENDATION:**

HACC staff recommends the adoption of Resolution #1963 approving the Housing Authority of Clackamas County (HACC) 5-Year Plan for FY 2022-2027 and authorizing HACC to submit the plan to the United States Department of Housing and Urban Development (HUD) in compliance with HUD regulations.

Respectfully submitted,

*Rodney Cook*

Rodney A. Cook, Director  
Health, Housing and Human Services

# Housing Authority of Clackamas County (HACC)

## 5-Year Plan 2022-2027



**Effective July 1, 2022-June 30, 2027**

**HACC Interim Executive Director: Toni Karter**



# Housing Authority of Clackamas County

## 5-Year Plan FY 2022-2027 - Effective 7/1/22-6/30/27

### Table of Contents

HUD FORM 50075-5Y: PHA 5-YEAR PLAN .....	3
ATTACHMENT A: SUMMARY OF ADMIN PLAN POLICY CHANGES.....	10
ATTACHMENT B: PUBLIC HOUSING ADMISSIONS & CONTINUED OCCUPANCY POLICY UPDATES ....	11
ATTACHMENT C: STATEMENT OF HOUSING NEEDS .....	14
ATTACHMENT D: DECONCENTRATION POLICY .....	19
ATTACHMENT E: VIOLENCE AGAINST WOMEN ACT STATEMENT .....	20
ATTACHMENT F: SUBSTANTIAL DEVIATION & SIGNIFICANT AMENDMENT/MOD. STATEMENT. ....	21
ATTACHMENT G: FINANCIAL RESOURCES .....	22
ATTACHMENT H: CAPITAL FUND PROJECTS AND BUDGET SUMMARY.....	25
ATTACHMENT I: CAPITAL FUND ANNUAL STATEMENT (HUD-50075.1).....	26
ATTACHMENT J: RESIDENT ADVISORY BOARD MEMBERS, MEETING MINUTES & COMMENTS .....	32
ATTACHMENT K: CERTIFICATION BY STATE AND LOCAL OFFICIALS (HUD-50077-SL) .....	38
ATTACHMENT L: CIVIL RIGHTS CERTIFICATION/CERTIFICATION LISTING (HUD-50077-ST-HCV-HP)..	39
ATTACHMENT M: PUBLIC NOTICE & PUBLIC COMMENTS .....	41
ATTACHMENT N: BOARD RESOLUTION FOR 5-YEAR PLAN.....	43

<b>5-Year PHA Plan (for All PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 03/31/2024</b>
---	---	--

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

**Applicability.** The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

<b>A.</b>	<b>PHA Information.</b>														
<b>A.1</b>	<p><b>PHA Name:</b> <u>Housing Authority of Clackamas County</u> <b>PHA Code:</b> <u>OR001</u></p> <p><b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2022</u>  <b>The Five-Year Period of the Plan (i.e. 2019-2023):</b> <u>2022-2027</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <ol style="list-style-type: none"> <li>1) Housing Authority Administrative Office, 13930 S Gain Street, Oregon City, OR 97045</li> <li>2) Housing Authority Clackamas Heights Property Management Office, 13900 S Gain Street, Oregon City, OR 97045</li> <li>3) Housing Authority Hillside Property Management Office, 2889 Hillside Court, Milwaukie, OR 97222</li> <li>4) Housing Authority Website: <a href="http://www.clackamas.us/housingauthority/plansandreports.html">http://www.clackamas.us/housingauthority/plansandreports.html</a></li> <li>5) Clackamas County Public Library located at 16201 S.E. Mcloughlin, Oak Grove, OR 97222</li> <li>6) Resident Advisory Boards (RAB) Members receive a full draft Annual Plan to review in detail at the RAB meeting.</li> <li>7) RAB Members received a summary of policy changes (hard copy) to hand out to other residents</li> </ol> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)</p> <table border="1" data-bbox="212 1249 1471 1440"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:					
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program							
		PH	HCV												
Lead PHA:															
<b>B.</b>	<b>Plan Elements.</b> Required for <u>all</u> PHAs completing this form.														
<b>B.1</b>	<p><b>Mission.</b> State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.</p> <p>The mission of the Housing Authority of Clackamas County is to provide and develop affordable housing with supportive services for individuals and families on their path to improved health, wellness, prosperity and inclusion. In order to sustain these services, we prioritize equitable service delivery, financial sustainability, and thriving partnerships to ensure our long term viability.</p>														

<p><b>B.2</b></p>	<p><b>Goals and Objectives.</b> Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <p>PHA specific and AFH goals &amp; strategies (includes goals and strategies in Section D.1):</p> <p><b>PHA Goal 1 – Improve the quality of Housing Authority assisted housing and customer service</b>  PHA Strategy 1.a – Maintain high performer status in Section 8  PHA Strategy 1.b – Improve access by making remote access options available for program intake, payments and signatures.  PHA Strategy 1.c – Continue robust client feedback system for continued service improvements.  PHA Strategy 1.d - Engage in capital fund rehabilitation projects to maintain units.  PHA Strategy 1.e – Continue ongoing staff training and cross-training to continue</p> <p><b>PHA Goal 2 – Improve community quality of life and economic vitality</b>  PHA Strategy 2.a – Continue Resident Services programs through partnerships with community groups &amp; service providers to build community and meet resident needs including food insecurity and those affected by COVID-19.  PHA Strategy 2.b – Encouraged Resident participation through resident associations and surveys to access housing needs.</p> <p><b>PHA Goal 3 – Promote self-sufficiency and asset development of families and individuals</b>  PHA Strategy 3.a - Continue to partner with local &amp; regional workforce partners to increase the number of employed/under-employed living in housing  PHA Strategy 3.b - Partner with agencies to provide supportive services including outreach, housing stabilization, and fostering independence for voucher program participants and work to expand self-sufficiency and supportive services programs to public housing residents.  PHA Strategy 3.c - Continued to offer a Credit Building Program for our Public Housing residents to support residents in their goals of becoming more financial stable and self-sufficient.</p> <p><b>Fair Housing Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County</b>  AFH Strategy 1.A. - Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition, reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units and ensure that those units will last for years to come.  AFH Strategy 1.B - Maximize the number of households receiving long term and short-term rental assistance from local, state and federal programs.</p> <p><b>Fair Housing Goal 2: Expand fair housing outreach, education, and enforcement</b>  AFH Strategy 2.A. - Increase fair housing education for staff, landlords &amp; community partners.  AFH Strategy 2.B. - Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions.  AFH Strategy 2.C. - Work in collaboration with partners to enforce fair housing law.</p> <p><b>Fair Housing Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes.</b>  AFH Strategy 3.A - Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.  AFH Strategy 3.B - Minimize barriers to ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes.</p>
-------------------	--

**B.3**

**Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

**PHA Goal 1: Develop new housing units with long-term affordability for a broad range of low-income households with an emphasis on dispersal of affordable housing by:**

- Awarded 41 Emergency Housing Vouchers (EHV)
- Applied for and received 20 additional Mainstream vouchers
- Applied for and received 50 Foster to Youth Initiative (FYI) vouchers
- Continuing to leverage private and/or other public funds to create additional housing opportunities
- Conducted a strategic portfolio review to consider recommendations for the rehabilitation, disposition, or redevelopment of existing Public Housing properties.
- Continued planning for the utilization of RAD and/or Demolition/Disposition Section 18 to improve & increase number of affordable units
- Construction of the Rosewood Station project was completed in March 2021. This project includes a total of 212 affordable units - 20 of the units are supported by PBVs.
- The rehabilitation of Hillside Manor was completed in September 2021. This RAD/Section 18 blend project closed on construction financing in May 2020.
- The Hillside Park Master plan approved by Milwaukie Planning Commission and is going to City Council for formal adoption mid- November 2021. HACC plans to submit the Section 18 Disposition application for Hillside Park Public Housing to HUD in early 2022.
- Construction financing for the Fuller Road Station project closed in April 2021. Construction is underway with completion slated for Fall 2022. The Fuller Road Station project was awarded Metro Bond Funding in response to HACC's 2020 NOFA. The property will include 100 new units that will serve low income families, including 25 units of permanent supportive housing. Funding for the project includes Metro Affordable Housing Bonds, 4% LIHTC, Metro TOD, County HOME funds, tax-exempt bonds and permanent debt. 25 units will be supported by PBVs.
- Construction financing for the Webster Road Redevelopment project closed in June 2021. Construction is underway with completion slated for July 2022. The Webster Road redevelopment consists of 48 units that will serve extremely low income and homeless individuals age 50 and older. Funding for the project includes Metro Affordable Housing Bonds, 4% LIHTC, PSH capital funds, County HOME funds, tax-exempt bonds and permanent debt. All 48 units will be supported by PBVs.
- In 2020, HACC awarded a total of \$42,803,000 in Metro Affordable Housing Bonds and 125 project-based vouchers to three projects proposed for development in Happy Valley (Good Shepherd Village), Oregon City (Maple Apartments), and unincorporated Clackamas County (Fuller Road Station). These three projects will provide a total of 414 units, of those 153 units will be reserved households at or below 30% AMI. Fuller Road station is currently in construction and Good Shepherd Village and Maple Apartments are slated to close on construction financing in the first quarter of 2022.
- HACC conditionally awarded 8 VASH vouchers, contingent on a LIFT-funding award, to the Molalla Apartments project - a proposed 60 unit affordable housing project located in Molalla.

