Housing Authority of Clackamas County

2023-2024 Annual Plan
& Moving to Work Supplement
Mid-Year Revision

Board approved - 10/5/23 & HUD approved 3/28/24

Effective January 1, 2024

HACC Executive Director: Toni Karter

Health, Housing & Human Services
CLACKAMAS COUNTY

Housing Authority of Clackamas County

2023 Annual Plan Mid-Year Revision

Updated to align with HUD Conditional Approval 12/29/23

Effective 1/1/2024-6/30/2024

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***ITEM REVISED FOR ALIGNMENT WITH HUD CONDITIONAL APPROVAL 12/29/23**

Streamlined Annual PHA Plan *(High Performer PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024

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

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

Definitions.

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

A. PHA Information.

A.1

PHA Name: Housing Authority of Clackamas County **PHA Code**: OR001
PHA Type: ☒ High Performer
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2023
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units: 445 **Number of Housing Choice Vouchers (HCVs):** 2147 **Total Combined:** 2592
PHA Plan Submission Type: ☐ Annual Submission ☒Revised Annual Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

1) Housing Authority Administrative Office, 13930 S Gain Street, Oregon City, OR 97045
2) Housing Authority Clackamas Heights Property Management Office, 13900 S Gain Street, Oregon City, OR 97045
3) Housing Authority Hillside Property Management Office, 2889 Hillside Court, Milwaukie, OR 97222
4) Housing Authority Website: http://www.clackamas.us/housingauthority/plansandreports.html
5) Clackamas County Public Library located at 16201 S.E. Mcloughlin, Oak Grove, OR 97222
6) Resident Advisory Boards (RAB) Members receive a full draft Annual Plan to review in detail at the RAB meeting.
7) RAB Members received a summary of policy changes (hard copy) to hand out to other residents

☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.	Plan Elements
B.1	**Revision of Existing PHA Plan Elements.** (a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission? Y N ☐ ☒ Statement of Housing Needs and Strategy for Addressing Housing Needs. ☒ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. ☐ ☒ Financial Resources. ☒ ☐ Rent Determination. ☐ ☒ Homeownership Programs. ☐ ☒ Safety and Crime Prevention. ☐ ☒ Pet Policy. ☒ ☐ Substantial Deviation. ☒ ☐ Significant Amendment/Modification (b) If the PHA answered yes for any element, describe the revisions for each element below: Updated Attachments: Policies that Govern Eligibility, Selection and Admissions & Rent Determinations - See Attachments A & B for changes due to HOTMA and intersecting MTW activities to be effective January 1, 2024 for Public Housing and Housing Choice Voucher programs, but full implementation of policy changes July 1, 2024. Delays in implementation allowed by HUD due to the magnitude of the changes and software considerations. Policy changes that are not considered a substantial deviation or significant amendment/modification required to implement HOTMA are not included. Policy changes are summarized. Exact policy language for all HOTMA changes will be updated when specific policy language is available from Nan McKay in November 2023. Substantial Deviation and Significant Amendment/Modification – See Attachment F - reformatted and added required HUD language for Capital Fund Program. Attachments included in the plan without changes since last submission: Statement of Housing Needs and Strategy for Addressing Housing Needs – See Attachment C (no changes) Financial Resources - See Attachment G (no changes) Safety and Crime Prevention – VAWA statement – no changes made - See Attachment E (no changes) (c) The PHA must submit its Deconcentration Policy for Field Office Review. See Attachment D (no changes)
B.2	**New Activities.** *(No changes since last submission)* (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☒ ☐ Hope VI or Choice Neighborhoods. ☒ ☐ Mixed Finance Modernization or Development. ☒ ☐ Demolition and/or Disposition. ☒ ☐ Conversion of Public Housing to Tenant Based Assistance. ☒ ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☒ ☐ Project Based Vouchers. ☒ ☐ Units with Approved Vacancies for Modernization. ☒ ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (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. **Administration:** The Housing Authority Board bylaws will be reviewed and updated by the board, as needed, to ensure the most efficient operations and administration of the Authority while still meeting all legal obligations of the Authority. The Housing Authority is a separate legal entity than Clackamas County but is administered through a division of the Clackamas County's Department of Health, Housing & Human Services (H3S) since the majority of the Housing Authority Board is made up of the Board of County Commissioners.

Historically, the County's homeless and housing programs and services have been situated across a number of different divisions within the Department of H3S, but in an effort to increase collaboration across the housing continuum, Clackamas County is reorganizing their housing services to be better aligned through a new Housing and Community Development Division.
The Housing Authority will administratively align through this new division which will also include Community Development, CoC, HMIS administration, etc. With the development of this new division, the supportive services provided through Metro Supportive Housing Services funding will be managed through the County however the Regional Long Term Rent Assistance (RLRA) program and expanded resident services funded through the Metro Supportive Housing Services funding will be administered through the Housing Authority.

The leadership team for the new Housing and Community Development Division will oversee both County Housing Programs as well as the Housing Authority. Together, the division will work to meet the housing needs of Clackamas County residents by leveraging all available housing funding and programing available.
In addition, the Housing Authority will be reviewing available Moving to Work (MTW) waivers to streamline operations and serve more clients. The 2023 MTW Supplement will begin this work and will request for all waivers necessary to begin the implementation of the Asset Building Cohort PHA designed program. The Housing Authority will use the rest of FY 2023-2024 to plan additional activities to increase the efficiency of the agency that will be included in the 2024-2025 MTW Supplement.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Voucher Programs:

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

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

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

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

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

Public Housing:

The Housing Authority will continue to operate and maintain public housing units as the repositioning outlined in the Development section begins to unfold. As part of the ongoing operation and maintenance of the public housing units, HACC will continue to utilize awarded capital funds to perform repairs on vacant units necessary for re-occupancy. This means that there will be approximately 20 units offline approved for modernization throughout the year. These approved units may be carried over from one FY to another. At the end of the FY 2022-2023, HACC anticipates having approximately 3 units offline, approved for modernization. In addition to the modernization of vacant units, HACC will also continue to use awarded capital funds to perform other necessary improvements to our properties and structures, such as parking lot repairs, roof repairs, etc.

