

Housing Authority of Clackamas County



2023-2024 Annual Plan & Moving to Work Supplement DRAFT

Effective Dates July 1, 2023 – June 30, 2024

HACC Interim Executive Director: Toni Karter



Housing Authority of Clackamas County

Annual Plan FY 2023 – Effective 7/1/2023-6/30/2024

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

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

Definitions.

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

A.	PHA Information.																								
A.1	<p> PHA Name: Housing Authority of Clackamas County PHA Code: OR001 PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units: <u>445</u> Number of Housing Choice Vouchers (HCVs): <u>2147</u> Total Combined: <u>2592</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <ol style="list-style-type: none"> 1) Housing Authority Administrative Office, 13930 S Gain Street, Oregon City, OR 97045 2) Housing Authority Clackamas Heights Property Management Office, 13900 S Gain Street, Oregon City, OR 97045 3) Housing Authority Hillside Property Management Office, 2889 Hillside Court, Milwaukie, OR 97222 4) Housing Authority Website: http://www.clackamas.us/housingauthority/plansandreports.html 5) Clackamas County Public Library located at 16201 S.E. McLoughlin, Oak Grove, OR 97222 6) Resident Advisory Boards (RAB) Members receive a full draft Annual Plan to review in detail at the RAB meeting. 7) RAB Members received a summary of policy changes (hard copy) to hand out to other residents <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse;"> <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> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>Statement of Housing Needs and Strategy for Addressing Housing Needs – See Attachment C Other Policy that Govern Eligibility, Selection and Admissions - See Attachments A & B Financial Resources - See Attachment G Safety and Crime Prevention – VAWA statement – no changes made - See Attachment E Substantial Deviation and Significant Amendment/Modification – See Attachment F</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review. See Attachment D</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p>Administration:</p> <p>The Housing Authority Board bylaws will be reviewed and updated by the board, as needed, to ensure the most efficient operations and administration of the Authority while still meeting all legal obligations of the Authority. The Housing Authority is a separate legal entity than Clackamas County but is administered through a division of the Clackamas County’s Department of Health, Housing & Human Services (H3S) since the majority of the Housing Authority Board is made up of the Board of County Commissioners.</p> <p>Historically, the County’s homeless and housing programs and services have been situated across a number of different divisions within the Department of H3S, but in an effort to increase collaboration across the housing continuum, Clackamas County is reorganizing their housing services to be better aligned through a new Housing and Community Development Division.</p> <p>The Housing Authority will administratively align through this new division which will also include Community Development, CoC, HMIS administration, etc. With the development of this new division, the supportive services provided through Metro Supportive Housing Services funding will be managed through the County however the</p>

Regional Long Term Rent Assistance (RLRA) program and expanded resident services funded through the Metro Supportive Housing Services funding will be administered through the Housing Authority.

The leadership team for the new Housing and Community Development Division will oversee both a County Housing Programs as well as the Housing Authority. Together, the division will work to meet the housing needs of Clackamas County residents by leveraging all available housing funding and programing available.

In addition, the Housing Authority will be reviewing available Moving to Work (MTW) waivers to streamline operations and serve more clients. The 2023 MTW Supplement will begin this work and will request for all waivers necessary to begin the implementation of the Asset Building Cohort PHA designed program. The Housing Authority will use the rest of FY 2023-2024 to plan additional activities to increase the efficiency of the agency that will be included in the 2024-2025 MTW Supplement.

Development:

Repositioning Strategy:

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

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

In 2018-2019, HACC embarked on a Master Planning process that envisioned the redevelopment of the Hillside Park public housing community. The planning process engaged residents and community members, who helped develop a vision for a vibrant mixed-use, mixed-income community. The design preserves and rebuilds existing affordable housing at the site, while creating opportunities for expanded housing choice and type. In late 2020, HACC submitted a land use application to the city of Milwaukie seeking to rezone the site to allow for increased density and mixed-use housing. In late 2021, the City of Milwaukie formally approved HACC's land use application. In 2020, HACC completed an environmental review conducted under 24 CFR part 58 and the RRFO and AUGF were approved by HUD. In November 2022, HACC submitted a Section 18 Disposition application for the first phase of project (54 units). If the application is approved, HACC will relocate all impacted households following the approved Relocation Plan with the assistance of a relocation contractor and Section 8 vouchers.

HACC's application for a RAD conversion and Section 18 blend, which entails converting 100 units, 70 under a RAD HAP contract and 30 under a regular PBV contract (including 5 de minimis units that are backfilled with regular PBVs), as part of the rehabilitation of Hillside Manor, located at 2889 SE Hillside Ct, Milwaukie, was approved. The project closed on construction financing in May 2020 and construction was completed in October 2021. Conversion to permanent financing occurred in August 2022.

HACC has 145 scattered sites throughout Clackamas County. In March 2022, HACC completed the environmental review (ER) process conducted under 24 CFR part 58. In 2023-2024, HACC anticipates submitting a Section 18 Disposition application for these sites. If a Section 18 application is submitted and approved, HACC will relocate all 145 households following the approved Relocation Plan with the assistance of a relocation contractor and Section 8 vouchers. HACC is also exploring the possibility of submitting a Section 32 Homeownership Plan for a portion of these units.

Metro Bond:

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

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

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

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

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

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

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

Projects Overview:

The Fuller Road Station project located in unincorporated Clackamas County\closed on construction financing in April 2021 and completed construction in September 2022 with lease up currently underway. Fuller Road Station consists of 100 units that will serve households with incomes 60% of AMI or below, including 30 units reserved for households with incomes at or below 30% AMI. 25 units will be dedicated to households experiencing homelessness.

The Good Shepherd Village project located in Happy Valley closed on construction financing in February 2022. This project consists of 143 units that will serve households with incomes 60% of AMI or below, including 58 units reserved for households with incomes at or below 30% AMI. 35 units will be dedicated to households experiencing homelessness, including 15 units prioritized for veterans experiencing homelessness. Construction completion is expected in Fall 2023.

The Maple Apartments project located in Oregon City closed on construction financing in May 2022. This project consists of 171 units that will serve households with incomes 60% of AMI or below, including 70 units reserved for households with incomes at or below 30% AMI. At least nine units will be dedicated to households experiencing homelessness. Construction completion is expected in Winter 2023.

In May 2022, HACC awarded the Marylhurst Commons project, located in Lake Oswego, \$3 Million in Metro Affordable Housing Bond Funds. The project closed on construction financing in September 2022. Marylhurst

Commons consists of 100 units that will serve households with incomes 60% of AMI or below, including 40 units reserved for homeless or at-risk households with incomes at or below 30% AMI. Construction completion is expected in early 2024.

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

In 2023-2024 HACC plans to award its remaining allocation of Metro Bond funds (~\$26.5MM) to support the development of approximately 250-300 new units of affordable housing.

Voucher Programs:

HACC was awarded 16 new Fair Shares vouchers and 30 new Mainstream vouchers and applied for additional VASH and Stability vouchers. These vouchers are an addition to our ACC Amendment total. HACC was awarded \$107,000 in Mainstream Voucher special Administrative Fee to assist Mainstream Voucher holders with security deposit and other rental barriers. HACC is working with a new Supportive Services program to improve the stability and success of all our clients we serve but is especially having to focus on our 75 Foster Youth to Independence (FYI) and 41 Emergency Housing (EHV) Vouchers as both populations have limited term vouchers. We are focusing on trying to get these households interested in the Family Self Sufficiency Program and other resources to stabilize their income to prepare them to go off assistance.

HACC will continue to apply for and accept additional vouchers in the future. HACC submitted and was approved to maximize the number of units we Project Base to increase the inventory of new affordable housing construction into the future.

In early 2020 regional voters, passed Metro Measure 26-210 known as the Supportive Housing Services (SHS) Measure aimed to eradicate chronic homelessness through pairing rental assistance and supportive services. This local funding source will add about 45 million dollars to the County's Homeless Services budget. In November 2021, HACC began assisting families with Regional Long Term Rent Assistance (RLRA) and services in the first year of operations, HACC has served over 200 households with rent assistance. This program is expanding rapidly with a goal of serving 30 households a month ongoing until funding thresholds are reached. In addition, RLRA vouchers will be project based in applicable local project properties and new developments to increase affordable housing and permanent supportive housing options in Clackamas County.

The services will continue to be funded with SHS funding however they will be administered through the County. Services will be paired with all RLRA vouchers. In addition, SHS funding will add service components to other housing programs to increase housing stability across the continuum and bring better housing success to all housing programs. HACC will act not only as the RLRA administrator but also as an RLRA landlord for RLRA voucher holders housed at local project sites and will be eligible for the SHS landlord incentive program.

HACC will continue to pursue opportunities to project-base vouchers, both Federal and RLRA, in developments and established properties to increase affordable and supportive housing options. In addition, HACC is also exploring a master leasing model for the RLRA program, especially to increase housing options for our clients most difficult to house. With properties master leasing or project-basing, HACC will pursue options to include onsite supportive services and resident services through local funding to increase housing stability and community building activities for client success at these properties.

Public Housing:

The Housing Authority will continue to operate and maintain public housing units as the repositioning outlined in the Development section begins to unfold. As part of the ongoing operation and maintenance of the public housing units, HACC will continue to utilize awarded capital funds to perform repairs on vacant units necessary for re-occupancy. This means that there will be approximately 20 units offline approved for modernization throughout the year. These approved units may be carried over from one FY to another. At the end of the FY 2022-2023, HACC

anticipates having approximately 3 units offline, approved for modernization. In addition to the modernization of vacant units, HACC will also continue to use awarded capital funds to perform other necessary improvements to our properties and structures, such as parking lot repairs, roof repairs, etc.

The growing resident services team will continue to assist public housing residents with housing retention and pathways to greater self-sufficiency. Resident surveys continue to report very high ratings agreeing or strongly agreeing that the Housing Authority staff members responding to their needs were friendly/courteous and professional.

Resident Services:

The Resident Services team is made up of a ROSS Coordinator, 2 FSS Coordinators, 3 Resident Services Specialists, Housing Case Manager, 2 Peer Support Specialists, 2 Americorps participants and 1 Social Work Intern. The resident service team supports HACC's Properties serving individuals, families, seniors, and people with disabilities.

Resident Services Program focuses on the following objectives:

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

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

- Individualized case coordination, life skills, credit repair, and financial counseling
- Connections to area workforce, employment, and higher education
- Parent support in raising healthy children who are ready to learn and succeed
- Mental health counseling
- Alcohol and drug treatment and recovery
- Eligible public benefits
- Legal services
- Housekeeping and personal care services
- Health care and wellness programs
- Culturally specific services
- Safety net services
- Domestic violence services
- Peer-delivered support and relationships; and
- Volunteer and social activities.

B.3

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

PHA Goal 1 – Improve the quality of Housing Authority assisted housing and customer service

- PHA Strategy 1.a – Maintain high performer status
- 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

PHA Goal 2 – Improve community quality of life and economic vitality

- PHA Strategy 2.a – Continue Resident Services programs through partnerships with community groups & service providers to build community and meet resident needs including food insecurity and those affected by COVID-19.
- PHA Strategy 2.b – Encouraged Resident participation through resident associations and surveys to access housing needs.

PHA Goal 3 – Promote self-sufficiency and asset development of families and individuals

- PHA Strategy 3.a - Continue to partner with local & regional workforce partners to increase the number of employed/underemployed living in housing
- 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. Planned expansion of current Credit Building program and addition of a Savings account program as new Moving To Work (MTW) status as part of the Asset Building Cohort.

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

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

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

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

Fair Housing Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to

increase fair housing for all protected classes.

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

B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/25/2021 See Attachment H: Capital Fund Projects Summary See Attachment I: Capital Fund Budget</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit? Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>See Attachment J: Resident Advisory Board Meeting Minutes & Comments</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment K: Certification by State and Local Officials (HUD-50077-SL)</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment L: Civil Rights Certification/Certification of Listing (HUD-50077-ST-HCV-HP)</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan? Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> <p>See Attachment O: Public Notice & Public Comments</p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<p>Affirmatively Furthering Fair Housing.</p>

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

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

Describe fair housing strategies and actions to achieve the goal

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

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

Describe fair housing strategies and actions to achieve the goal

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

Fair Housing Goal 3: 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

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

Instructions for Preparation of Form HUD-50075-HP

Annual Plan for High Performing PHAs

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

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

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

B. Plan Elements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C. Other Document and/or Certification Requirements

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

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

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

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

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

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

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

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

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

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

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

ATTACHMENT A:

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

Chapter	Old Policy Language	New Policy Language	Summary
1	1-I.B. ORGANIZATION AND STRUCTURE OF HACC The officers of HACC are known as commissioners or, collectively, as the Board of Commissioners (Board). The Board consists of the five Clackamas County elected Board of Commissioners and one Board-appointed HACC Resident Commissioner.	1-I.B. ORGANIZATION AND STRUCTURE OF HACC Bylaws for the Housing Authority identify that the officers of HACC are known as commissioners or, collectively, as the Board of Commissioners (Board). The Board consists of the seven (7) commissioners. Five (5) Commissioners shall be that of the governing body of Clackamas County referred to as the elected Board of County Commissioners, one Board-appointed HACC Resident Commissioner who receives direct assistance from the Housing Authority, and one appointed resident of the County .	Updated Board Structure language to tie to the Bylaws currently in place.
1	1-I.B. ORGANIZATION AND STRUCTURE OF HACC No Language	1-I.B. ORGANIZATION AND STRUCTURE OF HACC HACC is a “Moving to Work” (MTW) agency. MTW is a federal program administered by HUD that gives a PHA the flexibility to design and test various approaches for providing and administering housing assistance that reduce cost and achieve greater cost effectiveness in federal expenditures; give incentives to families with children where head of household is working, seeking work, or is participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and increase housing choices for low-income families.	Adding required language acknowledging our new Moving to Work (MTW) status.
1	1-I.C. HACC's MISSION HACC's mission is to provide affordable, safe, decent and sanitary housing opportunities in a fiscally responsible manner to low-income people in Clackamas County.	1-I.C. HACC's MISSION The mission of the Housing Authority 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	Updated our mission last year and needed to align in Admin Plan.

		equitable service delivery, financial sustainability, and thriving partnerships to ensure our long term viability.	
1	1-I.D. HACC's PROGRAMS 1. The Housing Choice Voucher (HCV) including Fair Share Housing vouchers program. 8. The Foster Youth to Independence Program (FYI) and Family Unification Program (FUP), if awarded. 9. The Metro 300 Grant	1-I.D. HACC's PROGRAMS 1. The Housing Choice Voucher (HCV) including Fair Share Housing vouchers program. 8. The Foster Youth to Independence Program (FYI) and Family Unification Program (FUP), if awarded.	Added newly awarded Fair Share Housing Choice Vouchers, Family Unification Program (FUP) added as applying and hoping for award of new vouchers. Removed Metro 300 as no longer exists.
1	1-III.A. OVERVIEW AND PURPOSE OF THE PLAN	1-III.A. OVERVIEW AND PURPOSE OF THE PLAN Policies established by HACC under its MTW authority are identified as “MTW” throughout the administrative plan. For non-MTW programs, the policies are governed by federal regulations as listed throughout the plan.	Added MTW policy language as required with new status.
2	2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION After a request for an accommodation is presented, the HACC will respond, in writing, within 14 business days. HACC will notify in writing if the request is approved. Except in cases where an accommodation is requested for an extension on a voucher, the notification may only come by phone call to the client to put into immediate effect.	2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION After a request for an accommodation is presented with a verification of disability, the HACC will respond, in writing, within 14 business days. HACC will notify in writing if the request is approved. If the household is homeless, email may suffice as notification. Except in cases where an accommodation is requested for an extension on a voucher, the notification may only come by phone call to the client to put into immediate effect.	Making policy clear 14 day clock on considering a request does not start until HACC receives a verification of disability related need and that email can suffice as notification of a decision.