**PHA Goal 2: Improve access & housing choice for everyone, with a focus on protected classes and single parent households by:**

- Provided voucher mobility counseling to live in areas near schools, work and care providers.
- Conducted outreach efforts to potential voucher landlords by doing newsletters, Fair Housing Trainings, and educational outreach about our program offerings.
- Revised payment standards to reduce the barriers to finding affordable housing and now offer two different area payment standards one for general Clackamas County and one for higher rent areas: Lake Oswego, West Linn, Wilsonville and Happy Valley.
- Continuing our security deposit loan program for Section 8 families
- Provided higher payment standards for families needing ADA units. Maintain a list of ADA units within the County to assist families seeking housing
- Advertise in culturally diverse media to promote access to program wait lists to protected classes.
- Established partnerships with service providers that work with protected classes and single parent households.
- Established working Memorandums of Understandings (MOUs) with the CoC and DHS to successfully apply for new funding for Mainstream Vouchers, Emergency Housing Vouchers and Foster Youth to Independence Vouchers.
- Preferences for homeless and disabled maintained.
- Project Basing vouchers to developments that serve high barrier households.

**PHA Goal 3: Enforce Fair Housing Laws and Increase public understanding of Fair Housing laws by:**

- HACC hosted free Fair Housing and Landlord Tenant Law trainings and plans to continue hosting free training
- Strengthened the partnership with Fair Housing Council of Oregon and continued distributing fair housing information
- Continued to partner with Housing Rights & Resources Program
- We offer training at Metro Multifamily and other Landlord Group Meetings on the Benefits of Rental Assistance
- Distributed Fair Housing Videos and Information to landlords participating in Section 8 through Landlord newsletter.

- Continuing to educate clients on Fair Housing Rights & provide Fair Housing brochures at Orientation meetings
- Continued attending State subcommittee meetings on Renters Rights and other nonprofit Renter Rights Advocacy Groups
- Aligned our 5-year plan with the County's 5-year Consolidated Plan & completed the Assessment of Fair Housing plan
- No outstanding FHEO findings
- Conduct trainings for staff on Fair Housing and Diversity Equity and Inclusion

**PHA Goal 4: Improve the quality of Housing Authority assisted housing and customer service by:**

- Maintained high performer status in Section 8
- Established remote access with zoom and phone intakes
- In process of converting to YARDI Café to offer online forms, signature ability and payments
- Streamlined administrative operations, creating efficiencies and improving customer service
- Continued to maintain a robust client feedback system, with managers continuous review of feedback, making adjustments as needed
- Completed 126 capital fund rehabilitation projects.
- Developed strategies and workflows for cross training staff to ensure we provide the highest level of service to clients we serve.
- Attend RAD & LIHTC Compliance Trainings for new developments scheduled to come on line in 2021
- Staff training on Diversity, Equity and Inclusion (DEI) via Alanna Hein, required all staff to attend Mental Health First Aid Training Trauma Informed Care workgroup, Domestic Violence Training and Fair Housing Training

**PHA Goal 5: Improve community quality of life and economic vitality by:**

- Partnered with Youth Service Providers to provide outdoor community building services to school aged youth
- Developed stronger partnerships with service providers who assist our elderly and/or disabled residents
- Continued to grow the community gardens program, including doubling the number of garden beds at our Hillside Manor property, many of the beds are taller, to accommodate residents who have mobility challenges
- Applied for and received funding from Clackamas County Behavioral Health to rebuild garden beds at Clackamas Heights and replaced fence that surrounds the garden
- Third year hosting an Americorps member, who is focused on the community gardens and food insecurity within the Public Housing community
- Encouraged Resident participation through Resident Associations
- Contracted with Clackamas County Social Services and other resident service providers to provide a variety of Public Housing services using county provided general fund including 1 FTE Case Manager, 1.5 FTE Peer Support Specialist and 1 FTE additional resident services support staff.
- Developed strong partnership with Public Health to support affected by COVID-19
- Applied for funds through Clackamas County Behavioral Health to provide food resources to residents who were quarantined during the pandemic
- Expanded food distribution partners, to be able to deliver food to residents through three emergency declarations (Ice Storm, Wild Fires, and COVID-19)
- In process of expanding partnership with Oregon Food bank to turn space in a HACC owned building into a food pantry.
- Deployed a housing needs survey to all Public Housing and Section 8 residents (sent by email and mail), in partnership with our workforce agencies, social service agency and transportation agency.

**PHA Goal 6: Promote self-sufficiency and asset development of families and individuals by:**

- Continue to partner with local & regional workforce partners to increase the number of employed/under-employed living in housing
- Partnered with agencies to provide supportive services to increase independence for the elderly and families with disabilities
- Awarded Resident Opportunities Self Sufficiency (ROSS) grant.
- Applied for and received renewal funding for the Family Self Sufficiency (FSS) grant
- Research and apply for future grants that provide services and enhance residents' quality of life
- Established Memorandum of Understandings with area service agencies to provide outreach and housing stabilization services for families referred for Housing Choice Vouchers and Mainstream Vouchers.
- Continued to offer a Credit Building Program for our Public Housing residents. If residents elect to enroll, HACC reports on-time rent payment, to the Credit Bureau's through a third party. This has been an effective way to support residents in their goals of becoming more financial stable and self-sufficient.
- Expanded the Family Self Sufficiency program to include outreach and enrollment to Public Housing residents
- Continued to enroll residents in the ROSS program



<p><b>B.4</b></p>	<p><b>Violence Against Women Act (VAWA) Goals.</b> Provide a statement of the PHA’s goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>See Attachment E: Violence Against Women Act Statement</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<p><b>Significant Amendment or Modification.</b> Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>See Attachment F: Significant Amendment or Modification Statement</p>
<p><b>C.2</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>See Attachment J: Resident Advisory Board Meeting Minutes &amp; Comments</p>
<p><b>C.3</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD-50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment K: Certification by State and Local Officials (HUD-50077-SL)</p>
<p><b>C.4</b></p>	<p><b>Required Submission for HUD FO Review.</b></p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y   N  <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p> <p>See Attachment M: Public Notice and Public Comments</p>

**D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)**

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

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

*Describe fair housing strategies and actions to achieve the goal*

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

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

*Describe fair housing strategies and actions to achieve the goal*

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

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

*Describe fair housing strategies and actions to achieve the goal*

- A. Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.
- B. Minimize barriers to ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes.

## Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

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

**A.1** Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **Five-Year Period** that the Plan covers, i.e. 2019-2023, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

**PHA Consortia:** Check box if submitting a Joint PHA Plan and complete the table.

### B. Plan Elements.

**B.1 Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR § 903.6(a)(1))

**B.2 Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR § 903.6(b)(1))

**B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. (24 CFR § 903.6(b)(2))

**B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

### C. Other Document and/or Certification Requirements.

**C.1 Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32, REV 2.

#### C.2 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB have comments?

(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR § 903.17(b), 24 CFR § 903.19)

#### C.3 Certification by State or Local Officials.

[Form HUD-50077-SL](#), *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

#### C.4 Required Submission for HUD FO Review.

Challenged Elements.

(a) Did the public challenge any elements of the Plan?

(b) If yes, include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

### D. Affirmatively Furthering Fair Housing.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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

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

---

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

**ATTACHMENT A**

**Summary of Proposed Housing Choice Voucher Administrative Plan Policy Changes Effective Upon Board Approval**

<b>Chapter</b>	<b>Old Policy Language</b>	<b>New Policy Language</b>	<b>Summary</b>
<b>6-III.A</b>	<p><b>Minimum Rent [24 CFR 5.630]</b>  <u><b>HACC Policy</b></u>                      The minimum rent for this locality is \$50. The minimum rent does not apply to SPC, PBV or VASH. Tenant Based Rental Assistance awarded with HOME funds shall follow State minimum rent \$10.</p>	<p><b>Minimum Rent [24 CFR 5.630]</b>  <u><b>HACC Policy</b></u>                      The minimum rent for this locality is \$0. If HACC is awarded Tenant Based Rental Assistance (TBRA) with HOME funds, it shall follow State minimum rent \$10.</p>	<p><b>Removing minimum rent. This adjustment will be done July 1, 2022 for all families impacted by minimum rent.</b></p>
<b>6-III.A.</b>	<p><u><b>HACC Policy</b></u>                      HACC will make utility reimbursements to the family.</p>	<p><u><b>HACC Policy</b></u>                      HACC will make utility reimbursements to the family or at the request of the family can make the reimbursement directly to the electric company.</p>	<p><b>Adding direct payment to electric company as has proven very effective for families to keep power bills paid.</b></p>
<b>9-I.G.</b>	<p><b>9-I.G. HAP CONTRACT EXECUTION [24 CFR 982.305]</b>  <u><b>HACC Policy</b></u>                      The start date on the contract will be the later of: the day after the unit passes inspection, the lease start date. The lease agreement must be signed by both landlord and tenant and the term must be at least 12 months.</p>	<p><b>9-I.G. HAP CONTRACT EXECUTION [24 CFR 982.305]</b>  <u><b>HACC Policy</b></u>                      The start date on the contract will be the later of: the day the unit passes inspection, the lease start date. The lease agreement must be signed by both landlord and tenant and the term must be at least 12 months unless the landlord specifically requests a shorter lease term.</p>	<p><b>Removing a day of delay in executing lease by removing the rule that can only start lease the day AFTER unit passes inspection and can now start the day it passes inspection. Also allows landlords to align lease terms upon request.</b></p>