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

Resident Services:

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

Resident Services Program focuses on the following objectives:

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

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

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

	• Legal services • Housekeeping and personal care services • Health care and wellness programs • Culturally specific services • Safety net services • Domestic violence services • Peer-delivered support and relationships; and • Volunteer and social activities.
B.3	**Progress Report.** *(No changes since last submission)* Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan. **PHA Goal 1 – Improve the quality of Housing Authority assisted housing and customer service** • PHA Strategy 1.a – Maintain high performer status • PHA Strategy 1.b – Improve access by making remote access options available for program intake, payments and signatures. • PHA Strategy 1.c – Continue robust client feedback system for continued service improvements. • PHA Strategy 1.d - Engage in capital fund rehabilitation projects to maintain units. • PHA Strategy 1.e – Continue ongoing staff training and cross-training to continue **PHA Goal 2 – Improve community quality of life and economic vitality** • PHA Strategy 2.a – Continue Resident Services programs through partnerships with community groups & service providers to build community and meet resident needs including food insecurity and those affected by COVID-19. • PHA Strategy 2.b – Encouraged Resident participation through resident associations and surveys to access housing needs. **PHA Goal 3 – Promote self-sufficiency and asset development of families and individuals** • PHA Strategy 3.a - Continue to partner with local & regional workforce partners to increase the number of employed/underemployed living in housing • PHA Strategy 3.b - Partner with agencies to provide supportive services including outreach, housing stabilization, and fostering independence for voucher program participants and work to expand self-sufficiency and supportive services programs to public housing residents. • PHA Strategy 3.c - Continued to offer a Credit Building Program for our Public Housing residents to support residents in their goals of becoming more financial stable and self-sufficient. Planned expansion of current Credit Building program and addition of a Savings account program as new Moving To Work (MTW) status as part of the Asset Building Cohort. **Fair Housing Goal 1: Increase and preserve affordable, accessible housing options throughout Clackamas County** • AFH Strategy 1.A. - Leverage local, state and federal funding and resources to increase the number of affordable and permanent supportive housing units including accessible units in high opportunity areas throughout Clackamas County. In addition, reposition and redevelop underutilized and outdated public housing properties to increase affordable housing units to ensure that those units will last for years to come. • AFH Strategy 1.B - Maximize the number of households receiving long term and short-term rental assistance from local, state and federal programs. **Fair Housing Goal 2: Expand fair housing outreach, education, and enforcement** • AFH Strategy 2.A. - Increase fair housing education for staff, landlords & community partners. • AFH Strategy 2.B. - Review payment standards by area to be sure choices are not limited and to study Fair Market Rent to be accurate with market conditions. • AFH Strategy 2.C. - Work in collaboration with partners to enforce fair housing law.

	Fair Housing Goal 3: Review internal policies and practices with a trauma-informed, accessibility, and racial equity lens to increase fair housing for all protected classes. • AFH Strategy 3.A - Ensure all housing forms including forms and letters sent by HACC to residents and voucher recipients are trauma-informed, racially equitable and accessible. • AFH Strategy 3.B - Minimize barrier and ensure equal or better access to housing programs and monitor housing stability outcomes for Black, Indigenous and People of Color and all protected classes. • AFH Strategy 3.C - Provide multiple ways for County residents to access services and information. Email, phone, text, in-person, etc. Ensure that outgoing messages are available in multiple languages and all staff have access to interpretation services quickly and efficiently.
B.4.	**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. *(No changes since last submission)* See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/25/2021 See Attachment H: Capital Fund Projects Summary See Attachment I: Capital Fund Budget
B.5	**Most Recent Fiscal Year Audit**. *(No changes since last submission)* (a) Were there any findings in the most recent FY Audit? Y N ☒ ☐ (b) If yes, please describe: See Attachment P for audit details.
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y N ☒ ☐ (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. See Attachment J: Resident Advisory Board Meeting Minutes & Comments **(updated to include additional RAB meeting Minutes and Comments for revision)**
C.2	**Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment K: Certification by State and Local Officials (HUD-50077-SL) **(Updated for revision)**
C.3	**Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Form 50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment L: Civil Rights Certification/Certification of Listing (HUD-50077-ST-HCV-HP) **(Updated for revision)**
C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N ☐ ☒ If yes, include Challenged Elements. See Attachment O: Public Notice & Public Comments **(updated to include additional public process for revision)**

D.	**Affirmatively Furthering Fair Housing (AFFH). (No Changes from Prior Submission)**
D.1	**Affirmatively Furthering Fair Housing.** **Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.**

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

Describe fair housing strategies and actions to achieve the goal

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

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

Describe fair housing strategies and actions to achieve the goal

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

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

Describe fair housing strategies and actions to achieve the goal

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

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

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

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

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

B. Plan Elements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C. Other Document and/or Certification Requirements

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

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

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

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

D. Affirmatively Furthering Fair Housing.

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

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

ATTACHMENT A & B COMBINED

PROPOSED POLICY CHANGES FOR BOTH THE
Housing Choice Voucher Program (HCV) & Public Housing (PH)

Updated to align with HUD Conditional Approval 12/29/23

Adopted changes for HCV will be made to the Admin Plan and the changes for Public Housing will be made to the Admissions and Continued Occupancy Policy (ACOP) effective January 1, 2024 with implementation by July 1, 2024.

1. MTW ASSET BUILDING PROGRAM UPDATES – ASSET BUILDING PARTICIPANTS ONLY

HACC is implementing a PHA-Designed Asset Building MTW program. The program expands HACC's current credit building program and adds a down payment assistance component.

Below are the policy changes proposed to the Asset Building Program components added to the MTW Supplement for this revision. These changes are not connected with HOTMA and are strictly MTW related.

Saving Account Component Changes:

- Each household enrolled in the homeownership program will be required to establish a savings account that is HACC managed. HACC will deposit funds equal to $350 per month for 24 months to be used as part of a down payment on the purchase of a new home. This change added clarifying language and changed contribution amount from a percentage of income to a flat rate of $350/month to simplify budgeting and implementation for the agency and participants.
- Adding clarification to add FSS program participants within the selection criteria. FSS participation was implied and originally assumed but adding the missing language in the document to make it clear.
- Adjusted Household income criteria to $45,000/year or above. Updated from $30,000 a year as households at the higher income will likely have an easier time meeting eligibility for a home loan.
- Updated cost estimates to operate this program to $218,000 over two years. This estimate was adjusted from $130,000, due to the impacts of changing from a percentage of income to a flat amount contribution.

Credit Building Program Changes:

- Removed the incentives and reimbursements to landlords that participate. This change is the result of comments received by HUD's review of the first MTW Supplement submission.
- Updated language regarding who is estimated to participate in this expansion program to include other HACC programs such as project-based HCV. This change is simply to clarify the language for readers.

2. UPDATED INCOME CALCULATIONS – HOTMA CHANGES - HCV & PH

The following policy changes from the HOTMA final rule aim to simplify income calculations, limit assets and account for inflation factors. Some of the policies are not optional changes but are included because HACC anticipates the policy change could have a negative impact for residents.

Calculation of Asset Income: Families will be allowed to self-certify their assets, if their assets are valued under $50,000. Assets will be verified every three years. This policy applies to both HCV and PH programs.

Asset Limits: Families will not be allowed to receive benefits if they have over $100,000 in total assets or ownership in real property where the family could live. This limitation amount will have annual upward adjustments for inflation starting in 2025. Asset limitations also have additional exemptions added by the HOTMA final rule that will be adopted. This policy is not optional and is included to inform our residents since it is anticipated to have a negative impact on a very limited number of residents.

Public Housing Eligibility for Over-income Families (PH only policy)

Effective January 1, 2024, HACC will update their policy on over-income families under HOTMA. HACC will be updating their policy to begin terminations of households instead of offering an alternate rent to those families determined to be over-income for 24 months. This is a policy change from last update as HACC is directing resources toward households in the greatest need including those waiting on our waitlist.

