

# Housing Authority of Clackamas County



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**2025-2026 Annual Plan**

**& Moving to Work Supplement**

**Effective Dates July 1, 2025 – June 30, 2026**

**HACC Executive Director: Shannon Callahan**



Approval Process: RAB Review: 1/22/25, Public Comment Period 1/27/25-3/16/25, Public Hearing 1/13/25,  
Board Approval \_\_\_\_\_, HUD Submission \_\_\_\_\_, HUD Approval \_\_\_\_\_.

# Housing Authority of Clackamas County

## 2025 Annual Plan & MTW Supplement

Effective 7/1/2025-6/30/2026

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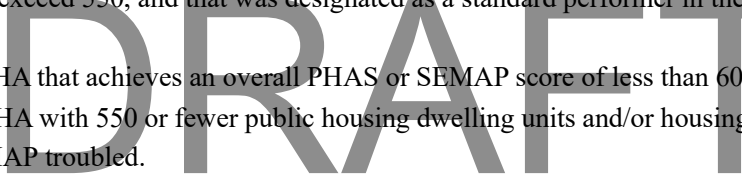
<p><b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i></p>	<p><b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b></p>	<p><b>OMB No. 2577-0226</b> <b>Expires 09/30/2027</b></p>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** The Form HUD-50075-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.



<b>A.</b>	<b>PHA Information.</b>														
A.1	<p><b>PHA Name:</b> <u>Housing Authority of Clackamas County</u> <b>PHA Code:</b> <u>OR001</u></p> <p><b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p><b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2025</u></p> <p><b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p><b>Number of Public Housing (PH) Units</b> <u>445</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>2152</u></p> <p><b>Total Combined Units/Vouchers</b> <u>2597</u></p> <p><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 a copy of their PHA Plans.</p> <p><b>How the public can access this PHA Plan:</b> Copies of the Annual Plan and Moving to Work Supplement are available at the following locations for public review. 1) Housing Authority Administrative Office, 13930 S Gain Street, Oregon City, OR 97045 2) Housing Authority Clackamas Heights Property Management Office, 13900 S Gain Street, Oregon City, OR 97045 3) Housing Authority Hillside Manor Property Management Office, 2889 Hillside Court, Milwaukie, OR 9722 4) Housing Authority Website: <a href="http://www.clackamas.us/housingauthority/plansandreports.html">http://www.clackamas.us/housingauthority/plansandreports.html</a> 5) Clackamas County Public Library located at 16201 S.E. McLoughlin, Oak Grove, OR 97222 6) Resident Advisory Boards (RAB) Members receive a hard copy and/or electronic copy according to their preference</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" data-bbox="165 1858 1534 1921"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td> </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						
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		PH	HCV												

<p><b>B.</b></p>	<p><b>Plan Elements.</b></p>
<p><b>B.1</b></p>	<p><b>Revision of Existing PHA Plan Elements.</b>                  (a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</li> </ul> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><b>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. &amp; Rent Determination.</b>                  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 has paused many policy changes previously approved including some approved Moving to Work (MTW) waivers. Policies and Waivers impacted are included in Attachments A, B and M (MTW Supplement).</p> <p><b>Financial Resources.</b>                  Financial Resources updates are detailed in Attachment G</p> <p><b>Rent Determination.</b>                  See Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions above.</p> <p><b>Homeownership Programs.</b>                  As a MTW Agency in the Asset Building Cohort, the Authority is operating a homeownership savings program for 25 families. The program is detailed in the MTW Supplement in Attachment M.</p> <p><b>Community Service and Self-Sufficiency Programs.</b>                  HACC has expanded and continues to expand their resident services programing and offerings expanded. More detailed information is provided in Sections B.2.- New Activities and B.3.- Progress Report.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p><b>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</b>                  Deconcentration Policy – unchanged – is included in Attachment D.</p>
<p><b>B.2</b></p>	<p><b>New Activities.</b>                  (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> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</li> <li><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</li> <li><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</li> </ul>



(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:**

Near the end of fiscal year 2023-2024, HACC submitted a Section 18 Disposition application for Clackamas Heights, a 99-unit Public Housing property located at 13900 S. Gain St., Oregon City, OR 97045, and Oregon City View Manor (OCVM), a 100-unit Public Housing property located at 200 S. Longview Way in Oregon City. In late October 2025, HACC's Section 18 Disposition application was approved by HUD. HACC applied for Tenant Protection Vouchers (TPV) for Clackamas Heights in November 2025. Once TPVs are received, HACC plans to relocate all 99 households following the approved Relocation Plan and with the assistance of Section 8 Tenant Protection Vouchers. Once all residents have been relocated (expected in Fall 2025), HACC plans to break ground on the redevelopment of Clackamas Heights. The Housing Authority plans to redevelop the 16-acre site with approximately 225 units of cluster housing that will be affordable to households making 60% of AMI or below. Approximately 112 units will be supported with Project-based rental assistance vouchers (PBV) issued by HACC. Once the Clackamas Heights redevelopment is nearing completion and HACC has received 100 TPVs for OCVM, HACC plans to begin relocating the 100 households residing at OCVM following the approved Relocation Plan and with the assistance of Section 8 Tenant Protection Vouchers. OCVM and relocated Clackamas Heights residents will be given the right to return to the newly redeveloped property once complete. Once all residents have been relocated (expected in fiscal year 2027-2028), HACC plans to sell the OCVM property to the highest qualified bidder through a negotiated sale at Fair Market Value. All proceeds will be used to support HACC's acquisition and/or development of affordable housing.

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. In September 2023, HACC received approval for 54 Tenant Protection Vouchers. Relocation of the 54 impacted households was completed in Spring 2024. Construction of the first three buildings in the Hillside Park Master-Planned Redevelopment project, including 275 units of affordable housing, is currently underway and construction completion is expected in 2026. In June 2024, HACC submitted a Section 18 Disposition application for the second phase of the project (46 units). The application is currently under review with HUD. Predevelopment planning is underway on the remaining 225 units anticipated for the second phase of the Master-Planned Redevelopment. In Fall of 2025, HACC plans to begin relocating the 46 remaining households residing at Hillside Park following the approved Relocation Plan and with the assistance of Section 8 Tenant Protection Vouchers. Hillside Park residents will be given the right to return or to relocate directly into a newly developed unit at Hillside Park once complete. Once all residents have been relocated (expected in mid-2026), HACC and its development partners plan to break ground on the second phase of the Master-Planned Redevelopment.

HACC has 145 scattered sites throughout Clackamas County. In May 2024, HACC submitted a Section 18 Disposition application for these sites. In September 2024, HACC received Section 18 disposition approval from HUD. In late October 2024, HACC applied for Tenant Protection Vouchers (TPV) for the Scattered Sites. Once TPVs are received, HACC plans to relocate all 145 households following the approved Relocation Plan and with the assistance of Section 8 Tenant Protection Vouchers. Once residents have been successfully relocated from their unit, HACC plans to sell the units to provide affordable homeownership opportunities, supportive and recovery-oriented care, or to the highest qualified bidder. All proceeds from the sales will be used to assist in the development of affordable housing (less than 80% AMI) and acquisition of office space for HACC's HCV program and ancillary departments.

**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 \$134,927,882. 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 1215 Metro Affordable Housing Bond-funded units underway in Clackamas County, including 560 completed units in operation, 356 units in construction, and 299 units in pre-development. As of November 2024, all remaining Metro Affordable Housing Bond funds have been allocated to projects.

HACC is using approximately 435 PBV's 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.

#### Projects Overview:

In June 2022, HACC completed the rehabilitation of the Webster Road property, now known as Tukwila Springs. Tukwila Springs is fully leased and provides 48 units of Permanent Supportive Housing for chronically homeless and very low-income individuals aged 50 and older. Conversion to permanent financing occurred in 2023.

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 was completed in late Spring 2024 and the project is in operations.

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 was completed in Spring 2024 and the project is in operations.

HACC Metro is utilizing bond funds to support the repositioning and redevelopment of Hillside Park. HACC expects this redevelopment project will take place in two phases. Phase 1 includes the demolition of 54 public housing units that are being redeveloped with 275 units of housing affordable to households at 60% AMI and below, including 108 units affordable to households with incomes 30% of AMI or below. HACC and its development partners broke ground on 275 units in mid-2024, with completion expected in early-to-mid 2026.

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 Wilsonville TOD project, now known as Vuela, and the Shortstack Milwaukie project are in construction. The Lake Grove project, now known as El Nido, is expected to break ground on construction in mid-2025.

In November 2024, HACC awarded its remaining allocation of Metro Bond funds to support HACC's public housing repositioning and redevelopment projects, including an allocation of \$5.5 million to Hillside Park Buildings D&E and a \$15 million allocation to support the Redevelopment of 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 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. Through this funding source, HACC has assisted over 800 families with Regional Long Term Rent Assistance (RLRA) vouchers. Each RLRA voucher is paired with supportive services to increase housing stability. In addition, HACC, as an RLRA landlord for RLRA voucher holders housed at local project sites and will be eligible for the SHS landlord incentive program.

Building on the success of the RLRA program, HACC will now also serve as the administrator of a new State Long Term Rental Assistance (LTRA) for Clackamas County. This new state program will add additional voucher capacity and allow the Authority to serve even more families.

HACC will continue to pursue opportunities to project-base vouchers in developments and established properties to increase affordable and supportive housing options.

**Public Housing:**

The Housing Authority will continue to operate and maintain public housing units as the repositioning outlined in the Development section continues to unfold. HACC will relocate public housing households following the approved Relocation Plan and with the assistance of Section 8 Tenant protection vouchers and is currently working 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 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. HACC will continue to apply for additional funds to meet the needs of their communities.

*Other Capital Grant Programs* - HACC will continue to apply for available funding in alignment with their goals and strategic plan to best serve their residents.

*Units with Approved Vacancies for Modernization* - The Housing Authority currently has no units vacant for approved modernization through HUD.

*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 continues 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 stability and pathways to greater self-sufficiency. Resident surveys continue to report very high ratings agreeing or strongly agreeing that the Housing Authority staff members responding to their needs were friendly/courteous and professional.

The Resident Services team is currently made up of a 13 staff including 1 ROSS Coordinator, 2 FSS Coordinators (expanded from 1), 3 Resident Services Specialists, 2 Housing Specialists, 1.5 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 participants of HACC's Programs with recent expansion to support Housing Choice Voucher participants who are at risk of eviction. The team supports individuals, families, seniors, and people with disabilities who are participating in Housing Authority programs.

Resident Services Programs focus on the following objectives:

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

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

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

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B.3

**Progress Report.**

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

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

PHA Strategy 1.a – Maintain high performer status

- Achieved ratings of a high performer in HCV program and will work toward reestablishing high performer status by improving unit conditions with regular inspections in Public Housing and maintaining financial reporting.

PHA Strategy 1.b – Improve access by making remote access options available for program intake, payments and signatures.

- Continued to offer remote briefings and orientations and continue to work to implement Yardi Rent Café.

PHA Strategy 1.c – Continue robust client feedback system for continued service improvements.

- Continued to survey clients at annual exams and used the information to look at systemic improvements in customer service.
- Survey results show that over 92% of respondents felt their needs were met by Housing Authority staff.

PHA Strategy 1.d - Engage in capital fund rehabilitation projects to maintain units.

- Focus on improvements required for High Performer status due to the repositioning strategy. The repositioning strategy will over time replace aging Public Housing units with new affordable housing units.

PHA Strategy 1.e – Continue ongoing staff training and cross-training to continue

- Continued training staff across programs including federal voucher programs, local funded voucher programs (RLRA) and Public Housing. Internal promotions across programs spread detailed program knowledge and experience to different program areas.

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

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

- Expanded the Resident Services team to include additional staff to expand supports for Housing Choice Voucher participants and to include peer support and a housing specialist, to help families navigate the housing continuum and

coordinate with community programs.

- Expanded the community garden program by adding an additional AmeriCorps member, allowing one dedicated staff member for each community garden program to engage residents and coordinate food programs.

PHA Strategy 2.b – Encouraged Resident participation through resident associations and surveys to access housing needs.

- Deploy community needs survey at least every three years with thoughtful outreach and response.
- Working to expand the role and frequency of meetings of the Resident Advisory Board to include additional opportunities to provide HACC operations feedback.
- The completion of resident surveys is encouraged at annual examinations. In addition, HACC will reach out annually to encourage families shifting to a triennial schedule to complete the resident survey each year.

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

PHA Strategy 3.a - Continue to partner with local & regional workforce partners to increase the number of employed/underemployed living in housing

- Resident services staff continued to provide service coordination and referrals for residents including Foster Youth to Independence participants to employment partners
- Board approved a partnership agreement with Clackamas Workforce Development Board to help fund the Clackamas WorkSource One-Stop employment center with other community partners.
- Expanded rent reporting for credit building program with over sixty residents opting in. Those residents who participate have seen credit scores increasing by an average of 100 points.
- Implemented HACC’s first homeownership program, Home Savings, with 25 families enrolled and moving towards homeownership by the end of the 24-month term.
- 3 families have successfully purchased homes this year with the help of a ROSS coordinator.
- 6 families have graduated from the Family Self-Sufficiency program with an average of \$19,043.65 in escrow

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.

In addition, see Fair Housing Goals in Section D.

**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 12/4/24 Capital Fund Projects Summary provided in Attachment H Capital Fund Budget provided in Attachment I**

<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b>                  (a) Were there any findings in the most recent FY Audit?                  Y <input type="checkbox"/> N <input checked="" type="checkbox"/>                  (b) If yes, please describe:</p>
<b>C. Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b>                  (a) Did the RAB(s) have comments to the PHA Plan?                  Y <input checked="" type="checkbox"/> N <input type="checkbox"/>                  (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.  <b>See attachment J attached</b></p>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b>  <u>Form HUD 50077-SL</u>, <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>
<b>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b>                  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>
<b>C.4</b>	<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.                  (a) Did the public challenge any elements of the Plan?                  Y <input type="checkbox"/> N <input checked="" type="checkbox"/>                  If yes, include Challenged Elements.</p>
<b>C.5</b>	<p><b>Troubled PHA.</b>                  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?                  Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>                  (b) If yes, please describe:</p>
<b>D. Affirmatively Furthering Fair Housing (AFFH).</b>	
<b>D.1</b>	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b>                  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> <p><b>Fair Housing Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County</b>  <u>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.</u></p> <ul style="list-style-type: none"> <li>Continued expansion of locally funded RLRA program which has to date added over 600 new supportive housing vouchers to Clackamas County.</li> <li>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 over 500 affordable housing units.</li> <li>Partnering on affordable housing developments in high opportunity areas including Wilsonville, Lake Oswego and opening the first ever affordable housing development in Happy Valley, Good Shephard Village through support of local housing bond funds.</li> </ul> <p><u>AFH Strategy 1.B - Maximize the number of households receiving long term and short-term rental assistance from local, state and federal programs.</u></p> <ul style="list-style-type: none"> <li>RLRA voucher program is currently serving over 800 families, and the State LTRA voucher program is being added.</li> <li>HACC continues to apply for additional vouchers from HUD to continue to expand its HCV program.</li> <li>Utilizing new state funding available, the HCDD Housing Services team is rapidly expanding options for short-term rental programs to county residents.</li> </ul> <p><b>Fair Housing Goal 2: Expand fair housing outreach, education, and enforcement</b>  <u>AFH Strategy 2.A. - Increase fair housing education for staff, landlords &amp; community partners.</u></p> <ul style="list-style-type: none"> <li>Hold yearly fair housing training for all staff and landlords facilitated and led by the Fair Housing Council of Oregon.</li> <li>Expanded fair housing training to include additional County employees within our new Housing and Community Development Division.</li> <li>Provide insurance provider fair housing training for each new HACC staff member.</li> </ul>

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

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

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

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

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

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

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

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

- Continue to work toward increased SHS funding to culturally specific providers.
- 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.

**Form identification:** OR001-Housing Authority of Clackamas County Form HUD-50075-ST (Form ID - 2812) printed by Erin Fernald in HUD Secure Systems/Public Housing Portal at 01/08/2025 09:42PM EST

Updated downloaded copy 1/16/25 EF

**ATTACHMENT A:  
Summary of Proposed Housing Choice Voucher Administrative Plan Policy Changes**

**Housing Opportunity through Modernization Act (HOTMA) Implementation Delays:** HUD updated HOTMA implementation timelines which have impacted the implementation of many previously approved policy changes. Impacted policies are included in this document as for transparency purposes. For these policies, the old policy language, if any, will remain in effect until further guidance is issued by HUD.

\*Indicates policy alignment with Admissions and Continued Occupancy Plan (ACOP) for Public Housing program.

