

April 4, 2024

BCC Agenda Date/Item: \_\_\_\_\_

Housing Authority Board of Commissioners  
 Clackamas County

**Adoption of Resolution 1982 for the approval of the Housing Authority FY 2024-25 Annual Plan and Moving to Work Supplement required for grant funding from the US Department of Housing and Urban Development. Grant value is approximately \$30M. No County General Funds are involved.**

|                                     |   |                           |              |
|-------------------------------------|---|---------------------------|--------------|
| <b>Previous Board Action/Review</b> | February 22, 2024 – Public Hearing<br>April 2, 2024 – Item presented at Issues  |                           |              |
| <b>Performance Clackamas</b>        | This item helps to build public trust through good government by providing transparency regarding all activities and policy changes of the Housing Authority. |                           |              |
| <b>Counsel Review</b>               | Yes   | <b>Procurement Review</b> | No           |
| <b>Contact Person</b>               | Toni Karter   | <b>Contact Phone</b>      | 503-650-3139 |

**EXECUTIVE SUMMARY:** The Housing Authority of Clackamas County (HACC), a component unit within the Housing and Community Development Division of the Health, Housing and Human Services Department, is requesting board adoption of a resolution approving the FY 2024-25 Annual Plan (Plan) and Moving to Work (MTW) Supplement as required for the Housing Authority to be granted federal funding by the Department of Housing and Urban Development (HUD).

Every year, HUD requires Housing Authorities to complete an Annual Plan outlining progress toward the Housing Authority 5-Year Plan goals, anticipated new activities, and policy changes. Since HACC has been awarded MTW status, HACC’s Annual Plan requires an MTW Supplement detailing the MTW program and requested program waivers. Any deviation in activity from what is stated in HACC’s Annual Plan and Supplement may require further HUD approval.

HACC’s Annual Plan drafting process requires engagement with residents, staff, HACC’s Board, and the public. HACC presented the draft plan to the Resident Advisory Board on January 25, 2024, and posted the Plan for public review for 45 days starting on January 30, 2024. A public hearing was held on February 22, 2024, for the public and commissioners to comment and give feedback on the draft plan. Details of the comments received through the engagement process are found in Attachments J and O.

The Plan includes exact policy language changes previously discussed and approved by HUD, changes required for implementing the Housing Opportunity Through Modernization Act (HOTMA), and some new policy changes to further align all our Program offerings with MTW in mind.

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Staff considered the comments made during the public process as required and only made minor edits to today's Plan and Supplement version. Audit results have not yet been provided to HACC; however, if there are findings, they will be added to the Annual Plan in Attachment P for HUD submission and will be shared with the Board at a separate meeting. Legal has reviewed the resolutions included, and the Plan is ready for board approval prior to HUD-required submission no later than April 17, 2024.

**RECOMMENDATION:** Staff requests the Board adopt resolution 1982 to approve the FY 2024-25 Annual Plan and MTW Supplement and authorize Chair Tootie Smith to sign all required documents for submission to HUD.

Respectfully submitted,

*Rodney A. Cook*

Rodney A. Cook

Director of Health Housing and Human Services

**Attachment N:  
Annual Plan Resolution**

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

In the Matter of Approving the  
Housing Authority of Clackamas  
County's Annual Plan



Resolution No. 1982  
*Page 1 of 2*

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

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

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

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

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

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

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

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

**Attachment N:  
Annual Plan Resolution**

**BEFORE THE BOARD OF COMMISSIONERS  
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In the Matter of Approving the  
Housing Authority of Clackamas  
County's Annual Plan

}

Resolution No. 1982  
*Page 2 of 2*

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

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

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

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

**DATED** this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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

\_\_\_\_\_  
Chair

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

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

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

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

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

- 903.7a Housing Needs
- 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

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

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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)

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|  |  |
|--|--|
| Name of Authorized Official<br><br>Commissioner Tootie Smith | Title<br><br>Housing Authority Board Chair |
| Signature<br><br>X   | Date                                       |

# Housing Authority of Clackamas County



## 2024-2025 Annual Plan & Moving to Work Supplement

Effective Dates July 1, 2024 – June 30, 2025

HACC Interim Executive Director: Toni Karter



Approval Process: RAB Review: 1/25/24, Public Comment Period 1/30/24-3/15/24, Public Hearing 2/22/24,  
Board Approval \_\_\_\_\_, HUD Submission \_\_\_\_\_ HUD Approval \_\_\_\_\_.

Draft as of 3/19/24





# Housing Authority of Clackamas County

## 2024 Annual Plan & MTW Supplement

Effective 7/1/2024-6/30/2025

### Table of Contents

|  |     |
|--|-----|
| HUD FORM 50075 PHA ANNUAL PLAN (15) .....  | 5   |
| ATTACHMENT A: SUMMARY OF HOUSING CHOICE VOUCHER ADMIN PLAN POLICY CHANGES .....                      | 20  |
| ATTACHMENT B: SUMMARY OF PUBLIC HOUSING ADMISSIONS & CONTINUED OCCUPANCY POLICY UPDATES (ACOP) ..... | 43  |
| ATTACHMENT C: STATEMENT OF HOUSING NEEDS .....   | 56  |
| ATTACHMENT D: DECONCENTRATION POLICY .....   | 61  |
| ATTACHMENT E: VIOLENCE AGAINST WOMEN ACT STATEMENT.....  | 62  |
| ATTACHMENT F: SUBSTANTIAL DEVIATION & SIGNIFICANT AMENDMENT/MOD. STATEMENT .....                     | 63  |
| ATTACHMENT G: FINANCIAL RESOURCES .....  | 65  |
| ATTACHMENT H: CAPITAL FUND PROJECTS & BUDGET SUMMARY .....   | 67  |
| ATTACHMENT I: CAPITAL FUND ANNUAL STATEMENT (HUD-50075.1) .....                                      | 68  |
| ATTACHMENT J: RESIDENT ADVISORY BOARD MEETING MINUTES & COMMENTS.....                                | 74  |
| ATTACHMENT K: CERTIFICATION BY STATE AND LOCAL OFFICIALS (HUD-50077-SL) .....                        | 81  |
| ATTACHMENT L: CIVIL RIGHTS CERTIFICATION/CERTIFICATION LISTING (HUD-50077-ST-HCV-HP) .....           | 82  |
| ATTACHMENT M: MOVING TO WORK (MTW) SUPPLEMENT .....  | 84  |
| ATTACHMENT N: BOARD RESOLUTION & CERTIFICATIONS.....   | 110 |
| ATTACHMENT O: PUBLIC NOTICE & PUBLIC COMMENTS.....   | 114 |
| ATTACHMENT P: FY 2022 AUDIT (IF NEEDED) .....  | TBD |



|  |   |  |
|--|---|--|
| <b>Annual PHA Plan</b><br><i>(Standard PHAs and Troubled PHAs)</i> | U.S. Department of Housing and Urban Development<br>Office of Public and Indian Housing | OMB No. 2577-0226<br>Expires: 03/31/2024 |
|--|---|--|

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

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

**Definitions.**

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

| A.                 | PHA Information.  |                    |          |                             |                                 |                              |                                 |                              |     |           |  |  |  |  |  |
|--------------------|---|--------------------|----------|-----------------------------|---------------------------------|------------------------------|---------------------------------|------------------------------|-----|-----------|--|--|--|--|--|
| A.1                | <p> <b>PHA Name:</b> <u>Housing Authority of Clackamas County</u>      <b>PHA Code:</b> <u>OR001</u><br/> <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA   <input type="checkbox"/> Troubled PHA<br/> <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2024</u><br/> <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)<br/> <b>Number of Public Housing (PH) Units:</b> <u>445</u>   <b>Number of Housing Choice Vouchers (HCVs):</b> <u>2204</u>   <b>Total Combined Units/Vouchers:</b> <u>2649</u><br/> <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission      <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council with a copy of their PHA Plans.         </p> <ol style="list-style-type: none"> <li>1) Housing Authority Administrative Office, 13930 S Gain Street, Oregon City, OR 97045</li> <li>2) Housing Authority Clackamas Heights Property Management Office, 13900 S Gain Street, Oregon City, OR 97045</li> <li>3) Housing Authority Hillside Manor Property Management Office, 2889 Hillside Court, Milwaukie, OR 97222</li> <li>4) Housing Authority Website: <a href="http://www.clackamas.us/housingauthority/plansandreports.html">http://www.clackamas.us/housingauthority/plansandreports.html</a></li> <li>5) Clackamas County Public Library located at 16201 S.E. Mcloughlin, Oak Grove, OR 97222</li> <li>6) Resident Advisory Boards (RAB) Members receive a full draft Annual Plan which includes a summary of policy changes to share with other residents.</li> </ol> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)         </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program |                                 | PH                           | HCV | Lead PHA: |  |  |  |  |  |
| Participating PHAs | PHA Code  |                    |          |                             |                                 | Program(s) in the Consortia  | Program(s) not in the Consortia | No. of Units in Each Program |     |           |  |  |  |  |  |
|                    |   | PH                 | HCV      |                             |                                 |                              |                                 |                              |     |           |  |  |  |  |  |
| Lead PHA:          |   |                    |          |                             |                                 |                              |                                 |                              |     |           |  |  |  |  |  |

| B.  | Plan Elements  |
|-----|--|
| B.1 | <p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency 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"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>Changes and revisions to elements are included in this plan as follows:</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <ul style="list-style-type: none"> <li>• Changes in policies that govern eligibility, selection, and admissions as well as rent determination proposed for HACC's Housing Choice Voucher Administrative Plan (Admin Plan) and Public Housing Admissions and Occupancy Policy (ACOP) are detailed in Attachments A and B, respectively. Due to changes in Housing Opportunity Through Modernization Act (HOTMA) implementation timelines, HACC is updating its implementation of many policy changes proposed including conditionally approved Moving to Work (MTW) waivers. HACC plans to implement all changes no later than January 1, 2025 in accordance with HOTMA final rule. Implementation dates will be communicated with residents and referenced in the Admin Plan and ACOP, if differing from the January 1, 2025 date.</li> <li>• Community Service and Self Sufficiency Programs: HACC has expanded and continues to expand their resident services programing. More staff positions have been added and offerings expanded. More detailed information is provided in Sections B.2.- New Activities and B.3.- Progress Report.</li> <li>• Financial Resources updates are detailed in Attachment G</li> <li>• Asset Management changes: Recent efforts in Asset Management include active recruitment to fill vacant positions. The now fully staffed Asset/Property Management team is working on building out Standard Operating Procedures utilizing our new software and industry wide best practices to help create a more efficient and effective working environment which will help us in our efforts to get back to High Performer status. Additional information is provided in Sections B.2.- New Activities and B.3.- Progress Report.</li> </ul> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <ul style="list-style-type: none"> <li>• Deconcentration Policy – unchanged – is included in Attachment D for review.</li> </ul> |
| B.2 | <p><b>New Activities.</b></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 type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</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 type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</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>   |

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

**Development:**

**Repositioning Strategy:**

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

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

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

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

**Metro Affordable Housing Bond:**

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

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

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

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

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

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

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

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

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. The property is fully leased. Fuller Road Station consists of 100 units that serve households with incomes 60% of AMI or below, including 30 units reserved for households with incomes at or below 30% AMI. 25 units are dedicated to households experiencing homelessness.