It was also noted by adopting this policy, HACC would avoid a reduction to Operating Fund as serving over income families would have resulted in HUD deducting those households over income from our funding.

Earned Income Disallowance (EID): The Earned Income Disregard (EID) program is ending with the HOTMA final rule. Current households will be allowed to finish out the majority of their planned benefit. This policy is not optional, and it is included in the summary to inform our residents as it is a lost benefit anticipated to have a negative impact. HACC expects minimal impact to households in HCV; however, there will likely be larger impacts for PH households.

Safe Harbor: At this time, HACC will not adopt the HOTMA “safe harbor” policy to utilize income determinations from other Federal Public Assistance Programs. HACC will continue to do their own internal determinations.

3. ALTERNATE RE-EXAMINATION SCHEDULE – MTW WAIVERS 3.A, 3.B – HCV & PH

In order to further streamline processes, HACC is seeking to adopt an updated interim re-examination schedule through MTW waivers to start a triennial review schedule for seniors and people with disabilities on a fixed income. The triennial review schedule will be applied to households with at least one fixed income source, not including zero income households, where all the adults in the household are seniors or people with disabilities.

This subset of our community does not frequently see significant changes from year to year and annual reviews can be burdensome, so HACC proposes to do full reviews on these households once every three years instead of once a year. In fiscal year 2024-25, households qualifying for triennial reviews will complete their annual review and then will not be scheduled to have another regular review for three years. Households on a triennial review schedule will be sent rent notices and informational letters to remind them that they're on a triennial review.

If a household has zero income where all adults in the household are seniors or people with disabilities, they will be placed on a six-month review cycle. The goal of these six-month reviews will be to connect households with services or organizations who can help the household through the process of confirming SSI or SSDI income. Once these families have a fixed income source they may qualify for triennial reviews.

For now, all other households will remain on the Annual review schedule.

Unless otherwise stipulated in the waiver, households will be subject to the new HOTMA rules for interim re-examinations in which interim reexaminations will only be required if a household's income decreases by 10% or more or is estimated to have increased by 10% or more.

In addition, HACC will also adopt the optional HOTMA policy requiring HACC to provide a 30-day notice to families that will be impacted by a rent increase from an annual or interim examination. There may be exceptions for families who fail to report timely any increase in income or family composition.

An impact analysis for the adoption of the alternate re-exam schedules 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 based on income increases that had been processed over the last three years. The analysis also indicted that HACC would be able to offset some of these additional expenses by reducing staff time processing examinations. The overall loss for HACC is estimated at $36,364 per year to implement these policies which would be off-set by the gain estimated by simplifying rent calculations.

Additional details regarding this MTW waiver and the impact analysis can be found in the attachments.

4. INSPECTION PROCESS CHANGE – MTW WAIVER 5.C - HCV

Third-Party Requirement for Project Based Vouchers (PBV) Property Inspections – MTW Waiver 5.c

HACC is proposing to eliminate the requirement for a third party to conduct HQS inspections on units our agency owns or controls, when assisted with tenant-based (HCV) or project-based vouchers (PBV). HACC currently engages a third-party contractor to conduct Housing Quality Standard (HQS) inspections in these cases, and it is time consuming and costly. Using HACC staff to conduct these HQS inspections will streamline processes and create cost effectiveness. HACC will continue to have a sampling of inspections done by our auditor to ensure quality control and transparency in the process. This policy only applies to units our agency owns or controls that are assisted by HCVs or PBVs. This policy does not apply to PH as we are already allowed to inspect our own PH. Additional details regarding this MTW waiver can be found in the MTW Supplement.

This waiver does not require an impact analysis or a hardship policy.

5. LOCAL PROJECT-BASED VOUCHER (PBV) PROGRAM – MTW WAIVERS – PBV ONLY

HACC is utilizing MTW to create a local PBV program, designed to efficiently meet the needs of our local community and therefore are requesting multiple MTW waivers for program flexibilities.

Rent Reasonableness 3rd Party Requirement – MTW Waiver 2.d

HACC is proposing to eliminate the requirement for a third party to conduct rent reasonableness on units our agency owns or controls that are assisted with project-based vouchers. HACC currently engages a third-party contractor to conduct rent reasonableness in these cases, and it is time consuming and costly. Conducting rent reasonableness calculations internally will streamline processes and create cost effectiveness. Additional details regarding this MTW waiver can be found in the MTW Supplement. This policy applies only to HCVs and PBVs.

This waiver does not require an impact analysis or hardship policy.

Increase PBV Program Cap - MTW Waiver – MTW Waivers 9.a, 9.b

HACC is proposing to increase the program cap to 50% and the project cap to 100%. This is an increase from 20% that currently exists. PBVs are an important resource in our community, allowing the agency to coordinate with local property owners, developers, service coordinators and jurisdictional partners to provide targeted housing for different populations. Additional details regarding this MTW waiver can be found in the MTW Supplement.

This waiver does not require an impact analysis or hardship policy.

Limit Portability for PBV – MTW Waiver 9.h

HACC is proposing to waive the current requirement to provide a tenant-based voucher at 12 months when requested by a PBV household. Because of the limited availability of tenant-based vouchers in our community, we currently have a list of approximately 500 households waiting to access a tenant-based voucher – with many more in our community who are eligible, but not yet on any waitlist.

HACC will require a tenant to live in a PBV unit for 24 months. HACC will only make an exception for those requesting a move for VAWA or other reasonable accommodation.

Requests must be submitted in writing and will be reviewed by the Program Manager. If a request is denied, the household would have the right to an informal review through the hearing process. Additional details regarding this MTW waiver can be found in the MTW Supplement. This waiver does not require an impact analysis or hardship policy.

This waiver does not require an impact analysis.

6. TENENT BASED HCV WAITLIST - GENERAL POLICY CHANGE – HCV ONLY

HACC regularly partners with local service providers to create housing programs that provide supports to ensure stability and success for participating families. HACC is proposing to set aside special purpose vouchers such as the Regional Long Term Rent Assistance (RLRA), Emergency Housing Voucher (EHV), Mainstream Vouchers (MS), Shelter Plus Care (SPC) and Foster Youth to Independence (FYI) for exclusively partnering with the Continuum of Care (CoC) Coordinated Housing Access (CHA) as a wait list that partners homeless families with a service provider to serve a vulnerable target population.

Two systems will be used, one for special purpose vouchers and one for regular HCV vouchers as detailed below. Note: These policies apply only to HCV tenant-based vouchers in the HCV program. They are general policy changes HACC is proposing that are not related to HOTMA or MTW.

Special Purpose HCV Voucher Waitlist

The CHA referral waitlist for special purpose vouchers will be added to serve those transitioning out of institutional and other segregated settings, at serious risk of institutionalization, homeless or at risk of becoming homeless.