Ch	Old Policy Language	New Policy Language	Summary
2	<p><i>PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES</i>  <i>2-II.A. OVERVIEW</i>  <u>HACC Policy</u>                      Information on the availability of reasonable accommodation will be provided to all families at the time of application, orientation and is available on our website. HACC will also ask all applicants and participants if they require any type of accommodation, in writing, on the intake application, reexamination documents, and notices of adverse action by HACC. HACC will keep an updated Reasonable Accommodation Procedure in place for staff to rely upon for uniformity in treatment. The Occupancy Specialist will be the primary contact for a client to request a reasonable accommodation. This will be posted in the Notice for Reasonable Accommodation. The Operations Manager will act as the 504/Reasonable Accommodation Coordinator for the Tenant-Based rental assistance programs. All Reasonable accommodation requests will be forwarded to the Coordinator for review and determination of status.</p>	<p><i>PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES</i>  <i>2-II.A. OVERVIEW</i>  <u>HACC Policy</u>                      HACC will ask all applicants and participants if they require any type of accommodations in writing, on the intake application, reexamination documents, and notices of adverse action by HACC, by including the following language:                      “If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority.”                      A specific name and phone number of designated staff will be provided to process requests for accommodation.                      HACC will display posters and other housing information and signage in locations throughout the PHA’s office in such a manner as to be easily readable from a wheelchair.</p>	<p><b>New General Policy Change</b></p> <p>Refinement of policy language regarding staff notifications to applicants and participants regarding access to reasonable accommodations.</p> <p><b>Plan to implement 7/1/25</b></p>



	The PHA will display posters and other housing information and signage in locations throughout the PHA’s office in such a manner as to be easily readable from a wheelchair.		
3	<p><i>3-I.M. LIVE-IN AIDE</i>  <u>HACC Policy</u>  HACC recognizes the need for full-time and part-time assistance for elderly and disabled persons. Full-time care is 24/7 with full-time residency in the household. The other allowance for assistance is the Essential Family Member as defined under Family 3-I.B. Both LIA and Essential Family Members will complete the LIA Packet before being screened for consideration to add to household.</p> <ol style="list-style-type: none"> <li>1. Before a live-in aide may be moved into a unit, a third-party verification must be supplied that establishes the need for 24/7 care and the fact that the person cared for will be able to remain in the unit and comply with the lease terms as the result of such care.</li> <li>2. A live-in aide must be required for 24-hour care and will be required to submit a certification stating that as a live-in aide they are (1) not obligated for the support of the person(s) needing the care, (2) would not be living in the unit except to provide the necessary supportive services, and (3) does not hold other full-time employment. A member of a household family cannot change and become a Live-In-Aide due to this definition. The live-in aide must provide a valid photo ID, SSN and must sign all applicable authorization forms for release of information.</li> </ol>	<p><i>3-I.M. LIVE-IN AIDE</i>  <u>HACC Policy</u>  A family’s request for a live-in aide may be made either orally or in writing. The PHA <i>will verify the need for a live-in aide with a reliable, knowledgeable professional, such as a doctor, social worker, or case worker</i>, unless the disability-related need is apparent or known to the PHA. For continued approval, the family may be required to submit a new, written request-subject to PHA verification at each annual reexamination.  In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.  The PHA will not approve a particular person as a live-in aide, and may withdraw such approval if [24 CFR 982.316(b)]:  The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;  the person commits drug-related criminal activity or violent criminal activity; or the person currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.</p> <ol style="list-style-type: none"> <li>1. Before a live-in aide may be moved into a unit, a third-party verification must be supplied that establishes the need for 24/7 care and the fact that the person cared for will be able to remain in the unit and comply with the lease terms as the result of such care.</li> <li>2. A live-in aide must be required for 24-hour care and will be required to submit a certification stating that as a live-in aide they are (1) not obligated for the support of the person(s)</li> </ol>	<p><b>New General Policy Change</b></p> <p>Refinement of policy language regarding a request for a Live-in Aide and determination criteria.</p> <p><b>Plan to Implement 7/1/2025</b></p>

<p><b>3.</b> Move-in of a live-in aide must not result in overcrowding of the existing unit except in extraordinary and temporary circumstances, as approved by the HACC (although, a reasonable accommodation for a resident with a disability may be to move the family to a larger unit).</p> <p><b>4.</b> Live-in aides have no right to the voucher as a remaining member of a participant family even when the live-in aide is a relative of the tenant renting the unit.</p> <p><b>5.</b> To provide 24/7 care, the live-in aide cannot work or attend school unless there is proof of a relief aide being present when not attending to the needs of the client.</p> <p><b>6.</b> The income of a live-in aide is not counted in determining the family's rent.</p> <p><b>7.</b> A live-in aide can be a single person. A live-in aide with a family may also be considered, provided that the addition of the live-in aide's family does not result in overcrowding of the existing unit. The family of the live-in aide will not be considered when assigning the voucher bedroom size. The members of the live-in-aide's family must meet the owner's screening criteria.</p> <p><b>8.</b> Relatives who satisfy the definitions and stipulations herein may qualify as a live-in aide but only if they sign a statement prior to moving in, acknowledging no rights to the unit as the remaining member of a participant family.</p> <p><b>9.</b> A live-in aide will be required to meet the owner's screening requirements with respect to past behavior, especially:</p>	<p>needing the care, (2) would not be living in the unit except to provide the necessary supportive services, and (3) does not hold other full-time employment. A member of a household family cannot change and become a Live-In-Aide due to this definition. The live-in aide must provide a valid photo ID, SSN and must sign all applicable authorization forms for release of information.</p> <p><b>3.</b> Move-in of a live-in aide must not result in overcrowding of the existing unit except in extraordinary and temporary circumstances, as approved by the HACC (although, a reasonable accommodation for a resident with a disability may be to move the family to a larger unit).</p> <p><b>4.</b> Live-in aides have no right to the voucher as a remaining member of a participant family even when the live-in aide is a relative of the tenant renting the unit.</p> <p><b>5.</b> To provide 24/7 care, the live-in aide cannot work or attend school unless there is proof of a relief aide being present when not attending to the needs of the client.</p> <p><b>6.</b> The income of a live-in aide is not counted in determining the family's rent.</p> <p><b>7.</b> A live-in aide can be a single person. A live-in aide with a family may also be considered, provided that the addition of the live-in aide's family does not result in overcrowding of the existing unit. The family of the live-in aide will not be considered when assigning the voucher bedroom size. The members of the live-in-aide's family must meet the owner's screening criteria.</p> <p><b>8.</b> Relatives who satisfy the definitions and stipulations herein may qualify as a live-in aide but only if they sign a statement prior to moving in, acknowledging no rights to the unit as the remaining member of a participant family.</p> <p><b>9.</b> A live-in aide will be required to meet the owner's screening requirements with respect to past behavior, especially:</p>	
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<p>(a) A record of disturbance of neighbors, destruction of property, or of living or housekeeping habits, at present or at prior residences, which may adversely affect the health, safety, or welfare of other residents, neighbors or staff, or cause damage to the unit or the premises; and</p> <p>(b) Criminal activity such as crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity.</p> <p><b>10.</b> A live-in aide and any family members must pass HACC’s criminal background screening.</p> <p><b>11.</b> For continued approval, the family may be required to submit a new, written request-subject to PHA verification-at each annual reexamination.</p> <p><b>12.</b> The PHA will not approve a particular person as a live-in aide, and may withdraw such approval if [24 CFR 982.316(b)]:</p> <p>(a) The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program.</p> <p>(b) The person commits drug-related criminal activity or violent criminal activity; or</p> <p>(c) The person currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.</p> <p>HACC will notify the family of its decision in writing within 10 business days of receiving all the required documentation to a request for a live-in aide.</p>	<p>(a) A record of disturbance of neighbors, destruction of property, or of living or housekeeping habits, at present or at prior residences, which may adversely affect the health, safety, or welfare of other residents, neighbors or staff, or cause damage to the unit or the premises; and</p> <p>(b) Criminal activity such as crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity.</p> <p><b>10.</b> A live-in aide and any family members must pass HACC’s criminal background screening.</p> <p><b>11.</b> For continued approval, the family may be required to submit a new, written request-subject to PHA verification-at each annual reexamination.</p> <p><b>12.</b> The PHA will not approve a particular person as a live-in aide, and may withdraw such approval if [24 CFR 982.316(b)]:</p> <p>(a) The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program.</p> <p>(b) The person commits drug-related criminal activity or violent criminal activity; or</p> <p>(c) The person currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.</p> <p>HACC will notify the family of its decision in writing within 10 business days of receiving all the required documentation to a request for a live-in aide.</p>	
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4	<p><i>4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]</i>  <u>HACC Policy</u>  HACC will maintain one waiting list for the tenant-based HCV program. Preferences will be well documented. Mainstream (MS), SPC, FYI, EHV and RLRA wait lists are homeless preference served vouchers that are maintained through Coordinated Housing access (CHA) system managed by the Continuum of Care (CoC). Clients are pulled off the CHA and, when applicable, matched with case management services before being referred to HACC. HACC will maintain one PBV wait list with current tenant-based wait list applicants given opportunity to apply and will utilize the CHA as the wait list thereafter to prioritize placement of homeless individuals into these units. The exception would be for VASH who are directly referred from the VA. Descriptions of any population served at each property will dictate order of who is referred from the CHA. 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. The Portland Veteran's Administration will maintain the wait list for VASH.</p>	<p><i>4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]</i>  <u>HACC Policy</u>  HACC will maintain the following waiting lists:</p> <ol style="list-style-type: none"> <li>1. Specialty Voucher Wait List (EHV, FYI, SPC, and VASH)</li> <li>2. Mainstream Wait List</li> <li>3. PBV Wait List for the following properties: Hillside Manor, TCC and Rosewood. Additional waiting lists will be created for new PBV developments where TPV holders have the right to return as relocation participants.</li> <li>4. HCV waiting list</li> </ol> <p>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.</p> <p>Preferences will be well-documented. The Coordinated Housing Access (CHA) system will refer to the following unhoused preference voucher waitlists: MS, SPC, FYI, EHV and RLRA. When clients are referred by CHA, they will be matched with case management services before being referred to HACC. The Portland Veteran's Administration will maintain the waitlist for VASH PBV and will refer directly to HACC.</p>	<p><b>New General policy change</b></p> <p>Updated policy for HACC to revert back to managing waitlists.</p> <p><b>Plan to implement 7/1/25</b></p>
4	<p><i>4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]</i>  <i>Closing the Waiting List</i>  <u>HACC Policy</u>  HACC will close the HCV waiting list when the estimated waiting period for housing assistance for applicants on the list exceeds 24 months.</p>	<p><i>4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]</i>  <i>Closing the Waiting List</i>  <u>HACC Policy</u>  HACC will close the HCV waiting list when the estimated waiting period for housing assistance for applicants on the list exceeds 24 months. For special programs such as 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><b>New General policy change</b></p> <p>Updated policy for HACC to revert back to managing waitlists.</p>

	For special programs such as MS, FYI, EHV, SPC and RLRA that use the CHA as their wait list, the CHA guidelines as determined by the Continuum of Care (CoC) will be used.		<b>Plan to implement 7/1/25</b>
4	<i>4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]</i> The update request will provide a deadline by which the family must respond in the online system and will state that failure to respond will result in the applicant’s name being removed from the waiting list. The family’s response must be through the online system. Upon request, HACC staff will assist applicants with updating information in the online system.	<i>4-II.F. UPDATING THE WAITING LIST [24 CFR982.204]</i> 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.	<b>New General policy change</b> Updated policy for HACC to revert back to managing waitlists. <b>Plan to implement 7/1/25</b>
4	<i>Local Preferences [24 CFR 982.207; HCV p. 4-16] 4-III.C. SELECTION METHOD</i> 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 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	<i>Local Preferences [24 CFR 982.207; HCV p. 4-16] 4-III.C. SELECTION METHOD</i> 7. The section does not include Mainstream. For 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 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”.	<b>New General policy change</b>  Updated policy for HACC to revert back to managing waitlists.  <b>Plan to implement 7/1/25</b>

	<p>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”.</p> <p>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>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>	
6	<p><i>6-I.B. HOUSEHOLD COMPOSITION AND INCOME</i> <i>Temporarily Absent Family Members</i> <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><i>6-I.B. HOUSEHOLD COMPOSITION AND INCOME</i> <i>Temporarily Absent Family Members</i> <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><b>Previously Approved - HOTMA Change</b> Added clarification regarding household counts. <b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>

6	<p><b>6-I.C. ANTICIPATING ANNUAL INCOME</b>  <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 requirements and policy in Chapter 7 in the following cases:</p> <p>If EIV or other UIV data is not available,  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 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><b>6-I.C. CALCULATING ANNUAL INCOME</b>  <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>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><b>Previously Approved - HOTMA Change*</b></p> <p>Simplified language to align with HOTMA regulations.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
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6	<p><i>6-I.D. EARNED INCOME</i>  <u>HACC Policy</u>  For persons who regularly receive bonuses or commissions, HACC will verify, and then average amounts received for the two years preceding admission or reexamination. If only a one-year history is available, HACC will use the prior year amounts. In either case the family may provide, and HACC will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, HACC will count only the amount estimated by the employer. The file will be documented appropriately.</p>	<p><i>6-I.D. EARNED INCOME</i>  <u>HACC Policy</u>  The PHA will include in annual income the full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation.  For people who regularly receive bonuses or commissions, HACC will verify, and then average amounts received for the two years preceding admission or interim reexamination. If only a one-year history is available, HACC will use the prior year amounts. In either case the family may provide, and HACC will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, HACC will count only the amount estimated by the employer. The file will be documented appropriately.</p>	<p><b>Previously Approved - HOTMA Change*</b>  Added policy language to align with HOTMA regulations.  <b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
6	<p><i>6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9); Notice PIH 2015-21]</i>  New Policy to be added when HOTMA is fully implemented by HUD.</p>	<p><i>6-I.G. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27]</i>  <i>HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)]</i>  <u>HACC Policy</u>  If a student only receives financial assistance under Title IV of the Higher Education Act (HEA) and do not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family’s annual income. The PHA will not calculate actual covered costs in this case.  If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student’s financial assistance from the student’s actual covered costs. The PHA will include any amount of financial assistance in excess of the student’s actual covered costs in the family’s annual income.</p>	<p><b>Previously Approved - HOTMA Change*</b>    Added policy language and clarification by adding examples.    <b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>



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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.

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		<p style="text-align: center;">Example 3</p> <ul style="list-style-type: none"> <li>• Actual covered costs: \$22,000</li> <li>• Title IV HEA assistance: \$15,000</li> <li>• 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).</li> <li>• Other Student Financial Assistance: \$5,000</li> <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 Policy to be added when HOTMA is fully implemented by HUD.	<p><i>6-I.H. PERIODIC PAYMENTS</i>  <u>HACC Policy</u>  HACC will include in annual income the full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts.</p>	<p><b>Previously Approved - HOTMA Change*</b>  Added clarification of income calculations.  <b>To be implemented in alignment with</b></p>

		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.	<b>updated HOTMA implementation guidance from HUD.</b>
6	<p><i>6-I.H. PERIODIC PAYMENTS</i>  <i>Lump-Sum Payments for the Delayed Start of a Periodic Payment</i>  <u>HACC Policy</u>  When a delayed-start payment is received and reported during the period in which HACC is processing an annual reexamination, HACC will adjust the family share and HACC subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with HACC.</p>	<p><i>6-I.H. PERIODIC PAYMENTS</i>  <i>Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)]</i>  <u>HACC Policy</u>  HACC will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.  If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 11. If not, the PHA will consider the amount when processing the family's next regular recertification.</p>	<p><b>Previously Approved - HOTMA Change*</b>  Added policy language to align with the changes to examination schedules.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
6	<p>New Policy to be added when HOTMA is fully implemented by HUD.</p>	<p><i>6-I.H. PERIODIC PAYMENTS</i>  <i>Alimony and Child Support</i>  <u>HACC Policy</u>  The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement.  The PHA will count court-awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made.  In order to verify that payments are not being made, the PHA will review child support payments over the last three months.  If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made.  At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the</p>	<p><b>Previously Approved - HOTMA Change*</b></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><b>To be implemented in alignment with updated HOTMA</b></p>

		<p>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><b>implementation guidance from HUD.</b></p>
6	<p><i>PART II: ASSETS</i> <u>HACC Policy</u></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><i>PART II: ASSETS</i> <u>HACC Policy (HOTMA) – Effective July 1, 2024</u></p> <p>HACC will allow families to self-certify assets do not exceed the HUD-published threshold (\$50,000 for 2024 and \$51,600 for 2025) (per Chapter 7 of the Administrative Plan).</p>	<p><b>HOTMA Change*</b></p> <p>Allows families to self-certify assets under HUD-published threshold.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>

7	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]</i></p> <p><u>HACC Policy</u></p> <p>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><b>Previously Approved - HOTMA Change*</b></p> <p>HACC option for better compliance.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
7	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>7.I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27] Value of Assets and Asset Income [24 CFR 982.516(a)]</i></p> <p><u>HACC Policy (HOTMA) – Effective July 1, 2024</u></p> <p>For families with net assets totaling the HUD-published threshold amount, 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.</p> <p>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*</p> <p>Allows families to self-certify assets under HUD-published threshold amount.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
7	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>7-I.I. Level 1: Non-Third-Party Verification Technique: Self-certification [Notice PIH 2023-27]</i></p> <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><b>Previously Approved - HOTMA Change*</b></p> <p>Added required language that must be added to certification documents.</p> <p><b>To be implemented in alignment with updated HOTMA</b></p>