2	<p>2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS</p> <p>To meet the needs of persons with hearing impairments, TDD communication will be available through the use of 711 and email will be also used.</p>	<p>2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS</p> <p>To meet the needs of persons with hearing impairments, 711 is the local phone relay system we rely on, text, and email will be also used.</p>	<p>Added texting as an option.</p>
2	<p>2-III.B. ORAL INTERPRETATION</p> <p>HACC will utilize a language line for telephone interpreter services.</p>	<p>2-III.B. ORAL INTERPRETATION</p> <p>HACC will utilize a language line for telephone interpreter services. Where feasible, the PHA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents. Where feasible and possible, the PHA will encourage the use of qualified community volunteers.</p>	<p>HACC is committing to hiring more bilingual staff and increase LEP document offerings.</p>
3	<p>3-I.B. FAMILY AND HOUSEHOLD [24 CFR 982.201(c), ; FR Notice 02/03/12; Notice PIH 2014-20]</p> <p>Multi-person Family:</p> <p>A group of two or more persons who will live together on a regular basis in the same dwelling unit. (A regular basis is one where there is a present intent to live together for an indefinite period of time. The mere sharing of housing accommodations solely to qualify for rental assistance, or solely for the convenience of the parties, is not acceptable);</p> <p>A family also includes:</p> <p>Single-person Family:</p> <ul style="list-style-type: none"> a single person who is 62 years old of age or over; or a single person who is disabled; or a single person who is displaced; or a single person who is in the process of securing legal custody of any individual under the age of 18 years; or a single woman who is pregnant. <p>All other single persons may apply but will not be housed until all above listed single persons are housed.</p>	<p>3-I.B. FAMILY AND HOUSEHOLD [24 CFR 982.201(c), ; FR Notice 02/03/12; Notice PIH 2014-20]</p> <p>A family also includes two or more individuals who are not related by blood, marriage,</p> <p>adoption, or other operation of law but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family.</p> <p>Each family must identify the individuals to be included in the family at the time of</p> <p>application, and must notify the PHA if the family's composition changes.</p> <p>Other Family Definitions:</p> <p>A child who is temporarily away from the home because of placement in foster care is considered a member of the family for up to 180 days or until next annual whichever is less;</p> <p>Once initial eligibility process is completed, the changes to family composition will be allowed in accordance with policies in Section 11-II.C.</p>	<p>Simplified family definition</p>

	<p>Other Family Definitions:</p> <p>A child who is temporarily away from the home because of placement in foster care is considered a member of the family;</p> <p>A family also includes two or more individuals who are not related by blood, marriage, adoptions, other operation of law, but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of family.</p> <p>Each family must identify the individuals to be included in the family at the time of application, and must update this information in writing if the family's composition changes.</p> <p>HACC will not permit others who are currently living in independent circumstances, and have done so for a period of more than six months to move in with the participating family. Such persons may apply for housing by joining the wait list for any HACC housing program when the waiting lists are open.</p>		
3	<p>3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY</p> <p>Family Break-up [24 CFR 982.315; Notice PIH 2017-08]</p> <p>No language addressing special purpose vouchers existed</p>	<p>3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY</p> <p>Family Break-up [24 CFR 982.315; Notice PIH 2017-08]</p> <p>Exceptions for VASH and other special purpose Vouchers</p> <p>Since the set-aside of VASH and other special purpose vouchers is for veterans or have specific pre-qualified requirements for participants respectively, the voucher will remain with the veteran or pre-qualified participant in the case of a special purpose voucher.</p>	<p>Needed to address requirements of special purpose vouchers.</p>
3	<p><i>U.S. Citizens and Nationals</i></p> <p>1. For Citizens: A signed declaration of U.S. citizenship; and, an original U.S. Birth Certificate (or certified copy) or a U. S. Passport.</p>	<p><i>U.S. Citizens and Nationals</i></p> <p>1. For Citizens: Family members who claim U.S. Citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.</p>	<p>Ridding of requirement for Birth Certificate.</p>

3	<p>Previous Behavior in Assisted Housing [24 CFR 982.552(c)]</p> <p>Any PHA has ever been terminated assistance under the program for any member of the family.</p>	<p>Previous Behavior in Assisted Housing [24 CFR 982.552(c)]</p> <p>Any PHA has terminated assistance under the program for any member of the family in the last three years.</p>	<p>Softening and making it within the last 3 years only.</p>
4	<p>Local Preferences [24 CFR 982.207; HCV p. 4-16]</p>	<p>Local Preferences [24 CFR 982.207; HCV p. 4-16]</p> <p>12. FYI households that are disabled and unable to fully afford rent at time of voucher sunset will be offered a preference voucher referral due to risk of returning to homelessness.</p> <p>13. RLRA households that as a reasonable accommodation need to live outside the Metro region will be offered a preference voucher referral that meets their needs (either Mainstream, EHV, or regular voucher).</p>	<p>Added two new preferences to serve based on new program offerings are limited term in nature or limit where a person can live.</p>
5	<p>5-II.E. VOUCHER TERM AND EXTENSIONS</p> <p>Voucher Term [24 CFR 982.303]</p> <p><u>HACC Policy</u></p> <p>The initial voucher term will be 120 calendar days for all programs.</p> <p>The family must submit a Request for Tenancy Approval and proposed lease within the 120 day period unless HACC grants an extension.</p> <p>Extensions will be limited to no more than one 30 day extension as outlined under Extension of Voucher Term below.</p> <p>HACC will not grant extensions on ports to other jurisdictions.</p> <p>For families moving to HACC's jurisdiction under portability, HACC will honor extensions granted by the initial PHA only.</p> <p>The voucher term will not begin until the day after the tenant's 30 day notice has ended, or the day after the tenant/landlord has mutually agreed to terminate the lease. Exceptions to this</p>	<p>5-II.E. VOUCHER TERM AND EXTENSIONS</p> <p>Voucher Term [24 CFR 982.303]</p> <p><u>HACC Policy</u></p> <p>The initial voucher term will be 120 calendar days for all programs.</p> <p>The family must submit a Request for Tenancy Approval and proposed lease within the 120 day period unless HACC grants an extension.</p> <p>Requests for extensions must be received prior to expiration of voucher for consideration.</p> <p>For families moving to HACC's jurisdiction under portability, HACC will honor extensions granted by the initial PHA only.</p> <p>The voucher term will begin on date signed by both HACC and tenant.</p>	<p>Need language that supports no reconsideration of extensions after voucher has expired.</p> <p>Removed requirement to give Vacate Notice prior to being issued a voucher and allows family to have some overlap in rental assistance between moves as long as in the same month.</p>

	<p>policy will be considered for Domestic Violence and reasonable accommodation.</p> <p>Any extensions to the initial 30 day notice to vacate (if the tenant did not move as notified the landlord) will not change the voucher term that was initially set after the tenant's initial 30 day notice. Failure to vacate a unit by the tenant is not grounds for an extension on the voucher.</p>		
5	<p>Extensions of Voucher Term [24 CFR 982.303(b)]</p> <p>HACC will approve only one 30 day extension under the following circumstances:</p> <p>It is necessary as a reasonable accommodation for a person with disabilities.</p> <p>It is necessary due to reasons beyond the family's control, as determined by HACC. Following is a list of extenuating circumstances that HACC may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:</p> <p>Serious illness or death in the family</p> <p>Whether family size or other special circumstances make it difficult to find a suitable unit</p> <p>Any request for an additional extension must include the reason(s) an additional extension is necessary. HACC may require the family to provide documentation to support the request or obtain verification from a qualified third party.</p> <p>All requests for extensions to the voucher term must be made in writing and submitted to HACC prior to the expiration date of the voucher (or extended term of the voucher).</p> <p>HACC will decide whether to approve or deny an extension request within 10 business days of the date the request is received, and will immediately provide the family written notice of its decision.</p>	<p>Extensions of Voucher Term [24 CFR 982.303(b)]</p> <p>If HACC has inadequate funding or faces a sequestration, no extensions will be granted.</p> <p>Otherwise, the PHA will automatically approve an additional 30-day extension upon written request from the family. The request may be delivered in person, by e-mail, fax, or through a support agency on behalf of the family.</p> <p>The PHA may approve additional extensions only in the following circumstances:</p> <p>An additional 30-day extension is necessary as a reasonable accommodation for a person with disabilities</p> <p>An additional 30-day extension is necessary due to reasons beyond the family's control,</p> <p>as determined by the PHA. The extenuating circumstances the PHA may consider in making its decision include, but are not limited to, the reasons listed below.</p> <p>The presence of these circumstances does not guarantee that an extension will be granted:</p> <p>Serious illness or death in the family</p> <p>Other family emergency</p> <p>Obstacles due to employment</p> <p>Whether the family has already submitted requests for tenancy approval that were not approved by the PHA</p>	<p>Matching policy language to actual practice on extensions.</p>

	<p>If HACC has inadequate funding or faces a sequestration, no extensions will be granted.</p>	<p>Whether family size or other special circumstances make it difficult to find a suitable unit.</p> <p>Additional reasons for extensions may apply for families approved for portability (see Chapter 10).</p> <p>Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.</p> <p>All requests for extensions to the voucher term must be made in writing and submitted to the PHA prior to the expiration date of the voucher (or extended term of the voucher).</p> <p>The PHA will decide whether to approve or deny an extension request within 15 business days of the date the request is received and will immediately provide the family written notice of its decision.</p> <p>For families moving to the PHA's jurisdiction under portability, the voucher expiration date will be 30 calendar days from the expiration date of the initial PHA's voucher. The PHA will not approve an extension beyond that date unless the initial PHA is willing to extend its voucher term and the billing submission</p>	
6	<p>Reasonable Accommodation</p> <p>HACC will use a range of 110% - 120% of payment standard for reasonable accommodations, but will not approve a payment standard exceeding 120% of the fair market rent without HUD pre-approval.</p>	<p>Reasonable Accommodation</p> <p>HACC will use a range of 110% - 120% of fair market rents for reasonable accommodations whichever is lowest to make unit work for household but will not approve a payment standard exceeding 120% of the fair market rent without HUD pre-approval.</p>	<p>Matched policy language to practice.</p>
7	<p>7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION</p> <p>As verification of earned income, HACC will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating</p>	<p>7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION</p> <p>As verification of earned income, HACC will require the family to provide the most current, consecutive 60 days of pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income,</p>	<p>To reduce discrepancies with HUD's EIV system wanting more data for more accurate</p>

	schedule, etc.), the PHA may request additional paystubs or a payroll record.	fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.	calculation and to match actual procedures used by staff.
8	<p>Bedroom Definition</p> <p>For a room to be considered as a bedroom, it must meet the minimum definition as established by HUD. This includes, but is not limited to, the following: A room primarily designed for sleeping with a source of natural light, a minimum of which, 50% shall be openable, a minimum horizontal dimension of 7ft, a minimum height of 7'6", code complying means of emergency egress (2 ways to get out in a fire, usually implies a window and a door), an outlet with overhead permanent light fixture or two outlets, a permanent source of heat somewhere with the house that is adequate to heat all spaces, operable window, security, and a minimum of 70 square feet. Water heaters must be in a closet or enclosed if it exists in the space. Bedrooms cannot exist in a utility area. In addition, HACC's policy states that bedrooms in units built after 1940 will include closets built into the wall units. Rooms that have been remodeled will qualify as bedrooms as long as the remodel has included the addition of a closet and window easement. HACC may use tax information to determine total number of bedrooms in the unit.</p>	<p>Bedroom Definition</p> <p>For a room to be considered as a bedroom, it must meet the minimum definition as established by HUD. This includes, but is not limited to, the following: A room primarily designed for sleeping with a source of natural light, code complying means of emergency egress (2 ways to get out in a fire, usually implies a window and a door), an outlet with overhead permanent light fixture or two outlets, a permanent source of heat somewhere with the house that is adequate to heat all spaces, operable window if egress source. Water heaters must be in a closet or enclosed if it exists in the space. Bedrooms cannot exist in a utility area. In addition, HACC's policy states that bedrooms in units built after 1940 will include closets built into the wall units. Rooms that have been remodeled will qualify as bedrooms as long as the remodel has included the addition of a closet and window easement. HACC may use tax information to determine total number of bedrooms in the unit.</p>	<p>Removed size requirements to match practice while inspecting as bedrooms are not measured. Safety and function are priority for considering.</p>
8	<p>Inspection of HACC-Owned Units [24 CFR 982.352(b)]</p> <p>HACC currently has HUD approval to use HomeFoward for all inspections and rent reasonableness for units owned by HACC where a tenant based voucher is utilized.</p>	<p>Inspection of HACC-Owned Units [24 CFR 982.352(b)]</p> <p>HACC currently has HUD approval to use third party contractors for all inspections and rent reasonableness for units owned by HACC where a tenant-based voucher is utilized.</p> <p>HACC will be seeking HUD waiver approval to inspect owned properties where we are not the sole ownership entity under MTW.</p>	<p>Using multiple third party contractors for inspections on HACC owned properties and seeking waiver under MTW to inspect properties partially owned by HACC (LIHTC).</p>

8	Inspection Results and Reinspections If the unit fails the HQS inspection, the owner is notified either orally or in writing. A follow-up inspection is conducted to verify completion, except for those items that allow owner/tenant certification. As provided by federal regulation, HACC may conditionally approve a unit where the only fail item is exterior paint.	Inspection Results and Reinspections If the unit fails the HQS inspection, the owner is notified in writing. A follow-up inspection is conducted to verify completion. As provided by federal regulation, HACC may conditionally approve a unit where the only fail item is exterior paint.	Removing Self Certification on Initial inspections as COVID waiver allowing ended.
8	HAP Contract Termination The maximum length of time that HAP may be abated is 120 days or with manager pre-approval 180 days. However, if the owner completes corrections and notifies HACC before the termination date of the HAP contract, HACC may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.	HAP Contract Termination The maximum length of time that HAP may be abated is 60 days or with manager pre-approval 90 days. However, if the owner completes corrections and notifies HACC before the termination date of the HAP contract, HACC may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.	Shortening compliance days from 120 to 60 and 180 to 90
8	8-III.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED Owner-Initiated Rent Determinations All rents adjustments will be effective the first of the month following 60 days after HACC's receipt of the owner's request or on the date specified by the owner, whichever is later.	8-III.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED Owner-Initiated Rent Determinations All rents adjustments will be effective the first of the month following 60 days after HACC's receipt of the owner's request or on the start of a month specified by the owner, whichever is later.	Matching policy language to practice.
10	Reexamination of Family Income and Composition <u>HACC Policy</u> For families approved to move to a new unit within HACC's jurisdiction, HACC will perform a new annual reexamination in accordance with the policies set forth in Chapter 11 of this plan.	Reexamination of Family Income and Composition <u>HACC Policy</u> For families approved to move to a new unit within HACC's jurisdiction, the PHA will not perform a reexamination unless the move coincides with the family's regularly scheduled reexamination, or the family notifies the PHA of a change in family composition, income or assets. If a family composition changed and a new family member is added, the PHA will conduct a reexamination to determine any new income associated with the additional family member.	No longer changing annual dates at moves so reducing paperwork if no family changes at move no reexamination done.