Regular HCV Voucher Waitlist

A centralized wait list used for all regular HCV vouchers already exists, however, HACC is proposing to update preferences and definitions to this list as listed below:

a. Removing Preference: Maximum of 33 dedicated vouchers to serve homeless persons per fiscal year (FY) (July 1st to June 30th). Families must be homeless at time of application. This preference can only come from direct referring agencies that have signed a Memorandum of Understanding (MOU) outlining the services to be offered to those referred. The referrals must originate from the Coordinated Housing Access (CHA) system and have an HMIS identification number to show an intake was completed. To be referred households must be actively engaged in services at time of voucher issue. Referring agencies are limited to no more than 5 referrals from July 1-December 31. Starting January 1 remaining available vouchers will be distributed first come, first served order. Unused Preference slots do not carry over to the next fiscal year.

b. Removing Preference: Maximum of 17 dedicated vouchers within a fiscal year (July 1st to June 30th) for families referred by a domestic violence professional counseling organization and/or shelter, for victims of domestic violence that has occurred within the last 12 months and are certified as homeless by the agency and who continue to be in counseling or case management through the referring agency or other professionally recognized counseling organization. Referrals from agencies that have signed an MOU outlining the services to be offered to their referral families will only be accepted. The applicant must certify that the abuser will not reside with the applicant unless the PHA gives prior written approval. Applicants will be served on a first come, first served basis. Unused Preference slots do not carry over to the next fiscal year.

c. Removing Preference: Maximum of 10 dedicated vouchers per year within a fiscal year (July 1st to June 30th) for households referred by a provider that has entered into a Supportive Services MOU with HACC and applicant has been deemed by the provider to be in less need for supportive services. The household must be considered a candidate that is graduating off the PSH and that at time of entry into the PSH program were homeless and/or disabled. Unused Preference slots do not carry over to the next fiscal year. Referring agencies are limited to no more than 5 referrals from July 1-December 31. Starting January 1 remaining available vouchers will be distributed first come, first served order. Unused Preference slots do not carry over to the next fiscal year.

d. Removing Preference: For Mainstream Vouchers only, preference will be given to non-elderly persons with disabilities transitioning out of institutional and other segregated settings, at serious risk of institutionalization, homeless or at risk of becoming homeless who are referred by an agency with an active MOU to provide supportive services. Homeless status must be met at time of application.

e. Add Definition of Work-focused Household: Work-focused household is a household in which neither the head, spouse, nor cohead is a senior or a person with disabilities. All households that do not meet the definition of a senior and people with disabilities household are considered work-focused households.

f. Adding Preference: Work-focused households will be given preference when over 75% of households served are at or below 30% AMI.

g. Adding Local Preference: 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”. 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.

7. PBV WAITLIST POLICY CHANGES – HCV PBV ONLY

PBV program serves a variety of household types, often in specific settings or with linked services that increase the likelihood of success and stability for the voucher holder. Similarly, HACC is proposing all special purpose vouchers that are PBV will rely on the CHA as a wait list that partners homeless families with a service provider to serve a vulnerable target population. This will ensure a higher success rate for stability and success with this population. HACC will create two types of PBV wait lists, a referral-based type and a site-based type as detailed below. Note: These policies apply only to PBV vouchers in the HCV program. They are general policy changes HACC is proposing that are not related to HOTMA or MTW.

PBV REFERRAL-BASED WAIT LIST:

In situations where HACC is working with a specific provider or a targeted household type, HACC may forego use of a waitlist and instead use a referral and selection process. HACC will accept referrals from the specified partners and award those households the dedicated vouchers. Written documentation of the referral will be maintained to demonstrate why a person was served in the order served. This process will be modeled after the same procedure currently used for the existing Veteran Administration Supportive Housing (VASH) voucher program.

For example, HACC has dedicated PBV units for chronically homeless individuals, with supportive services linked to the assistance to ensure the household has the highest likelihood of housing stability. Our community has successfully established a CHA through which people experiencing homelessness or at imminent risk of homelessness can find housing resources and be connected with qualified service providers. When HACC has available PBV units dedicated to this specific population, for example Mainstream PBV, it makes the most sense to accept referrals directly from the CHA using a network of referrals, instead of establishing a wait list with information that will quickly become obsolete.

When using a referral-based placement option, HACC through the Supportive Housing Services contracts will have established and will institute quality control metrics to ensure that households are being referred in an equitable manner.

PBV SITE-BASED WAITLISTS:

HACC may allow individual PBV Projects to maintain their own site-based waiting lists with individual preferences. Site-based waitlists are often more practical to manage than the alternative of HACC individually managing multiple different lists. In addition, it sometimes creates a better connection between the applicant and the property or program.

HACC is likely to use site-based waitlists when the project has the capacity to offer onsite case management and services that administer the waitlist for all units identified in the PBV HAP contract. The community provider and leasing agents must demonstrate the ability to adhere to the site-based waitlist policies and would be subject to contract monitoring to ensure the waitlist is being managed correctly by each contract. HACC may still choose to administer select waitlists internally, per the current standard PBV waitlist processes.

When using a site-based waitlist option, HACC will establish an MOU with the waitlist manager and will institute quality control metrics to ensure household selection in an equitable manner.

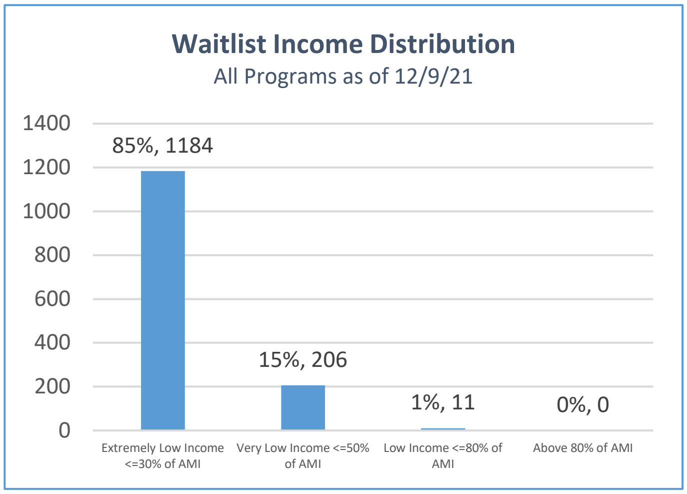
When any of these strategic waitlist processes are applied, the housing authority and/or the partner managing the process must comply with all applicable federal, state or local Fair Housing and civil rights laws and requirements. These laws and requirements are in place to promote equal housing choice for all prospective tenants regardless of race, color, religion, sex, sexual orientation, disability, familial status, or national origin. In cases where specific preferences are established, the housing authority and/or partner must apply criteria uniformly to all applicants in compliance with all Fair Housing and civil rights laws and requirements.