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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><b>implementation guidance from HUD.</b></p>
10	<p><i>10-I.C. Moving Process</i>  <i>Voucher Issuance and Briefing</i>  <u>HACC Policy</u></p> <p>For families approved to move to a new unit within HACC’s jurisdiction, HACC will issue a new voucher within 10 business days of HACC’s approval to move. Participants requesting to move to another unit may be required to attend a new briefing. At a minimum, participants will be given a briefing packet. HACC will follow the policies set forth in Chapter 5 on voucher term, extensions, and expiration. If a family does not locate a new unit within the term of the voucher and any extensions, the family may remain in its current unit with continued voucher assistance if the owner agrees and HACC approves. Otherwise, the family will lose its assistance.</p> <p>For families moving into or families approved to move out of HACC’s jurisdiction under portability, HACC will follow the policies set forth in Part II of this chapter. If a family chooses to not provide a Vacate Notice prior to issuance of voucher, no inspection and no HAP</p>	<p><i>10-I.C. Moving Process</i>  <i>Voucher Issuance and Briefing</i>  <u>HACC Policy</u></p> <p>For families approved to move to a new unit within HACC’s jurisdiction, they will be required to provide a written vacate notice no less than 30 days and no more than 60 days to the Landlord/Owner and HACC. HACC will issue a new voucher within 10 business days of HACC’s approval to move. Participants requesting to move to another unit may be required to attend a new briefing. At a minimum, participants will be given a briefing packet. HACC will follow the policies set forth in Chapter 5 on voucher term, extensions, and expiration. If a family does not locate a new unit within the term of the voucher and any extensions, the family may remain in its current unit with continued voucher assistance if the owner agrees and HACC approves. Otherwise, the family will lose its assistance.</p> <p>For families moving into or families approved to move out of HACC’s jurisdiction under portability, HACC will follow the policies set forth in Part II of this chapter.</p>	<p><b>New General policy change</b></p> <p>Reverting back to previous policy requiring families to provide vacate notice before being issued a voucher to move.</p> <p><b>Plan to implement 7/1/2025</b></p>

	Contract will be executed until such time as the family provides a copy of the Vacate Notice.		
11	<p><b>11-I.C. SCHEDULING ANNUAL REEXAMINATIONS</b> 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]. <u>HACC Policy</u> HACC will begin the annual reexamination process 120 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). If the family moves to a new unit, HACC will perform a new annual reexamination. The PHA also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.</p>	<p><b>11-I.B. SCHEDULING REGULAR /BIENNIAL/TRIENNIAL REEXAMINATIONS</b> 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]. <u>HACC Policy (MTW 3.b)</u> For seniors and people with disabilities households, the PHA will conduct regular reexaminations triennially (once every three years). As a part of the regular reexamination process, the PHA will determine ongoing eligibility for previously determined household type (seniors and people with disabilities or work-focused). Changes in household type will be applied at the family’s regular reexamination in accordance with policies in this chapter. HACC Policy HACC will begin the regular reexamination process no more than 120 days in advance of its scheduled effective date. Generally, HACC will schedule regular 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 a regular reexamination for completion prior to the anniversary date for administrative purposes.</p>	<p><b>Previously approved MTW Waiver 3.b – impacted by HOTMA*</b></p> <p>To streamline reexaminations for elderly and disabled households.</p> <p><b>To be implemented in alignment with HOTMA and release of the new HUD 50058 forms.</b></p>
11	New Policy to be added when HOTMA is fully implemented by HUD.	<p><b>11-II.C. CHANGES AFFECTING INCOME OR EXPENSES</b> <u>HACC Policy</u> HACC will conduct an interim reexamination upon request if the family’s adjusted income has decreased by 10 percent. <u>HACC Policy</u> When a family reports an increase in their earned income between annual reexaminations, HACC will conduct an interim reexamination if</p>	<p><b>Previously Approved - HOTMA Change*</b></p> <p>Streamline workload and only doing interim if a household income</p>

		<p>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></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>	<p>change is 10% or more.</p> <p>Regardless of this, families must report all changes in family composition or income within 7 business days.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
12	<p><i>Family Absence from the Unit [24 CFR 982.312]</i> <u>HACC Policy</u></p> <p>Family absence means no member of the family is residing in the unit.</p> <p>The family may be absent from the assisted unit for brief periods. For anticipated absences of more than 21 consecutive days, the family must notify the HACC, in writing, prior to the first day of the absence.</p> <p>For family absences greater than 30 consecutive days, the family must obtain approval from HACC. Reasonable requests will not be denied. Generally, approval is reserved for medical reasons, e.g., hospitalization, determinable nursing home stays, to care for ill relatives, etc.</p> <p>Assistance will terminate if a family absence exceeds the maximum period approved by HACC.</p>	<p><i>Family Absence from the Unit [24 CFR 982.312]</i> <u>HACC Policy</u></p> <p>If the family is absent from the unit for more than 30 consecutive calendar days, the family’s assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.F. The family may be absent from the assisted unit for brief periods. For anticipated absences of more than 21 consecutive days, the family must notify the HACC, in writing, prior to the first day of the absence.</p> <p>For family absences greater than 30 consecutive days, the family must obtain approval from HACC. Reasonable requests will not be denied. Generally, approval is reserved for medical reasons (e.g., hospitalization, determinable nursing home stays, to care for ill relatives, etc.).</p> <p>A family absence cannot exceed 180 days. Individual members of a household who are or are expected to be absent from the assisted unit for 180 consecutive days or less are considered temporarily absent</p>	<p><b>New General Policy change</b></p> <p>Refinement of policy language and immediate termination from program for absences of more than 30 days unless preapproved for very specific reasons.</p> <p><b>Plan to implement 7/1/2025</b></p>



	<p>For documented and verifiable medical reasons requiring the family to be absent from the unit for more than 180 days, the family’s assistance may be resumed if not more than one year has elapsed since the first day of the absence. This option is at the sole discretion of the HACC and will be considered on a case-by-case basis. A family in this circumstance will not have to go back on the wait list.</p> <p>Individual members of a household who are or are expected to be absent from the assisted unit for 180 consecutive days or less are considered temporarily absent and continue 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. These absences must be reported by the family as soon as anticipated or known. Exceptions to this general policy are discussed below. If the family is absent from the unit for more than 180 consecutive calendar days, the family’s assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.F.</p>	<p>and continue 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. These absences must be reported by the family as soon as anticipated or known.</p>	
12	<p>New Policy decision point to be added when HOTMA is fully implemented by HUD.</p>	<p><i>Upon the PHA’s HOTMA 102/104 compliance date, the below section on the asset limitation is added:</i>  <i>Asset Limitation [24 CFR 5.618; Notice PIH 2023-27]</i>  The PHA has discretion with respect to the application of the asset limitation at annual and interim reexamination. The PHA may adopt a written policy of total non-enforcement, enforcement, or limited enforcement as well as adopting exception policies.  <u>HACC Policy</u>  The PHA has adopted a policy of total enforcement of the asset limitation for all program participants. The asset limitation applies to</p>	<p><b>New HOTMA Change</b></p> <p>Newly added option for asset limitations enforcement.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>

		initial eligibility determinations for new admissions and current program participants in the PHA's HCV program.	
12	<p><i>Limitations on VAWA Protections [24 CFR 5.2005(d) and (e)]</i>  <i>Documentation of Abuse [24 CFR 5.2007]</i>  <u>HACC Policy</u></p> <p>When a participant family is facing assistance termination because of the actions of a participant, household member, guest, or other person under the participant's control and a participant or immediate family member of the participant's family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, sexual assault, stalking or human trafficking, HACC will request in writing that the individual submit documentation affirming that claim. The written request will include explicit instructions on where, when, and to whom the documentation must be submitted. It will also state the consequences for failure to submit the documentation by the deadline.</p>	<p><i>Limitations on VAWA Protections [24 CFR 5.2005(d) and (e)]</i>  <i>Documentation of Abuse [24 CFR 5.2007]</i>  <u>HACC Policy</u></p> <p>When an individual facing termination of assistance for reasons related to domestic violence, dating violence, sexual assault, stalking, or human trafficking claims protection under VAWA, the PHA will request that the individual provide documentation supporting the claim in accordance with the policies in section 16-IX.D of this plan.</p> <p>The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice. In such cases the PHA will document the waiver in the individual's file.</p>	<p><b>New General Policy change</b></p> <p>Simplifies policy language and gives PHA right to waive documentation requirement.</p> <p><b>Plan to Implement 7/1/2025</b></p>
14	<p>New Policy to be added when HOTMA is fully implemented by HUD.</p>	<p><i>14-II.D. HACC-CAUSED ERRORS OR PROGRAM ABUSE</i>  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>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</p>	<p><b>New HOTMA Change</b></p> <p>New policy language added to explain the processes surrounding rent overpayments.</p> <p><b>Plan to implement 7/1/2025 or in alignment with updated HOTMA</b></p>

		<p>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>	<p><b>implementation guidance from HUD.</b></p>
15	<p>New Policy to be added when HOTMA is fully implemented by HUD.</p>	<p><i>Distribution of HAP [24 CFR 982.623(c)]</i></p> <p>The PHA pays the owner of the space the lesser of the housing assistance payment or the portion of the monthly rent due to the owner. The portion of the monthly rent due to the owner is the total of:</p> <ul style="list-style-type: none"> <li>• The actual rent charged by the owner for the manufactured home space; and</li> <li>• Charges for the maintenance and management the space owner must provide under the lease.</li> </ul> <p>If the housing assistance payment exceeds the portion of the monthly rent due to the owner, the PHA may pay the balance of the housing assistance payment to the family. Alternatively, the PHA may pay the balance to the lender or utility company, in an amount no greater than the amount due for the month to each, respectively, subject to the lender's or utility company's willingness to accept the PHA's payment on behalf of the family.</p> <p><u>HACC Policy</u></p> <p>If the housing assistance payment exceeds the portion of the monthly rent due to the owner, HACC will retain any portion over housing assistance payment amount.</p> <p><i>Single HAP to Family [24 CFR 982.623.(d)]</i></p> <p>If the owner of the manufactured home space agrees, the PHA may make the entire housing assistance payment to the family, and the family is responsible for paying the owner directly for the full amount of rent of the manufactured home space due to the owner, including owner maintenance and management charges.</p>	<p><b>New HOTMA Change</b></p> <p>New policy language added with two new policy decision points clarified.</p> <p><b>Plan to implement 7/1/2025 or in alignment with updated HOTMA implementation guidance from HUD.</b></p>

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		<p><u>HACC Policy</u> HACC will not exercise the option to pay a single HAP and will pay HAP directly to the owner.</p>	
16	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>Small Area FMR PHAs (Mandatory and Opt-In) [Notice PIH 2018-01; Notice PIH 2023-32; Notice PIH 2024-34; and Implementing Small Area Fair Market Rents (SAFMR) Guidebook]</i></p> <p><u>HACC Policy</u> HACC is not a mandatory SAFMR PHA. HACC will not voluntarily adopt the use of SAFMRs except to establish exception payment standards in certain ZIP code areas.</p>	<p><b>New HOTMA Change</b> HACC has chosen not to use SAFMR. <b>Plan to implement 7/1/2025 or in alignment with updated HOTMA implementation guidance from HUD.</b></p>
16	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>Designated Payment Standard Areas [24 CFR 982.503(a)(3) and Notice PIH 2024-34]</i></p> <p>The PHA may establish designated payment standard areas within each FMR area where the PHA establishes different payment standards, provided each area is no smaller than a census tract block group. If the PHA designates payment standard areas, then it must include the criteria used to determine the designated areas and the payment standard amounts for those areas in the administrative plan.</p> <p><u>HACC Policy</u> HACC has established designated payment standard areas for zip codes 97034, 97035, 97068, 97086 and 97070. The criteria used to determine the designated areas and payment standards is based on market study showing these are higher rent areas that require a higher payment standard to make them accessible to voucher participants.</p>	<p><b>New HOTMA Change</b></p> <p>Clarifies HACC has payment standards that are higher in higher rent zip code regions.</p> <p><b>Plan to implement 7/1/2025 or in alignment with updated HOTMA implementation guidance from HUD.</b></p>
16	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>Exception Payment Standards [24 CFR 982.503(d), Notice PIH 2018-01, Notice PIH 2024-34, and FR Notice 9/27/21]</i></p> <p><u>HACC Policy</u> HACC has <u>not</u> established exception payment standards.</p>	<p><b>New HOTMA Change</b> Added language for clarification stating position regarding payment standard exceptions.</p>

			<b>Plan to implement 7/1/2025 or in alignment with updated HOTMA implementation guidance from HUD.</b>
16	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>Reasonable Accommodation [24 CFR 982.503(d)(5), 24 CFR 982.505(d), Notice PIH 2024-34, and Notice PIH 2010-26]</i></p> <p><u>HACC Policy</u></p> <p>A family that requires a reasonable accommodation may request a higher payment standard at the time the Request for Tenancy Approval (RTA) is submitted. The family must document the need for the exception. In order to approve an exception, or request an exception from HUD, the PHA must determine that:</p> <p>There is a shortage of affordable units that would be appropriate for the family; the family share would otherwise exceed 40 percent of adjusted monthly income; and the rent for the unit is reasonable.</p>	<p><b>New HOTMA Change</b></p> <p>Added new policy language regarding reasonable accommodations</p> <p><b>Plan to implement 7/1/2025 or in alignment with updated HOTMA implementation guidance from HUD.</b></p>
16	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>Updating Payment Standards [24 CFR 982.503(c)(3) and Notice PIH 2023-24]</i></p> <p><u>HACC Policy</u></p> <p>HACC will review the appropriateness of the payment standards on an annual basis when the new FMR is published, and at other times as determined necessary. In addition to ensuring the payment standards are always within the “basic range,” the PHA will consider the following factors when determining whether an adjustment should be made to the payment standard schedule:</p> <p>Funding Availability: HACC will review projected HAP expenditures to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. HACC will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts.</p>	<p><b>New HOTMA Change</b></p> <p>Clarification regarding process and determination for updating Payment Standards.</p> <p><b>Plan to implement 7/1/2025 or in alignment with updated HOTMA implementation guidance from HUD.</b></p>

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		<p>Rent Burden of Participating Families: Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, HACC will consider increasing the payment standard. In evaluating rent burdens, HACC will not include families renting a larger unit than their family unit size.</p> <p>Quality of Units Selected: HACC may review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market.</p> <p>Changes in Rent to Owner: HACC may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases and decreases by bedroom size.</p> <p>Unit Availability: HACC may review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.</p> <p>Lease-up Time and Success Rate: HACC may consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.</p> <p>Effective dates of changes to payment standard amounts will be determined at the time of update. HACC will always ensure the payment standards will be within the basic range. HACC will post its payment standards schedule on HACC’s website and include a copy in the voucher briefing materials.</p>	
16	New Policy to be added when HOTMA is fully implemented by HUD.	<p><i>Energy Efficient Utility Allowance [24 CFR 982.517(b)(2)(ii)]</i></p> <p>In addition to the area-wide utility allowance standard, the PHA may maintain an area-wide, energy efficient utility allowance schedule to be used for units that are in a building that meets Leadership in Energy and Environmental Design (LEED) or Energy Star standards.</p>	<p><b>New HOTMA Change</b></p> <p>Adding policy language that HACC will not maintain separate energy</p>

		<p><u>HACC Policy</u> HACC will not maintain an energy efficient utility allowance schedule. However, any requested alternatives/ deviations from the PHA published utility schedule will require a written waiver approval from HUD.</p>	<p>efficient utility schedule and clarifying that alternate UAs (such as engineered UAs) requires HUD waiver approval. <b>Plan to implement 7/1/2025 or in alignment with updated HOTMA implementation guidance from HUD.</b></p>
16	<p><i>16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555, Pub.L. 109-162]</i> <i>Hearing Officer’s Decision [24 CFR 982.555(e) (6)]</i> Language removed and replaced <i>Procedures for Rehearing or Further Hearing</i> <u>UHACC Policy</u> The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of the PHA will take effect and another hearing will not be granted.</p>	<p><i>16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555, Pub.L. 109-162]</i> <i>Hearing Officer’s Decision [24 CFR 982.555(e) (6)]</i> <i>Issuance of Decision [24 CFR 982.555(e)(6)]</i> A copy of the hearing must be furnished promptly to the family. <u>HACC Policy</u> The hearing officer will mail a “Notice of Hearing Decision” to the PHA and to the participant on the same day. This notice will be sent by first-class mail. The participant will be mailed the original “Notice of Hearing Decision” and a copy of the proof of mailing. A copy of the “Notice of Hearing Decision” will be maintained in the PHA’s file. <i>Effect of Final Decision [24 CFR 982.555(f)]</i> <u>UHACC Policy</u> The Executive Director has the authority to determine that the PHA is not bound by the decision of the hearing officer under the following circumstances: 1) the PHA was not required to provide a hearing, 2) the decision conflicted with or contradicted HUD regulations or requirements, 3) the decision was otherwise contrary to federal, state, or local laws.</p>	<p><b>New General Policy Change</b>  Updating policy language regarding informal hearing decisions. Gives the Executive Director authority to review and overturn determination of a hearing officer under specific circumstances.  <b>Plan to implement 7/1/2025</b></p>