## Attachment B

### Summary of Proposed Admissions and Continued Occupancy Plan Policy Changes Effective Upon Board Approval (ACOP)

Chapter 6	Old Policy Language	New Policy Language	Summary
<p>6-I.E</p> <p>Earned Income Disallowance</p>	<p>Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member’s current income with his or her baseline income. The family member’s baseline income is his or her income immediately prior to qualifying for the EID. The family member’s baseline income remains constant throughout the period that he or she is participating in the EID.</p>	<p>Calculation of the Disallowance, additional details:</p> <p>Household members under the age of 18 who are employed and continue in the same position (or continue to be employed) after turning 18 may qualify for the EID if they are not currently enrolled in school full-time.</p> <p>If they remain enrolled in school full-time after turning 18, they will qualify instead for the student allowance where only \$480 of their income per year is counted towards the household’s income (Employment income above \$480/year is excluded [24 CFR 5.609(c)(11)]).</p> <p>If they discontinue full-time student status, they will then be eligible for the EID for the full two-year eligibility period after student dis-enrollment. The EID will run continuously for the full 24 month program regardless of whether or not student status changes. If member goes back to school and chooses to go back to the student status allowance they may, but the EID time clock will not stop.</p>	<p>Added clarification to old policy</p>
<p>Chapter 6</p> <p>6-III.A</p> <p>Minimum Rent</p>	<p><b>Old Policy Language</b></p> <p>MIMIMUM RENT [24 CFR 5.630]</p> <p>HACC Policy</p> <p>The minimum rent for this locality is \$50.00.</p>	<p><b>New Policy Language</b></p> <p>MIMIMUM RENT [24 CFR 5.630]</p> <p>HACC Policy</p> <p>The minimum rent for this locality is \$0.00.</p>	<p><b>Summary</b></p> <p>Removing from the ACOP as it poses a barrier to housing stabilization for zero income families.</p>

Chapter 6	Old Policy Language	New Policy Language	Summary
<p>6-III.B</p> <p>Financial Hardships</p>	<p>FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]</p> <p><u>HACC Policy</u></p> <p>The financial hardship rules apply in this jurisdiction because HACC has established a minimum rent of \$50.00.</p>	<p>FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]</p> <p>HACC Policy</p> <p>Remove Section</p>	<p>Remove Financial Hardship language since Minimum Rent is being lowered to \$0.00</p>
<p>Chapter 10</p> <p>10-II.C</p> <p>Pet Restrictions</p>	<p><b>Old Policy Language</b></p> <p>Pet Restrictions</p> <p>HACC Policy</p> <p>The following animals are not permitted:</p> <p>Any animal whose adult weight will exceed 30 pounds. Dogs of the Pit Bull, Rottweiler, Chow, Doberman Pincher or Boxer breeds. Ferrets or other animals whose natural protective mechanisms pose a risk to small children of serious bites or lacerations. Any animal not permitted under state or local law or code.</p> <p>Number of Pets</p> <p>Residents may own a maximum of 2 pets, only 1 of which may be a dog. In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 10 gallons. Such a tank or aquarium will be counted as 1 pet.</p>	<p><b>New Policy Language</b></p> <p>Pet Restrictions</p> <p>HACC Policy</p> <p>The following animals are not permitted:</p> <p>Any animal whose adult weight will exceed 25 pounds. Dogs of the Pit Bull, Rottweiler, Chow, Doberman Pincher or Boxer breeds. Ferrets or other animals whose natural protective mechanisms pose a risk to small children of serious bites or lacerations. Any animal not permitted under state or local law or code</p> <p>Number of Pets</p> <p>Residents may own a maximum of 2 pets, only 1 of which may be a dog. In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 20 gallons. Such a tank or aquarium will be counted as 1 pet.</p>	<p><b>Summary</b></p> <p>Change weight limit and size of tank limit.</p>

Chapter 16	Old Policy Language	New Policy Language	Summary
<p>16-I.A. Setting Utility Allowances</p>	<p>PHAs must establish allowances for PHA-furnished utilities for all check metered utilities and for resident-purchased utilities for all utilities purchased directly by residents from a utility supplier [24 CFR 965.502(a)]. PHAs must also establish surcharges for excess consumption of PHA-furnished utilities [24 CFR 965.506]. HACC must maintain a record that documents the basis on which utility allowances and scheduled surcharges are established and revised, and the record must be made available for inspection by residents [24 CFR 965.502(b)].</p>	<p>PHAs must establish allowances for PHA-furnished utilities for all check metered utilities and for resident-purchased utilities for all utilities purchased directly by residents from a utility supplier [24 CFR 965.502(a)].</p> <p>PHAs must also establish surcharges for excess consumption of PHA-furnished utilities [24 CFR 965.506].</p> <p>HACC must maintain a record that documents the basis on which utility allowances and scheduled surcharges are established and revised, and the record must be made available for inspection by residents [24 CFR 965.502(b)]. <a href="https://www.clackamas.us/housingauthority/section8.html">https://www.clackamas.us/housingauthority/section8.html</a>; “Calculating Your Utility Allowance”.</p>	<p>Added details and link to “Calculating Your Utility Allowance”.</p>

## Attachment C

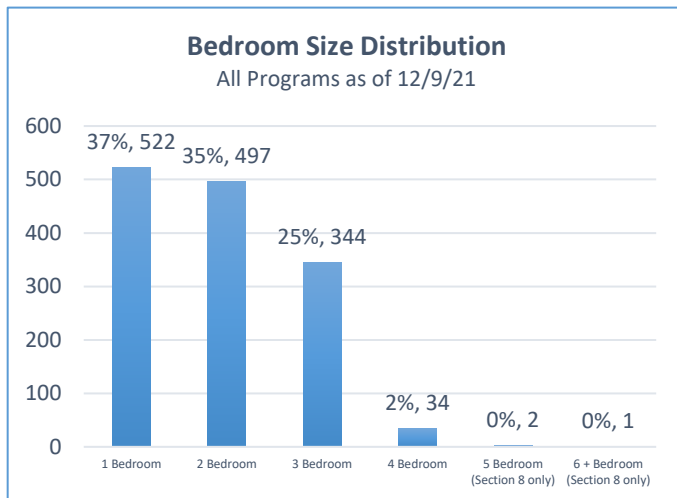
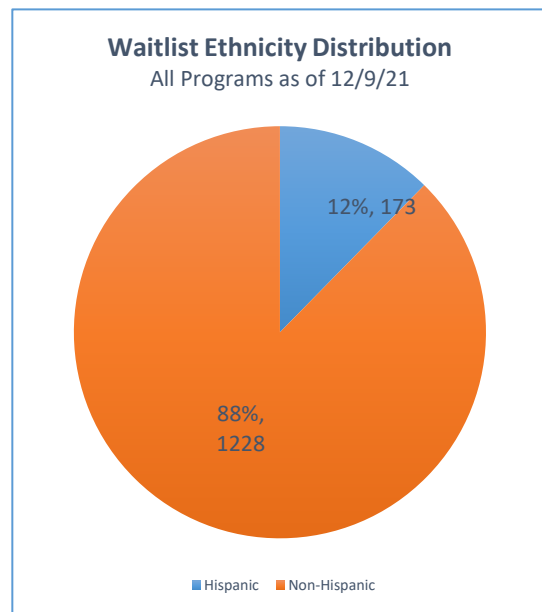
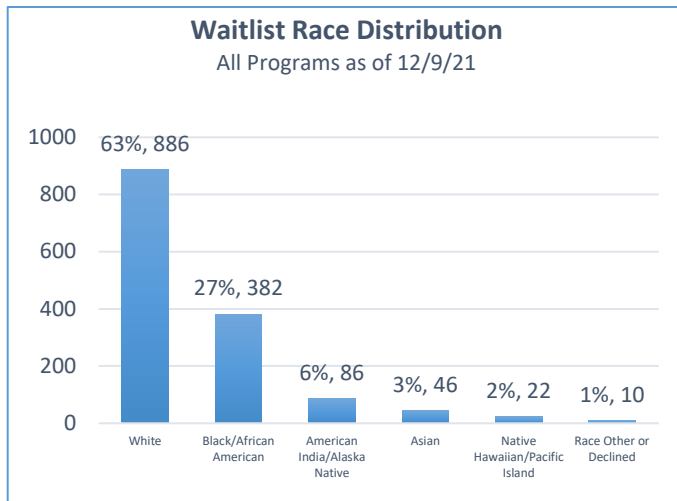
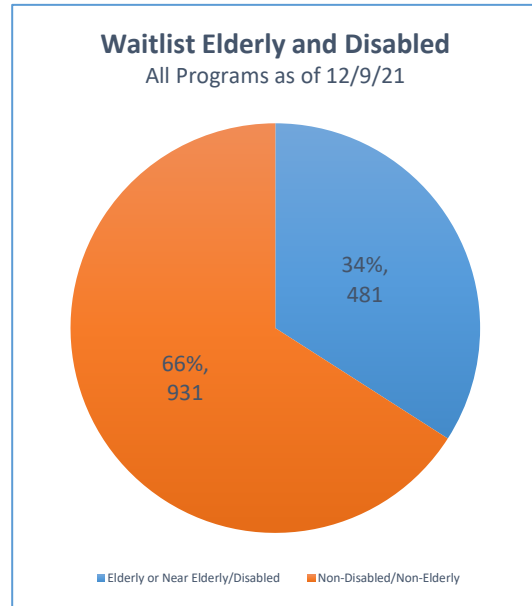
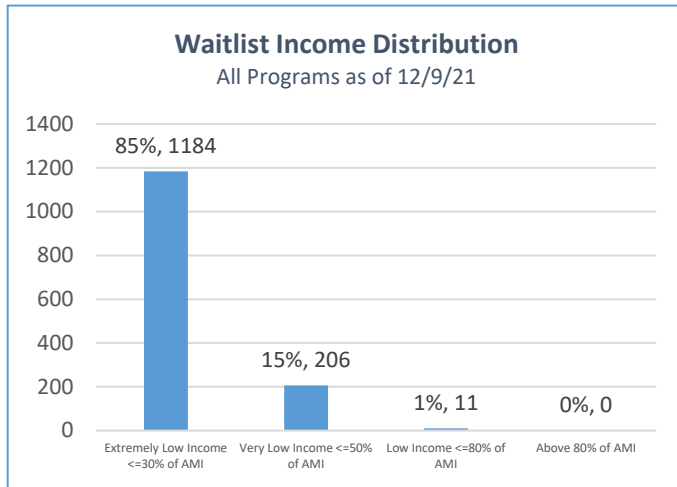
### Statement of Housing Needs and Strategy for Addressing Housing Needs