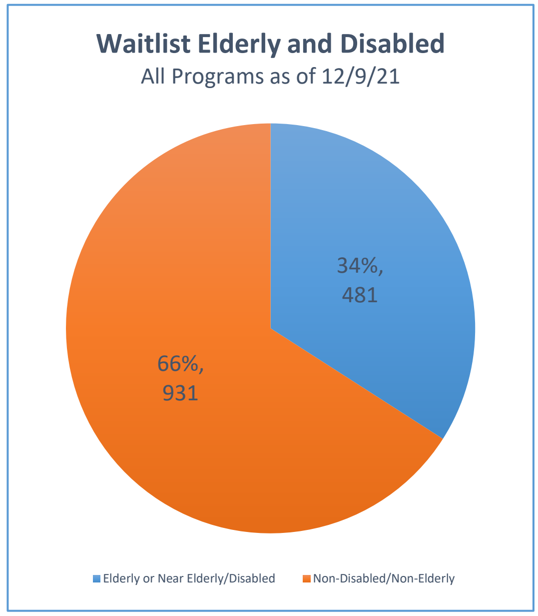
Attachment C:
Statement of Housing Needs and
Strategy for Addressing Housing Needs

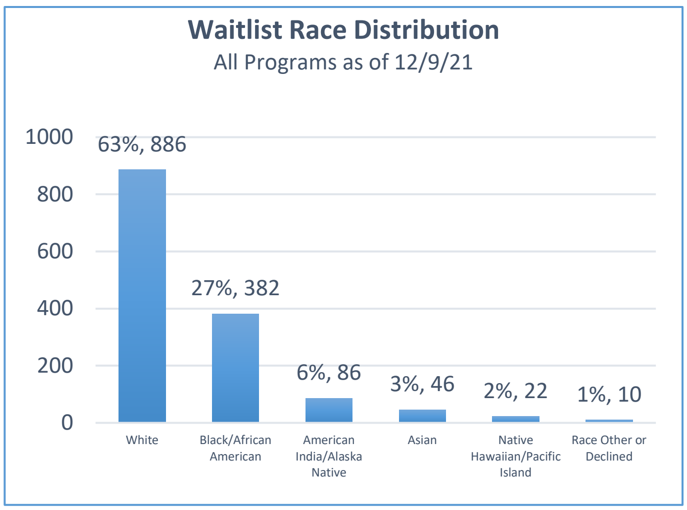
Statement of Housing Needs

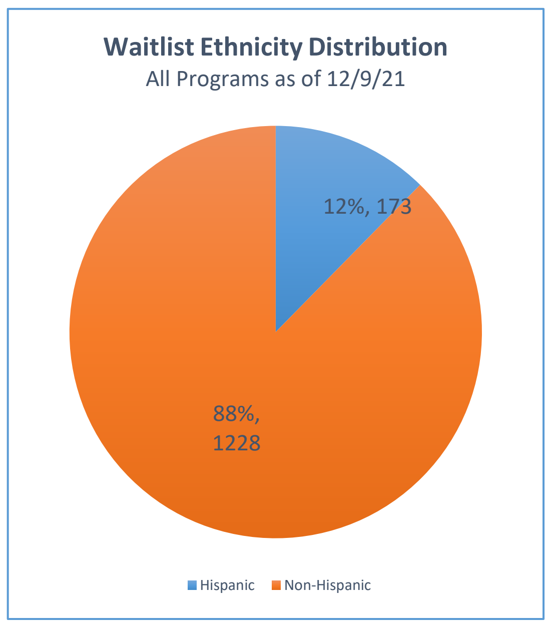
Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the 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.

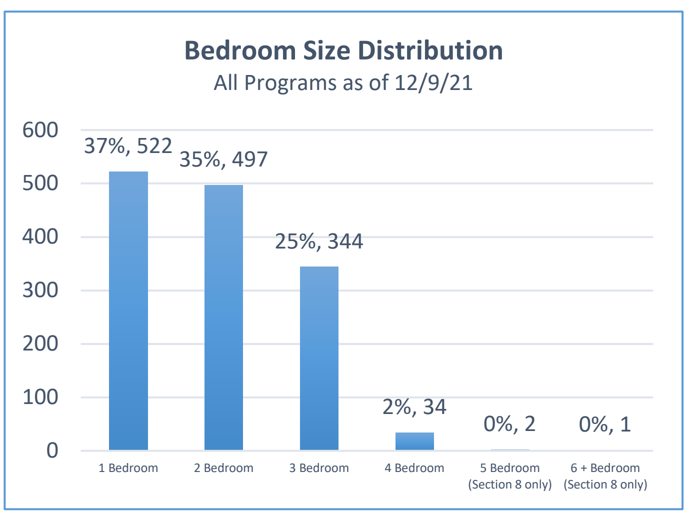
Waitlist Demographics – Combined as of 12/9/21		
	Number of HH	Percentage of HH
Waiting list total	1401	100%
Voucher Programs	722	52%
Public Housing	679	48%
Extremely Low Income <=30% of AMI	1184	85%
Very Low Income <=50% of AMI	206	15%
Low Income <=80% of AMI	11	1%
Above 80% of AMI	0	0%
Elderly or Near 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%


Waitlist Income Distribution
All Programs as of 12/9/21
1400
1200
1000
800
600
400
200
0
85%, 1184
15%, 206
1%, 11
0%, 0
Extremely Low Income <=30% of AMI
Very Low Income <=50% of AMI
Low Income <=80% of AMI
Above 80% of AMI


Waitlist Elderly and Disabled
All Programs as of 12/9/21
34%, 481
66%, 931
Elderly or Near Elderly/Disabled
Non-Disabled/Non-Elderly


Waitlist Race Distribution
All Programs as of 12/9/21
1000
800
600
400
200
0
63%, 886
27%, 382
6%, 86
3%, 46
2%, 22
1%, 10
White
Black/African American
American India/Alaska Native
Asian
Native Hawaiian/Pacific Island
Race Other or Declined


Waitlist Ethnicity Distribution
All Programs as of 12/9/21
12%, 173
88%, 1228
Hispanic
Non-Hispanic


Bedroom Size Distribution
All Programs as of 12/9/21
600
500
400
300
200
100
0
37%, 522
35%, 497
25%, 344
2%, 34
0%, 2
0%, 1
1 Bedroom
2 Bedroom
3 Bedroom
4 Bedroom
5 Bedroom (Section 8 only)
6 + Bedroom (Section 8 only)

Strategy for Addressing Housing Needs

<u>Introduction</u>
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 ClackamasCounty.

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 informationabout 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 andvoucher 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 assistancehowever many people are still not able to access stable housing. Inflation and rental rent increases at over 14% are also contributing to a rise in homelessness while social security and employment income are not keeping up with these disproportionate increase in basic needs. However, the Metro region has put unprecedented financial resources into supporting the building of more affordable housing, construction takes years, and the need is immediate.

Attachment D:
Deconcentration Policy

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

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

Attachment E:

Violence Against Women (VAWA) Statement

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

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

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

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

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

Toni Karter

Toni Karter, Interim Executive Director

12/05/2022

Date

Attachment F:
Definition of Substantial Deviation and Significant Amendment or Modification

Definition of Substantial Deviation and Significant Amendment

It is the intent of the Housing Authority of Clackamas County (HACC) to adhere to the mission, goals and objectives outlined in the 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 momentously 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 momentously 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.

