

CLACKAMAS COUNTY BOARD OF COUNTY COMMISSIONERS

Study Session Worksheet

Presentation Date: 3/18/14 **Start Time:** 10:00 am **Approx. Length:** 15 min.
Presentation Title: Housing Authority FY 2014 Annual Plan Public Hearing Study Session
Department: Housing Authority of Clackamas County (HACC)
Presenters: Cindy Becker, Chuck Robbins
Other Invitees: Mary Rain O'Meara

WHAT ACTION ARE YOU REQUESTING FROM THE BOARD?

HACC is seeking Board approval to hold a Public Hearing on the Housing Authority FY 2014 Annual Plan.

EXECUTIVE SUMMARY:

The Housing Authority of Clackamas County submits a plan annually to the U.S. Department of Housing and Urban Development (HUD). Known as the Annual Public Housing Authority (PHA) plan, this required document provides an annual update to HUD (U.S. Department of Housing and Urban Development) regarding the Housing Authority's policies, rules, and requirements concerning its operations, programs and services.

Per the requirements of the Quality Housing and Work Responsibility Act (QHWRA) of 1998, this Annual Plan was developed in consultation with the Resident Advisory Board (RAB). The RAB is made up of residents from Public Housing and Section 8 programs. The RAB met on January 14th, 2014 to review the Annual Plan. On January 3rd, 2014, HACC published a public notice opening the Annual Plan for public review and comments from January 23rd, 2014 through March 10th, 2014. The Annual Plan was made available at the HACC Administrative Office, HACC Property Management Offices, Clackamas County Oak Grove Library, and was posted on HACC's website.

The public hearing will satisfy HUD's requirement that the public be given an opportunity to make final comments before Board of County Commissioners. The BCC and HACC staff may take any comment into consideration and make potential alterations to the plan before the Board's final approval.

Upon BCC approval HACC staff will submit the Annual Plan to HUD for review no later than April 17th, 2014. HUD has 75 days for review and final acceptance of the plan, which is effective as of July 1st, 2014.

FINANCIAL IMPLICATIONS (current year and ongoing):

Approval of the Annual Plan by the BCC and HUD allows for continued and renewed funding to be received for program operations at the Housing Authority.

LEGAL/POLICY REQUIREMENTS:

This public hearing is part of the HUD required citizen participation process described in 24 CFR Part 91.105. Failure to hold a public hearing would result in the loss of the federal funds.

PUBLIC/GOVERNMENTAL PARTICIPATION:

This public hearing concludes the required public participation process as required by HUD for development of the PHA Annual Plan. A Resident Advisory Board meeting was held on January 14th, 2014. This public meeting was followed by a 45 day open comment period that was broadly advertised. Copies of the plan were made available at Housing Authority offices, the Clackamas County Library in Oak Grove, and on the Housing Authority’s web site. No public comments were received during the 45 day period.

OPTIONS:

1. Proceed with the March 20, 2014 Public Hearing.
2. Postpone the Public Hearing.
3. Elect to not hold a public hearing.

RECOMMENDATION:

Recommend Option #1. This is an annual event which allows the to County to access needed federal funds. This date was scheduled to ensure there was adequate time to respond to comments and questions, and if necessary modify the plan. The plan must be submitted to HUD no later than April 17th.

ATTACHMENTS:

Housing Authority FY 2014 Annual Plan

SUBMITTED BY:

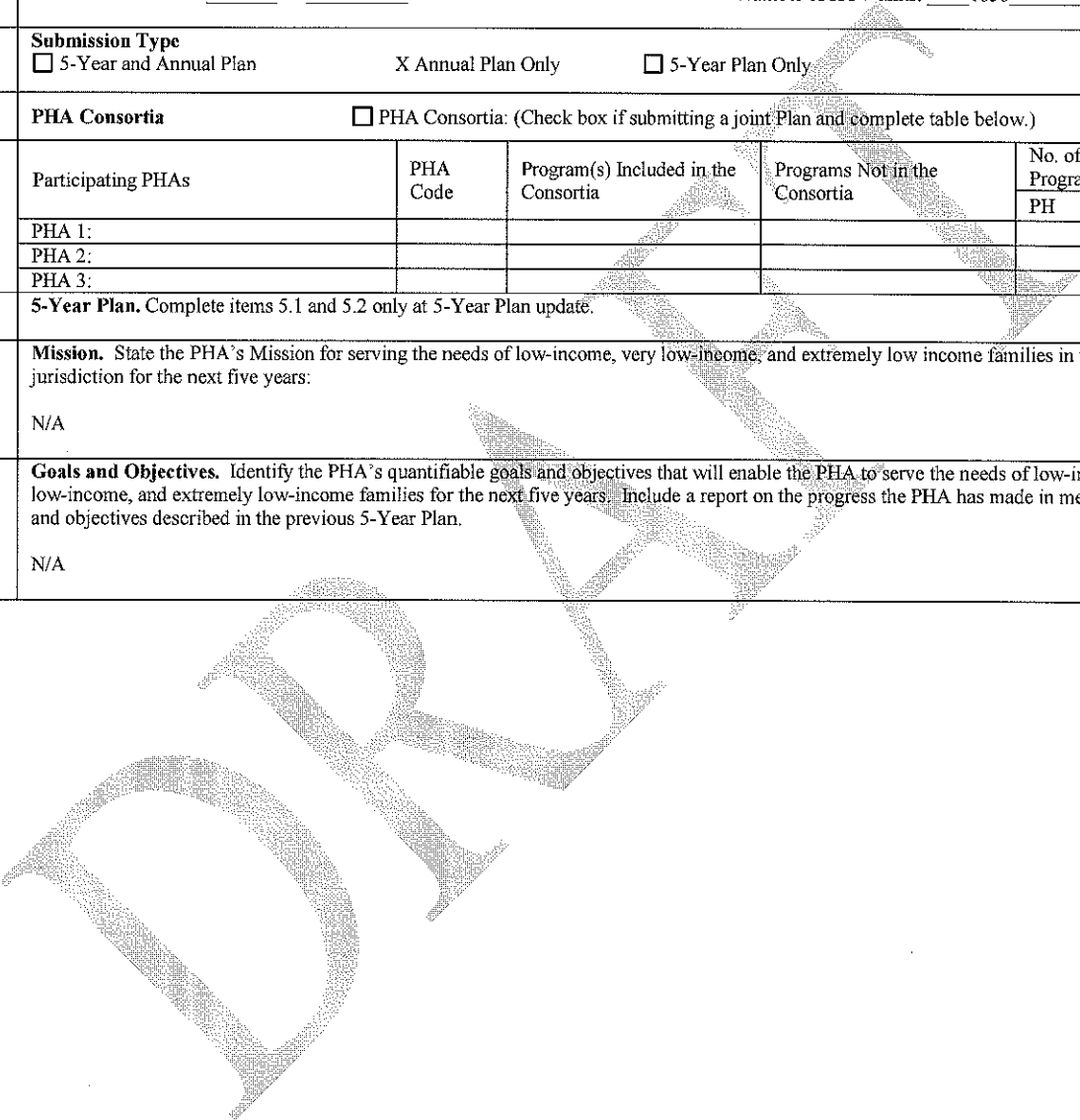
Division Director/Head Approval _____
Department Director/Head Approval _____
County Administrator Approval _____

Cindy Becker (Handwritten signature)

For information on this issue or copies of attachments, please contact Cindy Becker @ 503-650-569

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: <u>Housing Authority of Clackamas County</u> PHA Code: <u>OR001</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing <input type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>07/2014</u>				
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: <u>545</u> Number of HCV units: <u>1630</u>				
3.0	Submission Type <input type="checkbox"/> 5-Year and Annual Plan <input checked="" type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only				
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)				
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program PH HCV
	PHA 1:				
	PHA 2:				
	PHA 3:				
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.				
5.1	Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years: N/A				
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. N/A				



PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

Housing Authority of Clackamas County (HACC) Agency-Wide Updates

- 1) A new Advisory Board known as the "Clackamas Housing Advisory Board" will be formed in 2014 to advise the Housing Authority Board of Commissioners. The Board will advise on policy matters, housing issues, and programs and services for the low and moderate income residents of Clackamas County.
- 2) HACC may submit a Move to Work (MTW) application in FY 2014.
- 3) HACC has made a preliminary award of Project Based Vouchers to a project awarded under the Request for Proposals (RFP) for Supportive Housing issued in March 2013. HACC will implement a Housing Assistance Payment (HAP) contract with the project after final HUD approval is received. 20 Project Based Vouchers will be provided to units at Chez Ami (owned by Central City Concern).
- 4) HACC is a partner in the regional "Housing Works" Department of Labor grant which provides employment and training opportunities for residents of the Public Housing and Housing Choice Voucher programs. Program implementation will continue through October, 2015.
- 5) HACC will continue to implement its fair housing activities in FY 2014. These will include continuation of the landlord newsletter and training program, small area rents, turn back analysis, Limited English Proficiency access to documents, and updating the list of Clackamas County Accessible units.
- 6) HACC will issue a Request for Proposals (RFP) for housing development in FY 2014. Public Housing disposition funds and Project Based Vouchers will be included as HACC resources to award under this RFP.
- 7) HACC anticipates converting Shelter plus Care (S+C) Vouchers to sponsor-based in FY 2014. This will tie the vouchers to specific housing providers and properties.

6.0

Housing Choice Voucher Updates

- 1) HACC received renewed funding for 1.5 FTE FSS staffing.

Administrative Plan Policy Changes:

See **Attachment A** for a summary of Administrative Plan changes.

Public Housing/Asset Management Updates

1. In FY 2014, HACC will be opening up to six of its eighteen waiting lists, following a purge of the lists to determine applicants who are still interested in remaining on the waiting list.
2. HACC has appointed a new Resident Advisory Board.
3. HACC has updated its Admissions and Continued Occupancy Policy (ACOP). The update includes HUD mandated regulatory changes, clarifications, and the addition of a \$50.00 minimum rent. See **Attachment B** for the HACC policy on the \$50.00 minimum rent.

Development Updates

HACC will complete the renovation of the Easton Ridge Apartments in June 2014. The project will convert to permanent financing in October 2014. The complex will operate as a Low Income Housing Tax Credit (LIHTC) property for the next 15 years.

6.0

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

- Housing Authority Administrative Office, 13930 S Gain Street, Oregon City, OR
- Housing Authority Clackamas Heights Property Management Office, 13900 S Gain Street, Oregon City, OR
- Housing Authority Hillside Property Management Office, 2889 Hillside Court, Milwaukie, OR
- Housing Authority Website: <http://www.clackamas.us/hacc>
- Clackamas County Public Library located at 16201 S.E. McLoughlin, Oak Grove, OR

7.0	<p>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i></p> <p>1. HACC has made a preliminary award of Project Based Vouchers to a project awarded under the Request for Proposals (RFP) for Supportive Housing issued in March 2013. HACC will implement a Housing Assistance Payment (HAP) contract with the project after final HUD approval is received. 20 Project Based Vouchers will be provided to units at Chez Ami (owned by Central City Concern).</p> <p>2. HACC anticipates continuing its efforts to identify Mixed Finance Modernization or Development opportunities which could include the Rental Assistance Demonstration (RAD) program, and a combination of public housing and Project Based Section 8/Low Income Housing Tax Credit (LIHTC) units.</p> <p>3. HACC anticipates submitting an Inventory Removal Application to HUD's Special Applications Center (SAC) in FY 2014 for approval to sell up to 145 scattered site public housing units in addition to the 21 that HACC already has SAC approval to sell.</p> <p>4. HACC does not anticipate a Homeownership program in FY 2014. Referrals to community organizations that provide home ownership assistance will be made by HACC resident services staff.</p> <p>5. HACC anticipates using Project Based Section 8 vouchers in FY 2014.</p> <p>6. HACC will issue a Request for Proposals (RFP) for housing development in FY 2014. Public Housing disposition funds and Project Based Vouchers will be included as HACC resources to award under this RFP.</p>
8.0	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable. N/A per 24 CFR Parts 903, 905, 941, <i>et al.</i></p>
8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing. N/A per 24 CFR Parts 903, 905, 941, <i>et al.</i></p>
8.2	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. N/A per 24 CFR Parts 903, 905, 941, <i>et al.</i></p>
8.3	<p>Capital Fund Financing Program (CFFP). <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements. N/A</p>
9.0	<p>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. See Attachment C: Housing Needs Table and Statement of Housing Needs</p>
9.1	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan. N/A</p>