		In such a case, the PHA will mail a “Notice of Final Decision” to the PHA program director and the participant on the same day. The “Notice of Final Decision” will be sent by first-class mail. A copy of this notice will be maintained in the PHA’s file.	
16	<i>16-IV.B. REPAYMENT POLICY</i> New Policy to be added.	<p><i>16-IV.B. REPAYMENT POLICY</i> <i>Refusal to Enter into an Agreement</i> If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA must terminate assistance [Notice PIH 2018-18].</p> <p><u>HACC Policy</u> When a family refuses to repay monies owed to the HACC, in addition to termination of program assistance, HACC will utilize other available collection alternatives including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Collection agencies</li> <li>• Small claims court</li> <li>• Civil lawsuit</li> <li>• State income tax set-off program</li> </ul>	<p><b>New General Policy Change</b> New clear language that if a family owes HACC monies and refuses to repay or enter a payment agreement they will be terminated as REQUIRED. <b>Plan to implement 7/1/2025</b></p>
16	<i>16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]</i> New Policy to be added.	<p><i>16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]</i> The PHA is not limited to providing VAWA information at the times specified in the above policy. If the PHA decides to provide VAWA information to a participant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases the PHA make alternative delivery arrangements that will not put the victim at risk.</p> <p><u>HACC Policy</u> Whenever HACC has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail</p>	<p><b>New General Policy Change</b> Added new policy language to further protect victims of domestic violence. <b>Plan to implement 7/1/2025</b></p>



		<p>regarding VAWA protections to the victim’s unit if the PHA believes the perpetrator may have access to the victim’s mail, unless requested by the victim.</p> <p>When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room.</p> <p>The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.</p>	
16	<p><i>Notification to Owners and Managers [24 CFR 5.2005(a)(2)]</i></p> <p>While PHAs are no longer required by regulation to notify owners and managers participating in the HCV program of their rights and obligations under VAWA, the PHA may still choose to inform them.</p> <p><u>UHACC Policy</u></p> <p>HACC will provide owners and managers with information about their rights and obligations under VAWA at least annually through its Landlord Newsletter that is emailed to the Property.</p>	<p><i>Notification to Owners and Managers [24 CFR 5.2005(a)(2)]</i></p> <p><u>UHACC Policy</u></p> <p>HACC will provide owners and managers with information about their rights and obligations under VAWA at least annually through its Landlord Newsletter that is emailed to the Property.</p> <p>The VAWA information provided to owners will consist of the notice in Exhibit 16-5 and a copy of Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation.</p>	<p><b>New General Policy Change</b></p> <p>Added VAWA information to provide to owners to further protect victims of domestic violence.</p> <p><b>Plan to implement 7/1/2025</b></p>
16	<p><i>16-IX.D. DOCUMENTATION [24 CFR 5.2007]</i></p> <p><u>UHACC Policy</u></p> <p>Any request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.</p>	<p><i>16-IX.D. DOCUMENTATION [24 CFR 5.2007]</i></p> <p><u>UHACC Policy</u></p> <p>Any request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.</p> <p>HACC may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, HACC will consider factors that may contribute to the victim’s inability to provide documentation in a timely manner, including cognitive limitations,</p>	<p><b>New General Policy Change</b></p> <p>Clarification to policy made to update procedures regarding documentation of domestic violence.</p> <p><b>Plan to implement 7/1/2025</b></p>

	HACC may, in its discretion, extend the deadline for 10 business days. Any extension granted by the PHA will be in writing.	disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim’s need to address health or safety issues. Any extension granted by HACC will be in writing. Once the victim provides documentation, HACC will acknowledge receipt of the documentation within 10 business days.	
16	<u>Conflicting Documentation [24 CFR 5.2007(d)]</u> <u>HACC Policy</u> If presented with conflicting certification documents (two or more forms HUD-5382) from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. The family will have 30 calendar days from the date of request by the PHA to provide this documentation.	<u>Conflicting Documentation [24 CFR 5.2007(d)]</u> <u>HACC Policy</u> If presented with conflicting certification documents from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. When requesting third-party documents, the PHA will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation. If the PHA does not receive third-party documentation within the required timeframe (and any extensions) the PHA will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, the PHA will hold separate hearings for the applicants or tenants.	<b>New General Policy Change</b>  Clarification to policy made to update procedures.  <b>Plan to implement 7/1/2025</b>
17	17-VII.C. MOVES HACC Policy (MTW 9.h) – Effective 7/1/2024 PBV voucher holders wishing to transfer to a tenant-based program will be placed on a waiting list after their first year of PBV residency. The PHA will not give preference or priority on the HCV waiting list, other than those general preferences given to all on the wait list. Exceptions for VAWA and reasonable accommodation will be honored after the first year of the lease.	17-VII.C. MOVES HACC Policy (MTW 9.h) waiving certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R and those parts of 983.261 superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. HACC will require a tenant to live in a PBV unit for 24 months before requesting to transfer to a Project-based voucher. HACC will only make an exception to the 24-month requirement for those requesting a move due to VAWA or other reasonable accommodation.	<b>Previously Approved MTW Waiver 9.h Policy</b>  Updating and clarifying policy Language to align with previously approved MTW waiver.

	<p>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>All such requests must be submitted in writing to the housing authority and will be reviewed by the Program Manager. All households in program compliance who have requested a move to a tenant-based voucher will be added to the bottom of the tenant-based voucher waitlist. The household will be offered a tenant-based voucher when their name reaches the top of the waitlist, and a voucher becomes available. The household will not receive priority based on being part of the project-based program. If a request to transition to a tenant-based voucher is denied, the household would have the right to an informal review through the hearing process.</p> <p>This policy will be implemented with all PBV placements on or after 7/1/2025.</p>	<p><b>Plan to Implement 7/1/2025</b></p>
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**ATTACHMENT B**  
**Summary of Proposed Admissions and Continued Occupancy Plan Policy Changes**

**Housing Opportunity through Modernization Act (HOTMA) Implementation Delays:** HUD updated HOTMA implementation timelines which have impacted the implementation of many previously approved policy changes. Impacted policies are included in this document as for transparency purposes. For these policies, the old policy language, if any, will remain in effect until further guidance is issued by HUD.

\*Indicates policy alignment with Administrative Plan (Admin Plan) for the Housing Choice Voucher Program.

Ch	Old Policy Language	New Policy Language	Summary
6	<p>6-I.C. ANTICIPATING ANNUAL INCOME  <u>HACC Policy</u>                      When EIV is obtained and the family does not dispute the EIV employer data, HACC will use current tenant-provided documents to project annual income. When the tenant provided documents are pay stubs, HACC will make every effort to obtain current and consecutive pay stubs dated within the last 60 days. HACC will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:                      If EIV or other UIV data is not available,                      If HACC determines additional information is needed.                      In such cases, HACC will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how HACC annualized projected income.</p>	<p>6-I.C. CALCULATING ANNUAL INCOME  <u>HACC Policy</u>                      When HACC cannot readily anticipate income based upon current circumstances (e.g., in the case of temporary, sporadic, or variable employment, seasonal employment, unstable working hours, or suspected fraud), HACC will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income. Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to HACC to show why the historic pattern does not represent the family’s anticipated income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.</p>	<p><b>Previously Approved - HOTMA Change*</b></p> <p>Simplified language to align with new HOTMA regulations.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></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 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>		
6	<p><b>6-I.D. EARNED INCOME</b> <u>HACC Policy</u></p> <p>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><b>6-I.D. EARNED INCOME</b> <u>HACC Policy</u></p> <p>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.</p> <p>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><b>Previously Approved - HOTMA Change*</b></p> <p>Added policy language to align with HOTMA changes.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>

6	<p>6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9); Notice PIH 2015-21] New Policy to be added when HOTMA is fully implemented by HUD.</p>	<p>6-I.G. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27] HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)] <u>HACC Policy</u></p> <p>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.</p> <p>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.</p> <div data-bbox="726 703 1705 924" style="border: 1px solid black; padding: 5px;"> <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> <p>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.</p>	<p><b>Previously Approved - HOTMA Change*</b></p> <p>Added policy language to align with HOTMA changes and simplification of language.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
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		<p style="text-align: center;">Example 2</p> <ul style="list-style-type: none"> <li>• Actual covered costs: \$25,000</li> <li>• Title IV HEA assistance: \$26,000</li> <li>• Title IV HEA assistance covers the students' entire actual covered costs.</li> <li>• Other Student Financial Assistance: \$5,000</li> <li>• Excluded income: The entire Title IV HEA assistance of \$26,000</li> <li>• Included income: All other financial assistance of \$5,000</li> </ul>	
<p>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.</p>		<p style="text-align: center;">Example 3</p> <ul style="list-style-type: none"> <li>• Actual covered costs: \$22,000</li> <li>• Title IV HEA assistance: \$15,000</li> <li>• 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).</li> <li>• Other Student Financial Assistance: \$5,000</li> <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>	

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6	<p>New Policy to be added when HOTMA is fully implemented by HUD.</p>	<p>6-I.H. PERIODIC PAYMENTS  <u>HACC Policy</u>  HACC will include in annual income all periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts.  Payments in lieu of earnings, such as unemployment and disability compensation, and severance pay are also counted as income if they are received in the form of periodic payments.</p>	<p><b>Previously Approved - HOTMA Change*</b>  Added clarification of income calculations.  <b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
6	<p>6-I.H. PERIODIC PAYMENTS  Lump-Sum Payments for the Delayed Start of a Periodic Payment  <u>HACC Policy</u>  When a delayed-start payment is received and reported during the period in which HACC is processing an annual reexamination, HACC will adjust the family share and HACC subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with HACC.</p>	<p>6-I.H. PERIODIC PAYMENTS  Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)]  <u>HACC Policy</u>  HACC will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.  If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 11. If not, the PHA will consider the amount when processing the family’s next annual recertification.</p>	<p><b>Previously Approved - HOTMA Change*</b>  Added policy language to align with the changes to examination schedules.  <b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
6	<p>New Policy to be added when HOTMA is fully implemented by HUD.</p>	<p>6-I.H. PERIODIC PAYMENTS  Alimony and Child Support  <u>HACC Policy</u>  The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement.  The PHA will count court-awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made.  In order to verify that payments are not being made, the PHA will review child support payments over the last three months.  If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made</p>	<p><b>Previously Approved - HOTMA Change*</b>  Added language that the PHA will consider alimony and child support in calculations only when 3 months of payments can be verified.</p>



		<p>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.</p> <p>Alternately, the PHA will only count alimony or child support if it can verify three months of payments.</p>	<p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
6	<p>PART II: ASSETS HACC Policy HACC will accept a family's declaration of the amount of assets less than \$5,000 and the amount of income expected to be received from those assets. HACC's reexamination documentation, which is signed by all adult family members can serve as the declaration. Where the family has net family assets equal to or less than \$5,000, HACC does not need to request supporting documentation (e.g. bank statements) for the family to confirm the assets or the amount of income expected to be received from those assets. Where the family has net family assets in excess of \$5,000, HACC must obtain supporting documentation to confirm assets. Anytime</p>	<p>PART II: ASSETS <u>HACC Policy – 7/1/2024</u> HACC will allow families to self-certify assets do not exceed \$50,000.</p>	<p><b>Previously Approved - HOTMA Change*</b></p> <p>Allows families to self-certify assets under \$50,000.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>

	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.		
7	New Policy to be added when HOTMA is fully implemented by HUD.	<p>7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]</p> <p><u>HACC Policy</u></p> <p>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><b>Previously Approved - HOTMA Change*</b></p> <p>HACC option for better compliance.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
7	New Policy to be added when HOTMA is fully implemented by HUD.	<p>7.I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]</p> <p><i>Value of Assets and Asset Income [24 CFR 982.516(a)]</i></p> <p><u>HACC Policy (HOTMA) – Effective July 1, 2024</u></p> <p>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.</p> <p>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><b>Previously Approved - HOTMA Change*</b></p> <p>HACC is choosing to allow families to self-certify assets under \$50,000.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
7	New Policy to be added when HOTMA is fully implemented by HUD.	<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><b>Previously Approved - HOTMA Change*</b></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>Added required language that must be added to certification documents.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
11	New Policy to be added when HOTMA is fully implemented by HUD.	<p>11-I.B. SCHEDULING REGULAR TRIENNIAL REEXAMINATIONS</p> <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</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><b>Previously approved MTW Waiver 3.a – impacted by HOTMA*</b></p> <p>To streamline reexaminations for elderly and disabled households.</p> <p><b>To be implemented in alignment with HOTMA and release of the new HUD 50058 forms.</b></p>
11	New Policy to be added when HOTMA is fully implemented by HUD.	<p>11-II.C. CHANGES AFFECTING INCOME OR EXPENSES</p> <p><u>HACC Policy</u></p> <p>HACC will conduct an interim reexamination any time the family’s adjusted income has decreased by 10 percent.</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.</p>	<p><b>Previously Approved - HOTMA Change*</b></p> <p>To streamline workload and only do an interim if a household income change is 10% or more.</p>

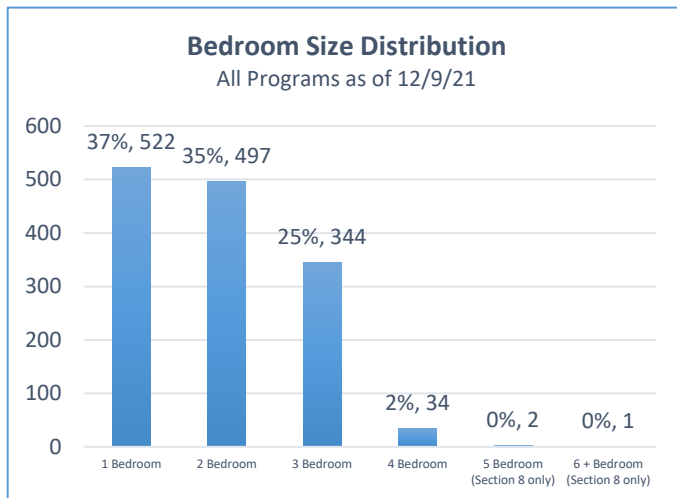
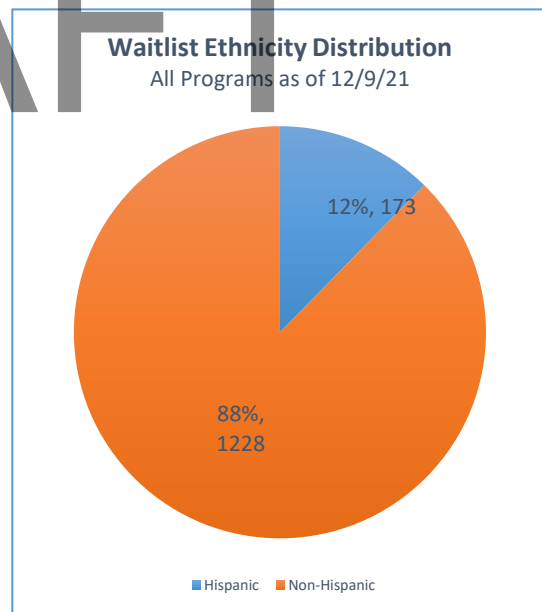
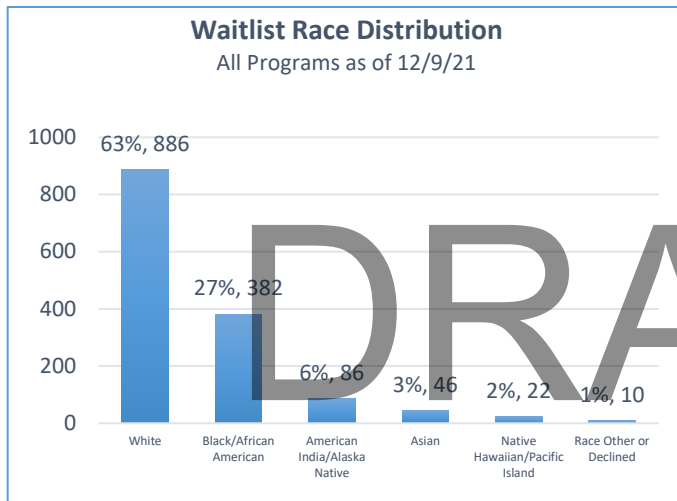
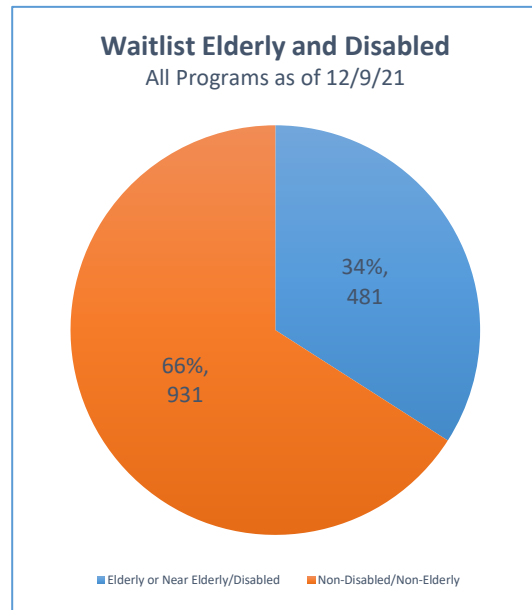
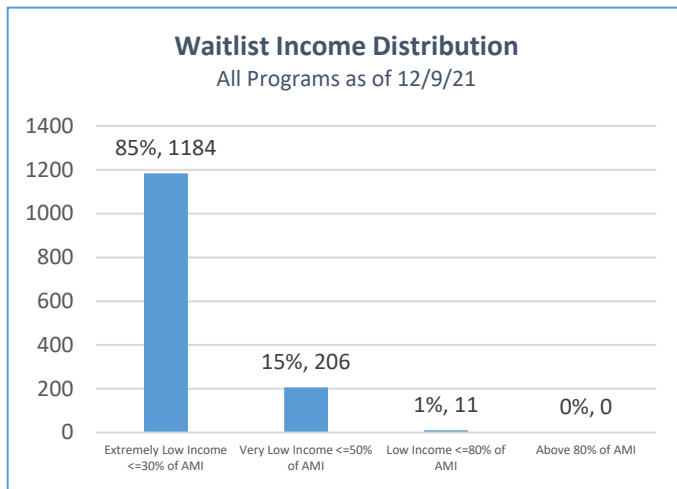
		<p>The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income.</p> <p>The PHA will perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination 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></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>	<p>Regardless of this, families must report all changes in family composition or income with 7 business days.</p> <p><b>To be implemented in alignment with updated HOTMA implementation guidance from HUD.</b></p>
16	<p>16-III.B. REPAYMENT POLICY</p> <p>Due Dates</p> <p><u>HACC Policy</u></p> <p>All payments are due by the close of business on the 15th day of the month. If the 15th does not fall on a business day, the due date is the close of business on the first business day after the 15th. HACC may adjust the due date to meet the tenant income pattern.</p>	<p>16-III.B. REPAYMENT POLICY</p> <p>Due Dates</p> <p><u>HACC Policy</u></p> <p>All payments are due by the close of business on the 8th day of the month. If the 8th does not fall on a business day, the due date is the close of business on the first business day after the 8th. HACC may adjust the due date to meet the tenant income pattern.</p>	<p><b>New General Policy Change</b></p> <p>Due date for repayment agreement adjusted to aligned with Admin Plan.</p> <p><b>Plan to implement 7/1/25</b></p>

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

**Statement of Housing Needs**

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

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



## Strategy for Addressing Housing Needs

### Introduction

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

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

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

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

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

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

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

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

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

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

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

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

**Strategies:**

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

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

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

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

**Strategies:**

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

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

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

**2.D:** Continue operating the Housing Rights and Resources line, which is a partnership between Clackamas County Social Services, Clackamas County Community Development, Legal Aid Services of Oregon, and Fair Housing Council of Oregon to provide information about fair housing law to landlords and tenants in Clackamas County.