Attachment G:
Financial Resources

Housing Authority of Clackamas County

All Programs Budget
Fiscal Year 2022/2023

	Public Housing	Housing Vouchers	Local Project	Central Offic	Development	Supportive Housing	Grants	FY23 Total	FY 2021 6/30/2021 Budget	FY 2020 6/30/2020 Budget	FY 2019 6/30/2019 Budget	$ Change from Prior Year Budget	% Change from Prior Year Budget
Revenue:													
Dwelling rent	1,777,169		590,204					2,367,372	2,039,290	2,383,065	2,223,249	328,082	16.09%
Vacancy loss	(43,000)		(8,123)					(51,123)	(55,817)	(63,443)	(47,202)	4,694	-8.41%
Other tenant income	109,500	29,370	2,400					141,270	143,670	178,790	160,082	(2,400)	-1.67%
Operating subsidy	2,215,000	1,701,655		127,186			27,000	4,070,841	3,468,120	3,493,992	3,683,350	602,721	17.38%
Housing assistance payments		21,954,677					514,368	22,469,045	16,169,002	15,192,953	14,404,534	6,300,043	38.96%
Mgmt fees				414,225				414,225	397,650	468,206	455,626	16,575	4.17%
Interest income	500	-	-	-				500	500	20,550	20,931	-	0.00%
County contribution			-	-	-		-	-	240,960	240,960	271,971	(240,960)	-100.00%
Grant revenue	295,000	104,088			34,872,213	1,282,020	1,353,859	37,907,180	2,271,161	2,169,168	1,147,105	35,636,019	1569.07%
Other/In-kind	-		6,000	-	2,555,322		10,341	2,571,663	2,408,531	1,302,348	769,293	163,132	6.77%
TOTAL REVENUE	**4,354,169**	**23,789,790**	**590,481**	**541,411**	**37,427,535**	**1,282,020**	**1,905,568**	**69,890,974**	**27,083,067**	**25,386,589**	**23,088,939**	**42,807,907**	**158.06%**
ADMINISTRATIVE EXPENSE:													
Salaries	724,039	898,645	74,448	787,263	584,049	665,311	9,824	3,743,579	2,402,504	2,132,370	1,918,999	1,341,074	55.82%
Employee benefits	406,223	628,505	42,805	513,727	339,716	465,007	12,012	2,407,995	1,441,247	1,339,754	1,108,321	966,748	67.08%
Legal fees	15,400	2,200	700	3,600	5,000	5,000		31,900	26,900	33,000	28,817	5,000	18.59%
Staff training/travel	20,000	7,800	500	10,000	7,000	7,000	-	52,300	46,200	46,700	35,135	6,100	13.20%
Auditing fees	13,694	10,797	787	5,903	8,240	10,277		49,699	47,857	46,274	45,534	1,842	3.85%
Other administrative expenses	192,831	256,449	179,338	178,331	123,086	81,425	-	1,011,461	1,921,983	1,579,364	1,313,266	(910,522)	-47.37%
Management fee expense	414,225	-	-	-	-		-	414,225	397,650	468,206	455,626	16,575	4.17%
TOTAL ADMINISTRATIVE	**1,786,411**	**1,804,396**	**298,579**	**1,498,825**	**1,067,091**	**1,234,020**	**21,836**	**7,711,158**	**6,284,341**	**5,645,668**	**4,905,698**	**1,426,817**	**22.70%**
TENANT SERVICES:													
Salaries	18,076	56,180					58,259	132,515	128,388	110,820	111,800	4,127	3.21%
Benefits	12,967	42,544					41,792	97,303	75,311	68,673	78,031	21,992	29.20%
Other	12,600	-		-			27,000	39,600	49,416	50,616	70,227	(9,816)	-19.86%
TOTAL TENANT SERVICES	**43,643**	**98,724**	**-**	**-**	**-**	**-**	**127,051**	**269,418**	**253,115**	**230,109**	**260,058**	**16,303**	**6.44%**
UTILITIES:													
Water	173,000		10,800				-	183,800	174,600	204,085	182,554	9,200	5.27%
Sewer	361,300		31,900				-	393,200	380,700	465,779	428,064	12,500	3.28%
Electricity	28,300		8,600	6,900			-	43,800	44,300	117,400	106,701	(500)	-1.13%
Gas	3,900	-	-	3,800			-	7,700	7,500	26,300	25,991	200	2.67%
TOTAL UTILITIES	**566,500**	**-**	**51,300**	**10,700**	**-**	**-**	**-**	**628,500**	**607,100**	**813,564**	**743,310**	**21,400**	**3.52%**
MAINTENANCE:													
Labor	717,729		28,003	-			-	745,732	680,096	686,769	675,797	65,636	9.65%
Benefits	477,565		20,781	-			-	498,347	478,834	477,600	462,281	19,513	4.08%
Materials	151,600		5,700	-			-	157,300	136,800	171,200	149,416	20,500	14.99%
Garbage contracts	167,800		2,000	-			-	169,800	161,800	157,800	160,707	8,000	4.94%
Other contracts	310,100	-	48,200	6,600			-	364,900	255,600	217,644	268,991	109,300	42.76%
												-	
TOTAL MAINTENANCE	**1,824,794**	**-**	**104,684**	**6,600**	**-**	**-**	**-**	**1,936,078**	**1,713,130**	**1,711,013**	**1,717,192**	**222,948**	**13.01%**

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

	Public Housing	Housing Vouchers	Local Projects	Central Office	Development	Supportive Housing	Grants	FY23 Total	FY 2021 6/30/2021 Budget	FY 2020 6/30/2020 Budget	FY 2019 6/30/2019 Budget	$ Change from Prior Year Budget	% Change from Prior Year Budget
GENERAL EXPENSES:													
Insurance	96,625	8,200	16,600	3,200			-	124,625	116,525	111,140	96,290	8,100	6.95%
Payment in Lieu of Taxes	86,000							86,000	86,000	104,610	71,500	-	0.00%
TOTAL GENERAL EXPENSES	**182,625**	**8,200**	**16,600**	**3,200**	**-**	**-**	**-**	**210,625**	**202,525**	**215,750**	**167,790**	**8,100**	**4.00%**
OTHER EXPENSES:													
Housing Assistance Payments		21,954,677					514,368	22,469,045	16,613,002	15,192,953	14,404,534	5,856,043	35.25%
Mortgage Payments			13,100				-	13,100	13,700	14,600	51,288	(600)	-4.38%
Grant Expense					35,268,000	57,258		35,325,258	-	-	-	35,325,258	
Supp Svcs, in-kind, child care							-	-	-	189,925	-	-	
Central office							127,186	127,186	122,559	122,559	159,641	4,627	3.78%
Capital Expenditures	-	-	91,330	-	-		1,109,275	1,200,605	1,234,615	1,268,485	574,904	(34,010)	-2.75%
TOTAL OTHER EXPENSES	**-**	**21,954,677**	**104,430**	**-**	**35,268,000**	**57,258**	**1,750,829**	**59,135,194**	**17,983,876**	**16,788,522**	**15,190,367**	**41,151,318**	**228.82%**
												-	
TOTAL EXPENSES	**4,403,974**	**23,865,997**	**575,593**	**1,519,325**	**36,335,091**	**1,291,278**	**1,899,716**	**69,890,973**	**27,044,088**	**25,404,626**	**22,984,415**	**42,846,886**	**158.43%**
OPERATING SURPLUS (DEFICIT)	**(49,805)**	**(76,207)**	**14,888**	**(977,914)**	**1,092,444**	**(9,258)**	**5,852**	**0**	**38,980**	**(18,037)**	**104,524**	**(38,979)**	**-100.00%**
												-	
TRANSFERS										350,000	350,000	(350,000)	-100.00%
Easton Ridge								-	500,000				
Development				977,914	(977,914)			-	-				
Local Projects		76,207	(76,207)					-	-				
												-	
OPERATING SURPLUS (DEFICIT) CONTINGENCY AFTER TRANSFERS	**(49,805)**	**0**	**(61,318)**	**0**	**114,530**	**(9,258)**	**5,852**	**0**	538,980	331,963	454,524	-	
Estimated Change in Fund Balance/Cash													
Public Housing	(49,805)							(49,805)	126,222				
Development					114,530			114,530	388,493				
Local Project Fund		0	(61,318)	0			5,852	(55,466)	24,265				
Budgeted Balance	-	-	-	-	-	9,258	-	9,258	-				