10	Voucher Issuance and Briefing If a family chooses to not provide a Vacate Notice prior to issuance of voucher, no inspection and no HAP Contract will be executed until such time as the family provides a copy of the Vacate Notice.	Voucher Issuance and Briefing If a family chooses to not provide a Vacate Notice prior to issuance of voucher, no inspection and no HAP Contract will be executed until such time as the family provides a copy of the Vacate Notice.	Allowing families to be issued a voucher to search for housing without giving Notice, but will not start new contract until Notice given.
10	Housing Assistance Payments [24 CFR 982.311(d)] HACC will pursue a prorated Housing Assistance Payment (HAP) whenever possible for mid-month moves. Should a family give advance notice to vacate mid-month, HACC will prorate rent	Housing Assistance Payments [24 CFR 982.311(d)] HACC will pursue a prorated Housing Assistance Payment (HAP) whenever possible for mid-month moves. Should a family give advance notice to vacate mid-month, HACC will prorate rent. HACC will allow overlap in a single month when needed.	Adding language to allow overlap of same month of rental assistance during moves.
11	11-I.C. SCHEDULING ANNUAL REEXAMINATIONS If the family moves to a new unit, HACC will perform a new Annual Reexamination	11-I.C. SCHEDULING ANNUAL REEXAMINATIONS Removed language	No longer changing annual dates with moves so longer need to do extra work with family moves.
11	Departure of a Family or Household Member If a household member ceases to reside in the unit, the family must inform HACC within 7 business days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent. Notification must be in writing and include any applicable documentation of proof. If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform HACC within 7 business days.	Departure of a Family or Household Member If a household member ceases to reside in the unit, the family must inform HACC within 7 calendar days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent. Notification must be in writing and include any applicable documentation of proof. If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform HACC within 7 calendar days.	Aligning all tenant reporting of changes must be within 7 calendar days.

11	<p>Required Reporting</p> <p>Families are required to report all increases in income (including new employment or change of employment), and assets within 7 business days of the date the change takes effect. ...</p> <p>3) When changes in income have not been reported to the PHA in a timely manner (within 7 business days of the change).</p>	<p>Required Reporting</p> <p>Families are required to report all increases in income (including new employment or change of employment), and assets within 7 calendar days of the date the change takes effect. ...</p> <p>3) When changes in income have not been reported to the PHA in a timely manner (within 7 calendar days of the change).</p>	<p>Aligning all tenant reporting of changes must be within 7 calendar days.</p>
11	<p>Optional Reporting</p> <p>To qualify for a rent reduction due to loss of income, the decrease in income must be anticipated to be for 30 or more consecutive days. If there is deemed to be an extreme hardship, such as an eviction notice for not being able to pay rent, and documented proof is available, a supervisor may approve an interim for a change in income less than 30 days.</p> <p>If the decrease is temporary (defined as less than 30 days), or the participant's income is unstable, the income may be reviewed every 30 days. The participant will be required to report within 7 business days that the income will increase and/or become substantially gainful, at which time a reexamination will be completed.</p>	<p>Optional Reporting</p> <p>To qualify for a rent reduction due to loss of income, the decrease in income must be anticipated to be for 30 or more consecutive days. If there is deemed to be an extreme hardship, such as an eviction notice for not being able to pay rent, and documented proof is available, a supervisor may approve an interim for a change in income less than 30 days.</p> <p>If the decrease is temporary (defined as less than 30 days), or the participant's income is unstable, the income may be reviewed every 30 days. The participant will be required to report within 7 calendar days that the income will increase and/or become substantially gainful, at which time a reexamination will be completed.</p>	<p>Adding a hardship option for changes of income less than 30 days.</p>
11	<p>11-II.D. PROCESSING THE INTERIM REEXAMINATION</p> <p>Method of Reporting</p> <p><u>HACC Policy</u></p> <p>When family obligations require the family to respond to a request or notify the HACC of a change, notifying the HACC of the request or change within 7 calendar days is considered prompt notice.</p>	<p>11-II.D. PROCESSING THE INTERIM REEXAMINATION</p> <p>Method of Reporting</p> <p><u>HACC Policy</u></p> <p>When family obligations require the family to respond to a request or notify the HACC of a change, notifying the HACC of the request or change within 7 calendar days is considered prompt notice.</p>	<p>Aligning all tenant reporting of changes must be within 7 calendar days.</p>

11	Utility Allowances [24 CFR 982.517(d)] <u>HACC Policy</u> Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual or interim reexamination after the allowance is adopted. HACC will not conduct an interim reexamination solely for the purpose of implementing the revised utility allowance schedule.	Utility Allowances [24 CFR 982.517(d)] <u>HACC Policy</u> Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual after the allowance is adopted. HACC will not conduct an interim reexamination solely for the purpose of implementing the revised utility allowance schedule.	Only adjusting the UA at Annual not at interims to reduce workload and errors.
19	NA	Temporary Policy Supplement EMERGENCY HOUSING VOUCHERS (EHVs)	Adding new Chapter for new Emergency Housing Vouchers (EHVs)

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Chapter	Old Policy Language	New Policy Language	Change
Chapter 1 OVERVIEW OF THE PROGRAM AND PLAN	1-I.B ORGANIZATION AND STRUCTURE OF HACC <p>The officers of HACC are known as commissioners or, collectively, as the Board of Commissioners (Board). The Board consists of the five Clackamas County elected Board of Commissioners and one Board-appointed HACC Resident Commissioner. The Board generally serves in the same capacity as the directors of a corporation, establishing policies under which HACC conducts business, ensuring that policies are followed by HACC staff and ensuring that HACC is successful in its mission. The Board is responsible for preserving and expanding HACC's resources and assuring HACC's continued viability.</p>	<p>Replaced language to read</p> <p>Bylaws for the Housing Authority identify that the officers of HACC are known as commissioners or, collectively, as the Board of Commissioners (Board). The Board consists of the seven (7) commissioners. Five (5) Commissioners shall be that of the governing body of Clackamas County referred to as the elected Board of County Commissioners, one Board-appointed HACC Resident Commissioner who receives direct assistance from the Housing Authority, and one appointed resident of the County.</p> <p>The Board generally serves in the same capacity as the directors of a corporation, establishing policies under which HACC conducts business, ensuring that policies are followed by HACC staff and ensuring that HACC is successful in its mission. The Board is responsible for preserving and expanding HACC's resources and assuring HACC's continued viability.</p>	<p>Added language from newest adopted Bylaws to better describe the Housing Authority Board of Commissioners and the possibility of adding another Resident Commissioner to the Board.</p>
Chapter 1 OVERVIEW OF THE PROGRAM AND PLAN	1-I.B ORGANIZATION AND STRUCTURE OF HACC <p><i>(Added language for MTW status)</i></p>	<p>Added the following language</p> <p>HACC is a "Moving to Work" (MTW) agency. MTW is a federal program administered by HUD that gives a PHA the flexibility to design and test various approaches for providing and administering housing assistance that reduce cost and achieves greater cost effectiveness in federal expenditures; give incentives to families with children where head of household is working, seeking work, or is participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and increase housing choices for low-income families.</p>	<p>Added required language acknowledging our new Moving to Work (MTW) status. MTW is a HUD administered program to help families work towards self-sufficiency.</p>

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<p style="text-align: center;">Chapter 1 OVERVIEW OF THE PROGRAM AND PLAN</p>	<p>1-III.A. OVERVIEW AND PURPOSE OF THE PLAN <i>(Added language for MTW status)</i></p>	<p>Added the following language Policies established by HACC under its MTW authority are identified as “MTW” throughout the ACOP. For non-MTW programs, the policies are governed by federal regulations as listed throughout.</p>	<p>Added MTW policy language as required with new status.</p>
<p style="text-align: center;">Chapter 1 OVERVIEW OF THE PROGRAM AND PLAN</p>	<p>1.I.C HACC MISSION The mission of Housing Authority of Clackamas County (HACC) is providing affordable, safe, decent, and sanitary housing opportunities in a fiscally responsible manner to low income people in Clackamas County.</p>	<p>Replaced language to read The purpose of a mission statement is to communicate the purpose of the agency to people inside and outside of the agency. It provides the basis for strategy development, identification of critical success factors, resource allocation decisions, as well as ensuring client and stakeholder satisfaction. <u>HACC Policy</u> The mission of the Housing Authority 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>Updated HACC Mission definition to align with recommended language and updated HACC Policy (our mission statement) to better align with our current goals.</p>
<p style="text-align: center;">Chapter 2 FAIR HOUSING AND EQUAL OPPORTUNITY</p>	<p>2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION <u>HACC Policy</u> After a request for an accommodation is presented, HACC will respond, in writing, within 14 business days. HACC will notify the family in writing if the request is approved.</p>	<p>Replaced language to read After a request for an accommodation is presented, HACC will respond, in writing, within 14 business days. HACC will notify the family in writing if the request is approved. If the household is homeless, email may suffice as a notification.</p>	<p>Added language regarding emailed approval to household’s who are homeless, to align with current Administrative Plan.</p>

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<p style="text-align: center;">Chapter 2 FAIR HOUSING AND EQUAL OPPORTUNITY</p>	<p>2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS</p> <p><u>HACC Policy</u></p> <p>To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display/ teletype) communication will be available.</p>	<p>Replaced language to read</p> <p>To meet the needs of persons with hearing impairments, 711 TTD/TTY (text telephone display / teletype) communication will be available. We will also utilize text and email to communicate.</p>	<p>Added “711” for more clarity, and language stating we will utilize text and email for communication with those with hearing impairments, to align with Administrative Plan.</p>
<p style="text-align: center;">Chapter 3 ELIGIBILITY</p>	<p>3.I.M LIVE IN AIDE</p> <p>Live-in aide means a person who resides with one or more elderly persons, or near elderly well-being of the person(s), (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403].</p> <p>HACC must approve a live-in aide if needed as a reasonable accommodation in accordance with 24 CFR 8, to make the program accessible to and usable by the family member with disabilities.</p> <p>A live-in aide is considered a household member but not a family member. The income of a live-in aide is not counted in the calculation of annual income for the family [24CFR 5.609(b)]. Relatives may be approved as live-in aides if they meet all of the criteria defining a live-in aide. Because live-in aides are not family members, a relative who serves as a live-in aide would not be considered a remaining member of a tenant family.</p>	<p>Replaced language to read</p> <p>Live-in Aide (LIA) means a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the person(s), (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403].</p> <p>HACC must approve a LIA if needed as a reasonable accommodation in accordance with 24 CFR 8, to make the program accessible to and usable by the family member with disabilities.</p> <p>A LIA is considered a household member but not a family member. The income of a LIA is not counted in the calculation of annual income for the family [24 CFR 5.609(b)]. Relatives may be approved as LIAs if they meet all of the criteria defining a LIA. Because LIA are not family members, a relative who serves as a LIA would not be considered a remaining member of a tenant family.</p>	<p>Updated “Live-in Aide” to the abbreviation (LIA) throughout the entire section 3.I.M for better readability, as this abbreviation is commonly used throughout the process of adding an LIA.</p>

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<p>Chapter 3 ELIGIBILITY</p>	<p>3-I.A. OVERVIEW</p> <p>Other Family Definitions:</p> <p>HACC will not permit others who are currently living in independent circumstances and have done so for a period of more than six months to move in with the participating family. Such persons may apply for housing by joining the wait list for any HACC housing program when the waiting lists are open.</p>	<p>Removed language</p>	<p>Due to the current housing crisis, HACC has removed this restriction to allow families to move in adult children in order to avoid homelessness.</p>
<p>Chapter 3 ELIGIBILITY</p>	<p>3.III.C OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION</p> <p>Previous Behavior [960.203(c) and (d) and PH Occ GB, p. 48]</p> <p><u>HACC Policy</u></p> <p>HACC will deny admission to an applicant family if HACC determines that the family:</p> <p>(Inserted language here)</p>	<p>Inserted language to read</p> <p>HACC will deny admission to an applicant family if HACC determines that the family:</p> <p>Owes rent or other amounts to any PHA in connection with Section 8, public housing, or other public housing assistance under the 1937 Act, unless the family repays the full amount of the debt prior to being selected from the waiting list.</p> <p>When denying admission due to family debts as shown in HUD's EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report. If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family's claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.</p>	<p>Updated existing policy to add recommended policy language. This language offers a better explanation of the current policy in place.</p>
<p>Chapter 6</p>	<p>6-I.C. ANTICIPATING ANNUAL INCOME</p> <p>Basis of Annual Income Projection</p>	<p>Replaced language to read</p> <p>When EIV is obtained and the family does not dispute</p>	<p>Updated the within 90 to 60 days to</p>

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INCOME AND RENT DETERMINATIONS	<p><u>HACC Policy</u></p> <p>When EIV is obtained and the family does not dispute the EIV employer data, HACC will use current tenant provided documents to project annual income. When the tenant provided documents are pay stubs, HACC will make every effort to obtain at least 4 consecutive pay stubs dated within the last 90 days.</p>	<p>the EIV employer data, HACC will use current tenant-provided documents to project annual income. When the tenant provided documents are pay stubs, HACC will make every effort to obtain at least 4 consecutive pay stubs dated within the last 60 days.</p>	<p>better align with current PIH recommendation.</p>
<p style="text-align: center;">Chapter 6</p> <p>INCOME AND RENT DETERMINATIONS</p>	<p>6-I.E. EARNED INCOME DISALLOWANCE [24 CFR 960.255;</p> <p>Calculation of the 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><i>(Insert language here)</i></p>	<p>Inserted the following language to read</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>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 <i>currently enrolled in school full-time</i>.</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</p>	<p>Added recommended additional language to clarify how EID impacts household members turning 18 enrolled as a student.</p>

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		status allowance they may, but the EID time clock will not stop.	
Chapter 6 INCOME AND RENT DETERMINATIONS	6-I.G. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)] Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PIH 2012-29] <u>HACC Policy</u> HACC will initially set its imputed asset passbook rate at the national rate as determined by the Federal Deposit Insurance Corporation (FDIC). HACC will review the passbook rate annually in December of each year. The rate will not be adjusted unless the current HACC rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.	Replaced language to read HACC will initially set its imputed asset passbook rate at the national rate as determined by the Federal Deposit Insurance Corporation (FDIC). HACC will review the passbook rate annually. The rate will not be adjusted unless the current HACC rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate. The effective date of changes to the passbook rate will be determined at the time of the review.	Updated existing policy to allow for annual review and effective date based on the time of the review. This replaces the policy that the review will only be in December of each year.
Chapter 6 INCOME AND RENT DETERMINATIONS	6-I.H. PERIODIC PAYMENTS <i>(Added new policy)</i>	Added new policy Applying SSA COLA to Current Annual and Interim Reexaminations Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining Social Security and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1st or later of the upcoming year [Notice PIH 2018-24].	Added new recommended policy to provide clarity on existing process.