#### Statement of Housing Needs

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

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





## Strategy for Addressing Housing Needs

### Introduction

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

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

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

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

Beginning in September 2021, a workgroup of Clackamas County Health, Housing and Human Services (H3S) housing and social services staff reviewed previous Fair Housing Goals and accomplishments. H3S staff also considered results from the following recently completed plans and studies:

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

Based on the information in these housing surveys and reports, historical data and feedback from the County's Housing Rights and Resources Program, a draft set of goals and strategies were developed as a starting point for community consideration and discussion. Contributing factors to the fair housing conditions were identified in 2017 and 2021 after a review of HUD data, comments during public meetings, community survey data and local housing data. Representatives of the Legal Aid Services of Oregon, the Fair Housing Council of Oregon, the Housing Authority of Clackamas County (HACC) and the Community Development Division formed a work group to review results of surveys, community meetings and available census data to select the contributing factors listed below:

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

- Lack of affordable, accessible housing in a range of unit sizes.
- Availability of affordable units in a range of sizes.
- Displacement of residents due to economic pressures.
- Community Opposition (to affordable housing developments).
- Site selection policies, practices and decisions for publicly supported housing.
- Lack of assistance for housing accessibility modifications.
- Private Discrimination.
- Lack of public fair housing enforcement.
- Lack of resources for fair housing agencies and organizations.
- Land Use and Zoning Laws.
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure.

The process of analysis to select the 2022-2027 AFH Goals for the jurisdiction was a series of meetings and discussions by the work group. The workgroup also developed a community survey which was distributed in 3 languages. 306 persons responded to the proposed goals and strategies listed in the survey. Workgroup members reviewed past fair housing efforts, clarified the contributing factors in the jurisdiction and in the Portland metro region and discussed available local data including census data and local reports.

After review of the available data and discussion of what data was not available, work group members agreed to the following goals and strategies in priority order:

**Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County.**

**Strategies:**

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

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

**1.C:** Evaluate zoning changes & incentives for building affordable housing including rezoning of vacant commercial properties into mixed-use buildings or using eminent domain or other methods to buy vacant properties to be used for housing programs.

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

**Strategies:**

**2.A:** Increase fair housing education for staff, landlords & community partners.

**2.B:** Review payment standards by area to be sure choices are not limited and to study FairMarket Rent to be accurate with market conditions.

**2.C:** Work in collaboration with partners to enforce fair housing law.

**2.D:** Continue operating the Housing Rights and Resources line, which is a partnership between Clackamas County Social Services, Clackamas County Community

Development, Legal Aid Services of Oregon, and Fair Housing Council of Oregon to provide information about fair housing law to landlords and tenants in Clackamas County.

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

**Strategies:**

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

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

These AFH goals will become part of planning and performance reporting documents for the Housing Authority and the Community Development Division for the 2022 through 2026 program years. These new AFH goals are similar to fair housing goals selected in 2017 listed here:

1. Develop new housing units with long-term affordability for a broad range of low- income households with an emphasis on dispersal of affordable housing.
2. Increase accessibility to affordable housing for persons with disabilities and single parent familial status households. (Households with children under 18 yrs.).
3. Improve access to housing and services for all protected classes.
4. Enforce Fair Housing laws and increase public understanding of Fair Housing laws.
5. Coordinate Fair Housing Advocacy and Enforcement Efforts among regional partners
6. Ensure that all housing in Clackamas County is healthy and habitable.

Since 2017 the significant changes that have impacted Clackamas County include a sharp increase in housing demand due to the number of new residents moving to the Portland metro area including Clackamas County. In 2020 alone numerous factors have impacted our county including: the 2020 COVID pandemic causing health and economic difficulties, a Forest Fire destroying numerous homes in a rural town, an Ice Storm and a Heat Dome hot weather event that caused some deaths in the metro area. The impacts of the COVID pandemic have caused employment losses that have put many households in danger of eviction and homelessness. County and state programs have provided some rent assistance however many people are still not able to access stable housing.

## Attachment D

### Deconcentration Policy

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

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

## Attachment E

### Violence Against Women (VAWA) Statement

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

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

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

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

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



---

Toni Karter, Interim Executive Director

---

12/28/21  
Date

## Attachment F

### Definition of Substantial Deviation and Significant Amendment or Modification

#### Definition of Substantial Deviation and Significant Amendment

It is the intent of the Housing Authority of Clackamas County (HACC) to adhere to the mission, goals and objectives outlined in the Annual Plan and the Five-Year Strategic Plan (the Plans). The Plans, however, will be modified and re-submitted to HUD should a substantial deviation from program goals and objectives occur.

#### A. Definition of Substantial Deviation from the 5-Year Plan

- Any collective change in the planned or actual use of federal funds for activities that would prohibit or redirect HACC's strategic goals or mission of sustaining or increasing the availability of decent, safe and affordable housing while promoting self-sufficiency and asset development of families and individuals from being implemented as identified in Plans.  
This includes elimination or major changes in any activities proposed, or policies provided in the Plans that would momentarily affect services or programs provided residents. This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.
- Any single or cumulative annual change in the planned or actual use of federal funds as identified in the Plans that exceeds 25% of the of HACC's annual program budgets for Housing Choice Voucher (Section 8) or Public Housing activities.
- A need to respond immediately to Natural Disasters or Declarations of Emergency beyond the control of the Housing Authority, such as earthquakes, flooding, landslides, or other unforeseen significant event.
- A mandate from local government officials, specifically the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.

A substantial deviation does not include any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein.

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

- 1) Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- 2) Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- 3) Changes to the financing structure for each approved RAD conversion.

#### B. Definition of Significant Amendment or Modification to the Annual and 5-year plans

- Changes of a significant nature to the rent or admissions policies, or the organization of the waiting list not required by federal regulatory requirements as to effect a change in the Section 8 Administrative Plan or the Public Housing Admissions and Continued Occupancy Policy (ACOP).
- Changes to HACC's plans effecting the demolition or disposition of public housing, designation of senior or disabled housing, the homeownership program, and a plan to convert public housing units to other than assisted housing.
- This includes elimination or major changes in any activities proposed, or policies provided in the agency plan that would momentarily affect services or programs provided residents. This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.

#### C. Capital Fund Program Definition of Significant Amendment or Modification to the Annual and 5-year plan

- A change in the planned or use of Capital Fund that have a total expense in excess of \$250,000 in any single year.

## Attachment G: Financial Resources

	Public Housing	Housing Vouchers	Local Projects	Central Office	Development	Supportive Housing	Grants	FY22 Total	FY 2021 6/30/2021 Budget	FY 2020 6/30/2020 Budget	FY 2019 6/30/2019 Budget	\$ Change from Prior Year Budget	% Change from Prior Year Budget
<b>Revenue:</b>													
Dwelling rent	1,357,169		581,175					1,938,344	2,039,290	2,383,065	2,223,249	(100,946)	-4.95%
Vacancy loss	(43,000)		(4,561)					(47,561)	(55,817)	(63,443)	(47,202)	8,256	-14.79%
Other tenant income	109,500	29,370	4,800					143,670	143,670	178,790	160,082	-	0.00%
Operating subsidy	2,085,000	1,518,000		127,186			27,000	3,757,186	3,468,120	3,493,992	3,683,350	289,066	8.33%
Housing assistance payments		18,692,000					514,368	19,206,368	16,169,002	15,192,953	14,404,534	3,037,366	18.79%
Mgmt fees				397,650				397,650	397,650	468,206	455,626	-	0.00%
Interest income	500	-	-	-				500	500	20,550	20,931	-	0.00%
County contribution					150,000			150,000	240,960	240,960	271,971	(90,960)	-37.75%
Grant revenue	295,000	86,468			34,233,000	10,000,000	1,353,859	45,968,327	2,271,161	2,169,168	1,147,105	43,697,166	1924.00%
Other/In-kind	-		6,000	-	3,174,653		10,341	3,190,994	2,408,531	1,302,348	769,293	782,463	32.49%
<b>TOTAL REVENUE</b>	<b>3,804,169</b>	<b>20,325,838</b>	<b>587,414</b>	<b>524,836</b>	<b>37,557,653</b>	<b>10,000,000</b>	<b>1,905,568</b>	<b>74,705,477</b>	<b>27,083,067</b>	<b>25,386,589</b>	<b>23,088,939</b>	<b>47,622,410</b>	<b>175.84%</b>
<b>ADMINISTRATIVE EXPENSE:</b>													
Salaries	423,560	775,919	66,934	660,314	649,931	429,045	21,624	3,027,329	2,402,504	2,132,370	1,918,999	624,825	26.01%
Employee benefits	275,438	494,633	41,312	372,615	381,027	283,338	13,774	1,862,137	1,441,247	1,339,754	1,108,321	420,889	29.20%
Legal fees	15,400	2,200	700	3,600	5,000	-		26,900	26,900	33,000	28,817	-	0.00%
Staff training/travel	20,000	7,700	500	10,000	7,000	-		45,200	46,200	46,700	35,135	(1,000)	-2.16%
Auditing fees	14,966	12,080	909	6,550	10,535	4,227		49,267	47,857	46,274	45,534	1,410	2.95%
Other administrative expenses	189,936	257,427	177,202	179,507	1,173,909	28,986		2,006,967	1,921,983	1,579,364	1,313,266	84,984	4.42%
Management fee expense	397,650	-	-	-	-	-		397,650	397,650	468,206	455,626	-	0.00%
<b>TOTAL ADMINISTRATIVE</b>	<b>1,336,949</b>	<b>1,549,959</b>	<b>287,557</b>	<b>1,232,586</b>	<b>2,227,403</b>	<b>745,597</b>	<b>35,398</b>	<b>7,415,449</b>	<b>6,284,341</b>	<b>5,645,668</b>	<b>4,905,698</b>	<b>1,131,108</b>	<b>18.00%</b>
<b>TENANT SERVICES:</b>													
Salaries	17,037	54,341				54,909		126,287	128,388	110,820	111,800	(2,101)	-1.64%
Benefits	11,614	44,106				37,432		93,152	75,311	68,673	78,031	17,841	23.69%
Other	12,600	-				27,000		39,600	49,416	50,616	70,227	(9,816)	-19.86%
<b>TOTAL TENANT SERVICES</b>	<b>41,251</b>	<b>98,446</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>119,341</b>	<b>259,039</b>	<b>253,115</b>	<b>230,109</b>	<b>260,058</b>	<b>5,924</b>	<b>2.34%</b>
<b>UTILITIES:</b>													
Water	173,000		11,100					184,100	174,600	204,085	182,554	9,500	5.44%
Sewer	361,300		32,200					393,500	380,700	465,779	428,064	12,800	3.36%
Electricity	28,300		10,700	6,900				45,900	44,300	117,400	106,701	1,600	3.61%
Gas	3,900			3,800				7,700	7,500	26,300	25,991	200	2.67%
<b>TOTAL UTILITIES</b>	<b>566,500</b>	<b>-</b>	<b>54,000</b>	<b>10,700</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>631,200</b>	<b>607,100</b>	<b>813,564</b>	<b>743,310</b>	<b>24,100</b>	<b>3.97%</b>