10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.</p> <ul style="list-style-type: none"> • HACC continues to participate in the Clackamas County Homeless Council. In this capacity, HACC continues to apply for and receive Continuum of Care funds for the Shelter plus Care (S+C) program and the Jannsen Transitional Housing Program. • HACC has achieved a High Performer rating on its Section Eight Management Assessment Program (SEMAP). • HACC continues to be a High Performer in Public Housing. • HACC continues to use its Easton Ridge property to further provide affordable housing. Easton Ridge currently accepts Section 8 Vouchers, Shelter + Care and VASH participants. • HACC continues to apply for and receive grant funding for 1.5 FTE housing choice voucher family self-sufficiency coordinators. • HACC utilized 100% of its HCV Housing Assistance grant. • HACC has consistently maintained high occupancy rates at 95% or greater in an efforts to serve those on the waitlist as quickly as possible. <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"</p> <p>Discretionary changes (changes which are not mandated by regulation) in the plans or policies of the HACC which fundamentally change the mission, goals, objectives, or plans of the agency and which require formal approval of the Board of Housing Authority Commissioners. Discretionary changes include Capital Fund items that have a total expense in excess of \$250,000 in any single year.</p>
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11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights)</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.</p> <p>(g) Challenged Elements</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>
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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

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

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing, and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.

3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.

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

5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.

6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).

8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.
13. **Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) **Hope VI or Mixed Finance Modernization or Development.**
 - 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.
- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>

- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.

ATTACHMENT A: Summary of Housing Choice Voucher Administrative Plan Policy Changes: 2014

	New Policy Summary	Old Policy Language	New Policy Language	Chapter	Page
1	<i>Family Absence from the Unit:</i> Failure to notify HACC of family absences greater than 21 days can result in termination from the Voucher program.	Did not reference program termination.	For anticipated absences of more than 21 consecutive days, the family must notify the HACC, in writing, within the first week of the absence. Failure to do so can result in termination from the program.	3	3-8
2	<i>Absent Due to Incarceration:</i> Failure to notify HACC of a family member's incarceration that is longer than 30 days can result in termination from the Voucher program.	Did not reference program termination.	If any adult family member is incarcerated for a period of more than 30 consecutive calendar days, that person will no longer be considered a family member. The family is obligated to report this information to HACC and failure to do so can result in a termination from the program. The family must submit a document from the court or institution indicating the length of incarceration.	3	3-9
3	<i>Live-in Aide:</i> A current member of a household's family cannot become a live-in aide.	Did not reference current family members.	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.	3	3-10
4	<i>Preference Vouchers:</i> Reduction in the maximum	- Shelter Plus Care : 20	- Shelter Plus Care : 7 vouchers - Bridges to Housing: 10 vouchers	4	4-9 -