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<p>Chapter 6</p> <p>INCOME AND RENT DETERMINATIONS</p>	<p>6-II.F. CHILD CARE EXPENSE DEDUCTION</p> <p>Eligible Child Care Expenses</p> <p>Necessary and Reasonable Costs</p> <p><u>HACC Policy</u></p> <p>Child care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.</p> <p>To establish the reasonableness of child care costs, HACC will use the schedule of child care costs from the local welfare agency. Families may present, and HACC will consider, justification for costs that exceed typical costs in the area.</p>	<p>Replaced language to read</p> <p>Childcare expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For childcare that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.</p> <p>To establish the reasonableness of childcare costs, HACC will use the schedule of childcare costs from a qualified local entity that either subsidizes childcare costs or licenses childcare providers. Families may present, and HACC will consider, justification for costs that exceed typical costs in the area.</p>	<p>Updated policy language for clarity of agencies that are qualified to provide schedule of childcare costs.</p>
<p>Chapter 6</p> <p>INCOME AND RENT DETERMINATIONS</p>	<p>6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]</p> <p>Reasonable Accommodation [24 CFR 8]</p> <p>On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit, if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [24 CFR 8 and 100, PH Occ GB, p. 172].</p> <p>Residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].</p> <p>See Chapter 2 for policies related to reasonable</p>	<p>Replaced language and header to read</p> <p>6-III.B. UTILITY ALLOWANCES [24 CFR 965, Subpart E]</p> <p>Reasonable Accommodation [24 CFR 8]</p> <p>On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit, if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [24 CFR 8 and 100, PH Occ GB, p. 172].</p> <p>Residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].</p>	<p>Added clarifying language about granting request for relief of excess utility charges and updated header from C to B with removal of prior 6-III.B</p>

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	accommodations.	<p>Further, the PHA may grant requests for relief from charges in excess of the utility allowance on reasonable grounds, such as special needs of the elderly, ill, or residents with disabilities, or special factors not within control of the resident, as the PHA deems appropriate. The family must request the higher allowance and provide the PHA with an explanation about the additional allowance required.</p> <p>See Chapter 2 for policies related to reasonable accommodations.</p>	
<p>Chapter 6</p> <p>INCOME AND RENT DETERMINATIONS</p>	<p>6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]</p> <p>Utility Allowance Revisions [24 CFR 965.507]</p> <p>HACC shall give notice to all residents of proposed allowances, scheduled surcharges, and revisions thereof. Such notice shall be given, in the manner provided in the lease or homebuyer agreement, not less than 60 days before the proposed effective date of the allowances or scheduled surcharges or revisions; shall describe with reasonable particularity the basis for determination of the allowances, scheduled surcharges, or revisions, including a statement of the specific items of equipment and function whose utility consumption requirements were included in determining the amounts of the allowances or scheduled surcharges; shall notify residents of the place where the PHA's record maintained in accordance with paragraph (b) of this section is available for inspection; and shall provide all residents an opportunity to submit written comments during a period expiring not less than 30 days before the proposed effective date of the allowances or scheduled surcharges or revisions. Such written</p>	<p>Replaced language to read</p> <p>HACC shall give notice to all residents of proposed allowances, scheduled surcharges, and revisions thereof. Such notice shall be given, in the manner provided in the lease or homebuyer agreement before the proposed effective date of the allowances or scheduled surcharges or revisions; shall describe with reasonable particularity the basis for determination of the allowances, scheduled surcharges, or revisions, including a statement of the specific items of equipment and function whose utility consumption requirements were included in determining the amounts of the allowances or scheduled surcharges; shall notify residents of the place where the PHA's record maintained in accordance with paragraph (b) of this section is available for inspection; and shall provide all residents an opportunity to submit written comments during a period expiring not less than 30 days before the proposed effective date of the allowances or scheduled surcharges or revisions. Such written comments shall be retained by the PHA and shall be available for inspection by residents. [24 CFR §965.502(c)]</p> <p>The tenant rent calculations must reflect any changes in HACC's utility allowance schedule [24 CFR 960.253(c)(3)].</p>	<p>Updated to remove the 60-day notice. Notification of revisions will be sent in the manner provided in Lease.</p>

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	<p>comments shall be retained by the PHA and shall be available for inspection by residents. [24 CFR §965.502(c)]</p> <p>The tenant rent calculations must reflect any changes in HACC's utility allowance schedule [24 CFR 960.253(c)(3)].</p>		
<p>Chapter 6</p> <p>INCOME AND RENT DETERMINATIONS</p>	<p>6-III.E. FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.253]</p> <p>Phasing In Flat Rents [Notice PIH 2017- 23; 24 CFR 960.253(b)]</p>	<p>Replaced language to read</p> <p>Phasing In Flat Rents [Notice PIH 2022- 33; 24 CFR 960.253(b)]</p>	<p>Updated reference to current PIH notice.</p>
<p>Chapter 7</p> <p>VERIFICATION</p>	<p>7-I.B OVERVUEW OF VERIFICATION REQUIREMENTS</p> <p>Requirements for Acceptable Documents</p> <p><u>HACC Policy</u></p> <p>Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the HACC request. The documents must not be damaged, altered or in any way illegible.</p> <p>Print-outs from web pages are considered original documents. HACC staff member who views the original document must make a photocopy</p> <p>Any family self certifications must be made in a format acceptable to HACC and must be signed in the presence of a HACC representative or HACC notary public.</p>	<p>Replaced language to read</p> <p>Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the HACC request. The documents must not be damaged, altered or in any way illegible. Print-outs from web pages are considered original documents.</p> <p>Any family self-certifications must be made in a format acceptable to HACC and must be signed in the presence of a HACC representative or notary public.</p>	<p>To ease administrative and applicant/tenant burden and with documents moving to electronic submission, HACC has removed the policy that HACC staff member must photocopy original document. If it is printed from web, no photocopy needed. Also removed that notary must be a HACC notary. Any request for a notarized document can be notarized by any notary.</p>

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<p>Chapter 7 VERIFICATION</p>	<p>7-I.C. UP-FRONT INCOME VERIFICATION (UIV) EIV Income and IVT Reports Income and IVT Reports will be retained in resident files with the applicable annual or interim reexamination documents.</p>	<p>Replaced language to read Income and IVT reports will be retained in resident files with the applicable annual or interim reexamination documents for the duration of the tenancy.</p>	<p>Added language about how long reports will be retained.</p>
<p>Chapter 7 VERIFICATION</p>	<p>7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION Written Third-Party Verification [Notice PIH 2018-18] <u>HACC Policy</u> Third-party documents provided by the family must be dated generally within 60 days of HACC request date. If HACC determines that third-party documents provided by the family are not acceptable, HACC will explain the reason to the family and request additional documentation. As verification of earned income, HACC will request pay stubs covering the 90-day period prior to HACC's request.</p>	<p>Replaced language to read Third-party documents provided by the family must be dated generally within 60 days of HACC request date. If HACC determines that third-party documents provided by the family are not acceptable, HACC will explain the reason to the family and request additional documentation. As verification of earned income, HACC will request at least 4 consecutive pay stubs within the last 60 days prior to HACC's request. At HACC's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), HACC may request additional paystubs or a payroll record.</p>	<p>Updated language from 90 days to 60 and at least 4 consecutive paystubs. This change in policy aligns with PIH Notice and existing ACOP 6.I.C. policy.</p>
<p>Chapter 7 VERIFICATION</p>	<p>7-I.E. SELF-CERTIFICATION <u>HACC Policy</u> The self-certification must be made in a format acceptable to HACC and must be signed by the family member whose information or status is being verified. All self-certifications must be</p>	<p>Replaced language to read The self-certification must be made in a format acceptable to HACC and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a HACC representative or notary public.</p>	<p>Removed requirement that notary must be a HACC notary public. This change aligns with change is 7.1.B.</p>

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	signed in the presence of a HACC representative or HACC notary public.		
Chapter 7 VERIFICATION	<p>7-II.A. VERIFICATION OF LEGAL IDENTITY</p> <p><u>HACC Policy</u></p> <p>Verification of Legal Identity for Adults</p> <ul style="list-style-type: none"> Current identification card <p>If none of these documents can be provided and at HACC's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to HACC and be signed in the presence of a HACC representative or HACC notary public.</p>	<p>Replace language to read</p> <ul style="list-style-type: none"> Current government employer identification card with picture <p>If none of these documents can be provided and at HACC's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to HACC and be signed in the presence of a HACC representative or notary public.</p>	<p>Clarification that an identification card needs to be government employer identification card with picture. Removed requirement that notary must be a HACC notary public.</p>
Chapter 7 VERIFICATION	<p>7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and Notice PIH 2018-24]</p> <p><u>HACC Policy</u></p> <p>Once an individual's status is classified as "verified" in HUD's EIV system, HACC will remove and destroy copies of documentation accepted as evidence of social security numbers.</p>	<p>Replaced language to read</p> <p>Once an individual's status is classified as "verified" in HUD's EIV system, HACC will not remove and destroy copies of documentation accepted as evidence of social security numbers.</p>	<p>Added "not" to align with current policy in place. This was likely a previous typo.</p>
Chapter 7 VERIFICATION	<p>7-II.D. FAMILY RELATIONSHIPS</p> <p>Absence of Adult Member</p> <p>If an adult member of the household is reported to be permanently absent or will no longer live in the subsidized unit, the Head of the Household must provide evidence to support that the person is no longer a member of the family (e.g., verification documentation can be a copy of a new lease, a</p>	<p>Replaced language to read</p> <p>If an adult member of the household is reported to be permanently absent or will no longer live in the subsidized unit, if HACC so requests, the Head of the Household must provide evidence to support that the person is no longer a member of the family (e.g., verification documentation can be a copy of a new lease, a utility bill with the new residence address, or a rent receipt in the person's name).</p>	<p>Updated policy language for clarification.</p>

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	utility bill with the new residence address, or a rent receipt in the person's name).		
Chapter 7 VERIFICATION	<p>7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS</p> <p>Social Security/SSI Benefits</p> <p><u>HACC Policy</u></p> <p>To verify the SS/SSI benefits of applicants, HACC will request a current (dated within the last 60 days) SSA benefit verification letter from each family member who receives social security benefits. If a family member is unable to provide the document, HACC will help the applicant request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the family has received the original benefit verification letter, it will be required to provide the letter to HACC.</p> <p>To verify the SS/SSI benefits of residents, HACC will obtain information about social security/SSI benefits through HUD's EIV system, and confirm with the resident(s) that the current listed benefit amount is correct. If the resident disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, HACC will request a current SSA benefit verification letter from each family member that receives social security benefits. If a family member is unable to provide the document, HACC will help the resident request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the</p>	<p>Replaced language to read</p> <p>Verification requirements for Social Security (SS) and Supplemental Security Income (SSI) benefits differ for applicants and participants.</p> <p>For applicants, since EIV does not contain SS or SSI benefit information, the PHA must ask applicants to provide a copy of their current SS and/or SSI benefit letter (dated within the last 60 calendar days) for each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the applicant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter from the applicant, make a photocopy of the document for the file, and return the original to the family.</p> <p>For participants, the PHA must obtain information through the HUD EIV system and confirm with the participants that the current listed benefit amount is correct.</p> <ul style="list-style-type: none"> If the participant agrees with the amount reported in EIV, the PHA must use the EIV-reported gross benefit amount to calculate annual income from Social Security. PHAs are required to use the EIV-reported SS and SSI benefit amounts when calculating income unless the tenant disputes the EIV-reported amount. For example, an SSA benefit letter may list the monthly benefit amount as \$450.80 and EIV displays the amount as \$450.00. The PHA must use the EIV-reported amount unless the participant disputes the amount. 	<p>Updated policy to recommended language in order to better clarify the process differences for applicants vs. participants and to document what verifications are not acceptable.</p>

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	<p>family has received the benefit verification letter, it will be required to provide the letter to HACC.</p>	<ul style="list-style-type: none"> • If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in EIV, the PHA must request a current SSA benefit verification letter (dated within the last 60 calendar days) from each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the participant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter from the participant, make a photocopy of the document for the file, and return the original to the family. • Photocopies of social security checks or bank statements are not acceptable forms of verification for SS/SSI benefits. 	
<p>Chapter 8</p> <p>LEASING AND INSPECTIONS</p>	<p>8-I.F. PAYMENTS UNDER THE LEASE</p> <p>Late Fees and Nonpayment</p> <p><u>HACC Policy</u></p> <p>If the family fails to pay their rent, or have a payment postmarked, by the eighth day of the month, and HACC has not agreed to accept payment at a later date, a 14-day Notice to Vacate will be issued to the resident for failure to pay rent, demanding payment in full or the surrender of the premises.</p> <p>In addition, if the resident fails to make payment by the end of the day (mid-night) or have a payment postmarked by the eighth day of the month, a late fee of \$25.00 will be charged. Notices of late fees will be in accordance with requirements regarding notices of adverse action. Charges are due and</p>	<p>Replaced language to read</p> <p>If the family fails to pay their rent, or have a payment postmarked, by the fifth day of the month, and HACC has not agreed to accept payment at a later date, a 30-day Notice to Vacate(during nationwide emergency orders) or a 14-day Notice to Vacate (upon expiration of nationwide emergency orders) will be issued to the resident for failure to pay rent, demanding payment in full or the surrender of the premises.</p> <p>In addition, if the resident fails to make payment by the end of the day (mid-night) or have a payment postmarked by the fifth day of the month, a late fee as defined in the lease will be charged. Notices of late fees will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, HACC may not</p>	<p>Updated the following language:</p> <p>Dates from 8th to 5th to align with current lease;</p> <p>added recommended nationwide emergency notice policy; changed late fee dollar amount to be aligned with lease and any charges HACC may be charged for NSF fees; added policy around multiple</p>