## Attachment G: Financial Resources

	Public Housing	Housing Vouchers	Local Projects	Central Office	Development	Supportive Housing	Grants	FY22 Total	FY 2021 6/30/2021 Budget	FY 2020 6/30/2020 Budget	FY 2019 6/30/2019 Budget	\$ Change from Prior Year Budget	% Change from Prior Year Budget
<b>MAINTENANCE:</b>													
Labor	617,893		27,113	-			-	645,005	680,096	686,769	675,797	(35,091)	-5.16%
Benefits	422,078		20,347	-			-	442,425	478,834	477,600	462,281	(36,409)	-7.60%
Materials	171,600		8,700	-			-	180,300	136,800	171,200	149,416	43,500	31.80%
Garbage contracts	167,800		2,100	-			-	169,900	161,800	157,800	160,707	8,100	5.01%
Other contracts	310,100	-	44,900	6,600			-	361,600	255,600	217,644	268,991	106,000	41.47%
												-	
<b>TOTAL MAINTENANCE</b>	<b>1,689,471</b>	<b>-</b>	<b>103,159</b>	<b>6,600</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,799,230</b>	<b>1,713,130</b>	<b>1,711,013</b>	<b>1,717,192</b>	<b>86,100</b>	<b>5.03%</b>
<b>GENERAL EXPENSES:</b>													
Insurance	96,625	8,000	15,100	3,200			-	122,925	116,525	111,140	96,290	6,400	5.49%
Payment in Lieu of Taxes	86,000							86,000	86,000	104,610	71,500	-	0.00%
<b>TOTAL GENERAL EXPENSES</b>	<b>182,625</b>	<b>8,000</b>	<b>15,100</b>	<b>3,200</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>208,925</b>	<b>202,525</b>	<b>215,750</b>	<b>167,790</b>	<b>6,400</b>	<b>3.16%</b>
<b>OTHER EXPENSES:</b>													
Housing Assistance Payments		18,692,000					514,368	19,206,368	16,613,002	15,192,953	14,404,534	2,593,366	15.61%
Mortgage Payments			13,700				-	13,700	13,700	14,600	51,288	-	0.00%
Grant Expense					34,233,000	9,254,403		43,487,403	-	-	-	43,487,403	
Supp Svcs, in-kind, child care								-	-	189,925	-	-	
Central office							127,186	127,186	122,559	122,559	159,641	4,627	3.78%
Capital Expenditures	-	-	91,330	-	-		1,109,275	1,200,605	1,234,615	1,268,485	574,904	(34,010)	-2.75%
<b>TOTAL OTHER EXPENSES</b>	<b>-</b>	<b>18,692,000</b>	<b>105,030</b>	<b>-</b>	<b>34,233,000</b>	<b>9,254,403</b>	<b>1,750,829</b>	<b>64,035,262</b>	<b>17,983,876</b>	<b>16,788,522</b>	<b>15,190,367</b>	<b>46,051,386</b>	<b>256.07%</b>
<b>TOTAL EXPENSES</b>	<b>3,816,796</b>	<b>20,348,405</b>	<b>564,847</b>	<b>1,253,086</b>	<b>36,460,403</b>	<b>10,000,000</b>	<b>1,905,568</b>	<b>74,349,105</b>	<b>27,044,088</b>	<b>25,404,626</b>	<b>22,984,415</b>	<b>47,305,018</b>	<b>174.92%</b>
<b>OPERATING SURPLUS (DEFICIT)</b>	<b>(12,628)</b>	<b>(22,567)</b>	<b>22,567</b>	<b>(728,250)</b>	<b>1,097,250</b>	<b>(0)</b>	<b>(0)</b>	<b>356,372</b>	<b>38,980</b>	<b>(18,037)</b>	<b>104,524</b>	<b>317,393</b>	<b>814.25%</b>
<b>TRANSFERS</b>													
Easton Ridge								-	500,000	350,000	350,000	(350,000)	-100.00%
Development				728,250	(728,250)			-	-	-	-	-	
Local Projects		22,567	(22,567)					-	-	-	-	-	
<b>OPERATING SURPLUS (DEFICIT) CONTINGENCY AFTER TRANSFERS</b>	<b>(12,628)</b>	<b>0</b>	<b>(0)</b>	<b>0</b>	<b>369,001</b>	<b>(0)</b>	<b>(0)</b>	<b>356,372</b>	<b>538,980</b>	<b>331,963</b>	<b>454,524</b>		
Estimated Change in Fund Balance/Cash													
Public Housing	(12,628)							(12,628)	126,222				
Development					369,001			369,001	388,493				
Local Project Fund		0	(0)	0			(0)	(1)	24,265				
Budgeted Balance	-	-	-	-	-	0	-	0	-	-	-	-	-

## Attachment G: Financial Resources

	Clackamas Heights (501)	Scattered Sites (502)	Hillside Park (503)	OCVM (504)	Public Housing FY22 Total
<b>INCOME:</b>					
Dwelling rent	292,500	618,345	240,000	206,323	1,357,169
Vacancy loss (3%)	(5,000)	(15,000)	(15,500)	(7,500)	(43,000)
Other tenant income	19,400	33,000	22,100	35,000	109,500
Operating subsidy	463,000	627,000	440,000	555,000	2,085,000
Interest income	50	300	100	50	500
Grant revenue	75,000	100,000	65,000	55,000	295,000
Other/Inkind	-	-	-	-	-
<b>TOTAL REVENUE</b>	<b>844,950</b>	<b>1,363,645</b>	<b>751,700</b>	<b>843,873</b>	<b>3,804,169</b>
<b>ADMINISTRATIVE EXPENSE:</b>					
Salaries	92,397	149,868	77,202	104,093	423,560
Employee benefits	66,446	101,973	42,427	64,592	275,438
Legal fees	900	7,500	2,000	5,000	15,400
Staff training/travel	4,500	6,500	4,500	4,500	20,000
Auditing fees	3,737	5,152	2,302	3,775	14,966
Other administrative expenses	47,088	57,022	41,241	44,585	189,936
Management fee expense	89,500	129,300	88,900	89,950	397,650
<b>TOTAL ADMINISTRATIVE</b>	<b>304,568</b>	<b>457,314</b>	<b>258,572</b>	<b>316,495</b>	<b>1,336,949</b>
<b>TENANT SERVICES:</b>					
Salaries	3,828	5,554	3,828	3,828	17,037
Benefits	2,609	3,786	2,609	2,609	11,614
Other	3,400	1,300	4,500	3,400	12,600
<b>TOTAL TENANT SERVICES</b>	<b>9,837</b>	<b>10,641</b>	<b>10,937</b>	<b>9,837</b>	<b>41,251</b>
<b>UTILITIES:</b>					
Water	36,600	65,600	37,600	33,200	173,000
Sewer	91,700	108,700	66,900	94,000	361,300
Electricity	8,500	2,200	8,000	9,600	28,300
Gas	800	1,300	1,000	800	3,900
<b>TOTAL UTILITIES</b>	<b>137,600</b>	<b>177,800</b>	<b>113,500</b>	<b>137,600</b>	<b>566,500</b>
<b>MAINTENANCE:</b>					
Labor	151,241	210,052	103,832	152,768	617,893
Benefits	97,989	150,702	74,409	98,978	422,078
Materials	28,800	92,700	19,500	30,600	171,600
Garbage contracts	36,300	59,300	41,700	30,500	167,800
Other contracts	55,600	122,400	89,800	42,300	310,100
<b>TOTAL MAINTENANCE</b>	<b>369,929</b>	<b>635,153</b>	<b>329,242</b>	<b>355,147</b>	<b>1,689,471</b>
<b>GENERAL EXPENSES:</b>					
Insurance	17,325	35,900	20,200	23,200	96,625
Payment in Lieu of Taxes	11,000	50,000	18,000	7,000	86,000
<b>TOTAL GENERAL EXPENSES</b>	<b>28,325</b>	<b>85,900</b>	<b>38,200</b>	<b>30,200</b>	<b>182,625</b>
<b>TOTAL EXPENSES</b>	<b>850,259</b>	<b>1,366,808</b>	<b>750,451</b>	<b>849,278</b>	<b>3,816,796</b>
<b>OPERATING SURPLUS (DEFICIT)</b>	<b>(5,309)</b>	<b>(3,163)</b>	<b>1,249</b>	<b>(5,405)</b>	<b>(12,628)</b>