	<p>amount of preference vouchers that will be issued to:</p> <ul style="list-style-type: none"> - Shelter Plus Care Participants - Bridges to Housing Participants - Transitional Housing referrals - Victims of Domestic Violence 	<p>vouchers</p> <ul style="list-style-type: none"> - Bridges to Housing: 35 Vouchers - Transitional Housing: 20 vouchers - Victims of Domestic Violence: 24 vouchers 	<p>- Transitional Housing: 15 vouchers</p> <p>- Victims of Domestic Violence: 20 vouchers</p>		4-12
5	<p><i>Preference Vouchers:</i></p> <p>Removal of preference voucher categories for:</p> <ul style="list-style-type: none"> - Medical absences greater than 180 days - SHP Permanent Supportive Housing Project - 10% of all vouchers targeted at victims of domestic violence - WICCO Adult Ex-Offenders grant 	n/a	n/a	4	4-9 - 4-12
6	<p><i>New Family and Household Members Requiring Approval:</i></p> <p>HACC is limiting which adults can be added to the household after initial eligibility. Only spouses of the Head of Household and Live in Aides for elderly or disabled family members will be allowed.</p>	n/a	<p>HACC will only allow the addition of adults after initial eligibility if:</p> <ul style="list-style-type: none"> • If it is in a spousal-type relationship with head of household only • If to provide live-in care for an elderly or disabled family member <p>Otherwise, HACC will not approve the addition of adults if not part of the household at initial</p>	11	11-7

				eligibility, if not included in portability documents or if not permitted as specifically identified above. This means HACC will not add parents, siblings, cousins, aunts, uncles, adult children, and any others.		
7	<i>Terminations due to Insufficient Funding:</i> Added criteria for terminating households who have ported outside the jurisdiction as the second in line for termination due to insufficient funding.	n/a		Households porting outside the jurisdiction will be the second households terminated and they will be terminated on a "first-on, first-off" basis (i.e. starting with families that have been on the program the longest) up to the number of terminations determined by the PHA to alleviate the insufficient funding issue. The PHA will notify the receiving PHA and the household of the ability to be absorbed to avoid termination.	12	12-8
8	<i>Scheduling an informal hearing:</i> Added a policy regarding families who do not show up for a hearing. All fees and expenses related to the hearing will be charged back to the family.	n/a		If a family is a "no show" to a hearing it requested and HACC will charge the family for all fees and expenses incurred in conjunction with the hearing (including, without limitation, fees and expenses associated with the review of your hearing request, hearing preparation, attending the hearing and all matters related thereto). Those fees and expenses (i.e., your debt to HACC) will then be listed in the Enterprise Income Verification (EIV) national database of debts owed to a Public Housing Authority. In order to remove a family's name from the EIV, the family must pay the full balance of any such debt in addition to any other debt that may have existed.	16	16-12
9	<i>Advertising for Project Based Vouchers:</i>	-Required HACC to		- HACC will advertise its request for proposals (RFP) for existing housing in the Oregonian. In	17	17-5 -

17-8		<p>addition, HACC will post the notice inviting such proposal submission and the rating and ranking procedures on its web site.</p> <ul style="list-style-type: none"> - HACC may periodically advertise that it is accepting proposals, in the Oregonian and on its website. - Within 30 business days of HACC making the selection, HACC will notify the selected owner in writing of the owner's selection for the PBV program. - In addition, HACC will publish its notice for selection of PBV proposals on its website. The announcement will include the name of the owner that was selected for the PBV program. 		<p>advertise in the Daily Journal of Commerce</p> <ul style="list-style-type: none"> -Required HACC to advertise for three consecutive weeks -Required HACC to notify selected owners within 10 days of making a selection - Required HACC to publish a notice of selection for PBV units in newspapers and trade journals. -Required HACC to execute the HAP contract within 10 business days of passing the HOS. -Indicated that 	
10				<p><i>Execution of the HAP contract:</i> Changed language to the timeframe of execution for the HAP contract.</p>	
11	17	<p>HACC will not provide vacancy payments to the</p>			17-

	<p><i>PBV units:</i> Changed language regarding vacancy payments to owners of PBV units. HACC will not make vacancy payments to these units.</p>	<p>HACC would decide on a case by case basis to pay for vacancy loss of owner.</p>	<p>owner.</p>		<p>24 and 17- 40</p>
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Attachment B

**Housing Authority of Clackamas County
Public Housing
Admissions and Continued Occupancy Plan Updates**

(Updated and Revised Policy Effective 7/1/2014 Noted in Italics)

PART III: CALCULATING RENT

6-III.A. OVERVIEW OF INCOME-BASED RENT CALCULATIONS

The first step in calculating income-based rent is to determine each family's total tenant payment (TTP). Then, if the family is occupying a unit that has tenant-paid utilities, the utility allowance is subtracted from the TTP. The result of this calculation, if a positive number, is the tenant rent. If the TTP is less than the utility allowance, the result of this calculation is a negative number, and is called the utility reimbursement, which may be paid to the family or directly to the utility company by HACC.