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	<p>payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, HACC may not take action for nonpayment of the fee until the conclusion of the grievance process. If the resident can document financial hardship, the late fee may be waived on a case-by-case basis.</p> <p>When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a returned check fee of \$25.00 will be charged to the family. The fee will be due and payable 14 days after billing.</p>	<p>take action for nonpayment of the fee until the conclusion of the grievance process. If the resident can document financial hardship, the late fee may be waived on a case-by-case basis.</p> <p>When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid, a late fee will be charged to the family including any service fees charged to HACC from the financial institution. The fee(s) will be due and payable 14 days after billing. If two (2) checks are returned within a twelve (12) month period, HACC will not accept personal checks for a period of 12 months.</p>	<p>returned checks to align with current policy.</p>
<p>Chapter 8</p> <p>LEASING AND INSPECTIONS</p>	<p>8-II.D. INSPECTION RESULTS</p> <p>Emergency Repairs [24 CFR 966.4(h)]</p> <p><u>HACC Policy</u></p> <p>When conditions in the unit are hazardous to life, health, or safety, HACC will make repairs or otherwise abate the situation within 24 hours.</p> <p>Defects hazardous to life, health or safety include, but are not limited to, the following:</p> <p><i>(Inserted language into list here)</i></p>	<p>Inserted language into list</p> <p>In in situations where the unit or building has a fuel burning appliance or an attached garage, missing or inoperable carbon monoxide detectors</p>	<p>Updated policy list to include language regarding carbon monoxide detectors.</p>
<p>Chapter 9</p> <p>REEXAMINATIONS</p>	<p>9-III.D. PROCESSING THE INTERIM REEXAMINATION</p> <p>Effective Dates</p> <p><u>HACC Policy</u></p> <p>If the family share of the rent is to decrease:</p> <p>The effective date of the decrease will be determined by the date the family reported the family change and submitted all required</p>	<p>Replaced language to read</p> <p>If the family share of the rent is to <i>decrease</i>:</p> <p>The decrease will be effective on the first day of the month following the month in which family reported the change and submitted all required documentation.</p> <p>In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively.</p>	<p>Updated policy to reduce rent burden when a family has a change that would result in a lower rent.</p>

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	<p>documentation. If the change was reported and all documentation required was received by the 15th of the month the decrease will be effective on the first day of the month following the month in which the change was reported. In cases where the change cannot be verified until after the 15th of the month, the change will not become effective until the first day of the following month. Due to causing an administrative burden, HACC will no longer process an interim reexamination for a monthly rent decrease of less than \$10.</p>	<p>Due to causing an administrative burden, HACC will no longer process an interim reexamination for a monthly rent decrease of less than \$10.</p>	
<p>Chapter 12 TRANSFER POLICY</p>	<p>12-II.B. TYPES OF HACC REQUIRED TRANSFERS Demolition, Disposition, Revitalizations, or Rehabilitation Transfers <i>(Replaced header)</i></p>	<p>Replaced header Demolition, Disposition, Revitalizations, or Rehabilitation, Including Rental Assistance Demonstration (RAD) Conversions Transfers</p>	<p>Updated policy header as recommended to include RAD language.</p>
<p>Chapter 13 LEASE TERMINATION</p>	<p>13-III.B. MANDATORY LEASE PROVISIONS [24 CFR 966.4(l)(5)] Over-Income Families [24 CFR 960.261 and FR Notice 7/26/18; Notice PIH 2019-11] At annual or interim reexamination, if a family's adjusted income exceeds the applicable over income limit, HACC will document the family file and begin tracking the family's over-income status. If one year after the applicable annual or interim reexamination the family's income continues to exceed the applicable over income limit, HACC will notify the family in writing that their income has exceeded the over income limit for one year, and that if the family continues to be over-income for</p>	<p>Replaced language to read At annual or interim reexamination, if a family's adjusted income exceeds the applicable over-income limit, HACC will document the family file and begin tracking the family's over-income status. If one year after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, HACC will notify the family in writing that their income has exceeded the over-income limit for one year, and that if the family continues to be over-income for 12 consecutive months, the family will be subject to the HACC's over-income policies. If two years after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, HACC will continue to</p>	<p>Updated policy to clarify that until the final rule related to alternative rent amounts becomes legally effective, HACC will give Over-Income Families choice between income-based rents or flat rent.</p>

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	<p>12 consecutive months, the family will be subject to the HACC's over-income policies.</p> <p>If two years after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, HACC will charge the family a rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit.</p> <p>HACC will notify the family in writing of their new rent amount. The new rent amount will be effective 30 days after the PHA's written notice to the family.</p>	<p>monitor and track that the family is over-income until such time as the final rule related to alternative rent amounts becomes legally effective, HACC will not terminate the assistance of over-income families or charge such families an alternative rent. HACC will continue to offer such families the choice between income-based or flat rent at each annual reexamination.</p> <p>Once alternative rent requirements for over-income families become legally effective, HACC will charge any family whose income has exceeded the over-income limit for at least two years the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit.</p> <p>HACC will notify the family in writing of their new rent amount. The new rent amount will be effective 30 days after the written notice to the family.</p>	
<p>Chapter 13</p> <p>LEASE</p> <p>TERMINATION</p>	<p>13-IV.D. LEASE TERMINATION NOTICE [24 CFR 966.4(l)(3);</p> <p>Timing of the Notice [24 CFR 966.4(l)(3)(i);</p> <p>HACC must give written notice of lease termination of: *</p> <p>⊖ 14 calendar days plus 3 days for mailing in the case of failure to pay rent</p> <p><u>HACC POLICY</u></p> <p>HACC will give written notice of 14 calendar days plus 3 days for mailing for nonpayment of rent. For all other lease terminations HACC will give 30 days plus 3 days for mailing, written notice or, if state or local law allows less than 30 days, such shorter notice will be given.</p>	<p>Replaced header, title, and language.</p> <p>13-IV.D. LEASE TERMINATION NOTICE [24 CFR 966.4(l)(3); Notice PIH 2021-29]]</p> <p>Timing of the Notice [24 CFR 966.4(l)(3)(i); 24 CFR 966.8; Notice PIH 2021-29]</p> <p>HACC must give written notice of lease termination of:</p> <ul style="list-style-type: none"> • During the period of time for which HUD determines that a national emergency requires additional time for families to secure federal funding that is available due to a Presidential declaration of a national emergency, at least 30 days from the date the tenant receives the notice in the case of failure to pay rent. • When such emergency is not present 14 calendar days plus 3 days for mailing in the case of failure to pay rent 	<p>Added Notice PIH reference to header. Added policy regarding in the event that HUD determines national emergency and clarifying language.</p> <p>*Note: Additional bulleted points are listed under this policy that remain unchanged.</p>

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		<p><u>HACC POLICY</u></p> <p>HACC will give written notice of 30 calendar days from the date the tenant receives the notice for nonpayment of rent (during nationwide emergency orders) or 14 calendar days plus 3 days for mailing for nonpayment of rent (upon expiration of nationwide emergency orders). For all other lease terminations HACC will give 30-days plus 3 days for mailing, written notice or, if state or local law allows less than 30 days, such shorter notice will be given.</p>	
Chapter 16 PROGRAM ADMINISTRATION	<p>16-I.A. OVERVIEW</p> <p><i>(Added website link)</i></p>	<p>Added website link</p> <p>https://www.clackamas.us/housingauthority/section8.html ; “Calculating Your Utility Allowance”.</p>	Added link for Calculating Your Utility Allowance.
Chapter 16 PROGRAM ADMINISTRATION	<p>16-I.E. REASONABLE ACCOMMODATION [24 CFR 965.508]</p> <p>On request from a family that includes a disabled or elderly person, HACC must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family [PH Occ GB, p. 172].</p>	<p>Replaced title and language to read</p> <p>16-I.E. REASONABLE ACCOMMODATION AND INDIVIDUAL RELIEF [24 CFR 965.508]</p> <p>On request from a family that includes a disabled or elderly person, HACC must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [PH Occ GB, p. 172].</p>	Updated header and policy to add clarity regarding current policy.
Chapter 16 PROGRAM ADMINISTRATION	<p>16-II.B.FLAT RENTS</p> <p><i>(Added new policy)</i></p>	<p>Added a new policy on applying flat rents</p> <p>Applying Flat Rents</p> <p><u>HACC Policy</u></p> <p>HACC will apply updated flat rents at each family’s next annual reexamination or flat rent update after implementation of the new flat rents.</p>	Added new policy for this section regarding how flat rent is applied.

ATTACHMENT B

Summary of Proposed Admissions and Continued Occupancy Plan Policy Changes

<p>Chapter 16</p> <p>PROGRAM</p> <p>ADMINISTRATION</p>	<p>16-III.A OVERVIEW</p> <p><i>(Added new policy)</i></p>	<p>Added new policy overview to this section</p> <p>Families are required to reimburse the PHA if they were charged less rent than required because the family either underreported or failed to report income. PHAs are required to determine retroactive rent amounts as far back as the PHA has documentation of family unreported income [Notice PIH 2018-18].</p>	<p>Added recommended policy overview for clarity.</p>
<p>Chapter 16</p> <p>PROGRAM</p> <p>ADMINISTRATION</p>	<p>16-III.B. REPAYMENT POLICY</p> <p><i>Payment Thresholds</i></p> <p><u>HACC POLICY</u></p> <p>HACC has established the following thresholds for repayment of debts:</p> <p>Amounts over \$5,000: tenants may request an alternate payment plan that exceeds 48 months.</p> <p>Amounts between \$3,000 and \$5,000: must be repaid within 48 months.</p> <p>Amounts between \$2,000 and \$2,999: must be repaid within 30 months.</p> <p>Amounts within \$1,000 and \$1,999: must be repaid within 24 months.</p> <p>Amounts under \$1,000 must be repaid within 12 months.</p> <p>If a family can provide evidence satisfactory to HACC that the threshold applicable to the family's debt would impose an undue hardship, HACC may, in its sole discretion, determine that a lower monthly payment amount is reasonable. In making its determination, HACC will consider all relevant information, including the following:</p>	<p>Replaced language to read</p> <p>HACC has established the following thresholds for repayment of debts:</p> <p>If a family is paying less than 40 percent of its monthly adjusted income (MAI) in rent, the minimum monthly payment amount will be the greater of the following two amounts; the difference between 40 percent of the family's MAI and the TTP at the time the agreement is executed or a minimum of \$25.</p> <p>If a family can provide evidence satisfactory to HACC that a monthly payment amount of \$25 would impose an undue hardship, HACC may, in its sole discretion, determine that a lower monthly payment amount is reasonable. In making its determination, HACC will consider all relevant information, including the following:</p> <ul style="list-style-type: none"> ○ The amount owed by the family to HACC ○ The reason for the debt, including whether the debt was the result of family action/inaction or circumstances beyond the family's control. ● The family's current and potential income and expenses. ● The family's current family share as calculated under 24 CFR 982.515. The 	<p>Updated policy to ensure that a family's monthly share of rent plus the monthly debt repayment amount does not exceed 40 percent of the family's monthly adjusted income (MAI).</p>

ATTACHMENT B

Summary of Proposed Admissions and Continued Occupancy Plan Policy Changes

	<p>The amount owed by the family to HACC. The reason for the debt, including whether the debt was the result of family action/inaction or circumstances beyond the family's control.</p> <p>The family's current and potential income and expenses. The family's current family share as calculated under 24 CFR 982.515. The family's history of meeting its financial responsibilities.</p> <p>If the family's income increases or decreases during the term of the repayment agreement, either the PHA or the family may request that the monthly payment amount be adjusted accordingly.</p>	<p>family's history of meeting its financial responsibilities.</p> <p>If the family's income increases or decreases during the term of the repayment agreement, either the PHA or the family may request that the monthly payment amount</p>	
<p>Chapter 16</p> <p>PROGRAM ADMINISTRATION</p>	<p>16-III.B. REPAYMENT POLICY</p> <p>Repayment Agreements Involving Improper Payments</p> <p>Notice PIH 2017-12 Requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:</p>	<p>Replaced language and title to read</p> <p>Repayment Agreement Terms</p> <p>All repayment agreements must be in writing, dated, signed by both the family and the PHA, include the total retroactive rent amount owed, amount of lump sum payment made at time of execution, if applicable, and the monthly repayment amount. Notice PIH 2018-18</p> <p><u>HACC Policy</u></p> <p>HACC requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:</p>	<p>Updated policy to add recommended language and help with readability.</p>
<p>Chapter 16</p> <p>PROGRAM ADMINISTRATION</p> <p>P</p>	<p>16-V.B. RECORD RETENTION</p> <p>HACC must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].</p>	<p>Replace language to read</p> <p>HACC must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease for the duration of the tenancy, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101]. [Notice PIH</p>	<p>Updated policy to include amount of retention and PIH notice reference.</p>