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

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

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

HACC plans to use bond funds to support the repositioning and redevelopment of Hillside Park. HACC expects this redevelopment project will take place in two phases. Phase 1 is expected to break ground in mid-2024 and will consist of the demolition of 54 public housing units that will be redeveloped with 275 units of housing affordable to

households at 60% AMI and below, including at 100 units affordable to households with incomes 30% of AMI or below.

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

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

**Voucher Programs:**

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

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

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

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

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

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

**Public Housing:**

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

*Capital Funds* - Given this repositioning strategy, HACC will be looking to limit its investments in the properties to only those necessary to address health & safety concerns. Section 18 and MTW flexibility will allow HACC to use Capital Funds for relocations and other needs for operations. Whatever funds are not used for modernization and/or health & safety concerns, will be utilized in the repositioning efforts. The planned capital fund projects and proposed budget

summary is detailed in Attachment H and the Capital fund annual statement is included in Attachment I and HACC will continue to apply for additional funds to meet the needs of their communities.

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

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

Resident Services:

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

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

Resident Services Programs focus on the following objectives:

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

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

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



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|  | <ul style="list-style-type: none"> <li>• Legal services</li> <li>• Housekeeping and personal care services</li> <li>• Health care and wellness programs</li> <li>• Culturally specific services</li> <li>• Safety net services</li> <li>• Domestic violence services</li> <li>• Peer-delivered support and relationships; and</li> <li>• Volunteer and social activities.</li> </ul> |
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| <p><b>B.3</b></p> | <p><b>Progress Report.</b></p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><b>PHA Goal 1 – Improve the quality of Housing Authority assisted housing and customer service</b></p> <p><u>PHA Strategy 1.a – Maintain high performer status</u></p> <ul style="list-style-type: none"> <li>• Achieved ratings of a high performer in HCV program and will work toward reestablishing high performer status by improving unit conditions with regular inspections in Public Housing and maintaining financial reporting.</li> </ul> <p><u>PHA Strategy 1.b – Improve access by making remote access options available for program intake, payments and signatures.</u></p> <ul style="list-style-type: none"> <li>• Continued to offer remote briefings and orientations and is working to expand the usage of Yardi Rent Café.</li> </ul> <p><u>PHA Strategy 1.c – Continue robust client feedback system for continued service improvements.</u></p> <ul style="list-style-type: none"> <li>• Continued to survey clients at annual exams and used the information to look at systemic improvements in customer service.</li> <li>• Survey results show that over 92% of respondents felt their needs were met by Housing Authority staff.</li> </ul> <p><u>PHA Strategy 1.d - Engage in capital fund rehabilitation projects to maintain units.</u></p> <ul style="list-style-type: none"> <li>• Focus on improvements required for High Performer status due to the repositioning strategy. The repositioning strategy will over time replace aging Public Housing units with new affordable housing units.</li> </ul> <p><u>PHA Strategy 1.e – Continue ongoing staff training and cross-training to continue</u></p> <ul style="list-style-type: none"> <li>• Continued training staff across programs including federal voucher programs, local funded voucher programs (RLRA) and Public Housing. Internal promotions across programs spread detailed program knowledge and experience to different program areas.</li> </ul> <p><b>PHA Goal 2 – Improve community quality of life and economic vitality</b></p> <p><u>PHA Strategy 2.a – Continue Resident Services programs through partnerships with community groups &amp; service providers to build community and meet resident needs including food insecurity and those affected by COVID-19.</u></p> <ul style="list-style-type: none"> <li>• Expanded the Resident Services team to include additional staff to expand program to add supports for Housing Choice Voucher participants and to include peer support and a housing specialist, to help families navigate the housing continuum and coordinate with community programs.</li> <li>• Expanded the community garden program by adding an additional Americorps member, allowing one dedicated staff member for each community garden program to engage residents and coordinate food programs.</li> </ul> <p><u>PHA Strategy 2.b – Encouraged Resident participation through resident associations and surveys to access housing needs.</u></p> <ul style="list-style-type: none"> <li>• Deploy community needs survey at least every three years with thoughtful outreach and response.</li> <li>• Working to expand the role and frequency of meetings of the Resident Advisory Board to include additional opportunities to provide HACC operations feedback.</li> <li>• The completion of resident surveys is encouraged at annual examinations. In addition, HACC will reach out annually to encourage families shifting to a triennial schedule to complete the resident survey each year.</li> </ul> <p><b>PHA Goal 3 – Promote self-sufficiency and asset development of families and individuals</b></p> <p><u>PHA Strategy 3.a - Continue to partner with local &amp; regional workforce partners to increase the number of employed/underemployed living in housing</u></p> <ul style="list-style-type: none"> <li>• Resident services staff continued to provide service coordination and referrals for residents including Foster Youth to Independence participants to employment partners</li> </ul> |
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- Board approved a partnership agreement with Clackamas Workforce Development Board to help fund the Clackamas WorkSource One-Stop employment center with other community partners.

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

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

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

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

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

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

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

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

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

- HACC continues to apply for additional vouchers from HUD to continue to expand its HCV program.
- Utilizing new state funding available, the HCDD Housing Services team is rapidly expanding options for short-term rental programs to county residents.

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

AFH Strategy 2.A. - Increase fair housing education for staff, landlords & community partners.

- Hold yearly fair housing training for all staff and landlords facilitated and led by the Fair Housing Council of Oregon.
- Expanded fair housing training to include additional County employees within our new Housing and Community Development Division.
- Provide insurance provider fair housing training for each new HACC staff member.

AFH Strategy 2.B. - Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions.

- Annually evaluate payment standards to align more closely with fair market rents.
- Established higher payment standards by zip code to accommodate higher fair market rent areas.

AFH Strategy 2.C. - Work in collaboration with partners to enforce fair housing law.

- Refer clients with fair housing related concerns to community partners who enforce fair housing law including the Fair Housing Council of Oregon, Legal Aid Services of Oregon and the Oregon Law Center.

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

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

- The Equity, Diversity and Inclusion (EDI) committee is working to systematically review all correspondence sent to clients.
- Working to expand the role and frequency of meetings of the Resident Advisory Board to include additional opportunities to provide HACC operations feedback on items such as HACC correspondence to better inform the work of the EDI committee.
- Working on diversifying representation on the RAB board beyond just minimum requirements to better include community members from marginalized groups.

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

- Increased SHS funding to culturally specific providers from \$2.68M in FY 22-23 to \$3.62M in FY 23-24.
- Additional training and coaching on diversity, equity, and inclusion for the housing services team.
- Hired a dedicated equity and engagement specialist on the housing services team who will work to advance racial equity throughout all programs in our housing services continuum.
- Continuing to implement a series of recommendations made by the Coalition of Communities of Color which will improve the Coordinated Entry process and assessment to ensure more equitable housing and service outcomes
- Supportive Housing Services funding is providing specialized technical assistance free of charge to culturally specific providers to expand their organizational capacity.

AFH Strategy 3.C - Provide multiple ways for County residents to access services and information. Email, phone, text, in-person, etc. Ensure that outgoing messages are available in multiple languages and all staff have access to interpretation services quickly and efficiently.

- Website can be translated into multiple languages
- Established ongoing contracts with culturally specific community providers to offer written and in person translation services.
- HACC has an established Limited English Proficiency policy.

**B.4 Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

**Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/25/2021**

- Capital Fund Projects Summary provided in Attachment H
- Capital Fund Budget provided in Attachment I

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| <p><b>B.5</b></p>  | <p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N<br/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p><b>The Audit is not yet complete. Findings, if any, will be added here before submission.</b></p>   |
| <p><b>C. Other Document and/or Certification Requirements.</b></p> |   |
| <p><b>C.1</b></p>  | <p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N<br/> <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><b>RAB meeting comments are detailed in Attachment J</b></p>                   |
| <p><b>C.2</b></p>  | <p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 5Man0077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p><b>Form HUD 5Man0077-SL is included Attachment K.</b></p>  |
| <p><b>C.3</b></p>  | <p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-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><b>Form HUD 50077-ST-HCV-HP is included in Attachment K.</b></p>                      |
| <p><b>C.4</b></p>  | <p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N<br/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> <p><b>Public Comments are included in Attachment O</b></p> |
| <p><b>C.5</b></p>  | <p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A<br/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p><b>This section is not applicable.</b></p>  |

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| <b>D.</b>   | <b>Affirmatively Furthering Fair Housing (AFFH).</b>  |   |  |   |   |                                    |   |
| <b>D.1</b>  | <p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="181 464 1455 1310"> <tr> <td data-bbox="181 464 1455 506"> <p><b>Fair Housing Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County</b></p> </td> </tr> <tr> <td data-bbox="181 506 1455 737"> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <ul style="list-style-type: none"> <li>• <b>AFH Strategy 1.A.</b> - 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. 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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.</li> </ul> |
| <p><b>Fair Housing Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County</b></p>   |   |   |  |   |   |                                    |   |
| <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <ul style="list-style-type: none"> <li>• <b>AFH Strategy 1.A.</b> - 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.</li> <li>• <b>AFH Strategy 1.B</b> - Maximize the number of households receiving long term and short-term rental assistance from local, state and federal programs.</li> </ul>  |   |   |  |   |   |                                    |   |
| <p><b>Fair Housing Goal 2: Expand fair housing outreach, education, and enforcement</b></p>   |   |   |  |   |   |                                    |   |
| <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <ul style="list-style-type: none"> <li>• <b>AFH Strategy 2.A.</b> - Increase fair housing education for staff, landlords &amp; community partners.</li> <li>• <b>AFH Strategy 2.B.</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.</li> <li>• <b>AFH Strategy 2.C.</b> - Work in collaboration with partners to enforce fair housing law.</li> </ul>   |   |   |  |   |   |                                    |   |
| <p><b>Fair Housing Goal 3:</b></p>  |   |   |  |   |   |                                    |   |
| <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <ul style="list-style-type: none"> <li>• <b>AFH Strategy 3.A</b> - Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible.</li> <li>• <b>AFH Strategy 3.B</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.</li> <li>• <b>AFH Strategy 3.C</b> - 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.</li> </ul> |   |   |  |   |   |                                    |   |

# Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

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

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

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

## B. Plan Elements. All PHAs must complete this section.

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” ([24 CFR §903.7](#))

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

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

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. ([24 CFR §903.7\(b\)](#)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. ([24 CFR §903.7\(b\)](#)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. ([24 CFR §903.7\(b\)](#))