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for a tenant family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by HACC

HACC has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B.

Welfare Rent [24 CFR 5.628]

HACC Policy

Welfare rent does not apply in this locality.

Minimum Rent [24 CFR 5.630]

HACC Policy

The minimum rent for this locality is \$50.00.

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

HACC Policy

The financial hardship rules apply in this jurisdiction because HACC has established a minimum rent of \$50.00.

Overview

If the HACC establishes a minimum rent greater than zero, HACC must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the TTP is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.*

PHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.*

PHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.*
- (4) A death has occurred in the family.*

PHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

- (5) The family has experienced other circumstances determined by the PHA.*

PHA Policy

Attachment B

The PHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

PHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less.

Long term hardship is defined as a hardship expected to last more than 90 days.

The PHA may not evict the family for nonpayment of minimum rent during the 90-day period beginning the month following the family's request for a hardship exemption.

When the minimum rent is suspended, the TTP reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption	
<i>Assume the PHA has established a minimum rent of \$50.</i>	
TTP – No Hardship	TTP – With Hardship
<i>\$0 30% of monthly adjusted income</i>	<i>\$0 30% of monthly adjusted income</i>
<i>\$15 10% of monthly gross income</i>	<i>\$15 10% of monthly gross income</i>
<i>N/A Welfare rent</i>	<i>N/A Welfare rent</i>
<i>\$50 Minimum rent</i>	<i>\$50 Minimum rent</i>
<i>Minimum rent applies. TTP = \$50</i>	<i>Hardship exemption granted. TTP = \$15</i>

PHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the HACC determines there is no financial hardship, HACC will reinstate the minimum rent and require the family to repay the amounts suspended.

Attachment B

For procedures pertaining to grievance hearing requests based upon the HACC's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

HACC Policy

HACC will require the family to repay the suspended amount within 30 calendar days of the HACC's notice that a hardship exemption has not been granted.

Temporary Hardship

If HACC determines that a qualifying financial hardship is temporary, the PHA must reinstate the minimum rent from the beginning of the first of the month following the date of the family's request for a hardship exemption.

The family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

For procedures pertaining to grievance hearing requests based upon the PHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

HACC Policy

HACC will enter into a repayment agreement in accordance with the PHA's repayment agreement policy (see Chapter 16).

Long-Term Hardship

If HACC determines that the financial hardship is long-term, HACC must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

HACC Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.*
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.*
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.*

Attachment C Housing Needs Tables

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.

Housing Needs of Families on the Waiting List: Housing Choice Voucher and Public Housing		
	# of Families	% of Total Families
Waiting List Total	2775	
Extremely Low Income <= 30% of AMI	2396	86%
Income >30% but <=50% of AMI	351	13%
Income >50% but <80% of AMI	28	1%
Elderly	450	16%
Individuals with Disabilities	1043	38%
White (non-Hispanic)	2310	83%
Black (non-Hispanic)	279	10%
Hispanic (all races)	181	7%
Native American (non-Hispanic)	72	3%
Asian/Pacific Islanders (non-Hispanic)	102	4%
Characteristics by Bedroom Size (Public Housing Only)		
0 BR	0	
1 BR	392	
2 BR	412	
3 BR	276	
4 BR	50	

**Housing Needs of Families Below 80% Area Median Income
Clackamas County**

Reflects 2010 American Community Survey Census data unless otherwise noted.