Attachment H:
Capital Fund Projects & Budget Summary 2023

Health, Housing & Human Services
CLACKAMAS COUNTY

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

EQUAL HOUSING OPPORTUNITY

December 14, 2022

2022 Capital Fund Completed Projects

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

2023 Proposed Capital Fund Projects

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

Healthy Families. Strong Communities.

P.O. Box 1510, 13930 S. Gain Street, Oregon City, OR, 97045-0510 • Phone (503) 655-8267 • Fax (503) 655-8676
TDD 503-655-8639 www.clackamas.us/housingauthority

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	Grant Type and Number	FFY of Grant:
OR 001	Capital Fund Program Grant No: OR16R00150123 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: FY2023

Type of Grant

- [x] Original Annual Statement
- [ ] Reserve for Disasters/Emergencies
- [ ] Revised Annual Statement (revision no:
- [ ] Performance and Evaluation Report for Period Ending:
- [ ] Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	**Revised[2]**	**Obligated**	**Expended**
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) [3]	$386,254.75			
3	1408 Management Improvements	$2,000.00			
4	1410 Administration (may not exceed 10% of line 15)	$154,501.90			
5	1480 General Capital Activity	$1,002,262.35			
6	1492 Moving to Work Demonstration				
7	1501 Collaterization Expense / Debt Service Paid by PHA				
8	1503 RAD-CFP				
9	1504 RAD Investment Activity				
10	1505 RAD-CPT				
11	9000 Debt Reserves				
12	9001 Bond Debt Obligation paid Via System of Direct Payment				
13	9002 Loan Debt Obligation paid Via System of Direct Payment				
14	9900 Post Audit Adjustment				

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

form HUD-50075.1 (07/2014)

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Part I: Summary		
PHA Name: **OR 001**	Grant Type and Number Capital Fund Program Grant No: OR16R00150123 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: FY2023

Type of Grant

- [X] Original Annual Statement
- [ ] Reserve for Disasters/Emergencies
- [ ] Revised Annual Statement (revision no:
- [ ] Performance and Evaluation Report for Period Ending:
- [ ] Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)	$1,545,019.00			
16	Amount of line 15 Related to LBP Activities				
17	Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 15 Related to Security - Soft Costs				
19	Amount of line 15 Related to Security - Hard Costs				
20	Amount of line 15 Related to Energy Conservation Measures				

Signature of Executive Director *	Date	Signature of Public Housing Director	Date
	1/18/23		

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

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[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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Part II: Supporting Pages								
PHA Name: OR001	Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/ No): Replacement Housing Factor Grant No: OR16R00150123			Federal FFY of Grant: 2023				
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated[2]	Funds Expended[2]	
AMP Wide Operations	Operations	1406	1	$386,254.75				
AMP Wide Mgmt. Improve.	Software: Operating Systems & Office Software	1408	1	$2,000.00				
AMP Wide Admin.	Central Office Cost Center (COCC) Salary & Benef.	1410	1	$154,501.90				
Audit	Financial Audit	1480/1410	1	$6,500.00				
AMP Wide Fees & Costs	A&E Consulting Services	1480/1430	1	$25,000.00				
PHA Wide Non Dwell. Equip.	Computers and Equipment	1480/1475	1	$1,500.00				
PHA Wide Relocation Costs	Relocation Costs Due to Modernization	1480/1495	1	$450,000.00				
AMP 1 - DEV 1 Clack. Hts.	Dwelling Renovation	1480/1460	1	$25,000.00				
AMP 3 - DEV 3 Hillside Park	Dwelling Renovation	1480/1460	1	$65,000.00				

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

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Part II: Supporting Pages								
PHA Name: OR001	Grant Type and Number Capital Fund Program Grant No: OR16R00150123 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2023				
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated[2]	Funds Expended[2]	
AMP 4 - DEV 4 OCVM	Dwelling Renovations	1480/1460	1	$77,500.00				
AMP 2 - DEV 006	Dwelling Renovations	1480/1460	1	$0.00				
AMP 2 - DEV 007	Dwelling Renovations	1480/1460	1	$351,762.35				
AMP 2 - DEV 008	Dwelling Renovations	1480/1460	1	$0.00				
AMP 2 - DEV 010	Dwelling Renovations	1480/1460	1	$0.00				
AMP 2 - DEV 011	Dwelling Renovations	1480/1460	1	$0.00				
AMP 2 - DEV 012	Dwelling Renovations	1480/1460	1	$0.00				
AMP 2 - DEV 019	Dwelling Renovations	1480/1460	1	$0.00				
AMP 2 - DEV 020	Dwelling Renovations	1480/1460	1	$0.00				
AMP 2 - DEV 021	Dwelling Renovations	1480/1460	1	$0.00				
RAD - CFP	Rental Assistance	1503	1	$0.00				
RAD Investment Activity	RAD Investment Activity	1504	1	$0.00				
RAD - CPT	RAD - CPT	1505	1	$0.00				

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

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OMB No. 2577-0157
Expires 11/30/2023

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

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

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

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

Attachment J:
Resident Advisory Board Meeting Minutes

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

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

RAB Board Members in attendance: Laura Bales (HSP), Brian Henderson (S8), Irisa Hernandez (HSP), Ann Leenstra (Resident Commissioner – S8), Arnold Rodacker (HSP), Misty Pate (HSP), Jackie Fuller (SS), T. DeWeese (OCVM), Grace Essy (SS), Yelena Potoskaya (CH), Lisa Verlo (CH), Helen Sotriakis (S8) - All properties/programs represented. Members not in attendance: Gail Morgan (SS), Venus Barnes (CH), Charlene Hartley (OCVM), Darcy Lockhart (OCVM), Paul Reynolds (S8), Cathy Hasse (S8)

Video recording of the meeting for more detail can be found at:
https://clackamascounty.zoom.us/rec/share/iOQj3aPvO7H9BCR3givGEDtHfi5Xl3Ura1jeAcP29UvYhhAp-Ihb2gJMSpbUFZJL.1Z2YvQJnv08awWzB

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Paraphrased Comments, Questions & Answers collected throughout the meeting:

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

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

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

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

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

> Devin – We have property managers and asset management listening and will work on addressing the flooding issue. But, yes, the laundry room will be torn down in Phase I and there will be a temporary solution for laundry and mail during construction – not in the manor for residents still living at Hillside Park.
>
> Ariana – We will be working on a resolution to the laundry room flooding by the end of this week. I understand what you are saying and I will be out there this afternoon. I have been talking to Thomas and he shared your ideas and concerns. We are going to address it and resolve it hopefully by the end of the week.