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

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

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

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

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

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

**Safety and Crime Prevention (VAWA).** Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the

coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

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

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

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

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

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

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

**HOPE VI or Choice Neighborhoods.** **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for HOPE VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). (Notice PIH 2011-47)

**Mixed Finance Modernization or Development.** **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](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](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

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

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

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

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

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

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

**Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan ([24 CFR §903.7\(b\)](#)).

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

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

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

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

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

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

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

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

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

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

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

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

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



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

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

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

**ATTACHMENT A:**

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

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

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

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

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

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

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| <p>of application. This preference can only come from direct referring agencies that have signed a Memorandum of Understanding (MOU) outlining the services to be offered to those referred. The referrals must originate from the Coordinated Housing Access (CHA) system and have an HMIS identification number to show an intake was completed. To be referred households must be actively engaged in services at time of voucher issue. Referring agencies are limited to no more than 5 referrals from July 1-December 31. Starting January 1 remaining available vouchers will be distributed first come, first served order. Unused Preference slots do not carry over to the next fiscal year.</p> <p>7. Maximum of 17 dedicated vouchers within a fiscal year (July 1st to June 30th) for families referred by a domestic violence professional counseling organization and/or shelter, for victims of domestic violence that has occurred within the last 12 months and are certified as homeless by the agency and who continue to be in counseling or case management through the referring agency or other professionally recognized counseling organization. Referrals from agencies that have signed an MOU outlining the services to be offered to their referral families will only be accepted. The applicant must certify that the abuser will not reside with the applicant unless the PHA gives prior written approval. Applicants will be served on a first come, first served basis. Unused Preference slots do not carry over to the next fiscal year.</p> <p>8. Maximum of 10 dedicated vouchers per year within a fiscal year (July 1st to June 30th) for households referred by a provider that has entered into a Supportive Services MOU with HACC and applicant has been deemed by the provider to be in</p> |  | <p>administrative burden and work with One County to end homelessness using the mechanism.</p> <p>Implementation to begin 7/1/24</p> |
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|   | <p>less need for supportive services. The household must be considered a candidate that is graduating off the PSH and that at time of entry into the PSH program were homeless and/or disabled. Unused Preference slots do not carry over to the next fiscal year. Referring agencies are limited to no more than 5 referrals from July 1-December 31. Starting January 1 remaining available vouchers will be distributed first come, first served order. Unused Preference slots do not carry over to the next fiscal year.</p> |   |   |
| 4 | <p>Local Preferences [24 CFR 982.207; HCV p. 4-16]<br/>4-III.C. SELECTION METHOD</p>  | <p>Local Preferences [24 CFR 982.207; HCV p. 4-16]<br/>4-III.C. SELECTION METHOD</p> <p>6. Definition of Work-focused Household: Work-focused household is a household in which neither the head, spouse, nor cohead is a senior or a person with disabilities. All households that do not meet the definition of a senior and people with disabilities household are considered work-focused households. Work-focused households will be given preference when over 75% of households served are at or below 30% AMI.</p> <p>7. Households residing in Clackamas County The term “residence” includes shelters and other dwelling places where homeless families may be living or sleeping. Applicants who are working or have been notified that they were hired to work in Clackamas County will be treated as residents of Clackamas County. Graduates of, or active participants in, education and training programs in Clackamas County will be treated as residents of Clackamas County if the education or training program is designed to prepare individuals for the job market. The PHA defines training program as “a learning process with goals and objectives, generally having a variety of</p> | <p>General Policy Change</p> <p>Adding preference for work focused households and Clackamas County residents and defining homeless preference for special purpose vouchers.</p> <p>Implementation to begin 7/1/24</p> |

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

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| 5 | <p><b>5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS</b><br/> <b>HACC Policy</b> HACC will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances. However, to avoid cutting families from the program due to insufficient funding, HACC will not absorb the cost of allowing an additional bedroom if other non-disabled family members are able to double up to give an extra bedroom for use by the disabled family member.</p> <p>The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size or reasonable accommodation payment standard and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability-related request for accommodation is readily apparent or otherwise known. The family's continued need for an additional bedroom due to special medical equipment may be re-verified at annual reexamination.</p> <p>HACC will notify the family of its determination within 14 business days of receiving the family's request. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.</p> | <p><b>5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS</b><br/> <u>HACC Policy</u><br/> HACC will strictly enforce two per bedroom to avoid a financial burden.</p> <p>HACC will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances only if a "bedroom" specifically is required and other rooms within the unit cannot be used to meet the needs.</p> <p>During a housing crisis and/or while there is insufficient funding to serve our fully allotted number of vouchers congressionally approved (ACC), HACC will not absorb the cost of allowing an additional bedroom if other non-disabled family members are able to share bedroom or other rooms for sleeping to give an extra bedroom for use by the disabled family member.</p> <p>Additionally, HACC will not absorb the cost of allowing an additional bedroom if medical supplies or equipment can be stored in rooms other than a bedroom (living room, closet, corner of kitchen, etc.).</p> <p>The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size or reasonable accommodation payment standard and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability-related need for accommodation is readily apparent or otherwise known. The family's continued need for an additional bedroom due to special medical equipment may be re-verified at annual reexamination.</p> <p>No request will be considered prior to receiving verification of disability related need for an accommodation. HACC will notify the family of its determination within 14 business days of receiving the family's accommodation request and the verification of disability related need. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.</p> | <p>General Policy Change</p> <p>To serve as many families as possible HACC is strictly enforcing 2 per bedroom subsidy standards.</p> <p>Implementation to begin 7/1/24</p> |
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| 5 | <p>5-II.D. VOUCHER ISSUANCE AND RESCISSIONS [24 CFR 982.302]</p>   | <p>5-II.D. VOUCHER ISSUANCE AND RESCISSIONS [24 CFR 982.302]</p> <p>Category 3: Vouchers for whom there are no elderly or disabled family members.</p>   | <p>General Policy Change</p> <p>If we ever had to rescind vouchers, clarifies nondisabled households would be removed before disabled households.</p> <p>Implementation to begin 7/1/24</p> |
| 6 | <p>6-I.B. HOUSEHOLD COMPOSITION AND INCOME<br/>Temporarily Absent Family Members<br/><u>HACC Policy</u></p> <p>Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.</p> | <p>6-I.B. HOUSEHOLD COMPOSITION AND INCOME<br/>Temporarily Absent Family Members<br/><u>HACC Policy</u></p> <p>Unless specifically excluded by the regulations, the income of all family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit (as confirmed by the state child welfare agency). An individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. An individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.</p> | <p>HOTMA Change</p> <p>Added language as to clarify all income of all household members are counted regardless of if temporarily absent.</p> <p>Implementation no later than 1/1/25</p>     |
| 6 | <p>6-I.C. ANTICIPATING ANNUAL INCOME<br/><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 current and consecutive pay stubs dated within the last 60 days. HACC will obtain written and/or oral third-party verification in accordance with the verification</p>  | <p>6-I.C. CALCULATING ANNUAL INCOME<br/><u>HACC Policy</u></p> <p>When EIV is obtained and HACC cannot readily anticipate income based upon current circumstances (e.g., in the case of temporary, sporadic, or variable employment, seasonal employment, unstable working hours, or suspected fraud), HACC will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.</p>  | <p>HOTMA Change</p> <p>Simplified language to align with HOTMA regulations.</p> <p>Implementation no later than 1/1/25</p>  |

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

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|   | count only the amount estimated by the employer. The file will be documented appropriately.               | credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, HACC will count only the amount estimated by the employer. The file will be documented appropriately.  |  |
| 6 | 6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9); Notice PIH 2015-21]<br>All old language removed. | 6-I.G. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27]<br>HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)]<br><u>HACC Policy</u><br>If a student only receives financial assistance under Title IV of the Higher Education Act (HEA) and do not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family's annual income. The PHA will not calculate actual covered costs in this case.<br>If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student's financial assistance from the student's actual covered costs. The PHA will include any amount of financial assistance in excess of the student's actual covered costs in the family's annual income.<br><div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">Example 1</p> <ul style="list-style-type: none"> <li>• Actual covered costs: \$20,000</li> <li>• Other student financial assistance: \$25,000</li> <li>• Excluded income: \$20,000 (\$25,000 in financial assistance - \$20,000 in actual covered costs)</li> <li>• Included income: \$5,000</li> </ul> </div> When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the | HOTMA Change<br><br>Added policy language and clarification by adding examples.<br><br>Implementation no later than 1/1/25 |

other student’s financial assistance will be applied to any remaining actual covered costs.  
 If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance” would be excluded from income.

Example 2

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

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

Example 3

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

Example 4

- Actual covered costs: \$18,000

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|   |   | <ul style="list-style-type: none"> <li>• Title IV HEA Assistance: \$15,000</li> <li>• The remaining amount not covered by Title IV HEA assistance is \$3,000 (\$18,000 in actual covered costs - \$15,000 in Title IV HEA Assistance)</li> <li>• Other student Financial Assistance: \$5,000</li> <li>• When other student financial assistance is applied, financial assistance exceeds actual covered costs by \$2,000 (\$3,000 in actual covered costs - \$5,000 in other financial assistance).</li> <li>• Included income: \$2,000 (the amount by which the financial aid exceeds the student's actual covered costs).</li> </ul>  |  |
| 6 | New HOTMA policy added.   | <p>6-I.H. PERIODIC PAYMENTS<br/> <u>HACC Policy</u><br/> HACC will include in annual income the full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts.<br/> Payments in lieu of earnings, such as unemployment and disability compensation, and severance pay are also counted as income if they are received in the form of periodic payments.</p>  | <p>HOTMA Change</p> <p>Added policy language defining all payments included in the calculation of income.</p> <p>Implementation no later than 1/1/25</p> |
| 6 | <p>6-I.H. PERIODIC PAYMENTS<br/> Lump-Sum Payments for the Delayed Start of a Periodic Payment<br/> <u>HACC Policy</u><br/> When a delayed-start payment is received and reported during the period in which HACC is processing an annual reexamination, HACC will adjust the family share and HACC subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with HACC.</p> | <p>6-I.H. PERIODIC PAYMENTS<br/> Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)]<br/> <u>HACC Policy</u><br/> HACC will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.<br/> If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 11. If not, the PHA will consider the amount when processing the family's next regular recertification.</p> | <p>HOTMA change</p> <p>Added policy language to align with the changes to examination schedules.</p> <p>Implementation no later than 1/1/25</p>          |