ATTACHMENT B

Summary of Proposed Admissions and Continued Occupancy Plan Policy Changes

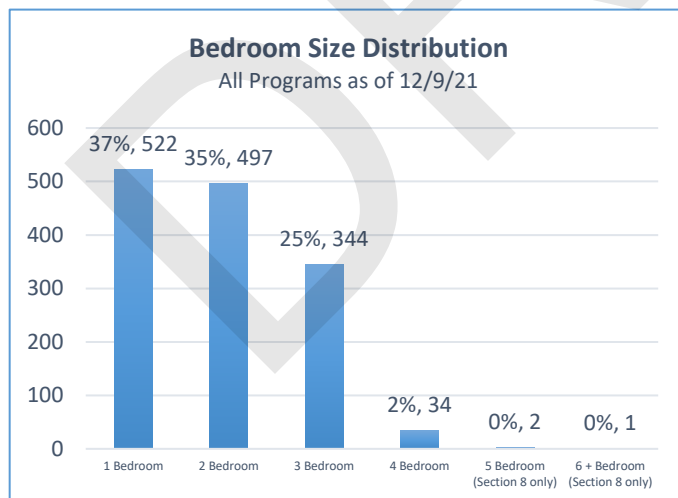
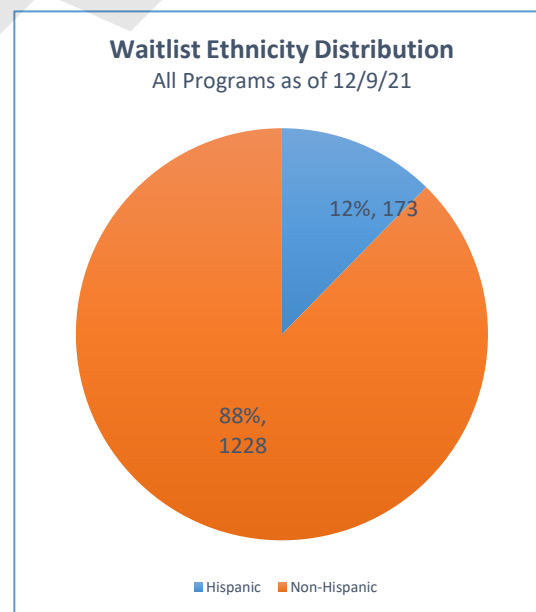
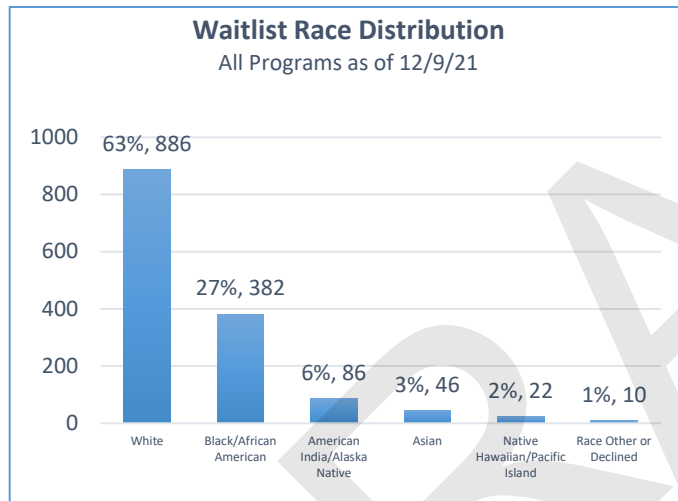
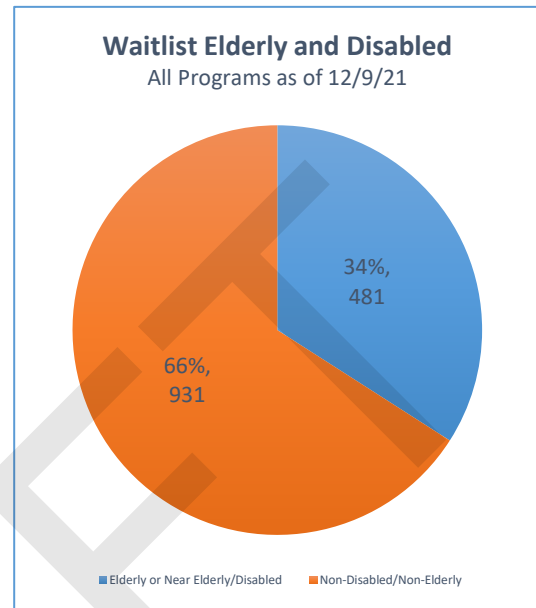
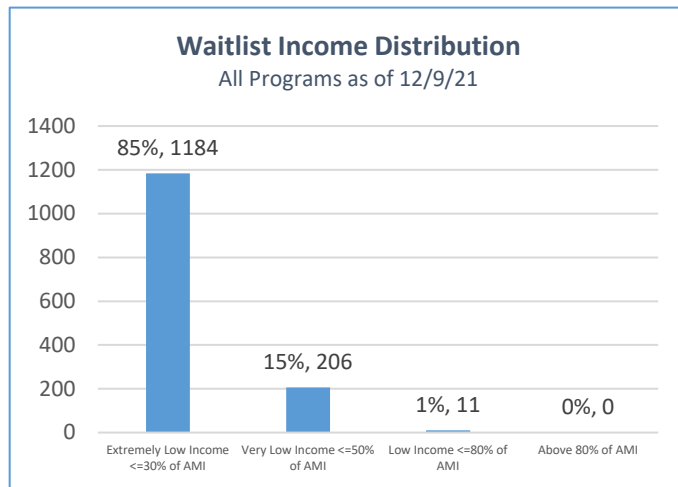
	<p><u>HACC Policy</u></p> <p>HACC will keep the last three years of the Form HUD-50058 and supporting documentation and for at least three years after end of participation all documents related to a family's eligibility, tenancy, and termination.</p>	<p>2018-18].</p> <p><u>HACC Policy</u></p> <p>HACC will keep the last three years of the Form HUD-50058 and supporting documentation the duration of the tenancy, and for at least three years after end of participation all documents related to a family's eligibility, tenancy, and termination.</p>	
GLOSSARY	<p><u>ACRONYMS USED IN PUBLIC HOUSING</u></p> <p><i>(Added new acronym)</i></p>	<p>Inserted the following</p> <p>IVT Income Validation Tool</p>	<p>Added new acronym</p>
GLOSSARY	<p><u>GLOSSARY OF PUBLIC HOUSING TERMS</u></p> <p><i>(Added new term to glossary)</i></p>	<p>Inserted the following</p> <p><i>Income Validation Tool (IVT)</i> Accessible through HUD's EIV system, provides validation of tenant reported wages, unemployment compensation, and Social Security benefits by comparing the income reported in IMS-PIC via form HUD-50058 to information received from the Department of Health and Human Services' (HHS) National Directory of New Hires (NDNH), and the Social Security Administration (SSA) data sharing agreements.</p>	<p>Added new term</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, H3S staff also considered results from the following recently completed plans and studies before proposing and adopting the 2021-2027 Fair Housing goals and strategies for Clackamas County:

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

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

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

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

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

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

Goal 1: Increase and preserve affordable, accessible housing options throughout 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 have become part of planning and performance reporting documents for the Housing Authority and the Community Development Division for the 2022 through 2026 program years.

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

Attachment D:

Deconcentration Policy

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2] HACC's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of HACC's deconcentration policies must be 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

12/05/2022
Date

Attachment F:

Definition of Substantial Deviation and Significant Amendment or Modification

Definition of Substantial Deviation and Significant Amendment

It is the intent of the Housing Authority of Clackamas County (HACC) to adhere to the mission, goals and objectives outlined in the Annual Plan and the Five-Year 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 35% of the of HACC's annual program budgets for Housing Choice Voucher (Section 8) or Public Housing activities.
- A need to respond immediately to Natural Disasters or Declarations of Emergency beyond the control of the Housing Authority, such as earthquakes, flooding, landslides, or other unforeseen significant event.
- A mandate from local government officials, specifically the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.
- A substantial deviation does not include any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein.

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

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

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

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

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

- A change in the planned use or use of Capital Fund that have a total expense in excess of \$500,000 in any single year.

Attachment G: Financial Resources

Housing Authority of Clackamas County

All Programs Budget
Fiscal Year 2022/2023

	Public Housing	Housing Vouchers	Local Project	Central Office	Development	Supportive Housing	Grants	FY23 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
Revenue:													
Dwelling rent	1,777,169		590,204					2,367,372	2,039,290	2,383,065	2,223,249	328,082	16.09%
Vacancy loss	(43,000)		(8,123)					(51,123)	(55,817)	(63,443)	(47,202)	4,694	-8.41%
Other tenant income	109,500	29,370	2,400					141,270	143,670	178,790	160,082	(2,400)	-1.67%
Operating subsidy	2,215,000	1,701,655		127,186			27,000	4,070,841	3,468,120	3,493,992	3,683,350	602,721	17.38%
Housing assistance payments		21,954,677					514,368	22,469,045	16,169,002	15,192,953	14,404,534	6,300,043	38.96%
Mgmt fees				414,225				414,225	397,650	468,206	455,626	16,575	4.17%
Interest income	500	-	-	-				500	500	20,550	20,931	-	0.00%
County contribution			-	-	-		-	-	240,960	240,960	271,971	(240,960)	-100.00%
Grant revenue	295,000	104,088			34,872,213	1,282,020	1,353,859	37,907,180	2,271,161	2,169,168	1,147,105	35,636,019	1569.07%
Other/In-kind	-		6,000	-	2,555,322		10,341	2,571,663	2,408,531	1,302,348	769,293	163,132	6.77%
TOTAL REVENUE	4,354,169	23,789,790	590,481	541,411	37,427,535	1,282,020	1,905,568	69,890,974	27,083,067	25,386,589	23,088,939	42,807,907	158.06%
ADMINISTRATIVE EXPENSE:													
Salaries	724,039	898,645	74,448	787,263	584,049	665,311	9,824	3,743,579	2,402,504	2,132,370	1,918,999	1,341,074	55.82%
Employee benefits	406,223	628,505	42,805	513,727	339,716	465,007	12,012	2,407,995	1,441,247	1,339,754	1,108,321	966,748	67.08%
Legal fees	15,400	2,200	700	3,600	5,000	5,000		31,900	26,900	33,000	28,817	5,000	18.59%
Staff training/travel	20,000	7,800	500	10,000	7,000	7,000	-	52,300	46,200	46,700	35,135	6,100	13.20%
Auditing fees	13,694	10,797	787	5,903	8,240	10,277		49,699	47,857	46,274	45,534	1,842	3.85%
Other administrative expenses	192,831	256,449	179,338	178,331	123,086	81,425	-	1,011,461	1,921,983	1,579,364	1,313,266	(910,522)	-47.37%
Management fee expense	414,225	-	-	-	-	-	-	414,225	397,650	468,206	455,626	16,575	4.17%
TOTAL ADMINISTRATIVE	1,786,411	1,804,396	298,579	1,498,825	1,067,091	1,234,020	21,836	7,711,158	6,284,341	5,645,668	4,905,698	1,426,817	22.70%
TENANT SERVICES:													
Salaries	18,076	56,180				58,259		132,515	128,388	110,820	111,800	4,127	3.21%
Benefits	12,967	42,544				41,792		97,303	75,311	68,673	78,031	21,992	29.20%
Other	12,600	-		-		27,000		39,600	49,416	50,616	70,227	(9,816)	-19.86%
TOTAL TENANT SERVICES	43,643	98,724	-	-	-	-	127,051	269,418	253,115	230,109	260,058	16,303	6.44%
UTILITIES:													
Water	173,000		10,800				-	183,800	174,600	204,085	182,554	9,200	5.27%
Sewer	361,300		31,900				-	393,200	380,700	465,779	428,064	12,500	3.28%
Electricity	28,300		8,600	6,900			-	43,800	44,300	117,400	106,701	(500)	-1.13%
Gas	3,900	-	-	3,800			-	7,700	7,500	26,300	25,991	200	2.67%
TOTAL UTILITIES	566,500	-	51,300	10,700	-	-	-	628,500	607,100	813,564	743,310	21,400	3.52%
MAINTENANCE:													
Labor	717,729		28,003	-			-	745,732	680,096	686,769	675,797	65,636	9.65%
Benefits	477,565		20,781	-			-	498,347	478,834	477,600	462,281	19,513	4.08%
Materials	151,600		5,700	-			-	157,300	136,800	171,200	149,416	20,500	14.99%
Garbage contracts	167,800		2,000	-			-	169,800	161,800	157,800	160,707	8,000	4.94%
Other contracts	310,100	-	48,200	6,600			-	364,900	255,600	217,644	268,991	109,300	42.76%
TOTAL MAINTENANCE	1,824,794	-	104,684	6,600	-	-	-	1,936,078	1,713,130	1,711,013	1,717,192	222,948	13.01%

Housing Authority of Clackamas County
All Programs Budget
Fiscal Year 2022/2023

	Public Housing	Housing Vouchers	Local Projects	Central Office	Development	Supportive Housing	Grants	FY23 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
GENERAL EXPENSES:													
Insurance	96,625	8,200	16,600	3,200			-	124,625	116,525	111,140	96,290	8,100	6.95%
Payment in Lieu of Taxes	86,000							86,000	86,000	104,610	71,500	-	0.00%
TOTAL GENERAL EXPENSES	182,625	8,200	16,600	3,200	-	-	-	210,625	202,525	215,750	167,790	8,100	4.00%
OTHER EXPENSES:													
Housing Assistance Payments		21,954,677					514,368	22,469,045	16,613,002	15,192,953	14,404,534	5,856,043	35.25%
Mortgage Payments			13,100				-	13,100	13,700	14,600	51,288	(600)	-4.38%
Grant Expense					35,268,000	57,258		35,325,258	-	-	-	35,325,258	
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%
TOTAL OTHER EXPENSES	-	21,954,677	104,430	-	35,268,000	57,258	1,750,829	59,135,194	17,983,876	16,788,522	15,190,367	41,151,318	228.82%
TOTAL EXPENSES	4,403,974	23,865,997	575,593	1,519,325	36,335,091	1,291,278	1,899,716	69,890,973	27,044,088	25,404,626	22,984,415	42,846,886	158.43%
OPERATING SURPLUS (DEFICIT)	(49,805)	(76,207)	14,888	(977,914)	1,092,444	(9,258)	5,852	0	38,980	(18,037)	104,524	(38,979)	-100.00%
TRANSFERS													
Easton Ridge							-	-	500,000	350,000	350,000	(350,000)	-100.00%
Development				977,914	(977,914)		-	-	-				
Local Projects		76,207	(76,207)				-	-	-				
OPERATING SURPLUS (DEFICIT)													
CONTINGENCY AFTER TRANSFERS	(49,805)	0	(61,318)	0	114,530	(9,258)	5,852	0	538,980	331,963	454,524		
Estimated Change in Fund Balance/Cash													
Public Housing	(49,805)							(49,805)	126,222				
Development					114,530			114,530	388,493				
Local Project Fund		0	(61,318)	0			5,852	(55,466)	24,265				
Budgeted Balance	-	-	-	-	-	9,258	-	9,258	-	-	-	-	-

**Attachment H:
Capital Fund Projects & Budget Summary 2023**



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



December 14, 2022

2022 Capital Fund Completed Projects

- Project # 21006 – Asbestos Abatement \$18,625.80 (2 Units)
- Project # 21007 – Air Monitoring \$5,861.97 (6 Units)
- Project # 21001 – AMP Wide Flooring \$133,515.15 (16 Units)
- Project # 22002 – Modernization of 22010 Leslie \$247,000.00
- Project # 22007 – AMP Wide Cabinets \$6,601.00 (2 Units)
- Project # 22008 – Moving Services \$3,467.78 (4 Units)

2023 Proposed Capital Fund Projects

- On Demand Flatwork Project - \$350,000.00
- OCVM & Scattered Sites Roofing \$215,000.00
- Operations Office HVAC Upgrade \$25,000.00
- Modernization Work Scattered Sites \$250,000.00
- Relocation Expenses - \$450,000.00

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TDD 503-655-8639 www.clackamas.us/housingauthority

Attachment I: Capital Fund Annual Statement

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

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

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

PHA Name OR001	Grant Type and Number Capital Fund Program Grant No: OR16R00150123 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: FY2023
--------------------------	--	---

Type of Grant

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

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) ³	\$386,254.75			
3	1408 Management Improvements	\$2,000.00			
4	1410 Administration (may not exceed 10% of line 15)	\$154,501.90			
5	1480 General Capital Activity	\$1,002,262.35			
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				

¹ To be completed for the Performance and Evaluation Report.