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

**Strategies:**

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



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

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

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

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## 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.

## 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.

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	Public Housing	Housing Vouchers	Local Projects	Central Office	Development	State & Local Rental Assistance + Tenant Services	Grants	FY25 Total	FY 2024 6/30/2024 Budget	FY 2023 6/30/2023 Budget	FY 2022 6/30/2022 Budget	\$ Change from Prior Year Budget	% Change from Prior Year Budget
<b>Revenue:</b>													
Dwelling rent	1,950,501	-	673,375	-	-	-	-	2,623,876	2,642,254	2,367,372	1,938,344	(18,378)	-0.70%
Vacancy loss	-	-	-	-	-	-	-	-	(46,800)	(51,123)	(47,561)	46,800	-100.00%
Other tenant income	9,595	62,299	90,315	53,400	-	15,273	-	230,882	266,450	141,270	143,670	(35,568)	-13.35%
Operating subsidy	2,268,280	2,744,591.02	-	-	-	-	-	5,012,871	3,960,426	4,070,841	3,757,186	1,052,445	26.57%
Housing assistance payments	-	25,779,966	-	-	-	-	395,998	26,175,964	23,036,532	22,469,045	19,206,368	3,139,432	13.63%
Mgmt fees	-	-	-	392,492	-	-	-	392,492	467,625	414,225	397,650	(75,133)	-16.07%
Interest income	56	-	5,049	7,792	-	-	-	12,897	500	500	500	12,397	2479.44%
County contribution	-	-	-	-	-	-	-	-	-	-	150,000	-	-
Grant revenue	-	176,208	-	-	38,516,373	4,958,449	2,082,350	45,733,380	54,363,192	37,907,180	45,968,327	(8,629,812)	-15.87%
Other Shared Revenues	-	-	-	-	-	27,102,609	-	27,102,609	-	-	-	27,102,609	-
Other/In-kind	-	-	-	7,576	500,000	-	-	507,576	2,342,522	2,571,663	3,190,994	(1,834,946)	-78.33%
<b>TOTAL REVENUE</b>	<b>4,228,431</b>	<b>28,763,064</b>	<b>768,739</b>	<b>461,260</b>	<b>39,016,373</b>	<b>32,076,331</b>	<b>2,478,348</b>	<b>107,792,548</b>	<b>87,032,701</b>	<b>69,890,974</b>	<b>74,705,477</b>	<b>20,759,847</b>	<b>23.85%</b>
<b>ADMINISTRATIVE EXPENSE:</b>													
Salaries	560,768	864,837	74,042	919,218	534,059	1,095,125	16,005	4,064,055	4,039,245	3,743,579	3,027,329	24,810	0.61%
Employee benefits	310,357	538,393	51,792	662,676	287,527	928,907	15,502	2,795,154	2,754,379	2,407,995	1,862,137	40,775	1.48%
Legal fees	200	-	1,228	99	149,810	-	-	151,337	19,300	31,900	26,900	132,037	684.13%
Staff training/travel	8,129	3,176	32	13,040	15,532	7,547	4,500	51,957	54,800	52,300	45,200	(2,843)	-5.19%
Auditing fees	16,165	13,371	8,906	13,562	6,304	14,513	-	72,820	54,200	49,699	49,267	18,620	34.35%
Other administrative expenses	256,549	272,820	124,864	308,832	81,458	2,476,562	-	3,521,084	1,005,070	1,011,461	2,006,967	2,516,014	250.33%
Management fee expense	406,742	-	-	-	-	-	-	406,742	414,225	414,225	397,650	(7,483)	-1.81%
<b>TOTAL ADMINISTRATIVE</b>	<b>1,558,909</b>	<b>1,692,598</b>	<b>260,864</b>	<b>1,917,426</b>	<b>1,074,691</b>	<b>4,522,654</b>	<b>36,007</b>	<b>11,063,149</b>	<b>8,341,219</b>	<b>7,711,158</b>	<b>7,415,449</b>	<b>2,721,929</b>	<b>32.63%</b>
<b>TENANT SERVICES:</b>													
Salaries	21,043	137,045	-	100,208	-	111,271	129,485	499,052	505,332	132,515	126,287	(6,279)	-1.24%
Benefits	13,779	108,704	-	-	-	100,208	100,208	322,900	326,963	97,303	93,152	(4,063)	-1.24%
Other	7,006	-	-	-	-	-	-	7,006	12,600	39,600	39,600	(5,594)	-44.40%

<b>TOTAL TENANT SERVICES</b>	<b>41,829</b>	<b>245,750</b>	<b>-</b>	<b>100,208</b>	<b>-</b>	<b>211,479</b>	<b>229,693</b>	<b>828,959</b>	<b>844,895</b>	<b>269,418</b>	<b>259,039</b>	<b>(15,936)</b>	<b>-1.89%</b>
<b>UTILITIES:</b>													
Water	228,801	-	16,769	-	-	-	-	245,571	185,129	183,800	184,100	60,442	32.65%
Sewer	415,647	-	34,644	-	-	-	-	450,292	338,559	393,200	393,500	111,733	33.00%
Electricity	29,122	-	8,640	13,280	-	-	-	51,042	30,679	53,800	45,900	20,363	66.37%
Gas	2,624	-	609	2,250	-	-	-	5,483	5,166	9,700	7,700	317	6.14%
<b>TOTAL UTILITIES</b>	<b>676,194</b>	<b>-</b>	<b>60,663</b>	<b>15,530</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>752,387</b>	<b>559,533</b>	<b>640,500</b>	<b>631,200</b>	<b>192,854</b>	<b>34.47%</b>
<b>MAINTENANCE:</b>													
Labor	667,235	-	27,283	-	-	-	-	694,518	779,200	745,732	645,005	(84,682)	-10.87%
Benefits	412,728	-	14,847	-	-	-	-	427,575	508,898	498,347	442,425	(81,323)	-15.98%
Materials	180,794	2,942	25,440	2,050	-	-	-	211,226	168,700	157,300	180,300	42,526	25.21%
Garbage contracts	198,993	-	11,438	-	-	-	-	210,431	202,000	169,800	169,900	8,431	4.17%
Other contracts	194,602	14,003	75,241	5,132	148,978	-	-	437,956	493,880	364,900	361,600	(55,924)	-11.32%
<b>TOTAL MAINTENANCE</b>	<b>1,654,352</b>	<b>16,945</b>	<b>154,249</b>	<b>7,182</b>	<b>148,978</b>	<b>-</b>	<b>-</b>	<b>1,981,706</b>	<b>2,152,679</b>	<b>1,936,078</b>	<b>1,799,230</b>	<b>(170,972)</b>	<b>-7.94%</b>
<b>GENERAL EXPENSES:</b>													
Insurance	303,305	14,827	46,574	6,046	3,111	4,699	-	378,561	181,994	124,625	122,925	196,567	108.01%
Payment in Lieu of Taxes	52,078	-	-	-	-	-	-	52,078	86,000	86,000	86,000	(33,922)	-39.44%
Other/Extraord. Maint.	-	-	-	-	-	-	-	0	-	-	-	-	#DIV/0!
OPEB Accrual	-	-	-	-	-	-	-	0	-	-	-	-	#DIV/0!
<b>TOTAL GENERAL EXPENSES</b>	<b>355,383</b>	<b>14,827</b>	<b>46,574</b>	<b>6,046</b>	<b>3,111</b>	<b>4,699</b>	<b>-</b>	<b>430,639</b>	<b>267,994</b>	<b>210,625</b>	<b>208,925</b>	<b>162,645</b>	<b>60.69%</b>
<b>OTHER EXPENSES:</b>													
Housing Assistance Payments	104,456	26,640,766	-	-	-	26,007,354	540,914	53,293,490	34,119,069	22,469,045	19,206,368	19,174,422	56.20%
Mortgage Payments	50,238	-	5,382	-	-	-	-	55,620	13,100	13,100	13,700	42,520	324.58%
Grant Expense	-	-	-	-	35,980,391	-	-	35,980,391	38,294,833	35,325,258	43,487,403	(2,314,442)	-6.04%
Supp Svcs, in-kind, child care	-	-	-	-	-	877,680	-	877,680	530,041	-	-	347,639	65.59%
Contingency	-	-	350,000	-	706,637	-	-	1,056,637	127,186	127,186	127,186	929,451	730.78%
Capital Expenditures	-	-	-	-	-	-	1,471,890	1,471,890	1,507,638	1,200,605	1,200,605	(35,748)	-2.37%
<b>TOTAL OTHER EXPENSES</b>	<b>154,694</b>	<b>26,640,766</b>	<b>355,382</b>	<b>-</b>	<b>36,687,027</b>	<b>26,885,034</b>	<b>2,012,804</b>	<b>92,735,708</b>	<b>74,591,867</b>	<b>59,135,194</b>	<b>64,035,262</b>	<b>18,143,841</b>	<b>24.32%</b>
<b>TOTAL EXPENSES</b>	<b>4,441,361</b>	<b>28,610,886</b>	<b>877,732</b>	<b>2,046,392</b>	<b>37,913,807</b>	<b>31,623,866</b>	<b>2,278,504</b>	<b>107,792,548</b>	<b>86,758,186</b>	<b>69,902,973</b>	<b>74,349,105</b>	<b>21,034,361</b>	<b>24.24%</b>
<b>OPERATING SURPLUS (DEFICIT)</b>								<b>0</b>	<b>0</b>				
<b>OPERATING SURPLUS (DEFICIT)</b>	<b>(212,929)</b>	<b>152,179</b>	<b>(108,992)</b>	<b>(1,585,132)</b>	<b>1,102,566</b>	<b>452,465</b>	<b>199,844</b>	<b>(0) 0</b>	<b>274,514</b>	<b>(12,000)</b>	<b>356,372</b>	<b>(274,514)</b>	<b>-100.00%</b>

December 10, 2024

**Attachment H**

### **2024 Capital Fund Completed Projects**

- AMP Wide Flooring \$47,280.00 (3 Units)
- AMP Wide Cabinets \$13,094.00 (1 Units)
- OCVM & Scattered Sites Roof Project \$187,550.00 (13 Units)
- Relocation Expenses and Costs \$142,885.70

### **2025 Proposed Capital Fund Projects**

- Gas Water Heater Replacement (34 Units – Scattered & OCVM, 8 LPF Locations) \$110,000.00
- Roof Replacement (3 Units – OCVM) \$40,000.00
- Relocation Expenses and Costs \$953,069.30

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## Attachment I: Capital Fund Annual Statement

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

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

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

PHA Name <b>OR001</b>	Grant Type and Number Capital Fund Program Grant No: <span style="float: right;">OR16R00150125</span> Replacement Housing Factor Grant No:	FFY of Grant: FFY of Grant Approval: FY2025
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- 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>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 15)	\$156,472.20			
5	1480 General Capital Activity	\$64,000.00			
6	1492 Moving to Work Demonstration	\$391,180.50			
7	1495 Resident Relocation	\$953,069.30			
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

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

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

<b>Part I: Summary</b>					
PHA Name: <b>OR 001</b>	Grant Type and Number Capital Fund Program Grant No: <b>OR16R00150125</b> Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval:  FY2025			
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)	\$1,564,722.00			
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	
X _____				X _____	

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

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

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

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

## Attachment I: Capital Fund Annual Statement

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
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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: <b>OR001</b>	Grant Type and Number Capital Fund Program Grant <b>OR16R00150125</b> No: CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: <b>2025</b>			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
AMP Wide Operations	Operations	1406	1	\$0.00				
AMP Wide Mgmt. Improve.	Software: Operating Systems & Office Software	1408	1	\$0.00				
AMP Wide Admin.	Central Office Cost Center (COCC) Salary & Benefits	1410	1	\$156,472.20				
AMP Wide Relocation Costs	Relocation due to Redevelopment	1495	1	\$620,000.00				
AMP Wide Redevelopment	MTW Redevelopment	1492	1	\$724,249.80				
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: <b>2025</b>	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406					
1408					
1410					
1480					
1492					
1501					
1503					
1504					
1505					
9000					
9001					
9002					
9900					
1499					

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<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 22, 2024 ~ 10:00am – 1:00pm Via Zoom**

<https://clackamascounty.zoom.us/j/85438915470?pwd=GqxXTgMANPpiQmbXLrRr4GWQH3mQA.1>

<b>10am-10:15</b>	Welcome & Introductions (15 min)	Shannon Callahan
<b>10:15-10:30</b>	Resident Participation Funds - Discussion & Vote (15 min)	Ann Leenstra
<b>10:30-10:40</b>	New Activities and Progress report Overview (10 min)	Kati Tilton
<b>10:40-10:45</b>	Financials & Capital Fund Overview (5 min)	Darren Chilton/Josh Teigen
<b>10:45-11:30</b>	Review of Proposed Policy changes for Vouchers & Public Housing with time for Q &A (45 min)	Kati Tilton/Tanika Cutsforth
<b>11:30-11:45</b>	<b>BREAK - (15 min)</b>	
<b>11:45-11:55</b>	Moving To Work (MTW) Supplement & Asset Building Activities Update (10 min)	Elizabeth Miller
<b>11:55-12:00</b>	Resident Services & Family Self Sufficiency Overview (5 min)	Jemila Hart/Hillary Merritt
<b>12:00-12:45</b>	Development Update with time for Q & A (45 min)	Elizabeth Miller
<b>12:45-1pm</b>	Additional time for Q &A (15 min)	All

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**RAB Board Members attendance: 13 Members**

Name	Attendance (Y/N)
Resident Commissioner, Ann Leenstra (HCV)	Y
Gail Morgan (SS)	Y
Jackie Fuller (SS)	Y
Grace Essy (SS)	Y
Misty Pate (HSP)	Y
Laura Bales (HSP)	Y
Irisa Hernandez (HSP to HCV)	Y
Venus Barnes (CH)	Y
Amanda Travis (CH) – new member	Y
Darcy Lockhart (OCVM)	Y
Brian Henderson (HCV)	Y
Carol Smith (HCV)	Y
Marilyn Scarratt (HCV) – new member	Y
Darcy Lockhart (OCVM)	Y

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

[https://clackamascounty.zoom.us/rec/share/dTcocYuuK9sP7OQJHS64GGUIYkNXZFiUo7pAdz5Y0wCapxkApRuuL1b30wizVWM.dY-Cv\\_ybKII0cXkW](https://clackamascounty.zoom.us/rec/share/dTcocYuuK9sP7OQJHS64GGUIYkNXZFiUo7pAdz5Y0wCapxkApRuuL1b30wizVWM.dY-Cv_ybKII0cXkW)

Passcode: 0U?Z1Ze0

**Paraphrased Notes including Comments, Questions & Answers collected throughout the meeting with additional information:**

*Erin started the meeting and recording. Erin introduced the Housing Authority's new Executive Director and Director of the Housing and Community Development Division of Clackamas County, Shannon Callahan. Shannon welcomed the RAB and then transitioned to staff and RAB member introductions. Some staff had technical difficulties and got on the call a bit later. A few staff had to leave early as well.*

*Resident Commissioner, Ann Leenstra, brought a Memorandum of Understanding (MOU) between the RAB and the Housing Authority outlining roles and how the Resident Participation funds would be used. Brian made a motion to approve the MOU, Irisa seconded the motion, and the motion passed unanimously (14-0). Ann will sign the MOU on behalf of the RAB.*

*Erin gave an overview of the review of the Annual Plan. This RAB meeting and input from RAB members will be included in Attachment J of the Plan that goes forward for the Public Hearing and public comment period. The public hearing was rescheduled by the board for February 13, 2025 at 10am on the 4<sup>th</sup> floor of the Public Services Building on the County's Red Soils campus. Additional comments and questions can be sent to [efernald@clackamas.us](mailto:efernald@clackamas.us) to be included in Attachment O with other public comments during the public comment period (1/27/25-3/16/25). The Plan outlines the Housing Authority's plans, proposed changes and progress towards goals.*

*Kati provided a review of the new activities and progress report.*

Q – Brian – What does the MTW Cap for vouchers mean?