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| 6 | New HOTMA policy added. | <p>6-I.H. PERIODIC PAYMENTS<br/>Alimony and Child Support<br/><u>HACC Policy</u></p> <p>The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement. The PHA will count court-awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made.</p> <p>In order to verify that payments are not being made, the PHA will review child support payments over the last three months. If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made.</p> <p>At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income.</p> <p>If the PHA determines and can appropriately verify that the family in all likelihood will not receive a similar payment, then the amount will not be considered when projecting annual income.</p> <p>If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income.</p> <p>If no payments have been made in the past three months and there are no lump sums, the PHA will not include alimony or child support in annual income. Alternately, the PHA will only count alimony or child support if it can verify three months of payments.</p> | <p>HOTMA Change</p> <p>Added language that the PHA will consider alimony and child support in calculations only when 3 months of payments can be verified.</p> <p>Implementation no later than 1/1/25</p> |
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| 6 | <p>PART II: ASSETS<br/>HACC Policy</p> <p>HACC will accept a family's declaration of the amount of assets less than \$5,000 and the amount of income expected to be received from those assets. HACC's reexamination documentation, which is signed by all adult family members can serve as the declaration. Where the family has net family assets equal to or less than \$5,000, HACC does not need to request supporting documentation (e.g. bank statements) for the family to confirm the assets or the amount of income expected to be received from those assets. Where the family has net family assets in excess of \$5,000, HACC must obtain supporting documentation to confirm assets. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to HACC to show why the asset income determination does not represent the family's anticipated asset income.</p> | <p>PART II: ASSETS<br/><u>HACC Policy – 7/1/2024</u></p> <p>HACC will allow families to self-certify assets do not exceed \$50,000 per Chapter 7 of the Administrative Plan.</p>   | <p>HOTMA Change</p> <p>Providing exact policy language.</p> <p>Allows families to self-certify assets under \$50,000.</p> <p>Implementation no later than 1/1/25</p>  |
| 6 | <p>6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505; 982.503(b)]<br/>HACC Policy</p> <p>If HACC changes its payment standard schedule resulting in a lower payment standard amount, during the term of a HAP contract, the PHA will reduce the payment standard at the family's second regular reexamination following the effective date of the decrease. HACC will not establish different policies for decreases in the payment standard for designated areas within their jurisdiction.</p> <p>Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination</p>  | <p>6-IV.F. APPLYING PAYMENT STANDARDS [24 CFR 982.505; 982.503(b)]</p> <p>HACC Policy – Effective July 1, 2024</p> <p>Revised payment standards will be applied to a family's rent and subsidy calculation at the first annual or interim reexamination that is effective after the payment standard is adopted. HACC will not do a re-exam solely for the purpose of implementing a new Payment Standard.</p> | <p>General Policy Change</p> <p>Updated to apply new payment standards at annuals and interims. Allows payment standards to increase in better alignment with rent increases.</p> <p>Implementation to begin 7/1/24</p> |

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



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

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

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

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

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

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

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

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



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

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

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

\*Indicates alignment with Admin Plan.

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

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| 4 | <p>4-I.B. APPLYING FOR ASSISTANCE [Notice PIH 2009-36]<br/> When the waiting list is open, applications will be available on the HACC website electronically and paper applications will be provided upon request.</p>  | <p>4-I.B. APPLYING FOR ASSISTANCE [Notice PIH 2009-36]<br/> When the waiting list is open, applications will be available electronically and staff assistance will be provided upon request at HACC’s Administrative Offices.</p>  | <p>General Policy Change*<br/> No longer accepting paper applications but assisting clients to apply online in person.<br/> Implementation to begin 7/1/24</p>                                  |
| 4 | <p>4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]<br/> Closing the Waiting List<br/> <u>HACC Policy</u><br/> HACC will close the waiting list when the estimated waiting period for housing assistance for applicants on the list exceeds 24 months. Where HACC has particular preferences or funding criteria that require a specific category of family, HACC may elect to continue to accept applications from these applicants while closing the waiting list to others.</p> | <p>4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]<br/> Closing the Waiting List<br/> <u>HACC Policy</u><br/> HACC will close the waiting list when the estimated waiting period for housing applicants on the list reaches 24 months for the most current applicants. Where HACC has particular preferences or other criteria that require a specific category of family, HACC may elect to use the CHA as their wait list, the CHA guidelines as determined by the Continuum of Care (CoC) will be used.</p> | <p>General Policy Change*<br/> Simplifying all wait lists to rely on the CHA relieving HACC of the administrative burden of maintaining the wait lists.<br/> Implementation to begin 7/1/24</p> |
| 4 | <p>4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]<br/> The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant’s name being removed from the waiting list.<br/> The family’s response must be in through Yardi’s Rent Café portal.</p>  | <p>4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]<br/> The update request will provide a deadline by which the family must respond in the online system and will state that failure to respond will result in the applicant’s name being removed from the waiting list.<br/> The family’s response must be through the online system. Upon request, HACC staff will assist applicants with updating information in the online system.</p>  | <p>General Policy Change*<br/> Administrative burden reduction for HACC requiring use of online updates for applicants.<br/> Implementation to begin 7/1/24</p>                                 |
| 4 | <p>4-III.E. THE APPLICATION INTERVIEW<br/> If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the</p>  | <p>4-III.E. THE APPLICATION INTERVIEW<br/> If the family is unable to obtain the information or materials within the required time frame, the family may request one 10-day extension and any additional requests for extensions will only be granted in cases of reasonable accommodation.</p>  | <p>General Policy Change*<br/> Clarifying the maximum time frame for extension requests.<br/> Implementation to begin 7/1/24</p>  |

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

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

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

financial assistance in excess of the student's actual covered costs in the family's annual income.

Example 1

- Actual covered costs: \$20,000
- Other student financial assistance: \$25,000
- Excluded income: \$20,000 (\$25,000 in financial assistance - \$20,000 in actual covered costs)
- Included income: \$5,000

When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the other student's financial assistance will be applied to any remaining actual covered costs.

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

Example 2

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

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

Example 3

- Actual covered costs: \$22,000
- Title IV HEA assistance: \$15,000
- The remaining amount not covered by Title IV HEA assistance is \$7,000 (\$22,000 in actual covered costs - \$15,000 in Title IV HEA assistance).
- Other Student Financial Assistance: \$5,000

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|   |   | <ul style="list-style-type: none"> <li>• \$7,000 in remaining actual covered costs - \$5,000 in other financial assistance</li> <li>• Excluded income: \$15,000 entire amount of the Title IV HEA Assistance + \$5,000 in other financial assistance</li> <li>• Included income: \$0</li> </ul>   |  |
|   |   | <p style="text-align: center;">Example 4</p> <ul style="list-style-type: none"> <li>• Actual covered costs: \$18,000</li> <li>• Title IV HEA Assistance: \$15,000</li> <li>• The remaining amount not covered by Title IV HEA assistance is \$3,000 (\$18,000 in actual covered costs - \$15,000 in Title IV HEA Assistance)</li> <li>• Other student Financial Assistance: \$5,000</li> <li>• When other student financial assistance is applied, financial assistance exceeds actual covered costs by \$2,000 (\$3,000 in actual covered costs - \$5,000 in other financial assistance).</li> <li>• Included income: \$2,000 (the amount by which the financial aid exceeds the student's actual covered costs).</li> </ul> |  |
| 6 | New HOTMA policy added.   | <p>6-I.H. PERIODIC PAYMENTS<br/> <u>HACC Policy</u><br/> HACC will include in annual income the all periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts.<br/> Payments in lieu of earnings, such as unemployment and disability compensation, and severance pay are also counted as income if they are received in the form of periodic payments.</p>   | HOTMA Change*<br>Providing exact policy language.<br>Added language defines all payments included in calculation of income to align with HOTMA regulations.<br>Implementation no later than 1/1/25 |
| 6 | 6-I.H. PERIODIC PAYMENTS<br>Lump-Sum Payments for the Delayed Start of a Periodic Payment<br><u>HACC Policy</u><br>When a delayed-start payment is received and reported during the period in which HACC is processing an annual reexamination, HACC will | 6-I.H. PERIODIC PAYMENTS<br>Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)]<br><u>HACC Policy</u><br>HACC will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.  | HOTMA Change*<br>Providing exact policy language.<br>Added policy language to align with the changes to examination schedules.   |