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

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

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Capital Fund Annual Statement**

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Capital Fund Financing Program

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

Part I: Summary					
PHA Name: OR 001	Grant Type and Number Capital Fund Program Grant No: OR16R00150123 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: FY2023			
Type of Grant <input checked="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 ¹	
		Original	Revised ²	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)	\$1,545,019.00			
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 * 		Signature of Public Housing Director Date <div style="display: flex; justify-content: space-between;"> <div></div> <div>1/18/23</div> </div>			

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

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

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

**Attachment I:
Capital Fund Annual Statement**

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

Part II: Supporting Pages								
PHA Name: OR001		Grant Type and Number Capital Fund Program Grant OR16R00150123 No: CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2023			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
AMP Wide Operations	Operations	1406	1	\$386,254.75				
AMP Wide Mgmt. Improve.	Software: Operating Systems & Office Software	1408	1	\$2,000.00				
AMP Wide Admin.	Central Office Cost Center (COCC) Salary & Benef.	1410	1	\$154,501.90				
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	\$1,500.00				
PHA Wide Relocation Costs	Relocation Costs Due to Modernization	1480/1495	1	\$450,000.00				
AMP 1 - DEV 1 Clack. Hts.	Dwelling Renovation	1480/1460	1	\$25,000.00				
AMP 3 - DEV 3 Hillside Park	Dwelling Renovation	1480/1460	1	\$65,000.00				

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

Part II: Supporting Pages								
PHA Name: OR001		Grant Type and Number Capital Fund Program Grant OR16R00150123 No: CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2023			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
AMP 4 - DEV 4 OCVN	Dwelling Renovations	1480/1460	1	\$77,500.00				
AMP 2 - DEV 006	Dwelling Renovations	1480/1460	1	\$0.00				
AMP 2 - DEV 007	Dwelling Renovations	1480/1460	1	\$351,762.35				
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				

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

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Capital Fund Financing Program

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

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: OR001					Federal FFY of Grant: 2023
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406					
1408					
1410					
1480					
1492					
1501					
1503					
1504					
1505					
9000					
9001					
9002					
9900					
1499					

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

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

Part III: Implementation Schedule for Capital Fund Financing Program

Federal FFY of Grant:
2022

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

Attachment J: Resident Advisory Board Meeting Minutes

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

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

RAB Board Members in attendance: Laura Bales (HSP), Brian Henderson (S8), Irisa Hernandez (HSP), Ann Leenstra (Resident Commissioner – S8), Arnold Rodacker (HSP), Misty Pate (HSP), Jackie Fuller (SS), T. DeWeese (OCVM), Grace Essy (SS), Yelena Potoskaya (CH), Lisa Verlo (CH), Helen Sotriakis (S8) - All properties/programs represented – 12 out of 18 members

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

<https://clackamascounty.zoom.us/rec/share/iOQj3aPvO7H9BCR3givGEDtHfi5XI3Ura1jeAcP29UvYhhAp-lhb2gJMSpbUFZJL.1Z2YvQJnv08awWzB>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Paraphrased Comments, Questions & Answers collected throughout the meeting:

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

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

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

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

Arnold – Have an issue with the laundry room flooding out/sewer. What is the feasibility to put in a portable trailer (for laundry)? Need resolution to problem.... There are safety concerns.... Maintenance has been trying to fix the problem but want the Housing Authority to hire a plumber or something. Want the property managers to help find a solution. When you remodeled Hillside Manor two washing machines were moved over to Hillside Park. There may be a sewer line problem but there could just be too much water pumping through too small of a line with the addition of the two machines. You may want to try removing the extra machines to see if that takes care of the flooding before sending out a plumber since there was to a problem before the extra machines were added. I have been working with Thomas on this. There could be build up in the lines over time (clogged) that could be cleaned out but they have already snaked out all but one including the toilet. Maybe the sewer lines are just not big enough for the extra machines.

Devin – We have property managers and asset management listening and will work on addressing the flooding issue. But, yes, the laundry room will be torn down in Phase I and there

will be a temporary solution for laundry and mail during construction – not in the manor for residents still living at Hillside Park.

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

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

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

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

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

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

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

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

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

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

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

Irisa – This is about what people are paying for rent and because we got a cost-of-living increase (social security). How can people be getting nearly 66% increase in rent when they only got a \$50 or \$80 raise? How can they? Property owners raise rents to accommodate property taxes increase and to make

improvement, etc. Why are they raising the rents at such high rates? 66% is a pretty high rate for an \$80 dollar increase.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Grace – Agreed they should not jump the waitlist.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Brian – I check my mail just once a week.

Toni – Those are excellent ideas.

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

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

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

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

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

Allison – Yes, Public Housing is still inspected annually.

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

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

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

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

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

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

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

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

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

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

Items to send out to RAB attendees after the meeting:

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

Attachment K:
HUD 50077-SL - Certification of Consistency with Consolidated Plan

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

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

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

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

certify that the Annual PHA Plan for fiscal year 2023 of

the Housing Authority of Clackamas County is consistent with the
PHA Name

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

Clackamas County
Local Jurisdiction Name

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

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 PFIA'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 Authorized Official:

Commissioner Tootie Smith

Title:

Housing Authority Board Chair

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.

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

Attachment L:
Certifications of Compliance including Civil Rights

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

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

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the **2023 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, 2023**, 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

PHA Name

OR001

PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2023-24

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

12/5/22

Signature

Date

Signature

Date

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

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Attachment M: Moving To Work Supplement

Section	Content / Response
A.	PHA Information
A.1	PHA Name: <u>Housing Authority of Clackamas County</u> PHA Code: <u>OR001</u> MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): <u>07/01/2023</u> PHA Program Type: Combined Public Housing and Section 8 MTW Cohort Number: <u>4 – Asset Building</u> MTW Supplement Submission Type: Annual Submission
B.	Narrative
B.1	MTW Supplement Narrative <p>The Housing Authority of Clackamas County (HACC) plans to use its MTW flexibility to align the needs of the community and residents with the three (3) MTW statutory objectives in ways that help transform operations, encourage self-sufficiency, and better utilize the funding it receives. After receiving notice of its selection to the Asset Building Cohort of the MTW Expansion, the HACC management team went through a visioning exercise to localize the MTW Statutory Objectives into language that fits the both the agency's and the community's "business objectives" for the MTW program. These business objectives will be used to guide staff through its waiver/activity selection and the application of its MTW funding flexibility. They are:</p> <ol style="list-style-type: none"> 1. Efficiencies gained will be used to redirect staff toward activities that have a higher value for the client, such as building trusting relationships, connecting clients to resources, and educating clients on the impacts of financial decisions. 2. Priority will be given to activities that seek a balance between reduced staff time and benefit to HACC's clientele in order for HACC to serve more families and provide its services more equitably. 3. HACC seeks to impact the homelessness crisis in the County and recognizes that the first step to do this is through eviction and termination prevention measures, requiring innovative programmatic approaches to common problems seen in housing. <p>In order to meet its PHA Annual Plan deadline, HACC chose to only include the activities related to its obligations under the Asset Building cohort in this first Supplement to the PHA Plan. However, work has already begun to review all available waivers and make plans for how each waiver can benefit the agency and the low-income families within the community.</p>
C.	MTW Waivers and Associated Activities
	The Housing Authority of Clackamas County (HACC) does not plan to implement any standard MTW Waivers or Activities this year.
D.	Safe Harbor Waivers
	The Housing Authority of Clackamas County (HACC) does not plan to implement any Safe Harbor Waivers this year.
E.	Agency-Specific Waivers
E.1	Agency-Specific Waivers for HUD Approval
(a)	Savings account deposits for downpayment assistance for Homeownership <u>Name of activity:</u> Matched Savings Homeownership Account <u>A full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice)</u> <p>The primary goal of the Savings Account Component of the HACC's proposed asset building initiative is to increase the number of households who are "banked" and to partner with local financial institutions willing to provide savings accounts to low-income families, without the restrictions that</p>

Attachment M: Moving To Work Supplement

Section	Content / Response
	<p>often lead to low-income households remaining unbanked. Low-income households without bank accounts pay high fees to cash their paychecks or to obtain money orders, which are often required for rent and utility payments when a household does not have access to a bank account. Evidence suggests that when a low-income household is banked, they establish credit, their credit scores increase, their likelihood of default is reduced, and they have lower amounts of delinquent debt.</p> <p>In 2021, HACC started the environmental review process required to dispose of its 145 scattered sites. HACC's scattered site portfolio consists of 2-, 3-, and 4-bedroom units in single-family homes, duplexes, triplexes, and 4-plexes throughout the County. These units can be up to thirty-five (35) miles apart from each other and each unit costs an average of \$2,000 more to operate than other units in the Public Housing portfolio. HACC is looking at the potential to sell the single-family scattered sites as affordable homes under a Community Land Trust model. HACC's hope is that the timeline of the disposition and relocation of the scattered site portfolio aligns with the 24-month reporting period for the demonstration.</p> <p>HACC's vision for the savings account component of the MTW asset-building program is to offer downpayment assistance to program participants who are ready for homeownership. Selection for program participation will be based on aptitude for homeownership using the criteria described below.</p> <p>HACC will partner with Proud Ground, DevNW, and CASA of Oregon, all who were selected based on their ability to provide savings accounts free of many of the restrictive characteristics of accounts typically offered to lower-income families, such as high annual fees, high penalties, and no over-draft protection. In addition, many banks offer "second chance accounts" and HACC will work to partner local banks with households to help them bridge the banking gap and become banked. Each household will be required to establish an account and HACC will deposit funds into their account equal to 20% of their current Public Housing rent payment each month for twenty-four (24) months. The preliminary analysis shows that even the households with higher incomes rarely report having assets, such as checking or savings accounts. In fact, only four (4) of the 25 households with incomes over \$50,000 reported having any assets at all.</p> <p>HACC will measure the success of the program using the following factors:</p> <ul style="list-style-type: none"> • Difference in credit score between initial baseline and current actual; • Difference in delinquent debt between initial baseline and current actual; • Percent of program participants who were successful in a home purchase. <p>Per HUD PIH Notice 2022-11, the "opt-out" aspect of this savings account program will require HACC to waive certain provisions of the following regulations: sections 23(b)-(f), and (n)(1) of the 1937 Act and 24 CFR 984.101-105, 984.201-204, 984.301-306 and 984.401.</p> <p>PIH Notice 2022-11 also lists the Safe Harbors required for the opt-out savings account, which include:</p> <ul style="list-style-type: none"> i. The PHA must continue to follow all requirements of 2 CFR part 200. ii. 24 CFR 984.305(a) on accounting and reporting must be retained. iii. The PHA must contribute at least \$10 per month for the benefit of each assisted household participating in the savings program. iv. The PHA must not contribute more per month for the benefit of each assisted household participating in the savings program than the applicable fair market rent of the unit in which they reside. v. The PHA must provide an opportunity for households to opt-out of this activity. <p><u><i>How the initiative achieves one or more of the 3 MTW statutory objectives</i></u></p> <ul style="list-style-type: none"> ○ Cost effectiveness: In 2021, HACC started the environmental review process required to dispose of its 145 scattered sites. HACC's scattered site portfolio consists of 2-, 3-, and 4-bedroom units in single-family homes, duplexes, triplexes, and 4-plexes throughout the

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Section	Content / Response
	<p>County. These units can be up to thirty-five (35) miles apart from each other and each unit costs an average of \$2,000 more to operate than other units in the Public Housing portfolio. This activity will give HACC the opportunity to sell the single-family scattered sites as affordable homes to the current occupants, benefiting the housing authority by reducing the cost to operate its Public Housing portfolio.</p> <ul style="list-style-type: none"> ○ Self-sufficiency: The model proposed by HACC in this activity will enable qualifying households to purchase a home under more favorable terms than traditionally available, helping these households build wealth through homeownership. <p><u><i>A description of which population groups and household types that will be impacted by this activity</i></u> HACC will use the following selection criteria to prioritize households interested in the savings account program:</p> <ol style="list-style-type: none"> 1) Interest in homeownership 2) Currently participating in the IDA homeownership matched savings program 3) Household income above \$30,000/year 4) Debt less than \$40,000 5) Credit Score of 700 or more, or actively working on getting it above 700 6) Completion of Financial Foundations and Homebuying workshops offered through Dev NW. 7) Completion of Proud Ground land trust orientation. <p>In addition, HACC is able to refer residents to DevNW financial education programs and cover the cost through a partnership with Clackamas County Social Services.</p> <p><u><i>Any cost implications associated with the activity</i></u> Depending on the decision on the percentage of rent to contribute, HACC estimates that this program will cost between \$130,00 and \$210,000 over two (2) years. These funds will come from HACC's HCV Housing Assistance Payment reserves.</p> <p><u><i>An implementation timeline for the initiative</i></u> The implementation timeline is still being developed and this document will be updated when it is ready.</p> <p><u><i>An impact analysis</i></u></p> <ol style="list-style-type: none"> 1. Agency finances – No projected impact to agency finances; funds will come from HUD-held agency HAP reserves. 2. Affordability of housing costs – No projected impact. 3. Agency waitlist – No projected impact. 4. Termination rate – No projected impact. 5. Occupancy / Utilization – No projected impact. 6. MTW Statutory Goals – This activity will help families become self-sufficient 7. Statutory Requirements – No projected impact. 8. Hardship requests – No projected impact. 9. Protected classes / Disparate impact – No project impact. <p><u><i>A description of the hardship policy for the initiative</i></u> Not applicable</p> <p><u><i>A copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</i></u> Will gather these during the public process</p>