A – Kati – HUD generally requires a 20% cap on the number of vouchers we can project base. The MTW waiver allows us to project base more.

Q – Misty – How can residents connect with more resources for mental health support?

A – Jemila – Resident Services (Jemila) can help connect residents with available resources.

Q – Venus – For the funding mentioned in the progress report, what is the status of this funding ongoing? What is the sustainability of these programs?

A – Kati – Most of the activities listed in the section are funded through a mixture of grant funds ROSS, FSS, Supportive Housing Services (SHS) and other available funds. HACC continues to apply yearly for annual grant funds and to pursue funding opportunities. SHS is a 10-year measure and will have at least the 10 years of funding.

Comment - Laura – The Security Deposit Loan Repayment program is great.

Q – Carol – In the chat – How do I enroll in the rent reporting for credit building program.

A – Elizabeth – Reach out to your resident services staff member. For Hillside Manor that would be Kelly Goodwin. Jemila has also been the primary person to help folks enroll.

Q – Brian – Since we don't have resident services here at Easton Ridge. How do I do enroll in the rent reporting for credit building program?

A – Elizabeth – Great question, one of the goals of the resident services program is to expand the program to other properties that are 3<sup>rd</sup> party managed by Quantum, like Easton Ridge. Working to partner with them to implement this year.

Q – Irisa – Can HCV (Section 8) program people participate in the resident services rent reporting for credit building program?



A – Elizabeth – No currently, we don't have the capacity to work with the hundreds of landlords that exist in the HCV (Section 8) program but are dipping our toes by expanding to the 3<sup>rd</sup> party managed properties that HACC has some ownership in: Easton Ridge, Clayton Mohr and Hillside Manor.

Comment – Laura – Not sure if it is still available but she got a credit building loan through a community organization out of Llyod Center (Cash Oregon/Innovative Changes or something like that).

*Darren Chilton reviewed the financial information in Attachment G. No questions were asked.*

*Josh reviewed Capital Fund Summary and Annual Report (Attachments H & I). Josh reviewed a change he was making since the summary was printed. He will provide Erin with an updated copy that removes the furnace project since upon further inspection, the forecasted upgrades were not needed at this time. The updated report will be included in the plan draft that goes out for public review and will be provided to the RAB in their after-meeting materials. Capital funds will continue shifting towards the repositioning work.*

Q – Laura – What condition should residents leave units in when moving out of the public housing units that are going to be disposed of? Do they need to thoroughly clean, repair nail holes, etc. if HACC is going to destroy the units upon their move out?

A – Elizabeth, Tanika, Charley – Tenants should leave units in broom swept condition unless a specific deal has been worked out with property management. Staff is doing more frequent curb side pickups to assist in helping residents prepare for the move and dispose of large items. No need to repair nail holes or any deep cleaning. Additional resources will be provided to assist households in disposing of items they do not intend to move with them. They should discuss specific requests about items to leave or not leave with their property manager or the asset management team.

Q – Laura – Will we still get our deposit back if we just get our stuff out even if we don't do a deep clean? Which properties does this apply to?

A – Charley – Yes, for public housing properties we are redeveloping (CH, HSP and OCVM) there is no need to repair nail holes, clean carpets or deep clean. There is also a form you can complete to release you from charges for leaving large items approved to be left by your property manager.

Q – Grace – How should residents leave scattered site units? Are they being destroyed?

A – Charley – The scattered site homes will be sold. Normal move out expectations apply to those moving out of public housing scattered site locations.

*Erin overviewed the next section of presentations noting Attachment A covers proposed policy changes for HCV only and then Attachment B covers proposed changes for public housing. An asterisk is noted in the summary column for policy changes that are aligned between programs.*

Q – Laura – For residents that are moving out of Hillside Park will they be under HCV rules permanently or will they move to HCV during construction then back to public housing rules when construction is done and they move back?

A – Elizabeth – As people are transitioned from public housing at HSP, CH, OCVM and SS they will be given a tenant protection voucher and transition from the PH program to the HCV program. Their program policies will switch from Public Housing (ACOP) to the program policies of the HCV program (Admin Plan), and they will remain under the HCV program policies moving forward. Public Housing programing will be ending for HACC once everyone has transitioned.

*Kati conveyed that Housing Opportunity Through Modernization Act (HOTMA) implementation was delayed by HUD and that we included in the Attachment A and B previously approved policies that have been paused for implementation awaiting additional information from HUD. New policy changes proposed are also included. Kati then reviewed the new proposed policy changes in Attachment A for HCV programs.*

Q – Carol - Why are there 7 vacancies in Hillside Manor?

A – Tanika – There are multiple factors including staff turnover at the site waitlist transitioning, but this is something we are aggressively pursuing right now to get those vacancies filled quickly. For those that are going through the relocation process right now, you do have a preference to jump to the top of the list for Hillside Manor so if anyone is interested, we can get them transferred over there relatively quickly.

Q – Brian – When will the HCV waitlist open again?

A – Kati – HACC has no plan to open the HCV waitlist at this time.

Q – Laura – Who does the written vacate notice of no less than 30 days and no more than 60 days policy change apply to?

A – Kati – HCV participants but does not apply to PH residents relocating with a Tenant Protection Voucher.

Q – Irisa – I heard that those that moved from Hillside could relocate in a year have you heard of that? Can those relocated from PH using a TPV, request to move a year later? And do we pay for the move?

A – Kati – Yes, they can request to move again but they would not have assistance with moving costs.

Q – Venus – What does FMR mean in the designated payment standards section?

A – Kati – FMR is the Fair Market Rent set by HUD used to calculate rent payment standards for our programs.

Q – Irisa – How can a reasonable accommodation be requested for issues accessing a unit, for example someone in a wheelchair with only stairs outside to get to their apartment? Would they have to move, or would the landlord make the changes? What do they need to provide to make the request? Will it be accepted?

A – Kati – If the unit is not owned by the Housing Authority the reasonable accommodation requests should go through the landlord using their specific reasonable accommodation form/process. If the request meets the terms and definitions for “reasonable accommodation” the landlord will make the change. This can be subjective to a degree.

Comment – Amanda (chat) - Regarding the in-home care provider/care givers policy, as a mom of an adult with special needs I’m very glad this is an option.

*Tanika reviewed changes in the public housing program. All were previously approved policy changes on hold with HOTMA awaiting more guidance from HUD except one. The one change is the deadline for repayment plans is changing to align with the HCV program to assist in the transition of households from PH to HCV. No questions.*

**BREAK ~ 10 Min**

*Elizabeth reviewed the Moving To Work Asset Building Cohort program with slides (see slides at the end of the notes).*

Comment – Laura – Really liked the Resident Services Staff slide with pictures.

Comment – Amanda (chat) – A bit off subject, but Chime has a great credit building pre-paid card that is a great opportunity to build credit if you are trying to buy a home. Venus agreed.

*Daisy provided a presentation and slides on the FSS program. (see slides at the end of the notes)*

Q – Irisa – Do you need to be on Housing Authority Assistance already to be in the program? Can it help with purchasing a car for employment? Is there an age limit?

A – Elizabeth/Daisy/Ashley – Yes, you do need to be enrolled in the HCV or PH program. There are a few vouchers programs HACC operates like RLRA are not eligible, but most programs are. Yes, you can use money saved through FSS to help purchase a car for employment if that is the goal you set with your coordinator. No, there is not an age limit.

Grace – If moving from PH (like SS) to HCV does the FSS funds move with you? How does this work for a zero-income household?

A – Daisy – Yes, the FSS savings will continue moving between PH and HCV. You can continue to work toward your FSS goals even if transitioning between eligible programs. If you had zero income and started the program, then got a job, that increase in rent from your new income would all go into your escrow account.

Q – Venus (chat) – Are the workshops for FSS participants mentioned available at the FSS website link shared in the chat (<https://www.clackamas.us/housingauthority/fss>)? If not, please provide me information when you have it.

Daisy – The workshop information is not yet available but will be soon. Staff will send Venus information when it is available.

*Elizabeth presented slides and information provided by Devin as Devin and the development team were unable to attend the meeting. Staff provided contact information for Darcy Vincent who will be assisting with relocations in the chat - Darcy Vincent, President, DDV Consulting Services, LLC, P: 971.246.1056 [Vincent7313@comcast.net](mailto:Vincent7313@comcast.net) [www.ddv-consulting.com](http://www.ddv-consulting.com). (slides are attached at the end of these notes)*

Q – Irisa – Will the slides from the presentations be sent to the RAB.

A – Elizabeth/Erin – yes, they will be provided with the minutes of the meeting along with answers to any questions that staff is unable to answer in today’s meeting.

Q – Irisa – On the S8 program, if I don’t want to move back to Hillside Court, can I move to Clackamas Heights? Will they assist us with that move? I was in Phase I of Hillside relocated to an apartment, but it has stairs, and it is difficult with my walker, and I have had falls. Maybe Clackamas Heights would have something more accommodating when it is done? I am not really asking to move now, and I am almost at 12 months now but when Clackamas Heights reopens is what I am asking?

A – Elizabeth – Yes, I don’t know if moving to Clackamas Heights would come with relocation assistance, but you can move with your voucher. Staff will follow up with more information.

**Additional Response Provided in Writing Following the Meeting:** – Relocation assistance is available for public housing residents wanting to return to the property they were moved from for redevelopment. For example, if your household was relocated from Hillside Park for

redevelopment and you want to return to Hillside Park (Building C) once construction is complete, you would receive relocation assistance. You may move to another property with your voucher after 12 months, however the relocation assistance for our repositioning of public housing would not be available for this move.

Q – Laura – With a S8 Vouchers, we can request to move after 12 months however in a case where stairs getting into an apartment are creating a fall hazard for someone using a walker, would they really have to wait 12 months?

**Response Provided in Writing Following the Meeting:** HCV participants may request a Reasonable Accommodation from the Housing Authority to move before 12 months.

Q – Brian – For the Condo style places (Milwaukie Short Stack) you mentioned they were for 80% AMI (Area Median Income), what is that amount for a one person or two-person household? I am not interested in purchasing but know people who might be.

A – Elizabeth – There is a chart on the housing authority website.

Fun comment – Brian – Are we going to have another development next to Park Place called Board Walk, maybe we could name the buildings at Hillside with monopoly names too. Others agreed that would be fun.

Q – Amanda – I was told by someone we would have just 24 hours to move out once we sign paperwork with our new landlord in relocations. Is that true since I thought it would be a little longer than that.

A – Kati – got a similar question in the chat sent directly to her – In HCV they do allow overlap between two units within the same month. You may need to vacate one unit by the end of the month but may obtain keys to your new unit at the beginning of the month when moving. We allow overlap within the same month only. If you are moving out of a unit on the 31<sup>st</sup> but get keys to your new place on the 5<sup>th</sup>, we would pay that month's HAP payments for both units.

Q – Brian – Can you share with me the amounts of the 80% AMI for the Milwaukie Short Stack since I cannot see the picture?

A – Kati – Yes, 80% AMI for a household of one is \$66,100 per year and for a household of 2 it is \$75,550. These amounts are adjusted each year.

Q – Irisa – What cottages are you talking about?

A – Elizabeth – The Milwaukie Short Stack which are more like townhomes with 2 levels and will have like 15 units.

Q – Grace – Darcy Vincent told her she would have only 24 hours from when she signed a lease on her new place to move out of her SS home or she would be charged fair market rent by the day on the SS location. Is this true? I have a large family in a 4-bedroom home with a garage and that is a bit scary to think we have only 24 hours to get out or will be charged since I am on a fixed income. I worry about paying for the 2-3 days I would need to move.

A – Elizabeth – I am unsure and will follow up with more information.

**Additional Response Provided in Writing Following the Meeting:** Yes, tenants will have 24 hours to vacate their public housing units once they have signed their lease and their new unit passes inspection. Providing moving assistance will allow us to help households regardless of size move within a single day. If additional time is needed, we ask residents to submit their requests for

additional moving time in writing to property management. Property management will work with residents on a case-by-case basis to ensure they have the relocation support needed.

Q – Carol – Will the Community Gardens in the new HSP development be separate from HSM?

A – Building C will have its own garden, and it will not be the same as the HSM one however, we may have the same AmeriCorps assigned to both gardens. Resident services will likely work on collaborative events and community building activities between them.

Q – Carol (chat) - With construction, Walsh and all the sub-contractors drive through the parking lot at HSM and they drive faster than they should. Is there a way to contact Walsh to ask them to please be considerate when using our parking lot? Also not to park in our parking lot.

A – Tanika – Yes, her team will talk to Walsh and the construction team working on the back side of HSM.

Q - Brian – Shared concerns about Easton Ridge gardens not being cared for and parking lot not being painted and asked why there were no resident services there.

A – Tanika – We are looking at getting resident services in some capacity over at Easton Ridge. We also have a lot of big plans for 2025 over at Easton Ridge and I know the Gardens are a hot topic. We are coming soon to check the property needs like the parking lot, sidewalk and roof. We are working on improvements for 2025. This is an exciting time.

Q – Irisa – Milwaukie short-stack – How do people get information on this homeownership opportunity?

A – Elizabeth – Unsure of who the contact regarding the Milwaukie Short Stack community land trust project but will provide the information after the meeting.

**Additional Response Provided in Writing Following the Meeting:** *Homeownership opportunities at Shortstack Milwaukie are being handled by Proud Ground. To apply for homeownership opportunities: Go to the Proud Ground website: <https://www.proudground.org/buying-a-home-with-us>; Review the eligibility criteria; Complete the [Proud Ground Intake Form](#); Complete the screening form & verify your email (1hr limit); and after you have verified your email, please send an email to [info@proudground.org](mailto:info@proudground.org) to request to be placed on the waiting list for Shortstack Milwaukie.*

Comment – Irisa – You guys were great. You did a really good job with your presentations.

Meeting adjourned. Slides to follow.