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



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

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

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

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

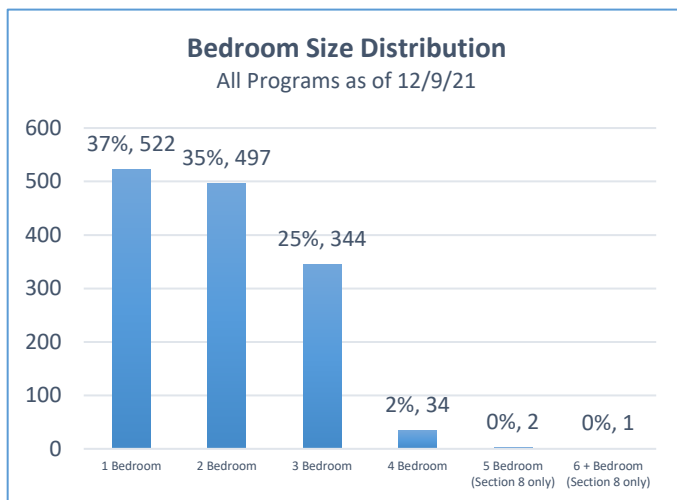
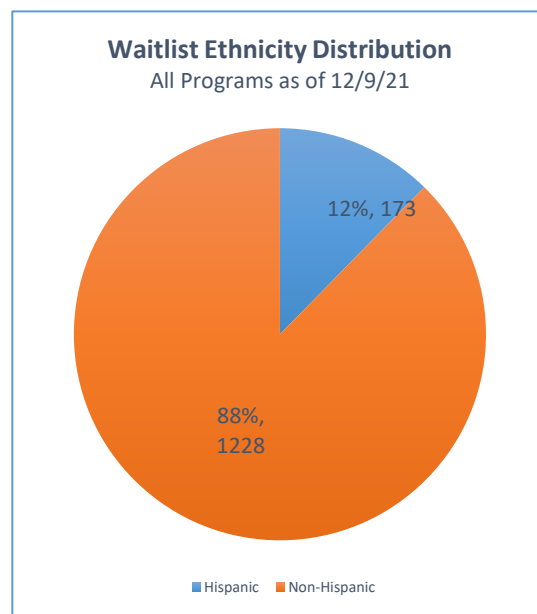
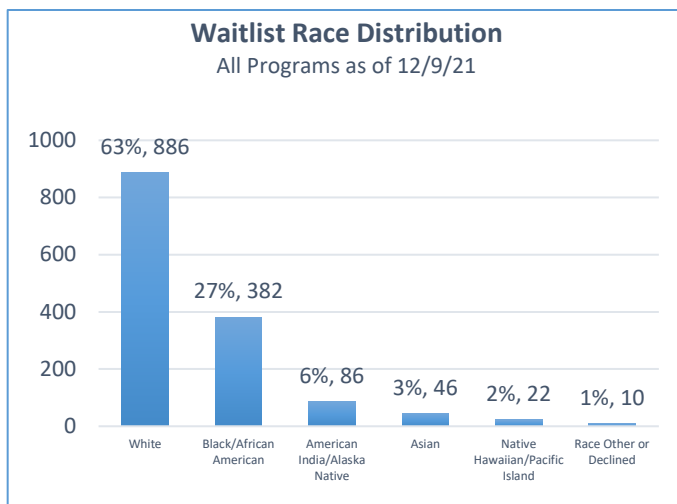
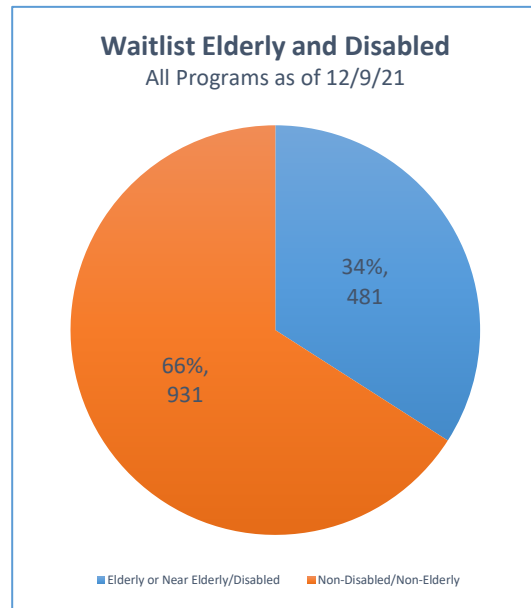
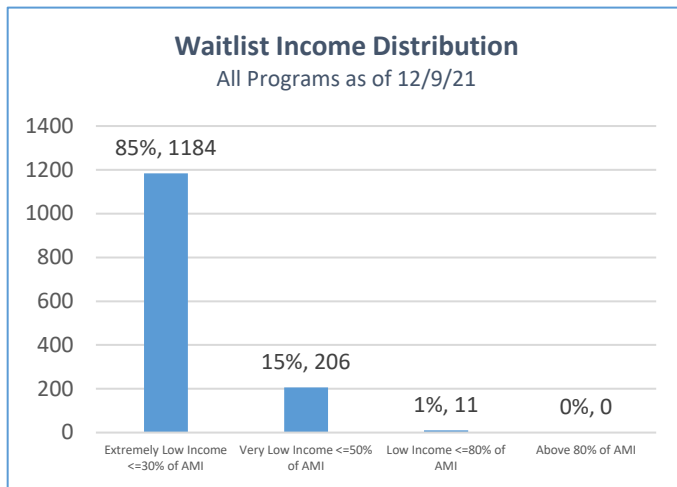
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|    |   | or if the change occurred during the last three months of the certification period. Families must report changes in income within 7 business days of the date the change takes effect. The family must notify HACC of the changes in writing.   |  |
| 11 | New General Policy added.   | 11-III.B. CHANGES IN FLAT RENTS AND UTILITY ALLOWANCES<br><ul style="list-style-type: none"> <li>HACC Policy</li> </ul> If the flat rent amount changes during the term of the HAP contract, the new flat rent will be applied in accordance with policies in Chapter 6.  | General Policy Change Added for clarification. Implementation to begin 7/1/24        |
| 11 | New General Policy added.   | 11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES<br>HACC Policy<br>If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in the PHA's subsidy standards (see Chapter 5), the new family unit size will be used to determine the payment standard amount for the family in accordance with policies in Chapter 6.   | General Policy Change Added for policy clarification. Implementation to begin 7/1/24 |
| 13 | <u>HACC Policy</u><br>For families whose income exceeds the over-income limit for 24 consecutive months, HACC will not terminate the family's tenancy and will charge the family the alternative non-public housing rent, as well as require the family to sign a new non-public housing lease in accordance with the continued occupancy policies below. | <u>HACC Policy</u> (To be implemented January 1, 2024, subject to change dependent on HUD guidance)<br>HACC's continued occupancy policy for over-income families, states that if the household's income continues to exceed the over-income limit for 24 consecutive months after the date that the Household is initially determined to be over-income, then HACC must provide a final written notice to the household. HACC's written notice must inform the household that<br><ul style="list-style-type: none"> <li>The Household's income has exceeded the over-income limit for 24 total and consecutive months,</li> </ul> HACC will terminate the household's tenancy with an End of Participation date that is effective no less than 30 days from the notice date and no more than 6 months from the date of the final determination, and; | HOTMA Change<br>Providing exact policy language.<br>Implemented 1/1/2024             |

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

**Statement of Housing Needs**

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

| Waitlist Demographics – Combined<br>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.



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Toni Karter, Interim Executive Director

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12/05/2022  
Date

## Attachment G: Financial Resources

Housing Authority of Clackamas County

All Programs Budget  
Fiscal Year 2024-2025

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

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

|                                       | Public Housing   | Housing Vouchers  | Local Projects   | Central Office   | Development        | Supportive Housing | Grants           | FY23 Total        | FY 2023<br>6/30/202<br>Budget | FY 2022<br>6/30/2022<br>Budget | FY 2021<br>6/30/21<br>Budget | \$ Change from Prior<br>Year Budget | % Change<br>from Prior<br>Year Budget |
|---------------------------------------|------------------|-------------------|------------------|------------------|--------------------|--------------------|------------------|-------------------|-------------------------------|--------------------------------|------------------------------|-------------------------------------|---------------------------------------|
| <b>GENERAL EXPENSES:</b>              |                  |                   |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| Insurance                             | 148,620          | 10,174            | 11,900           | 3,500            |                    | 7,800              | -                | 181,994           | 124,625                       | 122,925                        | 116,525                      | 57,369                              | 46.03%                                |
| Payment in Lieu of Taxes              | 86,000           |                   |                  |                  |                    |                    |                  | 86,000            | 86,000                        | 86,000                         | 86,000                       | -                                   | 0.00%                                 |
| <b>TOTAL GENERAL EXPENSES</b>         | <b>234,620</b>   | <b>10,174</b>     | <b>11,900</b>    | <b>3,500</b>     | <b>-</b>           | <b>7,800</b>       | <b>-</b>         | <b>267,994</b>    | <b>210,625</b>                | <b>208,925</b>                 | <b>202,525</b>               | <b>8,100</b>                        | <b>4.00%</b>                          |
| <b>OTHER EXPENSES:</b>                |                  |                   |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| Housing Assistance Payments           |                  | 21,207,699        |                  |                  |                    | 11,682,537         | 1,228,833        | 34,119,069        | 22,469,045                    | 19,206,368                     | 16,613,002                   | 11,650,024                          | 51.84%                                |
| Mortgage Payments                     |                  |                   | 13,100           |                  |                    |                    | -                | 13,100            | 13,100                        | 13,700                         | 13,700                       | -                                   | 0.00%                                 |
| Grant Expense                         |                  |                   |                  |                  | 38,294,833         |                    |                  | 38,294,833        | 35,325,258                    | 43,487,403                     | -                            | 2,969,575                           | 8.41%                                 |
| Supp Svcs, in-kind, child care        |                  |                   |                  |                  |                    | 530,041            | -                | 530,041           | -                             | -                              | -                            | 530,041                             | 100.00%                               |
| Central office                        |                  |                   |                  |                  |                    |                    | 127,186          | 127,186           | 127,186                       | 127,186                        | 122,559                      | -                                   | 0.00%                                 |
| Capital Expenditures                  | -                | -                 | 91,330           | -                | -                  |                    | 1,416,308        | 1,507,638         | 1,200,605                     | 1,200,605                      | 1,234,615                    | 307,033                             | -2.75%                                |
| <b>TOTAL OTHER EXPENSES</b>           | <b>-</b>         | <b>21,207,699</b> | <b>104,430</b>   | <b>-</b>         | <b>38,294,833</b>  | <b>12,212,578</b>  | <b>2,772,327</b> | <b>74,591,867</b> | <b>59,135,194</b>             | <b>64,035,262</b>              | <b>17,983,876</b>            | <b>15,456,673</b>                   | <b>26.14%</b>                         |
| <b>TOTAL EXPENSES</b>                 | <b>4,780,371</b> | <b>23,805,309</b> | <b>442,590</b>   | <b>1,523,894</b> | <b>39,273,673</b>  | <b>13,925,914</b>  | <b>3,006,436</b> | <b>86,758,186</b> | <b>69,902,973</b>             | <b>74,349,105</b>              | <b>27,044,088</b>            | <b>16,855,213</b>                   | <b>24.11%</b>                         |
| <b>OPERATING SURPLUS (DEFICIT)</b>    | <b>(30,861)</b>  | <b>(76,785)</b>   | <b>181,114</b>   | <b>(929,083)</b> | <b>1,375,200</b>   | <b>(117,884)</b>   | <b>(127,187)</b> | <b>274,514</b>    | <b>(12,000)</b>               | <b>356,372</b>                 | <b>38,980</b>                | <b>(38,979)</b>                     | <b>-100.00%</b>                       |
| <b>TRANSFERS</b>                      |                  |                   |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| Easton Ridge                          |                  |                   |                  |                  |                    |                    |                  | -                 |                               |                                |                              |                                     |                                       |
| Development                           |                  |                   |                  |                  |                    |                    |                  | -                 |                               |                                |                              |                                     |                                       |
| Local Projects                        |                  | 76,785            | (76,785)         |                  |                    |                    |                  | -                 |                               |                                |                              |                                     |                                       |
| <b>OPERATING SURPLUS (DEFICIT)</b>    |                  |                   |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| <b>CONTINGENCY AFTER TRANSFERS</b>    | <b>(30,861)</b>  | <b>0</b>          | <b>(104,329)</b> | <b>929,083</b>   | <b>(1,375,200)</b> | <b>117,884</b>     | <b>127,187</b>   | <b>(274,514)</b>  |                               |                                |                              |                                     |                                       |
| Estimated Change in Fund Balance/Cash |                  |                   |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| Public Housing                        | 30,861           |                   |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| Development                           |                  |                   |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| Local Project Fund                    |                  | 0                 |                  |                  |                    |                    |                  |                   |                               |                                |                              |                                     |                                       |
| <b>Budgeted Balance</b>               | <b>-</b>         | <b>-</b>          | <b>-</b>         | <b>-</b>         | <b>-</b>           | <b>-</b>           | <b>-</b>         | <b>0</b>          | <b>-</b>                      | <b>-</b>                       | <b>-</b>                     | <b>-</b>                            | <b>-</b>                              |

## **Attachment F:**

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

#### Definition of Substantial Deviation and Significant Amendment

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

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

- Any collective change in the planned or actual use of federal funds for activities that would prohibit or redirect HACC's strategic goals or mission of sustaining or increasing the availability of decent, safe and affordable housing while promoting self-sufficiency and asset development of families and individuals from being implemented as identified in Plans. This includes elimination or major changes in any activities proposed, or policies provided in the Plans that would 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 PHA Annual Plan and PHA 5-Year Plan**