Attachment H: Capital Fund Projects and Budget Summary

December 16, 2021

**2021 Capital Fund Completed Projects**

- Project # 19012 – AMP Wide Flooring \$111,154.18 (16 Units)
- Project # 20003 – AMP Wide Cabinets \$42,081.00 (6 Units)
- Project # 20005 – Clackamas Heights Deck Project \$180,890.25 (35 Units)
- Project # 20008 – Fire Repair at 6606 SE Hemlock \$162,000.00 (1 Unit)
- Project # 20009 – Clackamas Heights Skirting Project \$156,200.00 (100 Units)
- Project # 21001 – Scattered Sites Roofing Project \$163,120.00 (12 Units)
- Project # 21002 – Modernization of #88 OCVM \$87,910.00 (1 Unit)

**2022 Proposed Capital Fund Projects**

- On Demand Flatwork Project - \$275,000.00
- On Demand Flooring Contract - \$250,000.00
- Scattered Sites Roof Project - \$175,000.00
- Modernization of 22010 Leslie Street - \$175,000.00
- On Demand Asbestos Abatement Services - \$60,000.00
- On Demand Asbestos Air Monitoring Services - \$30,000.00
- Scattered Sites & OCVM Roof Project - \$200,000.00

*Healthy Families. Strong Communities.*

P.O. Box 1510, 13930 S. Gain Street, Oregon City, OR, 97045-0510 • Phone (503) 655-8267 • Fax (503) 655-8676

TDD 503-655-8639 [www.clackamas.us/housingauthority](http://www.clackamas.us/housingauthority) Fiscal Year 2022-2027 - Page 25 of 43

## Attachment I: Capital Fund Annual Statement

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

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

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

PHA Name <b>OR001</b>	Grant Type and Number Capital Fund Program Grant No: OR16R00150122 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: FY2022
--------------------------	--	---

Type of Grant

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


Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) <sup>3</sup>	\$317,964.75			
3	1408 Management Improvements	\$500.00			
4	1410 Administration (may not exceed 10% of line 15)	\$127,185.90			
5	1480 General Capital Activity	\$826,208.35			
6	1492 Moving to Work Demonstration				
7	1501 Collateralization Expense / Debt Service Paid by PHA				
8	1503 RAD-CFP				
9	1504 RAD Investment Activity				
10	1505 RAD-CPT				
11	9000 Debt Reserves				
12	9001 Bond Debt Obligation paid Via System of Direct Payment				
13	9002 Loan Debt Obligation paid Via System of Direct Payment				
14	9900 Post Audit Adjustment				

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

## Attachment I: Capital Fund Annual Statement

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

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

<b>Part I: Summary</b>					
PHA Name: <b>OR 001</b>	Grant Type and Number Capital Fund Program Grant No: <b>OR16R00150122</b> Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval:  FY2022			
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
15	Amount of Annual Grant: (sum of lines 2 - 14)	\$1,271,859.00			
16	Amount of line 15 Related to LBP Activities				
17	Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 15 Related to Security - Soft Costs				
19	Amount of line 15 Related to Security - Hard Costs				
20	Amount of line 15 Related to Energy Conservation Measures				
Signature of Executive Director*		Date 2/28/22		Signature of Public Housing Director	
 Toni Karter Interim Executive Director				Date	

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

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

## Attachment I: Capital Fund Annual Statement

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

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

Part II: Supporting Pages								
PHA Name: <b>OR001</b>		Grant Type and Number Capital Fund Program Grant <b>OR16R00150122</b> No: CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: <b>2022</b>		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
AMP Wide Operations	Operations	1406	1	\$317,964.75				
AMP Wide Mgmt. Improve.	Software: Operating Systems & Office Software	1408	1	\$500.00				
AMP Wide Admin.	Central Office Cost Center (COCC) Salary & Benef.	1410	1	\$127,185.90				
Audit	Financial Audit	1480/1410	1	\$6,500.00				
AMP Wide Fees & Costs	A&E Consulting Services	1480/1430	1	\$25,000.00				
PHA Wide Non Dwell. Equip.	Computers and Equipment	1480/1475	1	\$1,000.00				
PHA Wide Relocation Costs	Relocation Costs Due to Modernization	1480/1495	1	\$10,000.00				
AMP 1 - DEV 1 Clack. Hts.	Dwelling Renovation	1480/1460	1	\$110,000.00				
AMP 3 - DEV 3 Hillside Park	Dwelling Renovation	1480/1460	1	\$54,536.30				

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

## Attachment I: Capital Fund Annual Statement

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

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

Part II: Supporting Pages								
PHA Name: <b>OR001</b>		Grant Type and Number Capital Fund Program Grant <b>OR16R00150122</b> No: CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: <b>2022</b>		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
AMP 4 - DEV 4 OCVM	Dwelling Renovations	1480/1460	1	\$60,000.00				
AMP 2 - DEV 006	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 007	Dwelling Renovations	1480/1460	1	\$559,172.05				
AMP 2 - DEV 008	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 010	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 011	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 012	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 019	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 020	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 021	Dwelling Renovations	1480/1460	1	\$0.00				
RAD - CFP	Rental Assistance	1503	1	\$0.00				
RAD Investment Activity	RAD Investment Activity	1504	1	\$0.00				
RAD - CPT	RAD - CPT	1505	1	\$0.00				

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

## Attachment I: Capital Fund Annual Statement

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

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

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: <b>OR001</b>				Federal FFY of Grant: <b>2022</b>	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406					
1408					
1410					
1480					
1492					
1501					
1503					
1504					
1505					
9000					
9001					
9002					
9900					
1499					

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



**Attachment I: Capital Fund Annual Statement**

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

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

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: <b>OR001</b>					Federal FFY of Grant: <b>2022</b>
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

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

# Attachment J

## Resident Advisory Board Meeting Minutes

Tuesday, January 11, 2022 ~ 10am – 1:00pm Via Zoom

---

### **10:00-10:10 Welcome & Introductions**

Every year, we are required by HUD to submit an Annual Plan for what we have accomplished in the prior year and what we plan to do in the coming year. This meeting will fill everyone in on this and what changes have been made to the Annual Plan itself. Additionally, we will be reviewing the new Five Year Plan. We welcome all comments and questions, which will be made a part of the Annual and Five Year Plans.

17 staff and 8 RAB members were in attendance. The RAB members in attendance included: Arnold Rodacker, Brian Henderson, Irisa Hernandez, Jackie Fuller, Joel Johansen, Laura Bales, Linda Keener, and Venus Barnes

RAB membership includes: Resident Commissioner Ann Leenstra, Arnold Rodacker, Brian Henderson, Cathy Haase, Eric Wilkin, Gail Morgan, Gina Rhoades, Ginger Bradshaw, Irisa Hernandez, Jackie Fuller, Joel Johansen, Laura Bales, Linda Keener, Misty Pate, Paul Reynolds, and Venus Barnes

### **10:10-10:30 Annual & 5 Year Plan Review – New Activities & Progress Report & Goals**

The meeting began with a review of the sections which are present in both the Annual and Five Year Plans. These plans take effect July, 2022. The Housing Authority of Clackamas County (HACC) currently supports 445 public housing units and 2,101 house choice vouchers. The Plan Elements include a summary of plan and policy changes, which will be reviewed at today's meeting, as well as a summary of the various new activities planned to be undertaken for the duration of the plan.

New development related new activities were summarized in the Development Update. The new regional Supportive Housing Services Program was reviewed and a brief summary of the rental assistance and other new services through the Supportive Housing Services Program was provided. HACC successfully applied for 25 new Foster Youth to Independence rental assistance 3-year vouchers. HACC was so successful with the initial 25 vouchers that it was given an additional 50 vouchers. HACC was also awarded 20 Mainstream, 25 Veteran Administration Supportive Housing vouchers, and 41 new Emergency Housing Vouchers.

The Progress Report was reviewed to highlight how HACC met its six (6) goals from the PHA 5-Year Plan and noted that there were no findings from the last audit. The new Fair Housing Goals for HACC were then reviewed and their purpose was explained.

The Five Year Plan was then reviewed to discuss the sections which are unique to it and not present in the Annual Plan. A new mission statement was added for the Five Year Plan and the new Five Year Goals were reviewed. The sections which are also present in the Annual Plan were noted during this review.

### **10:30-10:45 Development Update**

This section began with a review of 2021's development milestones. In March, 2021 construction of 212 units of affordable housing were completed at Rosewood Station as part of a public-private partnership. In April we broke ground on the Fuller Road Station project, 100 units of affordable housing, which is a result of the Metro Bond funds and is slated for completion in August, 2022. In June, 2021 we broke ground on the Webster Road Redevelopment, 48 units of affordable housing, which is slated to open in July, 2022. The renovation of Hillside Manor was also completed in September, 2021. In November 2021, the application to rezone Hillside Park was unanimously approved by the Milwaukie City Council and is a major step in its redevelopment. The next step for the Hillside Park Redevelopment is to solicit developer feedback on how financing is structured. Once the structure is developed, we will submit our

Section 18 application to HUD for review. All current residents will receive rental assistance vouchers and assistance with relocation.