Family Type*	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Location
Income <= 30% of AMI	10,373	5	5	4	2	3	4
Income >30% but <=50% of AMI	6,704	4	4	3	2	3	3
Income >50% but <80% of AMI	12,239	3	3	2	2	2	2
Elderly**	14,621	4	2	2	3	2	2
Families with Disabilities- Total Population***	14,258	4	4	3	4	3	3
White (non-Hispanic)	24,408	4	4	3	2	3	3
Black (non-Hispanic)	350	4	4	3	2	3	4
Hispanic (all races)	2579	4	4	3	2	3	4
Native American (non-Hispanic)	328	4	4	3	2	3	4
Asian/Pacific Islanders (non-Hispanic)	737	4	4	3	2	3	4

* The Clackamas County average family size of 3 was used to for baseline AMI data.

** Elderly is defined as 65 years and over.

*** Disability Status Reflects American Community Survey 2009 Data

ATTACHMENT D

HACC Annual Plan 2014

1.15.14 RAB MEETING

Meeting Notes

10:00-10:15 Welcome and Introductions

Chuck Robbins

- Community Development Notice

Mark Sirois

- The Housing Authority and Community Development are now under one division known as "Housing and Community Development". The two agencies are exploring ways to streamline and combine their planning efforts to be more efficient and garner more community input.

Q: Why are the planning efforts being combined?

A: (Chuck Robbins) It makes sense for us to gather information once rather than have multiple efforts and meetings trying to get the same information. We also get better planning and projects when we increase the amount of input and citizens involved in the process.

- Information regarding Community Development planning and opportunities for resident engagement will be sent out to the RAB.

10:15-11:15 Plan Updates

- Agency-Wide Updates

Mary-Rain O'Meara

Q: Regarding award of project based vouchers to Chez Ami, why is the focus not on creation of new PBV units?

A: (Chuck Robbins) We want to support new development as an agency but there is also a need to provide assistance with affordable housing preservation. These vouchers will allow the Chez Ami property to continue to provide affordable supportive housing opportunities. Without the infusion of PBV, the property would be at risk of closing and we would lose that valuable resource in the county.

- Housing Choice Voucher
Updates

Toni Karter

- Q: #1 and #2 (absence from unit) HCV updates. If someone notifies you of an absence can they still keep their voucher? What if they are incarcerated?

A: (Toni Karter) The rule of thumb is a person can be absent 60 days if they "notify us first". No notification is grounds for termination. If a person is incarcerated, that is not

immediate grounds for termination. It all depends on the preponderance of the evidence, level of crime and length of incarceration.

-Q: #3 (Live In Aide) HCV Updates. If someone is not on the lease to begin with how would they add them?

A: (Toni Karter) They must submit a reasonable accommodation request showing a verified disability and need for a live-in-aide and the live-in-aide must pass a criminal background screening

-Q: #4 (Preference Vouchers) HCV Updates. How does someone qualify for a preference voucher?

A: (Toni Karter) You would have to be in one of the 16 preference voucher categories and be referred by a service provider.

-Q: #4 (Preference Vouchers) HCV Updates. Are victims of domestic violence prioritized as a preference group?

A: (Toni Karter) Yes, but we have to go by the order of the application received so they are not an automatic first served, but are ahead of regular wait list clients.

-Q: #6 (Adding eligible household members). How do you define spouses?

A: (Toni Karter) Significant others.

-Q: #6 (Adding eligible household members). If I want to add my boyfriend to the lease will he get a permanent place in housing?

A: (Toni Karter): Yes, once they are added to the lease they keep a permanent place on that voucher.

-Q: #6 (Adding eligible household members). Can you add your adult child to the lease?

A: (Toni Karter). Only if they were originally on the lease and have moved out for less than 6 months and want to rejoin the household.

-Q: #7 (Funding restrictions- first households to lose assistance). What does second in line mean? Who are the first in line?

A: (Toni Karter) The first in line would be people out looking with their voucher who have not found housing yet. Second in line are single nondisabled and not elderly families with no children then those households who have ported to another county.

-Q: #7 (Funding restrictions- first household to lose assistance). Is the voucher program at risk to lose funding each month?