- Changes of a significant nature to the rent or admissions policies that have a negative impact on households served, or the organization of the waiting list that negatively prolong the wait times, which are not required by federal regulatory requirements that effect a change in the Section 8 Administrative Plan or the Public Housing Admissions and Continued Occupancy Policy (ACOP).
- Changes to HACC's plans effecting the demolition or disposition of public housing, designation of senior or disabled housing, and a plan to convert public housing units to other than assisted housing.
- Changes of a significant nature would include the elimination or major changes to any activities proposed, or policies provided in the agency plan within the agency's control that would 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. Definition of Significant Amendment or Modification to the Capital Fund Program 5-Year Action Plan**

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

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

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



January 17, 2024

## **2023 Capital Fund Completed Projects**

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

## **2024 Proposed Capital Fund Projects**

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

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2024 Annual Plan and MTW Supplement - Page 67 of 115

## 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<br><b>OR001</b> | Grant Type and Number<br>Capital Fund Program Grant No: <span style="float: right;">OR16R00150124</span><br>Replacement Housing Factor Grant No: | FFY of Grant:<br>FFY of Grant Approval:<br>FY2024 |
|--------------------------|--|---|

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

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

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

## Attachment I: Capital Fund Annual Statement

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

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

| <b>Part I: Summary</b>   |  |  |                      |                                      |          |
|--|--|--|----------------------|--------------------------------------|----------|
| <b>PHA Name:</b><br><br><b>OR 001</b>  | <b>Grant Type and Number</b><br>Capital Fund Program Grant No: <b>OR16R00150124</b><br>Replacement Housing Factor Grant No:<br>Date of CFFP: | <b>FFY of Grant:</b><br>FFY of Grant Approval:<br><br>FY2024 |                      |                                      |          |
| <b>Type of Grant</b><br><input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:<br><input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report |  |  |                      |                                      |          |
| Line   | Summary by Development Account   | Total Estimated Cost   |                      | Total Actual Cost <sup>1</sup>       |          |
|  |  | Original   | Revised <sup>2</sup> | Obligated                            | Expended |
| 15   | Amount of Annual Grant:: (sum of lines 2 - 14)   | \$1,547,675.00   |                      |                                      |          |
| 16   | Amount of line 15 Related to LBP Activities  |  |                      |                                      |          |
| 17   | Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.   |  |                      |                                      |          |
| 18   | Amount of line 15 Related to Security - Soft Costs   |  |                      |                                      |          |
| 19   | Amount of line 15 Related to Security - Hard Costs   |  |                      |                                      |          |
| 20   | Amount of line 15 Related to Energy Conservation Measures  |  |                      |                                      |          |
| Signature of Executive Director *  |  | Date   |                      | Signature of Public Housing Director |          |
|  |  |  |                      | Date                                 |          |

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

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

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

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

## Attachment I: Capital Fund Annual Statement

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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:<br><b>OR001</b>                         | Grant Type and Number<br>Capital Fund Program Grant <b>OR16R00150124</b><br>No: CFFP (Yes/ No):<br>Replacement Housing<br>Factor Grant No: |                            |          |                      | Federal FFY of Grant:<br><b>2024</b> |                                 |                                |                |
| Development Number<br>Name/PHA-Wide<br>Activities | General Description of Major Work<br>Categories  | Development<br>Account No. | Quantity | Total Estimated Cost |                                      | Total Actual Cost               |                                | Status of Work |
|   |  |                            |          | Original             | Revised <sup>1</sup>                 | Funds<br>Obligated <sup>2</sup> | Funds<br>Expended <sup>2</sup> |                |
| AMP Wide Operations                               | Operations   | 1406                       | 1        | \$386,918.75         |                                      |                                 |                                |                |
| AMP Wide Mgmt. Improve.                           | Software: Operating Systems & Office Software  | 1408                       | 1        | \$500.00             |                                      |                                 |                                |                |
| AMP Wide Admin.                                   | Central Office Cost Center (COCC) Salary & Benefits  | 1410                       | 1        | \$154,767.50         |                                      |                                 |                                |                |
| AMP Wide Relocation Costs                         | Relocation due to Redevelopment  | 1495                       | 1        | \$500,000.00         |                                      |                                 |                                |                |
| AMP Wide Redevelopment                            | MTW Redevelopment  | 1492                       | 1        | \$441,988.75         |                                      |                                 |                                |                |
| AMP Wide  | Force Account  | 1480                       |          | \$64,000.00          |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |
|   |  |                            |          |                      |                                      |                                 |                                |                |

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

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



## Attachment I: Capital Fund Annual Statement

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

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

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

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



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

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

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

**RAB Board Members attendance: 1 new member added**

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

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

[https://clackamascounty.zoom.us/rec/share/tlALes55dsrRDKw\\_zilwr0d74ZNa9opij8e3aZ8z4OwfvzjvTQFRb4oej0fraFTC.1xi\\_zuHkvePAUv5t](https://clackamascounty.zoom.us/rec/share/tlALes55dsrRDKw_zilwr0d74ZNa9opij8e3aZ8z4OwfvzjvTQFRb4oej0fraFTC.1xi_zuHkvePAUv5t) Passcode:lc5F&f@&

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

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

**What is Housing Authority doing well (from introductions)?**

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

Ann - Represent who and what residents are to the commissioners

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

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

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

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

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



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

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

Jackie – Great job communicating

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

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

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

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

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

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

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

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

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

Staff – sharing information in presentations later in the meeting.

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

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

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

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

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

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

**Presenter information, Comments and Questions (Paraphrased):**

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

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

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

**Annual Plan Draft:**

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

### **B.1 Revision of Existing PHA Plan Elements:**

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

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

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

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

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

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

### **B.2 – New Activities**

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

Quick overview of section with highlights on:

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

### **B.3 - Progress Report**

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

### **B.4 – Capital Improvements**

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

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

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

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

**Attachment A – Admin Plan** - Policy Changes for HCV program (Section 8) - Staff reviewed all changes. Many changes were included in concept in the Mid-year revision and come from MTW waivers or HOTMA. This provided the detailed policy language on those changes from the Mid-year and added

other changes that were needed. Some topics that generated more discussion or of special note by staff – questions and comments are below by category:

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

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

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

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

### **MTW Activities (Attachment M):**

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

#### **Savings Accounts**

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

#### **Credit Building**

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

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

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

### **Resident Services**

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

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

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

<https://vimeo.com/338260366>

- No questions?

### **Development Update (New Activities and Progress Report)**

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

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

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

### **Toni's Retirement Announcement & Division news**

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

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

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

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

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

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

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

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

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

certify that the Annual PHA Plan for fiscal year 2024-2025 of the  
Housing Authority of Clackamas County is consistent with the  
*PHA Name*

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

Clackamas County  
*Local Jurisdiction Name*

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

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

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

|  |                    |
|--|--------------------|
| Name of Authorized Official: Commissioner Tootie Smith | Title: Board Chair |
| Signature:   | 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)

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

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

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 2024 in connection with the submission of the Plan and implementation thereof:*

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



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

Housing Authority of Clackamas County

OR001

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2024  
 5-Year PHA Plan for Fiscal Years 20\_\_\_\_ - 20\_\_\_\_

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

Name of Executive Director: Toni Karter

Name Board Chairman: Commissioner Tootie Smith, Chair

*Toni Karter*

2/5/24

Signature

Date

Signature

Date

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# MTW Supplement – Amended Annual Submission

**PHA Name:** Housing Authority of Clackamas County

**PHA Code :** OR001

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 07/01/2024

**PHA Program Type:** Combined

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Amended Annual Submission

## B. MTW Supplement Narrative.

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

They are:

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

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

Through the mid-year Revision of HACC's Annual Plan the following waivers were given conditional approval.

- Cohort Specific Waiver - Savings Account Component Updates – Savings Account participants only
- MTW Waivers 3.a, 3.b. - Alternate Re-examination schedule – HCV & PH
- MTW Waiver 5.c - Inspection Process – HCV only
- MTW Waiver 2.d - Rent Reasonableness 3rd Party Requirements – HCV only
- MTW Waiver 9.a,9.b - Increase PBV Program Cap – PBV only
- MTW Waiver 9.h - Limit Portability for PBV - PBV only

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

| 1. Tenant Rent Policies                                       |                           |
|---|---------------------------|
| a. Tiered Rent (PH)   | Not Currently Implemented |
| b. Tiered Rent (HCV)  | Not Currently Implemented |
| c. Stepped Rent (PH)  | Not Currently Implemented |
| d. Stepped Rent (HCV)   | Not Currently Implemented |
| e. Minimum Rent (PH)  | Not Currently Implemented |
| f. Minimum Rent (HCV)   | Not Currently Implemented |
| g. Total Tenant Payment as a Percentage of Gross Income (PH)  | Not Currently Implemented |
| h. Total Tenant Payment as a Percentage of Gross Income (HCV) | Not Currently Implemented |
| i. Alternative Utility Allowance (PH)                         | Not Currently Implemented |