We will also be focusing on repositioning our scattered sight portfolio this year. HACC has 145 scattered site units throughout Clackamas County. HACC spends a much higher percentage of capital funds allocation on these units than it does on the other three public housing properties. HACC is planning to apply to HUD for disposition approval of this housing. HACC staff has been meeting with local stakeholders as part of this process.

Staff will be working on a repositioning plan for Oregon City View Manor and Clackamas Heights, both located in Oregon City, over the next year as well. This may include submitting a Section 18 Disposition Application.

Metro Bond revenue dedicated to Clackamas County is approximately \$160M and HACC continues to administer this funding for additional developments. Our goal is to support the development of at least 812 units of affordable housing throughout the eligible Metro boundary within Clackamas County. HACC's strategy for reaching this goal is outlined in the 2019 Clackamas County Local Implementation Strategy which is located on our website.

Good Shepard will be breaking ground with 143 units of affordable housing in March, 2022 and Maple Apartments will be breaking ground with 171 units of affordable housing in May, 2022. Additionally, HACC is working with Metro and the City of Lake Oswego on what is expected to be 50 units of affordable housing development on Boons Ferry Road in Lake Oswego. This project will be supported with Metro Bond funds along with Supportive Housing Services funding. We also plan to release another notice of funding availability in summer, 2022 for approximately \$23M in Metro Bond funds paired with Supportive Housing Services funds.

Q: What was the term you used – RAD?

A: That stands for Rental Assistance Demonstration Program. This is a HUD tool to reposition properties from public housing to a kind of public-private partnership mixed finance model.

Q: When will the waitlists open?

A: Webster is planning to open in April, 2022 and those units will be pulling from our Coordinated Housing Access (CHA) list and Fuller Road is going to begin leasing in March, 2022. Fuller Road will be using a site based list.

Q: Is it possible to take a five minute break?

A: Yes, the meeting will resume at 11:00 AM.

The meeting resumed at 11:00 AM and Attachment C, the Housing Needs and Strategy for Addressing Housing Needs was reviewed. The waitlist demographics was highlighted and outreach to get a higher percentage of disabled, nonwhite, and elderly individuals on the waitlist was successful.

#### **11:00-11:15** Voucher Program Updates - Review Attachment A

Attachment A details the changes we're making to our rent assistance programs. In Attachment A, we are getting rid of the minimum rent policy as we feel it is a barrier and is putting people in a cycle of getting behind on their rent/utilities so we are getting rid of the \$50 minimum rent. We are also changing out utility reimbursement to the family policy. We have started instituting an option for families in public housing where HACC can pay a utility provider directly rather than giving the families a check to then pay the utility provider. We will now be offering this service to Section 8 recipients. The HAP Contract Execution language was also amended to remove a day of delay for starting rent assistance.

Q: You said you wanted to do it the day after inspection, what does that mean?

A: In order for rent assistance to start, the unit has to pass a housing quality standards inspection. This change allows rent assistance to start immediately and not the day after an inspection is completed.

Q: You are changing the \$50 minimum rent to \$0 for people with no income, why do you charge people based on their rent before taxes are taken out?

A: It's a federal regulation on how this is calculated.

Q: What is the security deposit loan program for Section 8 Families?

A: If you have a housing choice voucher and you have income, we have a loan program that we can loan you 50% of your monthly income and we pay it directly to your landlord as your security deposit. This can also improve your credit score as the loan is reported to the lending bureaus.

Two residents discussed how high security deposits are.

Q: Higher rent is being provided for families needing ADA units, what does that mean?

A: An ADA unit is built for people with disabilities. If you need to live on a ground floor unit and need a walk in shower, or no steps, those units are hard to come by and tend to have higher rent. So someone needing this can submit a reasonable accommodation form and ask for a reasonable accommodation payment standard, which cannot exceed 120% of fair market value rates.

### **11:15 – 11:30 Public Housing Updates - Review Attachment B**

The proposed Admissions and Continued Occupancy Plan Policy Changes was reviewed.

The Earned Income Disallowance is a program set up to give incentives for people to go and find work and it lasts for two years. The first 12 months we disregard the income and disregard 50% of it the second year. The new policy language clarifies what the rule is for full-time students.

For financial hardships we are trying to get rid of barriers for folks to get into housing and we are doing away with minimum rent.

For pet restrictions we are amending the size limit from 30 pounds to 25 pounds for dogs to match the language in the lease addendums. Also increasing the fish tank size from 10 gallons to 20 gallons. Setting utility allowance was just amended to add a link to our website on how to calculate your own utility allowance.

Q: It says in the book you are allowed to have two pets but it only says dogs, it doesn't say anything about cats. Can you have two cats if they are companion pets?

A: You can have two cats, the language says you can have two pets, one of which can be a dog. If you have a documented companion animal that is not considered a pet.

Q: (Resident received a letter that there was a 10% increase in their electricity allowance) Why do you need to wait until your next rental renewal before you get the allowance?

A: The policy is set up that way to protect tenants as there may be a decrease in allowance as well, this policy ensures that residents have a time to adjust to these changes.

Q: Will leases stay at 12 months? There's language about potentially doing a shorter lease.

A: Initially it's a 12 month lease but in effect it's a month to month lease as we don't charge a lease break fee. Generally speaking we try to do a 12 month lease but may do shorter leases if the situation needs it.

Q: Can they evict you without cause on a month to month lease?

A: Not in the first year, someone needs to have two to three different lease violations for them to give you a no cause eviction.

Q: What if someone cannot pay the security deposit?

A: There are multiple programs that pay security deposits such as through the Jewish Center and ANT Farm. We have case managers that help combine programs, loans, and payment agreements to help residents cover security deposits. There are also new bond programs which may be of assistance in the future. The new and upcoming affordable housing properties will have much lower security deposit requirements.

Q: Are there any programs that help with move-in costs?

A: The ADRC, Aging in Disability Resource Connection, might have a program which assists with this.

Q: When residents are relocated out of redeveloped properties and they have pets, will the new pet deposits be paid if they're companion pets?

A: Pet deposits and rent cannot be charged for companion pets.

Q: What happens to residents who are relocated but cannot live in apartments?

A: We will find a place that is the same cost and assistance will be provided to help locate an appropriate unit to accommodate their needs such as any ADA needs.

**11:30-11:45** Break

A break was not taken at this time as one was previously taken at 10:55 AM.

**11:45-12:15** Capital Fund Overview: Attachment H-I

A review of the 2021 Capital Fund Completed projects was given. 16 Units received new flooring and 6 units received new cabinetry. 35 Units at Clackamas Heights received renovated decks and a fire repair was done at 6606 SE Hemlock. A skirting project was undertaken at Clackamas Heights and 12 units will be receiving new roofing at the scattered sites properties.

The 2022 proposed Capital Fund Projects include wide scale on demand flatwork projects at multiple properties. A new flooring contract has also been executed. A unit at 22010 Leslie Street is now vacant and requires a full remodel and a full septic tank remodel which will be undertaken in 2022. The On Demand Asbestos Abatement and Air Monitoring Services Contracts have also been renewed for 2022.

The 2022 Capital Fund Budget (Attachment H) was then reviewed and totals \$1,271,859.00 for the year. A brief review of Attachment I detailing the line items in the 2022 Capital Fund Budget was given.

**12:15-12:30** Resident Services Overview

HACC's Resident Services Team is much larger than it has been in recent years. Includes dedicated staff to each neighborhood. Two Resident Services staff are doing peer support, one who is working on the public garden, and one social worker who assists residents with various programs. Over the last year resident services has been focused and shaped by the COVID-19 pandemic and have been focusing their work as a team on resident outreach to vulnerable folks in housing communities. Resident Services has also been focused on connecting residents to relevant community services such as community markets and gardens.

Through a partnership with Home Forward, there are many new resources and programs to support youth in the community. The team has also been doing a lot of support to help residents with economic empowerment assistance such as financial education resources and a credit building program.

There's also a quarterly newsletter which is available that details the various resources available. Staff also offered the newsletter as a resource for resident announcements.

Q: Can those still be mailed when we move?

A: They will be emailed.

**12:30-12:40** Family Self Sufficiency Overview

There have been no changes to the Family Self Sufficiency (FSS) Plan. In 2020, we started offering the FSS Plan to public housing residents as well as voucher residents. In that year, 14 public housing residents and 12 voucher participants were enrolled. In 2021, we had 16 voucher residents enroll in FCC and 7 public housing residents enroll.

This is a voluntary five year program available to public housing residents and those receiving voucher based assistance. Residents enrolled in FSS have a savings account that, as their income grows and their rent increases, the subsequent rent increase will be invested into the resident's FSS savings account.

Right now there are a total of 80 active participants: 58 voucher participants and 22 public housing participants.

In 2021, a webpage for the program was created along with weekly Zoom meetings to help provide information and answer questions the public may have about the program. This webpage contains all relevant information along with the application and self-assessment form to facilitate the enrollment process.

**12:40-12:45** Annual Plan Timeline

Today's meeting is the first review of the Annual and 5 Year Plans. The Public Review begins on January 19<sup>th</sup> and goes through March 6<sup>th</sup>. It is available at the HACC offices, on our website, local libraries, and at our properties. March 8<sup>th</sup> the Final Draft Plans will be submitted to H3S to schedule the public hearing. March 24<sup>th</sup> will be the public hearing at the HACC Board meeting. March 29<sup>th</sup> the final copy will be submitted to the Board for final approval. March 31<sup>st</sup> or April 7<sup>th</sup> will be the HACC Board approval meeting. April 12<sup>th</sup> Submit plans to HUD – our deadline to submit is April 17<sup>th</sup>. July 1<sup>st</sup> Plans go into effect

**12:45-1pm** Questions and Answers

Q: If you have a letter stating that you have a companion pet and that pet dies, why do you need to do the paperwork again?