Attachment M: Moving To Work Supplement

Section	Content / Response
(b)	<p>Expansion of Existing Credit Reporting Program</p> <p><u>Name of activity:</u> Expansion of Existing Credit Building Program</p> <p><u>A full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice)</u></p> <p>HACC currently operates the Rent Reporting for Credit Building program. The goal of this program is to educate program participants of the importance of establishing credit and helping them establish credit by regularly reporting rent payments to the credit bureaus. This program has the following attributes:</p> <ul style="list-style-type: none"> • HACC partners with financial capability providers to provide credit coaching and workshops to HACC Public Housing residents; • HACC has a contract with Esusu, a company that collects rent payment data from property owners and submits the data to the credit bureau, enabling the households to gain credit. <p>HACC pays for the services provided by Esusu and can only report payments made to HACC, which is why the program has traditionally only been offered to Public Housing residents. However, HACC proposes using MTW flexibility to expand these services beyond Public Housing by offering incentives and reimbursements to landlords for reporting rent payments to Esusu or a comparable credit reporting company. In addition, HACC proposes expanding its credit counseling services to include Housing Choice Voucher participants and residents in the affordable housing portfolio interested in financial literacy and building credit. HACC will offer the program to all participants initially but may need to randomly select applicants if the level of interest makes it cost-prohibitive.</p> <p>Below are some of the policy decisions HACC has made regarding the operation of the credit reporting program. These new and expanded program will follow these same guidelines.</p> <ol style="list-style-type: none"> 1. HACC can report up to two years of rent payment history as a part of a participant's initial enrollment. If a resident is more than 30 days late on a rent payment or missed a rent payment in the previous two years, HACC will report rent payment history beginning the month following the missed monthly payment. 2. HACC will check both rent payments and rent amounts on a monthly basis. 3. Rent will be reported as "on-time" with the credit bureaus as long as the resident is not over 30 days late. 4. Residents will be dis-enrolled if they miss a monthly payment. Residents are eligible to re-enroll if they make 3 months of on-time payments. 5. If a resident misses a rent payment, Resident Services will contact them immediately to determine if they wish to dis-enroll. 6. If resident decides to dis-enroll, they may elect to re-enroll after 3 months of on-time rental payments. 7. Residents who are dis-enrolled because of a loss of income related to being laid off can be re-enrolled immediately upon returning to their job or receiving unemployment. <p>HACC will measure success of the program using the following factors:</p> <ul style="list-style-type: none"> • Increase in the percentage of residents enrolled in rent reporting • Additional number of HACC-owned properties managed by third parties • Number of landlords agreeing to initiate a rent reporting program for their property(s) • Difference in credit score between initial baseline and current actual • Correlation between participation in credit counseling services and credit score increase • Increased enrollment over time • Regular long-term participation in the program • Number of credit-invisible households who now have a credit score • Other factors to be defined

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Section	Content / Response
	<p><u><i>How the initiative achieves one or more of the 3 MTW statutory objectives</i></u></p> <ul style="list-style-type: none"> • Cost effectiveness: encouraging households to pay their rent on time through incentive-based programs like credit reporting will likely increase the amount of on-time rent payments, reducing the need for late fee processing, Public Housing eviction proceedings, and Housing Choice Voucher terminations. • Self-sufficiency: better credit scores are directly related to increased buying power, which will allow households to pay lower interest rates and associated debt service and/or pay-day-loan fees, increasing their ability to secure loans and take advantage of traditional financing tools. • Housing Choice: households with better credit have more financial opportunities when it comes to finding a home. <p><u><i>A description of which population groups and household types that will be impacted by this activity</i></u></p> <p>Through the HACC newsletters and Property Management and Resident Services staff, residents will be informed of the value of building credit through rent reporting and will be instructed on how to enroll in the program. Households will be selected for the program based on their history of making on-time rent payments and their level interest in increasing their credit score.</p> <p>As part of the enrollment process, resident services staff will meet with the resident to provide enrollment paperwork and discuss how to access and review their credit report. When residents have complex financial situations, such as high amounts of debt or debt in collections, Resident Services staff will make referrals to community partners who can help them find and use tools to improve their financial position.</p> <p>Below are the general requirements that HACC will use when determining eligibility for the rent reporting program:</p> <ol style="list-style-type: none"> 1. Resident must be paying a minimum of \$10 in rent 2. Residents must have no late payments in the previous three (3) months. 3. Residents with late payments in the previous three months, will be required to make three months of on-time rent payments to become eligible to enroll in Rent Reporting. 4. Residents enrolling in Rent Reporting must be over the age of 18 and be on the lease. <p><u><i>Any cost implications associated with the activity</i></u></p> <p>HACC estimates that 5% of households living in one of its properties will choose to participate in the program. Due to the landlord's required involvement in the HCV program, HACC estimates around 3% of HCV households will choose to participate. This equates to about 80 households, which will cost the agency \$8,000 over the two-year reporting period.</p> <p><u><i>An implementation timeline for the initiative</i></u></p> <p>The implementation timeline is still being developed and this document will be updated when it is ready.</p> <p><u><i>An impact analysis</i></u></p> <ol style="list-style-type: none"> 1. Agency finances – No projected impact. 2. Affordability of housing costs – No projected impact. 3. Agency waitlist – No projected impact. 4. Termination rate – No projected impact. 5. Occupancy / Utilization – No projected impact. 6. MTW Statutory Goals – This activity will help families become self-sufficient and increase housing choice through the increased opportunities that good credit can bring. 7. Statutory Requirements – No projected impact. 8. Hardship requests – No projected impact. 9. Protected classes / Disparate impact – No project impact.

Attachment M: Moving To Work Supplement

Section	Content / Response																				
	<p><u>A description of the hardship policy for the initiative</u></p> <p>Not applicable</p> <p><u>A copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</u></p> <p>Will gather these during the public process</p>																				
F.	Public Housing Operating Subsidy Grant Reporting																				
F.1	<p>Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="text-align: center;">Federal Fiscal Year (FFY)</th><th style="text-align: center;">Total Operating Subsidy Authorized Amount</th><th style="text-align: center;">How Much PHA Disbursed by the 9/30 Reporting Period</th><th style="text-align: center;">Remaining Not Yet Disbursed</th><th style="text-align: center;">Deadline</th></tr> </thead> <tbody> <tr> <td style="text-align: center;">2021</td><td style="text-align: center;">N/A</td><td style="text-align: center;">N/A</td><td style="text-align: center;">N/A</td><td style="text-align: center;">09/30/2029</td></tr> <tr> <td style="text-align: center;">2022</td><td style="text-align: center;">N/A</td><td style="text-align: center;">N/A</td><td style="text-align: center;">N/A</td><td style="text-align: center;">09/30/2030</td></tr> <tr> <td style="text-align: center;">2023</td><td style="text-align: center;">\$1,306,533</td><td style="text-align: center;">\$1,197,157</td><td style="text-align: center;">\$109,376</td><td style="text-align: center;">09/30/2031</td></tr> </tbody> </table>	Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline	2021	N/A	N/A	N/A	09/30/2029	2022	N/A	N/A	N/A	09/30/2030	2023	\$1,306,533	\$1,197,157	\$109,376	09/30/2031
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G.	MTW Statutory Requirements																				
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>The Housing Authority of Clackamas County (HACC) will not be implementing any Local, Non-Traditional programs this year. Therefore, this section does not apply.</p>																				
G.2	<p>Establishing Reasonable Rent Policy.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="text-align: left;">Question</th><th style="text-align: left;">Input Options and Instructions</th></tr> </thead> <tbody> <tr> <td>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</td><td>No.</td></tr> </tbody> </table>	Question	Input Options and Instructions	Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	No.																
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G.3	<p>Substantially the Same (STS) – Local, Non-Traditional.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="text-align: left;">Question</th><th style="text-align: left;">Input Options and Instructions</th></tr> </thead> <tbody> <tr> <td>Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.</td><td>0 # of unit months</td></tr> <tr> <td>Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.</td><td>0 # of unit months</td></tr> <tr> <td>How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?</td><td>Please include only those units that serve households at or below 80% of AMI in the table provided.</td></tr> </tbody> </table>	Question	Input Options and Instructions	Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months	Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months	How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Please include only those units that serve households at or below 80% of AMI in the table provided.												
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G.4	<p>Comparable Mix (by Family Size) – Local, Non-Traditional.</p> <p>The Housing Authority of Clackamas County (HACC) will not be implementing any Local, Non-Traditional programs this year. Therefore, this section does not apply.</p>																				

**Attachment M:
Moving To Work Supplement**

Section	Content / Response										
G.5	Housing Quality Standards.										
	Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).										
H.	Public Comments (<i>will be completed after public comment period</i>)										
	<table border="1"> <thead> <tr> <th>Question</th><th>Input Options and Instructions</th></tr> </thead> <tbody> <tr> <td>Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.</td><td>Upload Attachment</td></tr> <tr> <td>Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.</td><td>Upload Attachment</td></tr> <tr> <td>If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?</td><td>Yes No N/A</td></tr> <tr> <td>If yes, please attach the comments received along with the MTW agency's description of how comments were considered.</td><td>Upload Attachment</td></tr> </tbody> </table>	Question	Input Options and Instructions	Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	Upload Attachment	Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.	Upload Attachment	If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	Yes No N/A	If yes, please attach the comments received along with the MTW agency's description of how comments were considered.	Upload Attachment
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I.	Evaluations										
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Does the PHA have an agency-sponsored evaluation?	No.										
J.	MTW Certification of Compliance										
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.										

**Attachment N:
Annual Plan Resolution**

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

In the Matter of Approving the
Housing Authority's Annual Plan and
its related Attachments including the
Moving to Work Supplement

Resolution No. 1974
Page 1 of 2

Whereas, the HACC and is required to submit an Annual Plan and its attachments including the Moving to Work (MTW) Supplement to the US Department of Housing and Urban Development (HUD) for annual funding and approval; and

Whereas, the Annual Plan and its attachments including the MTW Supplement, were developed using the required HUD templates and instructions; and

Whereas, the Resident Advisory Board Meeting, Public Hearing and Annual Plan and its attachments including the MTW Supplement drafts for public review were advertised in the Oregonian on January 6, 2023 and to residents through the Housing Authority Resident Services staff; and

Whereas, the Annual Plan and its certifications and attachments including the MTW Supplement were informed by input and recommendations from an established Resident Advisory Board (RAB) at their meeting on January 25, 2023; and

Whereas, the Annual Plan and its attachments including the MTW Supplement drafts were made available for public review and comment from January 30, 2023 through March 20, 2023, online and in hard copy form at various locations listed in the plan; and

Whereas, the Annual Plan and its attachments were discussed, and testimony was taken and recorded at a public hearing in front of the Housing Authority Board of Commissioners on March 16, 2023; and

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

Whereas, the Annual Plan and its related attachments including the MTW Supplement are to be submitted to HUD no later than April 14, 2023, at least 75 days prior to the effective date of July 1, 2023;

**Attachment N:
Annual Plan Resolution**

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

In the Matter of Approving the
Housing Authority's Annual Plan and
its related Attachments including the
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Resolution No. 1974
Page 2 of 2

NOW THEREFORE, IT IS HEREBY RESOLVED that the Housing Authority Board of Commissioners reviewed HACC's Annual Plan and its attachments including the MTW Supplement and formally approve the Annual Plan and its related attachments including the MTW Supplement; and

MAY IT ALSO BE RESOLVED that the Housing Authority Board of Commissioners authorize the Interim Executive Director of the Housing Authority, Toni Karter, to ensure the appropriate submission of these documents to HUD, no later than April 14, 2023.

DATED this _____ day of _____, 2023.

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

Chair

Recording Secretary

Streamlined PHA Plan PHA Certifications of Compliance

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the streamlined Annual PHA Plan for PHA fiscal year beginning July 1, 2023, hereinafter referred to as the Streamlined Annual Plan, of which this document is a part and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of the Streamlined Plan and implementation thereof:

1. The streamlined Annual Plan is consistent with the applicable comprehensive housing affordability strategy (or any streamlined Plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, and provided this Board or Boards an opportunity to review and comment on any program and policy changes since submission of the last Annual Plan.
3. The PHA made the proposed streamlined Annual Plan, including policy and program revisions since submission of the last Annual Plan, and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the streamlined Plan and invited public comment.
4. The PHA will carry out the streamlined Annual Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
6. For streamlined Annual Plans that include a policy or change in policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's MTCS in an accurate, complete and timely manner (as specified in PIH Notice 99-2);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(b)(2).
7. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
8. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
9. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
10. The PHA has submitted with the streamlined Plan a certification with regard to a drug-free workplace required by 24 CFR Part 24, Subpart F.
11. The PHA has submitted with the streamlined Plan a certification with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

19. The PHA will undertake only activities and programs covered by the streamlined Annual Plan in a manner consistent with its streamlined Annual Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its streamlined Plan.

20. All certifications and attachments (if any) to the streamlined Plan have been and will continue to be available at all times and all locations that the PHA streamlined Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the streamlined Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its streamlined Annual Plan and will continue to be made available at least at the primary business office of the PHA.

21. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):

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

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

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
- (ii) The changes were duly approved by the PHA board of directors (or similar governing body); and
- (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.

Housing Authority of Clackamas County
PHA Name

OR001
PHA Number

Streamlined Annual PHA Plan for Fiscal Year: 2023-2024

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

Name of Authorized Official	Title
Commissioner Tootie Smith	Housing Authority Board Chair
Signature	Date
X	

Attachment O:

Public Notice & Comments

Public Notice - January 6, 2023

A resident meeting to review the **Housing Authority of Clackamas County's (HACC) FY 2023 Annual Plan and Moving to Work (MTW) Supplement 2023** is scheduled for January 25, 2023 at 10am via Zoom (<https://clackamascounty.zoom.us/j/81456406707?pwd=dHZRTXpOa0ZpaGEzRi93ZFNxZm4wZz09>). Resident Advisory Board members and residents are encouraged to attend. In addition, a Public Hearing regarding the Annual Plan & MTW Supplement 2023 is scheduled for March 16, 2023 at 10am in person and via zoom. All residents are welcome to provide comment by registering 5 minutes prior to the meeting time online or in person. Meeting links and additional information can be found at <https://www.clackamas.us/housingauthority/housing-authority-of-clackamas-county-board>. Written comments may be submitted via email to: EFernald@clackamas.us. The meeting will be livestreamed and archived on the County YouTube Channel. HACC developed its Plan and Supplement in compliance with the Quality Housing and Work Responsibility Act of 1998 and Federal Register, Docket No. FR-4829-N-01. Drafts of the Annual Plan & MTW Supplement will be available for review from January 30 – March 20, 2022 online at <https://www.clackamas.us/housingauthority/plansandreports.html>. Hard copies will also be available for review at HACC's Admin Office located at 13930 S. Gain Street, Oregon City, OR, Monday through Thursday, 8AM to 6PM and the Clackamas County Library at 16201 SE Mcloughlin, Milwaukie, OR 97267.

Public Comments from Public Hearing on March 16, 2023