|   |                           |
|---|---------------------------|
| j. Alternative Utility Allowance (HCV)  | Not Currently Implemented |
| k. Fixed Rents (PH)   | Not Currently Implemented |
| l. Fixed Subsidy (HCV)  | Not Currently Implemented |
| m. Utility Reimbursements (PH)  | Not Currently Implemented |
| n. Utility Reimbursements (HCV)   | Not Currently Implemented |
| o. Initial Rent Burden (HCV)  | Not Currently Implemented |
| p. Imputed Income (PH)  | Not Currently Implemented |
| q. Imputed Income (HCV)   | Not Currently Implemented |
| r. Elimination of Deduction(s) (PH)   | Not Currently Implemented |
| s. Elimination of Deduction(s) (HCV)  | Not Currently Implemented |
| t. Standard Deductions (PH)   | Not Currently Implemented |
| u. Standard Deductions (HCV)  | Not Currently Implemented |
| v. Alternative Income Inclusions/Exclusions (PH)  | Not Currently Implemented |
| w. Alternative Income Inclusions/Exclusions (HCV)   | Not Currently Implemented |
| <b>2. Payment Standards and Rent Reasonableness</b>   |                           |
| a. Payment Standards- Small Area Fair Market Rents (HCV)  | Not Currently Implemented |
| b. Payment Standards- Fair Market Rents (HCV)   | Not Currently Implemented |
| c. Rent Reasonableness – Process (HCV)  | Not Currently Implemented |
| d. Rent Reasonableness – Third-Party Requirement (HCV)  | Currently Implementing    |
| <b>3. Reexaminations</b>  |                           |
| a. Alternative Reexamination Schedule for Households (PH)   | Currently Implementing    |
| b. Alternative Reexamination Schedule for Households (HCV)  | Currently Implementing    |
| c. Self-Certification of Assets (PH)  | Not Currently Implemented |
| d. Self-Certification of Assets (HCV)   | Not Currently Implemented |
| <b>4. Landlord Leasing Incentives</b>   |                           |
| a. Vacancy Loss (HCV-Tenant-based Assistance)   | Not Currently Implemented |
| b. Damage Claims (HCV-Tenant-based Assistance)  | Not Currently Implemented |
| c. Other Landlord Incentives (HCV- Tenant-based Assistance)   | Not Currently Implemented |
| <b>5. Housing Quality Standards (HQS)</b>   |                           |
| a. Pre-Qualifying Unit Inspections (HCV)  | Not Currently Implemented |
| b. Reasonable Penalty Payments for Landlords (HCV)  | Not Currently Implemented |
| c. Third-Party Requirement (HCV)  | Currently Implementing    |
| d. Alternative Inspection Schedule (HCV)  | Not Currently Implemented |
| <b>6. Short-Term Assistance</b>   |                           |
| a. Short-Term Assistance (PH)   | Not Currently Implemented |
| b. Short-Term Assistance (HCV)  | Not Currently Implemented |
| <b>7. Term-Limited Assistance</b>   |                           |
| a. Term-Limited Assistance (PH)   | Not Currently Implemented |
| b. Term-Limited Assistance (HCV)  | Not Currently Implemented |
| <b>8. Increase Elderly Age (PH &amp; HCV)</b>   |                           |
| Increase Elderly Age (PH & HCV)   | Not Currently Implemented |
| <b>9. Project-Based Voucher Program Flexibilities</b>   |                           |
| a. Increase PBV Program Cap (HCV)   | Currently Implementing    |
| b. Increase PBV Project Cap (HCV)   | Currently Implementing    |
| c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV) | Not Currently Implemented |

|  |                           |
|--|---------------------------|
| d. Alternative PBV Selection Process (HCV)   | Not Currently Implemented |
| e. Alternative PBV Unit Types (Shared Housing & Manufactured Housing) (HCV)        | Not Currently Implemented |
| f. Increase PBV HAP Contract Length (HCV)  | Not Currently Implemented |
| g. Increase PBV Rent to Owner (HCV)  | Not Currently Implemented |
| h. Limit Portability for PBV Units (HCV)   | Currently Implementing    |
| <b>10. Family Self-Sufficiency Program with MTW Flexibility</b>                    |                           |
| a. PH Waive Operating a Required FSS Program (PH)                                  | Not Currently Implemented |
| a. HCV Waive Operating a Required FSS Program (HCV)                                | Not Currently Implemented |
| b. PH Alternative Structure for Establishing Program Coordinating Committee (PH)   | Not Currently Implemented |
| b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV) | Not Currently Implemented |
| c. PH Alternative Family Selection Procedures (PH)                                 | Not Currently Implemented |
| c. HCV Alternative Family Selection Procedures (HCV)                               | Not Currently Implemented |
| d. PH Modify or Eliminate the Contract of Participation (PH)                       | Not Currently Implemented |
| d. HCV Modify or Eliminate the Contract of Participation (HCV)                     | Not Currently Implemented |
| e. PH Policies for Addressing Increases in Family Income (PH)                      | Not Currently Implemented |
| e. HCV Policies for Addressing Increases in Family Income (HCV)                    | Not Currently Implemented |
| <b>11. MTW Self-Sufficiency Program</b>  |                           |
| a. PH Alternative Family Selection Procedures (PH)                                 | Not Currently Implemented |
| a. HCV Alternative Family Selection Procedures (HCV)                               | Not Currently Implemented |
| b. PH Policies for Addressing Increases in Family Income (PH)                      | Not Currently Implemented |
| b. HCV Policies for Addressing Increases in Family Income (HCV)                    | Not Currently Implemented |
| <b>12. Work Requirement</b>  |                           |
| a. Work Requirement (PH)   | Not Currently Implemented |
| b. Work Requirement (HCV)  | Not Currently Implemented |
| <b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>        |                           |
| Use of Public Housing as an Incentive for Economic Progress (PH)                   | Not Currently Implemented |
| <b>14. Moving on Policy</b>  |                           |
| a. Waive Initial HQS Inspection Requirement (HCV)                                  | Not Currently Implemented |
| b. PH Allow Income Calculations from Partner Agencies (PH)                         | Not Currently Implemented |
| b. HCV Allow Income Calculations from Partner Agencies (HCV)                       | Not Currently Implemented |
| c. PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)     | Not Currently Implemented |
| c. HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)   | Not Currently Implemented |
| <b>15. Acquisition without Prior HUD Approval (PH)</b>                             |                           |
| Acquisition without Prior HUD Approval (PH)  | Not Currently Implemented |
| <b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>                |                           |
| Deconcentration of Poverty in Public Housing Policy (PH)                           | Not Currently Implemented |
| <b>17. Local, Non-Traditional Activities</b>                                       |                           |
| a. Rental Subsidy Programs   | Not Currently Implemented |
| b. Service Provision   | Not Currently Implemented |
| c. Housing Development Programs  | Not Currently Implemented |

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

|   |
|---|
| <b>2.d. - Rent Reasonableness – Third-Party Requirement (HCV)</b>   |
| <p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>HACC proposes waiving certain provisions of 24 CFR 982.352(b) and 983.303, eliminating the requirement that the PHA use a third-party entity to perform rent-reasonableness determinations for units and properties the agency owns, manages, or controls.</p> <p>Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency. Instead, HACC will apply its current rent reasonableness process for non-owned/managed units to units it owns and manages. This process has adequate controls in place to ensure uniformity, auditability, transparency, and fairness of the determination.</p> |
| <p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>   |
| <p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>   |
| <p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>  |
| <p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>   |
| <p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies to all family types</p>   |
| <p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>  |
| <p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>HACC will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls. properties it owns, manages, and controls.</p>  |
| <p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>  |
| <p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>  |
| <p><b>Please explain or upload a description of the quality assurance method.</b></p> <p>HACC uses Nelrod's EZRRD software to compile, analyze, and validate its rent comparisons for rent reasonableness. Using a third-party system for objective market analysis adds an element of quality control into HACC's process. In addition, HACC will follow the SEMAP guidelines (SEMAP Indicator 2) for reviewing rent reasonableness determinations. <i>(No document is attached)</i></p>   |

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

HACC relies on the Rent Reasonable Nelrod EZRRD Model, which offers a third party database of rents to determine rent reasonableness of all County units. This analysis is based on the unit amenities, age, location, and other factors. EZRRD uses its five-method analysis system to compare multiple features per unit for a more in-depth analysis, and automatically identifies the three best comparables based on the system's objective market analysis. *(No document is attached)*

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

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

HACC proposes waiving certain provisions of the following policies:

- i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act
- ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

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

decisions were made:

- i. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.
- ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
- iii. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
- iv. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household's income decreases by 10% or more.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

|   |
|---|
| Other – another specifically defined target population or populations.  |
| <p><b>If Other Selected in Previous Question: Please describe this target population in the text box.</b></p> <p>HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.</p>   |
| <p><b>Does the MTW activity apply to all public housing developments?</b></p> <p>The MTW activity applies to all developments</p>   |
| <p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p>          |
| <p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes - <u>This document is attached.</u></p>  |
| <p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>Yes</p>   |
| <p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b></p> <p>3.a. - Alternative Reexamination Schedule for Households (PH);<br/>3.b. – Alternative Reexamination Schedule for Households (HCV)</p>          |
| <p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p> <p>No</p>  |
| <p><b>What considerations led the MTW agency to modify the hardship policy?</b></p> <p>The hardship policy was modified due to the removal of waiver requests 1.g, 1.h, 1.r, 1.s. which were originally included with 3.a, 3.b in the hardship policy.</p>  |
| <p><b>How many hardship requests have been received associated with this activity in the past year?</b></p> <p>No hardship were requested in the most recent fiscal year.</p>   |
| <p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>  |
| <p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes - <u>This document is attached.</u></p>  |
| <p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>Yes</p>   |
| <p><b>Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</b></p> <p>3.a. - Alternative Reexamination Schedule for Households (PH);<br/>3.b. - Alternative Reexamination Schedule for Households (HCV)</p> |

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

2 or more

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

HACC interim policies are as follows:

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

HACC will allow a maximum of 2 interims per year.

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

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

HACC proposes waiving certain provisions of the following policies:

- i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act
- ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

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

- i. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.
- ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
- iii. If a family moves into a new unit, HACC will process the change without reviewing the household’s income.
- iv. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household's income decreases by 10% or more.

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

Cost effectiveness

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

Decreased expenditures

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

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



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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Other – another specifically defined target population or populations.

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

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

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

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

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

Applies to all tenant-based and project-based.

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

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

**Does this MTW activity require a hardship policy?**

Provided Already - This document is attached.

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

No

**Does the MTW activity require an impact analysis?**

Provided Already - This document is attached.

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

2 or more

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

HACC interim policies are as follows:

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

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

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

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

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

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

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

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

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

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

No

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

Following will explain the quality assurance method: *(No document is attached)*

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

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

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

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

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

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

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

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

No

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

50.00%

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

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

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

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

|  |
|--|
| <p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>  |
| <p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased revenue</p>   |
| <p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>   |
| <p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The projected implementation date has been delayed to no later than January 1, 2025.</p> |
| <p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>   |

|   |
|---|
| <p><b>9.h. - Limit Portability for PBV Units (HCV)</b></p>  |
| <p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>HACC proposes waiving certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will allow the HACC to waive the requirement that PHA's provide a tenant- based voucher to project-based households after being on a project-based voucher for twelve (12) months. Instead, HACC proposes to limit portability to twenty-four (24) months. Waiving the 12-month portability requirement will:</p> <ul style="list-style-type: none"> <li>i. Lower the cost of turning units for households moving to a tenant- based voucher</li> <li>ii. Help the project-based voucher project to cash flow by continuing to assist the household.</li> <li>iii. Decrease the administrative burden associated with program unit transfers.</li> <li>iv. Ensure that households on HACC waitlists, some of whom are currently unhoused and have been waiting their chance for a voucher, are offered a tenant-based voucher first.</li> </ul> |
| <p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>   |
| <p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased revenue; Decreased expenditures</p>  |
| <p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>  |
| <p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>   |
| <p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies to all family types</p>   |
| <p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p>   |

|   |
|---|
| The MTW activity applies to all properties with project-based vouchers  |
| <b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b><br>The projected implementation date has been delayed to no later than January 1, 2025. |
| <b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b><br>No   |

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

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

| <b>F.</b>                        | <b>Public Housing Operating Subsidy Grant Reporting.</b>   |  |                                    |                 |  |
|----------------------------------|--|--|------------------------------------|-----------------|--|
| <b>F.1</b>                       | Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency. |  |                                    |                 |  |
| <b>Federal Fiscal Year (FFY)</b> | <b>Total Operating Subsidy Authorized Amount</b>   | <b>How Much PHA Disbursed by the 9/30 Reporting Period</b> | <b>Remaining Not Yet Disbursed</b> | <b>Deadline</b> |  |
| 2024                             | \$1,176,859  | \$1,025,967  | \$150,892                          | 2032-09-30      |  |
| 2023                             | \$1,306,533  | \$1,197,157  | \$109,376                          | 2031-09-30      |  |
| 2022                             | \$0  | \$0  | \$0                                | 2030-09-30      |  |
| 2021                             | \$0  | \$0  | \$0                                | 2029-09-30      |  |

| <b>G.</b>                               | <b>MTW Statutory Requirements.</b>  |  |
|---|---|--|
| <b>G.1</b>                              | <b>75% Very Low Income – Local, Non-Traditional.</b>  |  |
|   | HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households. |  |
| <b>Income Level</b>                     | <b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>   |  |
| 80%-50% Area Median Income              | 0   |  |
| 49%-30% Area Median Income              | 0   |  |
| Below 30% Area Median Income            | 0   |  |
| Total Local, Non-Traditional Households | 0   |  |

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

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

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

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

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

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

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

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

**H.** **Public Comment**

Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments. See Attachments J & O of the Annual Plan.