A: You need to submit the paperwork and forms so we are aware of the new animals and because needs may change over time. Additionally, it assists with documenting pet damage and when/how it occurred.

Q: What are the pet policy changes? (Resident had to leave meeting during that section)

A: The changes were reviewed. The changes were lowering dog weight from 30 to 25 pounds and the fish tank size increased from 10 gallons to 20 gallons and these changes take effect July 1<sup>st</sup>, 2022. These changes were made to become uniform with what the lease addendums already state.

Q: Will these changes be carried over to the new development of Hillside Park?

A: We don't know yet but they will likely be the same or very similar.

Q: How does this rule affect people with, for example a dog that is 40 lbs, but has a reasonable accommodation?

A: This rule would not affect companion animals over the weight limit but does affect pet limits over that.

Q: What if someone has a dog that is 30 lbs right now?

A: The lease addendum they signed already says 25 lbs, this change is just to align our guidelines with the lease addendum. We will work with residents on any concerns arising the weight of their current dogs and this change.

A resident asked if everybody on the meeting knows about the availability for the low income energy assistance program and gave a brief review on the benefits of this program offered through Clackamas County Social Services.

Q: Can the transcript for the meeting be sent out to attendees?

A: The minutes which will be included in the Annual Plan as an attachment can be distributed after the meeting.

Q: Can management send a copy of companion pet documentation for when they move to a new location?

A: HACC management can likely provide copies assuming it isn't too old as paper documents are only retained for a certain period of time; however, properties may request new documentation.

Q: Is the energy assistance program that was mentioned called the LEAP Program and is it once or twice a year?

A: Yes it is and it is now twice a year.

Q: What is the name of the program that assisted with moving but shut down during COVID?

A: The name is Love In the Name of Christ (Love Inc) and they had volunteers which assisted prior to the COVID-19 pandemic but we are unsure if they will restart this moving assistance program.

Q: Is Dress for Success still active?

A: Yes, we can still do referrals there.

Staff asked if residents know about and have applied for the Oregon Rent Assistance Program (ORAP). There is currently a backlog to move through applications before they can assist new applicants.

Q: Will an updated letter about redevelopment of Hillside Park be sent to residents?

A: Yes, the letter is currently being translated and should be sent out soon.

Q: When do we anticipate residents to move out of Hillside Park?

A: The earliest for Phase 1 residents to move out would be the fourth quarter of 2022.

Q: Is this the residents in the southeast corner of the property?

A: Most of the properties south of Hillside Court – about half of the properties. We can send out a map which details this to anyone who requests it.

Q: When this redevelopment starts the laundry room will be torn down, could a vacant house on the Northside of Hillside Court be turned into a laundry room?

A: This is something being considered but there is still much that is to be determined. There will definitely be a laundry room available and updates will be provided as they're available.

Q: The mailboxes near 32<sup>nd</sup> Avenue have been broken into, is there an update on when they'll be repaired?

A: The vendor for the new mailboxes will be shipped on January 13<sup>th</sup>. As soon as it is received an installation will be scheduled.

Q: What was the delay on getting the new mailbox?

A: Shipment for the new mailbox was 4-6 weeks from the date of the order.

Resident commented that they are not affected by it but knows that those affected need to pick up their mail themselves and cannot have their case manager do it at the moment.

Q: Was there only that one mailbox involved in the break-in?

A: Yes, one other needed to be replaced but for other purposes.

Resident commented that Hillside Manor has a secure mailroom.

Staff will be looking into a survey for residents at the Hillside Manor to provide feedback.

Resident said they do not like the new cabinets at the Manor as they're not big enough and that the counters are too low so it gives them back-aches and does not like the color of the new handles.

Resident likes the new bathrooms except for the removal of the medicine cabinet. Resident also commented that the bedroom window does not close now but lives on the 8<sup>th</sup> floor. Resident does like the removal of the popcorn ceilings and the new sliding closet doors. Staff requested that resident include all of this in a letter when they move out as they are planning to soon.

Q: Where is Sonia?

A: Sonia resigned about a year and a half ago and Rich also retired.

Q: Why was the application to HUD for tearing "Hillside Park" down not sent yet?

A: There's a part of the application where we need to describe the development and financing plan but we need more input from the eventual developer. We are about to begin soliciting feedback from the developer. There is a competitive process which needs to be done but is not slowing the process down.

Q: Will this information be included in the letter that will go out?

A: Yes, this information will be summarized in the letter.

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

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

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

I, Toni Karter, the Interim Executive Director  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2022-2027 and/or Annual PHA Plan for fiscal year 2022 of the Housing Authority of Clackamas County is consistent with the  
*PHA Name*

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



Housing Authority of Clackamas County  
*Local Jurisdiction Name*

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

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

The Housing Authority of Clackamas County works closely with Community Development on creating the Clackamas County consolidated planning cycle(s) and PHA planning cycle(s) in accordance with the regulations 24 CFR part 91, for consolidated plan program participants, and 24 CFR part 903, for PHA's to jointly complete the Assessment of Fair Housing Plan.

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

Name of Executive Director: Toni Karter, Interim Executive Director		Name Board Chairperson: Commissioner Tootie Smith, Chair	
			
Signature	Date	Signature	Date

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

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



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

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

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 2022-27 5-Year and/or 2022 Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning July 1, 2022, in connection with the submission of the Plan and implementation thereof:*

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

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

**Housing Authority Of Clackamas County**

**OR001**

PHA Name

PHA Number/HA Code

- Annual PHA Plan for Fiscal Year **2022**
- 5-Year PHA Plan for Fiscal Years **2022 - 2027**

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

Name of Executive Director: Toni Karter, Interim Executive Director

Name Board Chairman – Commissioner Tootie Smith, Chair

*Toni Karter*                      12/15/2021  
 Signature                                      Date

Signature                                      Date

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

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

## **Attachment M:**

### **Public Notice & Comments**

#### **Public Notice - January 2, 2022**

A public meeting to cover the Housing Authority of Clackamas County's (HACC) FY 2022 Annual Plan and 2022-2027 5 Year Plan will be held on January 11, 2022 at 10am via Zoom link. Resident Advisory Board members and Public Housing residents are encouraged to attend. A Public Hearing to comment on HACC's FY 2022 Annual Plan and 2022-2027 5 Year Plan will be held on March 24, 2022 at 10am before the HACC Board of Commissioners in person and/or via zoom link. All residents are welcome to provide comment by registering online at: [https://clackamascounty.zoom.us/webinar/register/WN\\_6FKaA8LnQr6rPKmjHTNYQA](https://clackamascounty.zoom.us/webinar/register/WN_6FKaA8LnQr6rPKmjHTNYQA) for Public Communication via Zoom or via a blue card at the door, if attending in person. Please refer to our Presenting Effective Testimony Page at: <https://www.clackamas.us/bcc/presenting-effective-testimony> for more information. The registration ends 5 minutes after the start of the meeting for both in-person and online testimony. Alternatively, anyone can send in a comment to be read during the Citizen Communication portion of our meeting via email. Just send it in at any time during the meeting by emailing Erin Fernald at [EFernald@clackamas.us](mailto:EFernald@clackamas.us). The meeting will be livestreamed and archived on our County YouTube Channel. HACC developed its Plan in compliance with the Quality Housing and Work Responsibility Act of 1998 and Federal Register, Docket No. FR-4829-N-01. The Draft Plan will be available for review from January 19 – March 6, 2022 and can be found online at <https://www.clackamas.us/housingauthority/plansandreports.html>. Hard copies are kept for public review at HACC's administrative office located at 13930 South Gain Street, Oregon City, OR, open Monday through Thursday, 8AM to 6PM. The Plan can also be viewed at the Clackamas County Library, 16201 SE Mcloughlin, Milwaukie, OR 97267.

#### **Public Comments from Public Hearing on March 24, 2022**



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

In the Matter of Approving the Housing  
Authority's Five-Year Plan, related  
Certifications and Attachments



Resolution No. 1963  
*Page 1 of 1*

Whereas, the Housing Authority of Clackamas County (HACC), Oregon has developed an Annual Plan; and

Whereas, the Five-Year Plan is developed every five years; and

Whereas, the Five-Year Plan and its attachments, was developed using the required HUD templates with input and recommendations from an established Resident Advisory Board (RAB) on January 11, 2022; and

Whereas, the Five-Year Plan and its attachments were advertised in the Oregonian for public review and comment from January 19, 2022 through March 6, 2022; and

Whereas, the Five-Year Plan and its attachments were discussed and testimony was taken at a public hearing in front of the HACC Board of Commissioners on March 24, 2022; and

Whereas, HUD requires HACC Board approval in the form of a board resolution; and

Whereas, the Five-Year Plan, related certifications and attachments are to be submitted to HUD by April 14, 2022, at least 75 days prior to the effective date of July 1, 2022;

NOW THEREFORE, IT IS HEREBY ORDERED that The Board of Commissioners for the Housing Authority of Clackamas County reviewed HACC's Five-Year Plan and formally approves the Five-Year Plan, related Certifications and Attachments, and the Interim Executive Director of the Housing Authority is authorized to submit these documents to HUD.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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

\_\_\_\_\_  
Chair

\_\_\_\_\_  
Recording Secretary