1

## HACC Moving to Work Program Overview



The Moving to Work (MTW) program is known as **America's Housing Innovation Lab**. **HACC is 1 of 126 housing authorities in the Country that have MTW status (3,300 total housing authorities)**

MTW gives housing authorities the ability to design and implement new innovative programs that traditionally would not be possible

Using this flexibility, HACC can reduce administrative burdens and increase program effectiveness through policy waivers


The MTW community is a collaborative group of housing authorities focused on sharing ideas and finding ways to better serve households in their communities

2

## HACC Designed MTW Asset Building Program


**GOAL 1:**

Help 25 Families purchase a home



**GOAL 2:**

Expand our existing rent reporting program



3

3

# DRAFT

## Goal 1: Home Ownership Savings Accounts

**Home Savings Account**

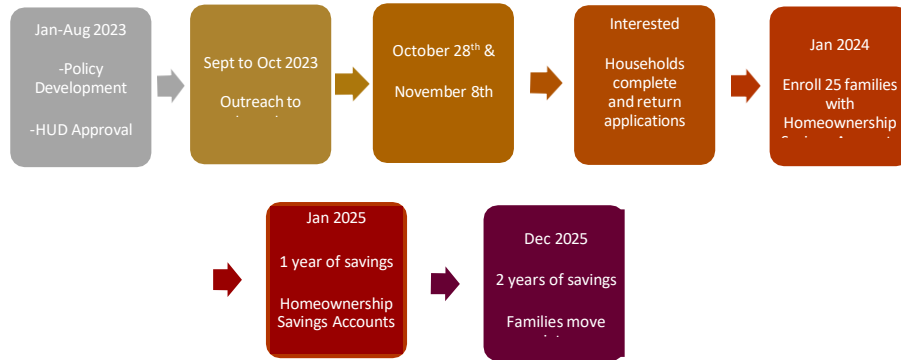
- HACC deposits \$350/month over 24 months
- Funds to be used toward purchasing a home (down payment, closing costs)

**Enroll 25 eligible families**

- Highly motivated to own a home
- Currently participating in the IDA match savings or Family Self Sufficiency program
- Income \$40,000/year or more; Debt less than \$40,000
- Working towards a credit score of 700+
- Agree to complete financial education & homeownership classes
- Agree to meet quarterly with HACC staff to work on homeownership goals

4

## Home \$AVINGS Program TIMELINE



5

5

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## Pathways to Home Ownership



Community Land Trust



Traditional Market Rate Homeownership



Purchase a Scattered Site Home (CLT or traditional)

6



## Goal 2: Expand Rent Reporting Program

- **64** Residents report
- **66%** of residents with improved credit
- **33+** average credit point increase
- **14%** of residents credit score moved from subprime to prime

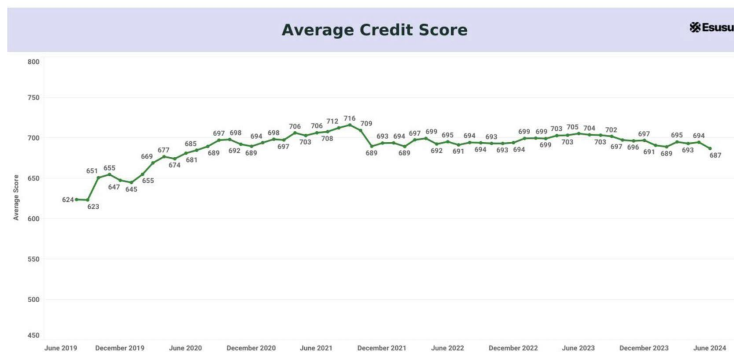
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## Rent Reporting Outcomes

Date: August 2019 to June 2024



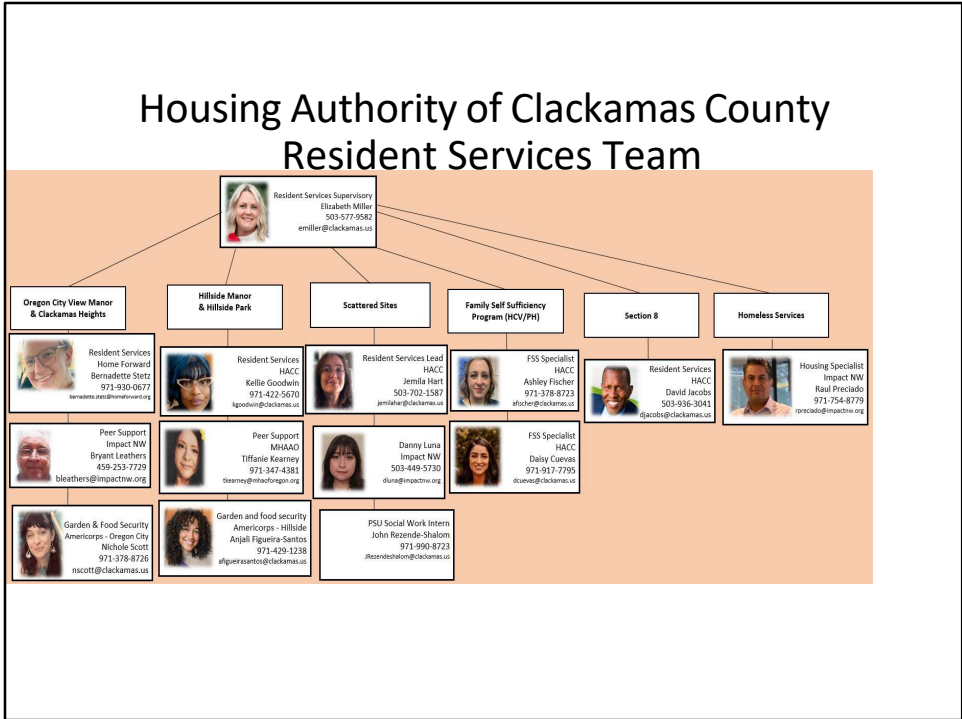
Current Average Credit Score:

**687**

**33**

Average Credit Score Improvement:

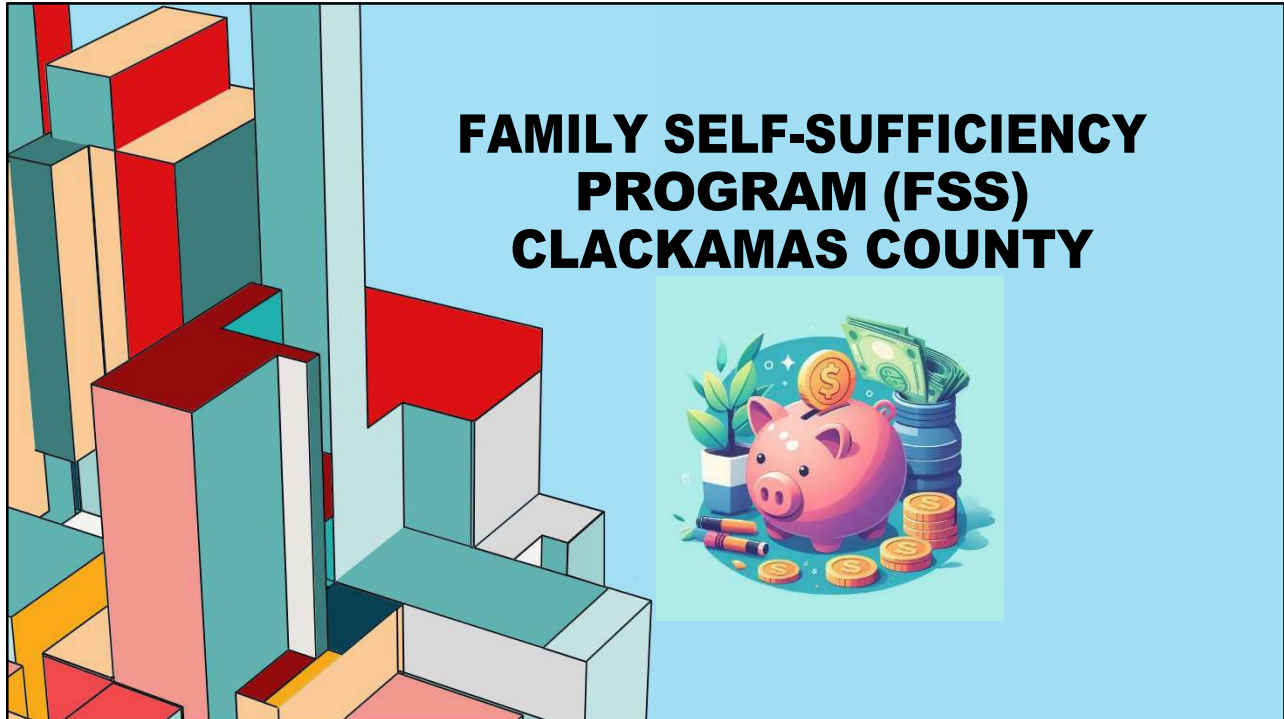
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FSS Program Slides from RAB meeting 1/22/2025

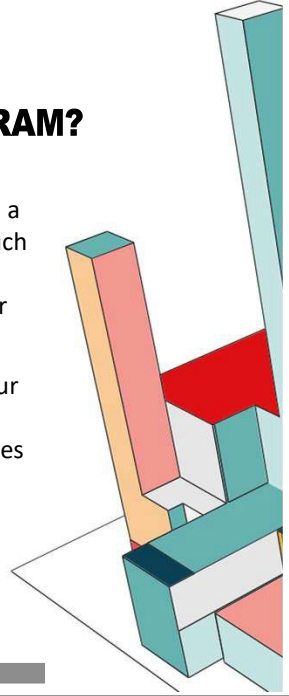


1

## WHAT IS THE FAMILY SELF-SUFFICIENCY PROGRAM?



- Participants in the FSS program work with a case manager to set personalized goals, such as securing employment, improving education, savings for a home purchase or increasing savings.
- The FSS Coordinator plays a vital role in our community by fostering relationships and assisting participants in navigating resources to achieve their personalized goals within our beautiful community.
- 5-year voluntary program.



2

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## ESCROW SAVINGS

As participants increase their income, the additional rent payments they would otherwise owe are deposited into an interest-bearing escrow account.

EXAMPLE: Betty Smith

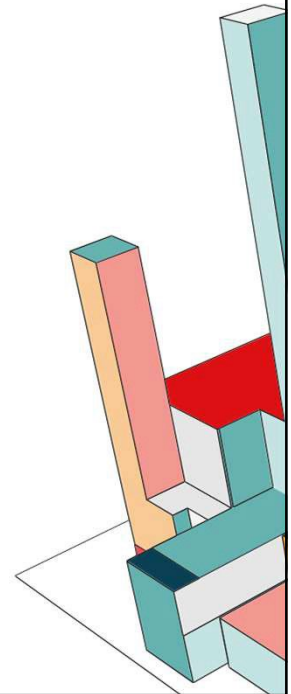
Current rent: \$100

FSS Program: \$500

\$400 Escrow monthly savings

### **I am not working right now; can I still sign up for FSS?**

Yes, actually households with Zero income will get the most out of the escrow when they start earning income.



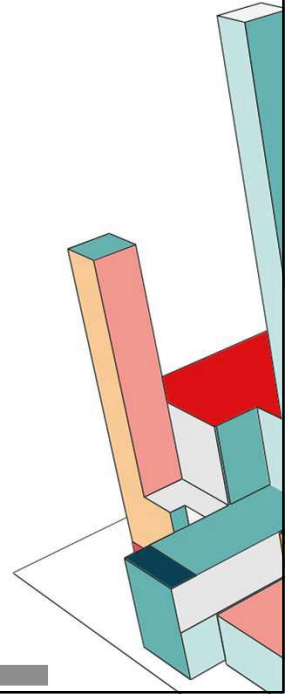
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## HOW DO YOU GRADUATE SUCCESSFULLY FROM FSS?

- The Head of Household will have completed the four or five goals that they wanted to focus on when they enrolled in the program (listed on their ITSP).
- The household cannot be receiving Welfare Assistance (TANF) for the 12-consecutive months prior to graduation
- The Head of Household will need to be full-time employed based on education, training and experience.

## Will Participating in the FSS Affect my housing assistance?

No, you will continue receiving housing assistance whether or not you complete the program. You have nothing to loss and a lot to gain by participating.



4

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## THANK YOU

Daisy Cuevas

Family Self-Sufficiency Coordinator

971-917-7795

[Dcuevas@clackamas.us](mailto:Dcuevas@clackamas.us)

Ashley Fischer

Family Self-Sufficiency Coordinator

971-378-8723



5

Development Update slides from RAB meeting 1/22/25



## HACC Development Update

1

# DRAFT

## 2024 Highlights - Year in Review

### Metro Bond Milestones:

- Mercy Greenbrae Apartments opened - 100 units leased
- Las Flores opened – 171 units leased
- Construction starts on Hillside Park Buildings A, B, & C – 275 units
- Construction starts on Vuela in Wilsonville – 121 units
- Construction starts on Shortstack Milwaukie – 15 homeownership units
- Metro Bond funding for the Clackamas Heights Redevelopment and Hillside Park Buildings D&E projects approved by Housing Authority Board
- Clackamas County on track to exceed Metro Bond unit production goal by 150%

### HACC Repositioning Milestones:

- Clackamas Heights, OCVM, and Scattered Site Section 18 applications approved by HUD
- Tenant Protection Vouchers received for Clackamas Heights and Scattered Sites
- Relocation of Clackamas Heights and Scattered Sites residents begin
- Design and construction teams selected for Clackamas Heights Redevelopment – schematic design is underway with guidance from Resident Advisory Committee

2

## 2025 Look Ahead

### Metro Bond Projects:

- Shortstack Milwaukie (15 units) – construction completion is expected this fall
- Vuela in Wilsonville (121 units) – construction completion is expected in December
- El Nido in Lake Oswego (55 units) – construction expected to start this summer

### HACC Repositioning Projects:

- Hillside Park Buildings A, B, & C – construction completion expected first half of 2026
- Clackamas Heights residents relocating to new homes by end of September 2025
- Clackamas Heights Redevelopment – construction expected to start late fall 2025
- Scattered Site relocation and homeownership sales commence
- Hillside Park Phase 2 relocation to start in fall 2025

3

## Opened in 2024: Mercy Greenbrae Apartments



- 100 units
  - 17 1-BR
  - 61 2-BR
  - 22 3-BR
- 40 units at 30% AMI providing permanent supportive housing
- 60 units at 60% AMI
- Located on the former Marylhurst College Campus in Lake Oswego
- Grand Opening held on July 16, 2024

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## Opened in 2024: Las Flores Apartments



- 171 units
  - 42 1-BR
  - 54 2-BR
  - 66 3-BR
  - 9 4-BR
- 70 units at 30% AMI including 17 units providing permanent supportive housing
- 101 units at 60% AMI
- Located in Oregon City
- Grand Opening held on September 4, 2024

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## In Construction: Hillside Park Buildings A, B, & C

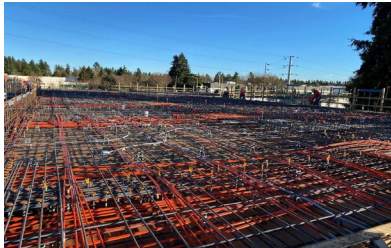


- **Building A** – 92 units
  - 25 Studios
  - 32 1-BR
  - 29 2-BR
  - 6 3-BR
- **Building B** – 83 units
  - 28 Studios
  - 65 1-BR
- **Building C** – 100 units
  - 3 Studios
  - 22 1-BR
  - 75 2-BR
- Completion expected in first half of 2026

6

6

## Under Construction: Vuela



- 121 units
  - 4 Studios
  - 38 1-BR
  - 67 2-BR
  - 12 3-BR
- 35 units at 30% AMI including 20 units providing permanent supportive housing
- 43 units at 60% AMI
- 43 units at 80% AMI
- Located in Wilsonville
- Completion expected in December 2025

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## Under Construction: Shortstack Milwaukie



- Affordable homeownership development
- 15 two-story cottages
- 900sf - 2-bedrooms & 1.5 bath
- Priced for households earning 80% AMI through the community land trust model
- Located in Milwaukie
- Completion expected in October 2025

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## Look Ahead: El Nido



- 55 units
  - 28 1-BR
  - 22 2-BR
  - 5 3-BR
- 20 units at 30% AMI, including 10 PSH
- 34 units at 60% AMI + 1 manager's unit
- Located in Lake Grove neighborhood of Lake Oswego
- Construction expected to begin in May 2025

9

# DRAFT

## Look Ahead: Clackamas Heights/Park Place Redevelopment



- Approx. 217 units
  - 92 1-BR
  - 82 2-BR
  - 30 3-BR
  - 13 4-BR
- 112 units at 30% AMI
- 105 units at 60% AMI
- Utilizes Oregon City's new "cottage cluster" zoning
- Located in Oregon City
- Construction expected to

10

10

## Look Ahead: Hillside Park Buildings D & E



- Approx. 162 units
  - 24 Studios
  - 54 1-BR
  - 50 2-BR
  - 31 3-BR
  - 3 4-BR
- Community garden
- Sports court
- Onsite youth program
- Construction expected to start in late spring or early summer 2026

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# DRAFT

## Clackamas County Metro Housing Bond Progress

**560 UNITS OPEN**

**356 UNITS IN CONSTRUCTION**

**302 UNITS COMMITTED**

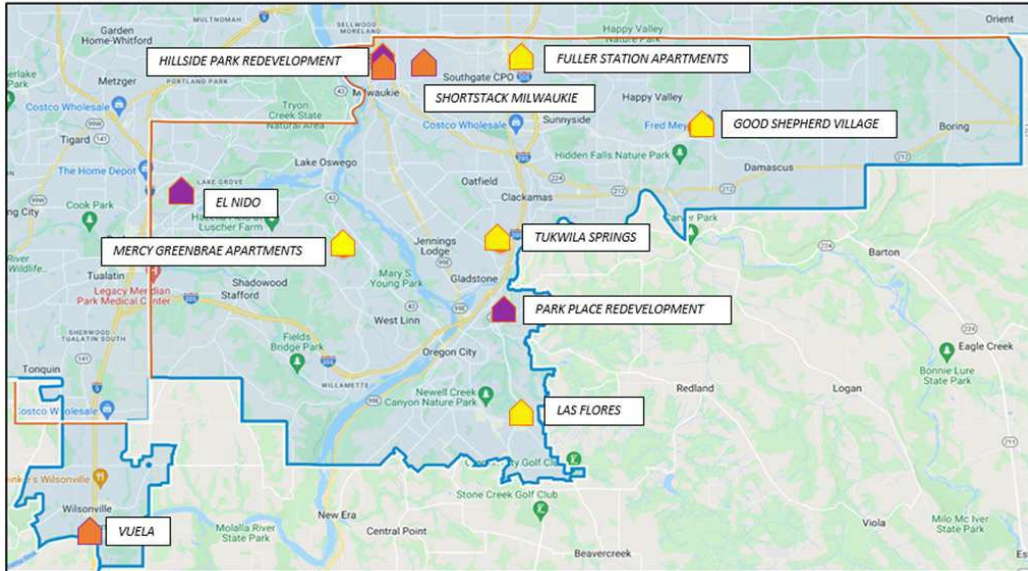
**150% OF TOTAL UNIT PRODUCTION GOAL**

AFFORDABLE HOUSING BOND PRODUCTION	Bond Funded Units	30% AMI or below	Family Size (2BR+)
<b>Clackamas County Production Goals</b>	<b>812</b>	<b>333</b>	<b>406</b>
Tukwila Springs - <b>COMPLETE</b>	48	48	0
Fuller Station Apartments - <b>COMPLETE</b>	99	30	82
Good Shepherd Village - <b>COMPLETE</b>	142	58	79
Las Flores - <b>COMPLETE</b>	171	70	129
Mercy Greenbrae - <b>COMPLETE</b>	100	40	83
Hillside Park Redevelopment - Bldg C - <b>IN CONSTRUCTION</b>	78	68	53
Vuela - <b>IN CONSTRUCTION</b>	120	35	79
Shortstack Milwaukie- Homeownership - <b>IN CONSTRUCTION</b>	15	0	15
Hillside Park Redevelopment - Bldgs A/B - <b>IN CONSTRUCTION</b>	143	40	14
El Nido - <b>CLOSING MAY 2025</b>	54	20	28
Hillside Park Redevelopment - Buildings D&E - <b>CLOSING JUNE 2026</b>	123	0	59
Clackamas Heights Redevelopment - <b>CLOSING NOV 2025</b>	125	112	51
<b>Total Unit Production</b>	<b>1218</b>	<b>521</b>	<b>672</b>
<b>Percent of Total Production Goals</b>	<b>150%</b>	<b>156%</b>	<b>166%</b>

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## Housing Bond Projects in Clackamas County



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## Public Housing Repositioning & Redevelopment

### Estimated Timelines

	Hills de Park Phase 1 54 units	Hillside Park Phase 2 46 units	Clackamas Heights 99 units	Oregon City View Manor 100 units	Scattered Sites 145 units
Section 18 application submitted	Sept 27, 2022	June 26, 2024	June 26, 2024	June 26, 2024	May 21, 2024
Section 18 approval received	June 26, 2023	Expected Q1 2025	October 31, 2024	October 31, 2024	Sept 25, 2024
Tenant Protection Vouchers Received	September 26, 2023	Expected Q2 2025	December 19, 2024	Expected Q3 2026	December 19, 2024
Relocation starts	September 2023	Fall 2025	January 2025	Fall 2026	January 2025
Relocation complete	April 2024	April 2026	September 2025	Q4 2027	Q4 2027
Redevelopment – construction start	July 2024	Spring 2026	Q4 2025	NA	NA
Redevelopment – construction complete	Q2 2026	Q2 2028	Q4 2027	NA	NA

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<p><b>Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)</b></p>	<p><b>U.S. Department of Housing and Urban Development</b>                  Office of Public and Indian Housing                  OMB No. 2577-0226  <b>Expires 3/31/2024</b></p>
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**Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan**

I, Craig Roberts, the Chair certify that the 5-Year PHA Plan for fiscal years 2025-2029 and/or Annual PHA Plan for fiscal year 2025 of the OR001 - Housing Authority of Clackamas County is consistent with the 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 pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

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

The Housing Authority of Clackamas County'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:	<b>Craig Roberts</b>	Title:	<b>Chair</b>
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.