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

**I.** **Evaluations.**

No known evaluations.

The Additional Attachments, **HARDSHIP POLICY & IMPACT ANALYSIS** for Waivers 3.a and 3.b and MTW certification follow.

**E. Cohort Specific Waiver – Previously approved**

**(a)**

## Savings account deposits for downpayment assistance for Homeownership

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

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

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

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

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

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

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

- Difference in credit score between initial baseline and current actual;
- Difference in delinquent debt between initial baseline and current actual;
- Percent of program participants who were successful in a home purchase.

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



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

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

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

- **Cost effectiveness:** In 2021, HACC started the environmental review process required to dispose of its 145 scattered sites. HACC's scattered site portfolio consists of 2-, 3-, and 4-bedroom units in single-family homes, duplexes, triplexes, and 4-plexes throughout the County. These units can be up to thirty-five (35) miles apart from each other and each unit costs an average of \$2,000 more to operate than other units in the Public Housing portfolio. This activity will give HACC the opportunity to sell the single-family scattered sites as affordable homes to the current occupants, benefiting the housing authority by reducing the cost to operate its Public Housing portfolio.
- **Self-sufficiency:** The model proposed by HACC in this activity will enable qualifying households to purchase a home under more favorable terms than traditionally available, helping these households build wealth through homeownership.

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

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

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

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

### Any cost implications associated with the activity

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

### An implementation timeline for the initiative

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

### An impact analysis

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

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

**A description of the hardship policy for the initiative**

Not applicable

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

See attachment O & J of Annual Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Any cost implications associated with the activity**

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

### **An implementation timeline for the initiative**

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

### **An impact analysis**

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

### **A description of the hardship policy for the initiative**

*Not applicable*

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

See attachment O & J of Annual Plan

## **HARDSHIP POLICY for MTW Waivers 3.a and 3.b.**

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

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

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

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

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

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

The Housing Authority of Clackamas County (HACC) proposes to implement a triennial reexamination schedule for all households on a fixed income households who are elderly or disabled. Under this waiver, the impacted households will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:

1. Approved rent increases will use an interim 50058 and will apply the most current payment standard. This will not result in an income review.
2. HACC will not conduct an interim reexamination when a new household member is added, regardless of work/income status, age, or disability.
3. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
4. Interims due to decreases in income will follow HOTMA rules, which stipulate an interim will be done if the household's income decreases by 10% or more.

#### *Definitions Used in this Analysis*

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

#### *Impact Analysis Method*

An in-depth analysis was performed using 50058 data from the last three (3) years. The goal of the analysis is to identify the following:

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

Answers to the standard HUD impact analysis questions identified in the MTW Operations Notice were derived from these analyses. Note that HACC does not anticipate the policy changes to have a negative impact on any specific households. Therefore, HACC measured the positive impact to identify cases where certain groups were impacted more positively than others. The

analysis confirmed that there will not be a negative impact to the families currently on program. However, the analysis also shows that fewer families may be able to be served in the future due to these changes.

## RESULTS

### **Financial Impact to the Agency**

Based on its analysis, HACC determined that this policy change will have a negative impact to the agency's HAP expenses, increasing annual HAP expenditures by \$64,506 per year (row "e" in the chart below). This is measured by looking at the increases in income that have been processed over the last three years and the associated increase in rent and decrease in HAP. By changing the review cycle to every three (3) years, the incremental decreases in HAP expense will not be realized.

The chart also shows that HACC will be able to offset some of this increase in HAP by eliminating the staff time needed to complete annual reviews and interims for increases in income. This savings is estimated to be \$28,142 annually (row "c" in the chart below).

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

### **Demographic Impact**

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

1. No households will see a negative impact due to this policy change, so the analysis shows which households had a more positive impact than others;

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

- Elderly/disabled on fixed income = Triennials

- All others = Annuals

| Metric  | African American | Asian      | Native HI/Pacific | Native Amer. | White      | Hispanic   | Non-Hispanic | Large Family | Disabled   | Elderly  | ELI        | VLI        | LI          | Formula |
|---|------------------|------------|-------------------|--------------|------------|------------|--------------|--------------|------------|----------|------------|------------|-------------|---------|
| a. Total Population (# annuals + move-ins)                  | 25               | 136        | 14                | 92           | 2,102      | 153        | 2,150        | 176          | 1,509      | 1,050    | 1,981      | 302        | 18          |         |
| b. Households with Increase in Income                       | 17               | 75         | 5                 | 53           | 1,422      | 80         | 1,450        | 83           | 1,065      | 811      | 1,317      | 195        | 16          |         |
| c. Percent of Population with Increase                      | 68%              | 55%        | 36%               | 58%          | 68%        | 52%        | 67%          | 47%          | 71%        | 77%      | 66%        | 65%        | 89%         | b / a   |
| d. Average Income Increase                                  | \$2,045.18       | \$2,818.99 | \$6,419.00        | \$1,463.28   | \$1,975.31 | \$5,117.88 | \$1,828.89   | \$7,798.64   | \$1,322.35 | \$899.30 | \$1,099.06 | \$5,975.74 | \$20,352.94 |         |
| e. Total Work Able Population (# annuals + move-ins)        | 0                | 0          | 0                 | 0            | 0          | 0          | 0            | 0            | 0          | 0        | 0          | 0          | 0           |         |
| f. Work Able Households with Increase in Income             | 0                | 0          | 0                 | 0            | 0          | 0          | 0            | 0            | 0          | 0        | 0          | 0          | 0           |         |
| g. Percent of Population with Increase - Work Able          | 0%               | 0%         | 0%                | 0%           | 0%         | 0%         | 0%           | 0%           | 0%         | 0%       | 0%         | 0%         | 0%          | f / e   |
| h. Average Income Increase - Work Able                      | 0                | 0          | 0                 | 0            | 0          | 0          | 0            | 0            | 0          | 0        | 0          | 0          | 0           |         |
| j. Work Able Households with Increase in Earned Income      | 0                | 0          | 0                 | 0            | 0          | 0          | 0            | 0            | 0          | 0        | 0          | 0          | 0           |         |
| k. Percent of Work Able HH's with Increase in Earned Income | 0%               | 0%         | 0%                | 0%           | 0%         | 0%         | 0%           | 0%           | 0%         | 0%       | 0%         | 0%         | 0%          | j / e   |

### Other Impact Analysis Questions

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

| # | Question   | Answer  |  |
|---|--|---|--|
| 1 | Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)   | While there is a chance that one or more families becomes over-income and remain housed (see question 2 below), HACC anticipates any impact to the waitlist or the amount of time families on the waitlist to be inconsequential.   |  |
| 2 | Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency) | HACC anticipates that this policy change could result in a family becoming over-income and remaining on program until the next review. This would most likely impact Low Income households (AMI>80%), whose increases in income were the largest over the last three years (\$20,352 vs. \$1,099 for ELI families). These households represent less than 1% of the total population, so the rate of occurrence will be minimal. |  |
| 3 | Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program   | With a reduction in HAP, HACC may see a slight reduction in utilization due to this policy change. However, the agency will still meet its Substantially the Same (STS) requirement and the reduction in households served will be offset by future MTW policy changes.   |  |
| 4 | Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice   | Cost effectiveness  | HACC analysis shows that by reducing the number of annuals and interims, this policy change will save the agency \$28,142 per year in administrative expenses.                   |
|   |  | Self-sufficiency  | HACC believes that allowing households to increase their income without an impact on rent will encourage households to increase their income and work to become self-sufficient. |
|   |  | Housing choice  | HACC does not anticipate any impact on housing choice.   |
| 5 | Impact on the agency's   | 1. Ensure that 75%   HACC will continue to use its current  |  |



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

**Conclusions for Waiver 3.a,3.b**

HACC recognizes that the change to reexamination frequency will have a negative impact on the funds it has available to house families in the HCV program. However, the agency also recognizes that the positive impact that this change will have on households could be significant and the increase in HAP expenditures can be offset by reduced administrative costs and other policy choices that the agency will be considering prior to the next MTW planning cycle.

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

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

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

Housing Authority of Clackamas County  
**MTW PHA NAME**

OR001  
**MTW PHA NUMBER/HA CODE**

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

Commissioner Tootie Smith  
**NAME OF AUTHORIZED OFFICIAL**

Chair  
**TITLE**

\_\_\_\_\_  
**SIGNATURE**

\_\_\_\_\_  
**DATE**

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

**Attachment N:  
Annual Plan Resolution**

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

In the Matter of Approving the  
Housing Authority of Clackamas  
County's Annual Plan



Resolution No. 1982  
*Page 1 of 2*

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

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

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

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

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

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

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

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

**Attachment N:  
Annual Plan Resolution**

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

In the Matter of Approving the  
Housing Authority of Clackamas  
County's Annual Plan



Resolution No. 1982  
*Page 2 of 2*

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

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

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

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

**DATED** this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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

\_\_\_\_\_  
Chair

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

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

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

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

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

- 903.7a Housing Needs
- 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

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

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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)

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

## Attachment O:

### Public Notice & Comments

#### Public Notice - January 12, 2024

##### **Housing Authority of Clackamas County – FY 2024-25 Annual Plan & Moving to Work Supplement**

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

#### Public Comments from Public Hearing on February 22, 2024

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

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

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

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

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

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

*Shull – Okay thank you very much.*

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



*Toni – Yes, absolutely we can do that.*

*Administrator Schmidt – Please provide that to all commissioners.*

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

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

*Closed PUBLIC testimony time.*

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

*Leenstra – I am good on this.*

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

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

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

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

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

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