A: (Toni Karter) No, we get our funding by the year, and this year it is looking more stable.

-Q: #7 (Funding restrictions- first household to lose assistance). What about families who are almost at the income limit?

A: (Toni Karter): Yes, those would also be households in line to lose funding if necessary.

-Q: #8 (Clients will be responsible for paying hearing fees when absent). What is your authority to do this?

A: (Toni Karter): We are getting that authority by setting this policy and by pre-notifying the clients in the Hearing Notification letter.

- Public Housing Updates Dan Potter

-Q: (Regarding Wait List openings) How long do you expect the new waiting lists to be once they are opened?

A: (Dan Potter) We expect to take enough names to last each list five years.

-Q: (\$50 minimum rents) What if your income is really low and you cannot afford the \$50 a month?

A: (Dan Potter) There will be a hardship exemption that residents can apply for.

-Q: (Public Housing guest policy) How many nights can a guest stay the night?

A: (Allison Coe) 21 days in 12 months for all guests.

-Q: (Landlord /Tenant law guest exemption) Does this exemption apply in HUD housing?

A: (Dan Potter) No, because we need to capture any extra income that the household earns that will impact the rent paid.

- Development Mary Bradshaw

- Q: (Scattered Site Sales) If this units were sold would they convert to vouchers or would the funds be used to build new units?

A: (Mary Bradshaw) We don't have an answer to that right now. We would have to go through a planning process to determine the best use of the funds.

-Q: (Homeownership program) Does HACC have a homeownership program?

A: (Mary-Rain O'Meara) HACC does not currently have a homeownership program but residents services staff can connect residents with community organizations that provide assistance with this.

- Housing Needs and Additional Info Mary-Rain O'Meara

11:15-11:45 Capital Fund Overview Dan Potter and Josh Teigen

-Q: (Loss of Resident Services fund) How will these services be paid for now?

A: (Dan Potter) We are looking into using reserves as applying for other grant funds to support this program.

- Q: (Asbestos in Hillside units) Has the asbestos in these units been taken care of?

A: (Josh Teigen) If the asbestos is exposed we take care of it and do a complete abatement. There may be asbestos in the units that is not harmful as long as it is not exposed or damaged.

11:45-12:00 Annual Plan Timeline/ Questions and Answers All

ATTACHMENT E

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

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

I, Chuck Robbins the Director of Housing and Community Development certify that the Five Year and
Annual PHA Plan of the Housing Authority of Clackamas County is consistent with the Consolidated Plan of
Clackamas County prepared pursuant to 24 CFR Part 91.

 3/4/14

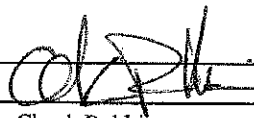
Signed / Dated by Appropriate State or Local Official

ATTACHMENT E

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: Housing and Urban Development	7. Federal Program Name/Description: CFDA Number, if applicable: N/A	
8. Federal Action Number, if known: N/A	9. Award Amount, if known: \$ N/A	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i>	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: <u>Chuck Robbins</u> Title: <u>Executive Director</u> Telephone No.: <u>503-650-5666</u> Date: <u>3/4/14</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

ATTACHMENT E

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Housing Authority of Clackamas County

Program/Activity Receiving Federal Grant Funding

Public Housing, Section 8 Housing Choice Voucher and VASH Programs

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here if there are workplaces on file that are not identified on the attached sheets.

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)

Form with fields for Name of Authorized Official (Chuck Robbins), Title (Executive Director), Signature (handwritten), and Date (3/4/14).

Certification of Payments to Influence Federal Transactions

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

Applicant Name

Housing Authority of Clackamas County

Program/Activity Receiving Federal Grant Funding

Public Housing, Section 8 Housing Choice Voucher and VASH Programs

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

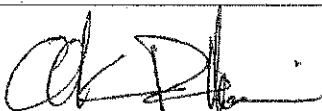
Name of Authorized Official

Chuck Robbins

Title

Executive Director

Signature



Date (mm/dd/yyyy)

3/4/14