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<b>Certification of Compliance with PHA Plan and Related Regulations</b> <i>(Standard, Troubled, HCV-Only, and High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024
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### 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    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 07/2025, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair

housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

8. For PHA Plans that include a policy for site-based waiting lists:

- The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.

16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.

19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.



- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

**Housing Authority of Clackamas County**

**OR001**

PHA Name

PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2025

   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	<b>Shannon Callahan</b>	Name Board Chairman	<b>Craig Roberts</b>
Signature	Date	Signature	Date

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# PHA Name: Housing Authority of Clackamas County

PHA Code: OR001

MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): 7/1/2025

PHA Program Type: Combined

MTW Cohort Number: Asset Building

MTW Supplement Submission Type: Annual Submission

## B. MTW Supplement Narrative.

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

They are:

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

In the first year of activities, HACC focused on establishing and launching Asset Building MTW cohort activities. With Housing Opportunity Through Modernization Act (HOTMA) effective dates and implementation timelines, HACC requested additional waivers which intersected with HOTMA changes through a mid-year revision of their Annual Plan and MTW Supplement with a plan to implement additional MTW activities by July 1, 2024, in conjunction with HOTMA. Due to the extension of HOTMA implementation timelines, HACC is pushing back implementation timelines of MTW activities that intersect with HOTMA to align with HOTMA implementation.

The MTW Waivers listed below have been previously approved.

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

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

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



n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<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 and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Currently Implementing
<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>*This activity does not require an impact analysis or hardship policy.</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.</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>Implementation began 7/1/24. No issues or concerns have arisen since implementation.</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. No document is attached.</p>
<p><b>Please explain or upload a description of the rent reasonableness determination method.</b></p> <p>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.</p>

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

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

HACC proposes waiving certain provisions of the following policies:

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

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

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

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

Cost effectiveness

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

<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 paused to align with HUD release of new HIP System and 50058 form.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</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); 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>Yes</p>
<p><b>What considerations led the MTW agency to modify the hardship policy?</b></p> <p>Added additional detail to better explain the policy based on feedback from HUD and alignment with Hardship policy requirements set by HUD. Added detail about what constitutes a hardship and how to receive more than the limit of interims. Also adds clarifying language to encompass better explain situations that might lead to a hardship. It better outlines the review of hardship exemptions and process for approval and denial. Language added to clarify that grievances will follow the current HACC program policies and records retention.</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 - This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>Yes</p>

DRAFT

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

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

**What is the recertification schedule?**

Once every three years

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

2 or more

**What is the recertification schedule?**

Once every three years

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

HACC interim policies are as follows:

- i. HACC will conduct an interim at household request, if the household's gross income decreases by 10% or more.
- ii. If utility allowances or flat rent adjustment is made, HACC may process the change without reviewing the household's income.

HACC will conduct no more than 2 interims per year. Households requesting more than 2 interims per year will be asked to file a Hardship exemption from this MTW activity.

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

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

HACC proposes waiving certain provisions of the following policies:

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

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

- i. HACC will conduct an interim if there is an approved rent increase. At such interim, HACC will apply the most current payment standard and utility allowance but will not review household income.
- ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
- iii. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
- iv. An interim will be conducted if a household is reporting a decrease of 10% or more in the household's gross income.
- v. HACC will limit interims to 2 per household per year. If a household would like more than 2 interims per year, HACC will request the household file for a Hardship exemption from this MTW activity.
- vi. Although all income changes are still to be reported to HACC by households in accordance with the Administrative Plan. Interims will not be conducted for increases in earned or unearned income. Increases in income will only be reviewed every three years.
- vii. Households may file a Hardship exemption for this MTW activity in accordance with the agency's MTW hardship policy at any time.

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

Cost effectiveness

<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 only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Other – another specifically defined target population or populations.</p>
<p><b>If Other Selected in Previous Question: Please describe this target population in the text box.</b></p> <p>HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>HACC proposes to apply this policy to all elderly or disabled households on fixed incomes.</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 paused to align with HUD release of new HIP System and 50058 form.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Provided Already</p>
<p><b>What is the recertification schedule?</b></p> <p>Once every three years</p>

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

2 or more

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

HACC interim policies are as follows:

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

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

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

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

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

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

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

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households



<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.</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>Implementation began 7/1/24. No issues or concerns have arisen since implementation.</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 the description of the quality assurance method:</b></p> <p>Following will explain the quality assurance method  HACC will apply the SEMAP standards and methods (SEMAP Indicator 5) to select PBV inspections performed during the year by HACC staff. HACC will conduct Quality Assurance inspections on the selected units to ensure consistency and transparency.  No document is attached.</p>
<p><b>9.a. - Increase PBV Program Cap (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)(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.</p> <p>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.</p> <p>*This activity does not require an impact analysis or hardship policy.</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>Neutral (no cost implications)</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 all properties with project-based vouchers</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>Implementation began 7/1/24 and is currently being applied to new developments. HACC is currently at 18% PBV of total HCV ACC.</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>What percentage of total authorized HCV units will be authorized for project-basing?</b></p> <p>50.00%</p>

<p><b>9.b. - Increase PBV Project Cap (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)(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.</p> <p>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> <p>*This activity does not require an impact analysis or hardship policy.</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>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 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>

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

The MTW activity applies to all family types

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

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

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

Implementation delayed to no later than 1/1/26. HACC expects to PBV 100% of units for a property in pre-development, not expected to lease until 2027.

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

No

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

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

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

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

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

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

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

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

<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> 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> 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> The MTW activity applies to all properties with project-based vouchers</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>  Implementation began 7/1/24. No issues or concerns have arisen since implementation.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b>  No</p>

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

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

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>			
<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>
2025	\$1,103,536.00	\$764,290.00	\$339,246.00	2033-09-30
2024	\$2,446,668.00	\$2,446,668.00	\$0	2032-09-30
2023	\$1,680,824.00	\$1,680,824.00	\$0	2031-09-30
2022	\$0	\$0	\$0	2030-09-30
2021	\$0	\$0	\$0	2029-09-30

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

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>	
<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?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

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

DRAFT

<b>H.</b>	<b>Public Comment</b>
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Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

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

<b>I.</b>	<b>Evaluations.</b>
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No known evaluations.

<p><b>E.</b></p>	<p><b>Cohort Specific Waiver (previously approved – updated for 2025)</b></p>
<p><b>(a)</b></p>	<p><b>Savings account deposits for downpayment assistance for Homeownership</b>  <b>Name of activity: Matched Savings Homeownership Account – Cohort Specific Waiver</b>  <b>A full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice)</b></p> <p>As an MTW-designee under the Asset Building cohort, HACC has elected to implement a PHA Designed asset building activity titled Home Savings Homeownership Program. The primary goal of the Savings Account Component of the HACC’s proposed asset building initiative is to provide a savings for families enrolled in the Home Savings Program to be able to put funds towards the purchase of a home.</p> <p>In 2021, HACC started the environmental review process required to dispose of its 145 scattered sites. HACC’s scattered site portfolio consists of 2-, 3-, and 4-bedroom units in single-family homes, duplexes, triplexes, and 4-plexes throughout the County. These units can be up to thirty-five (35) miles apart from each other and each unit costs an average of \$2,000 more to operate than other units in the Public Housing portfolio. HACC is looking at disposing/selling a portion of the single-family scattered sites as affordable homes under a Community Land Trust (CLT) model. Through CLT, homeownership is more affordable than traditional homeownership, making it accessible to families with lower incomes.</p> <p>HACC’s timeline of the disposition and relocation of the scattered site portfolio aligns with the 24-month reporting period for the Home Savings Program 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.</p> <p>HACC will partner with Proud Ground, DevNW and Habitat for Humanity, who were selected based on their ability to provide homeownership education and assistance, offered to lower income families as well as their experience with helping lower income families with homeownership through a Community Land Trust model. Each household enrolled in the Home Savings Program will enroll in the program for 24-months. HACC will deposit \$350 per month into an account that HACC owns and manages for twenty-four (24) months.</p> <p>HACC also plans on expanding its existing “Rent Reporting for Credit Building” program as part of the PHA designed asset building design. The expansion will be focused on properties that HACC has some ownership in, that is third party property managed, that houses voucher holders.</p> <p>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.</p> <p>Per HUD PIH Notice 2022-11, the “opt-out” aspect of this savings account program will require HACC to waive certain provisions of the following regulations: sections 23(b)-(f), and (n)(1) of the 1937 Act and 24 CFR 984.101-105, 984.201-204, 984.301-306 and 984.401.</p> <p>PIH Notice 2022-11 also lists the Safe Harbors required for the opt-out savings account, which include:</p> <ol style="list-style-type: none"> <li>i. The PHA must continue to follow all requirements of 2 CFR part 200.</li> <li>ii. 24 CFR 984.305(a) on accounting and reporting must be retained.</li> <li>iii. The PHA must contribute at least \$10 per month for the benefit of each assisted household participating in the savings program.</li> <li>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.</li> <li>v. The PHA must provide an opportunity for households to opt-out of this activity.</li> </ol>

### **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:

- Interest in homeownership in general
- Currently participating in the IDA homeownership matched savings program
- Household income above \$30,000/year
- Debt less than \$40,000
- Credit Score of 700 or more, or actively working on getting it above 700
- Completion of Financial Foundations and Homebuying workshops offered through Dev NW.
- 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**

HACC estimates that this program will cost \$210,000 over two (2) years. These funds will come from HACC's HCV Housing Assistance Payment reserves.

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

HACC began enrolling families on January 1, 2024.

### **An impact analysis**

Agency finances – No projected impact to agency finances; funds will come from HUD-held agency HAP reserves.

Affordability of housing costs – No projected impact.

Agency waitlist – No projected impact.

Termination rate – No projected impact.

Occupancy / Utilization – No projected impact.

MTW Statutory Goals – This activity will help families become self-sufficient

Statutory Requirements – No projected impact.

Hardship requests – No projected impact.

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



**Housing Authority of Clackamas County (OR001)**  
**Additional information on Cohort Activity –**  
**Expansion of Existing Credit Reporting Program**  
**(Previously Approved)**

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

**Housing Authority of Clackamas County (OR001)**  
**IMPACT ANALYSIS for MTW Waivers 3.a and 3.b**  
**(Previously approved)**

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

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

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

*Definitions Used in this Analysis*

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

*Impact Analysis Method*

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

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

Answers to the standard HUD impact analysis questions identified in the MTW Operations Notice were derived from these analyses. Note that HACC does not anticipate the policy changes to have a negative impact on any specific households. Therefore, HACC measured the positive impact to identify cases where certain groups were impacted more positively than others. The analysis confirmed that there will not be a negative impact to the families currently on program. However, the analysis also shows that fewer families may be able to be served in the future due to these changes.

**RESULTS**

**Financial Impact to the Agency**

Based on its analysis, HACC determined that this policy change will have a negative impact to

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

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

Population	Scenario	Formula
Elderly/Disabled on Fixed Income	Triennial	
Households with Earned Income	Annual	
Households on TANF	Annual	
Households with Zero Income	Annual	
Other Work Able Households	Annual	
<u>Triennials</u>		
- 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	$(g1 + h1)/3 - i1 - j1$
<u>Agency Impact</u>		
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.

#	Question	Answer	
5	Impact on the agency's ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	HACC will continue to use its current admissions policies, ensuring that this requirement is met.
		2. Establish a reasonable rent policy that encourages employment and self-sufficiency	While this policy is not a rent change policy, HACC believes that allowing households to increase their income without an impact on rent will encourage households to increase their income.
		3. Continue to assist substantially the same number of households	With a reduction in HAP, HACC will be able to serve fewer households. The agency will still meet its STS requirement and the reduction in households served will be offset by administrative efficiencies gained and other MTW policy changes.
		4. Continue to assist a comparable mix of households by family size	This policy will not have an impact on the household size of households served, although the analysis has shown that larger households will see more benefit from this policy change than small households.
		5. Meet Housing Quality Standards requirements	This policy change will not have any impact on HQS.
6	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	HACC does not anticipate any hardships as a result of this policy change as it will not have a negative impact on household's rent or utility payments.	

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

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

# **Housing Authority of Clackamas County (OR001)**

## **MTW HARDSHIP POLICY**

**(Previously approved)**

### **PURPOSE OF HARDSHIP POLICY**

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

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

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

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

### **ELIGIBILITY FOR A HARDSHIP EXEMPTION**

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

Exceptions to this policy include the following circumstances:

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

### **SUBMISSION OF A HARDSHIP EXEMPTION**

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



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

## **PROCESS FOR AGENCY REVIEW AND DETERMINATION**

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

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

## **HOUSEHOLD NOTIFICATION**

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

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

## **GRIEVANCE PROCEDURE**

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

## **RECORDS RETENTION**

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2025), 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.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and 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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies for the MTW PHA's jurisdiction and a description of the way the MTW Supplement is consistent with the applicable Consolidated Plan (24 CFR 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. 24 CFR 5.151. The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (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 the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), 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' for people with physical disabilities.
- (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 and should be made available electronically, upon request.

DRAFT

Housing Authority of Clackamas County

OR001

***MTW PHA NAME***

***MTW PHA NUMBER/HA CODE***

*I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).*

Craig Roberts

Chair

***NAME OF AUTHORIZED OFFICIAL***

***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 & MTW  
Supplement

}

Resolution No. \_\_\_\_\_  
*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 10, 2025; 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 22, 2025; and

**Whereas**, the Annual Plan and its attachments including the MTW Supplement drafts were made available for public review and comment from January 27, 2025 through March 16, 2025, 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 20, 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 & MTW  
Supplement

}

Resolution No. \_\_\_\_\_  
*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, 2025, at least 75 days prior to the effective date of July 1, 2025.

**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 Craig Roberts, 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, 2025.

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

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

\_\_\_\_\_  
Chair

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

## Attachment O:

### Public Notice & Comments

#### Public Notice – January 10, 2025

##### **Housing Authority of Clackamas County – FY 2025-26 Annual Plan & Moving to Work Supplement**

A resident meeting to review the Plan & Supplement is scheduled for 1/22/25 at 10am via Zoom <https://clackamascounty.zoom.us/j/85438915470?pwd=GqxXTgMANPpiQmbXLRr4GWQHp3mQA.1> Resident Advisory Board members and residents are encouraged to attend. In addition, a Public Hearing is scheduled for 2/20/25 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, any scheduling changes, registration and additional information can be found at <https://www.clackamas.us/bcc#weeklyschedule> closer to the meeting date. 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 1/27/25-3/16/25 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.

**The Public Hearing meeting was rescheduled to 2/13/25. This change was shared with the Resident Advisory Board at their meeting and is posted on the website.**

**DRAFT**

#### Public Comments from Public Hearing on February 13, 2025

Video of the hearing can be found at: [Add link to video](#)

[ADD Comments from Public Hearing](#)