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

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

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

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

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

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

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

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

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

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

Irisa – This is about what people are paying for rent and because we got a cost-of-living increase (social security). How can people be getting nearly 66% increase in rent when they only got a $50 or $80 raise? How can they? Property owners raise rents to accommodate property taxes increase and to make improvement, etc. Why are they raising the rents at such high rates? 66% is a pretty high rate for an $80 dollar increase.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Grace – Agreed they should not jump the waitlist.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Brian – I check my mail just once a week.

Toni – Those are excellent ideas.

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

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

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

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

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

Allison – Yes, Public Housing is still inspected annually.

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

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

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

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

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

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

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

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

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

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

Items to send out to RAB attendees after the meeting:

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

Resident Advisory Board Meeting Minutes

Tuesday, August 8, 2023 10am – 1pm

Via Zoom: Zoom link:
https://clackamascounty.zoom.us/j/86461775181?pwd=Z05ZQmE0K3prOVJoWkRkUk9Zb2lhQT09
Meeting ID: 864 6177 5181 Passcode: 735191 One tap mobile +13462487799,86461775181# US

10am-10:10	Welcome & Introductions	Toni Karter
10:10-10:40	Development Update (30 min)	Devin Elin
10:40-10:50	Policy Summary Intro - Background & Overview	Toni Karter
10:50-11:00	MTW Asset Building Program Updates – Asset building Participants only	Elizabeth Miller
11:00-11:15	Simplified Rent Calculations – MTW waivers – HCV & PH	Toni Karter
11:15-11:30	Updated Income Calculation Changes – HOTMA changes – HCV & PH	Toni Karter
11:30-11:40	**Break (10 minutes)**	
11:40-11:50	Alternate Re-Examination Schedule HCV & PH	Toni Karter
11:50-12:00	Inspection Process Change HCV	Toni Karter
12:00-12:15	Project Based Voucher Program Changes – HCV PBV only	Toni Karter
12:15-12:30	Tenant Based HCV Waitlist Changes – HCV	Toni Karter
12:30-12:45	Project Based Voucher Waitlist Changes – HCV PBV only	Toni Karter
12:45-1pm	Additional Questions and Answer Time	All

Residents in attendance - RAB Board Members are indicated with a *: Candice Brown (HCV), Ann Gibson (HCV), Tami Romero (HCV), Laura Bales* (HSP), Brian Henderson* (S8), Irisa Hernandez* (HSP), Ann Leenstra* (Resident Commissioner – S8), Jeremy Pinkham (CH), Arnold Rodacker* (HSP), Misty Pate* (HSP), Jackie Fuller* (SS), Tiffany DeWeese* (OCVM), Grace Essy* (SS), Yelena Potoskaya* (CH), Lisa Verlo* (CH), Janice Ross (HCV), Monica Ferguson (HCV), Steve Thompson (HCV), Helen Sotriakis* (HCV), Linette Miletti (HCV), Karetha DellGrottaglia (HCV), Douglas Roland (HCV), Sara Cooper (HCV), Venus Barnes* (CH), Darcy Lockhart* (OCVM) - All properties/programs represented.
RAB members not in attendance – Gail Morgan (SS), Charlene Hartley (OCVM), Paul Renalds (S8), Cathy Hasse (S8)

Video recording of the meeting for more detail can be found at:
https://clackamascounty.zoom.us/rec/share/FZgGToIjIgse97Wb4bS2zb9sJB0aIumZPL12BDY8HtuHp-kgbq-AvhxFrMO75BcN.-zD309pgXtWiMB11
Passcode: !c5F&f@&

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

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

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

Development Update: Good Shepherd Village: 143 units are scheduled to open in early to mid-October. Accepting applications now: taylah@qresinc.com or goodshepherd@quantumres.com for leasing inquiries and rent information. Las Flores Apartments, formally Maple Apartments, has electrical issues that have delayed leasing (2024 rather than Fall 2023). Marylhurst Commons in Lake Oswego, 100 units are on track to open this Spring 2024. Updates on the development projects for the Metro Bond will be presented to BCC for a 121 mixed used development in Wilsonville, 55-unit development in Lake Oswego, 15-unit project in Milwaukie. 812 unit goal is being accomplished.

HACC received approval from HUD 54 unit disposition in HSP. Section 8 Tenant Protection Vouchers will be issued. Phase 1 resident relocated with HCV. Assistance from relocation specialist, no one will be displaced. All relocated residents in Phase 1 will have option to return to new unit once completed or remain with HCV. Demolition of old units and 275 new units, begins June 2024. Waitlist priority given to those relocating.

Remaining Public Housing will be repositioned from Section 9 (Public Housing) to Section 8 (Voucher). Public Housing funds have been trending downward for years. Leveraging funds: metro bonds, tax credits. Primary objective to make sure residents are provided opportunities to relocate. Applying for 2040 Planning Grant from Metro – provides stipends, virtual/in-person forums, accessible materials, and more.

In coming weeks working with Ann Leenstra, Clackamas County Housing Commissioner, HACC Staff, to create Resident Planning Committee contact Devin if interested in participating: CHRedevInfo@clackamas.us. Available opportunity for all HACC clients, not project specific.

Devin read letter for Metro 2040 Grant Committee. Ann motioned to approve acceptance of letter and to sign it on behalf of RAB members. Motion 2nd by Brian. Opened for discussion. No further discussion on the letter. No objections. Support of the letter and of Ann signing, passed unanimously.

Policy Summary Intro – Background & Overview: Moving to work allows us to pull Federal Money without the restrictions that are in place now. Money remains the same but unlocks some of the fund restrictions with the Moving-to-Work status. Submit to HUD a Waiver request when want to make a change to the program. Impact analysis on resident, budget, and other impacts.

Better utilize funds, for example, let everyone work remotely to save rent costs on building and use those funds for program. We can't serve less people with more money, must serve the same number of clients with thoughtfulness and mission with the same amount of funding. Our County is different from Multnomah and Washington County we need to utilize funds to forward the mission of Clackamas County.

We are changing more policies than originally planned due to HOTMA, Housing Opportunities through Modernization Act. As agency we were rushed to align MTW Waivers and HOTMA Final Rule. Changes must be in Admin Plan and ACOP by January 1, 2024. We won't implement all of them until July 1, 2024. Fiscal year is July 1 – June 30 for HACC. For ease and to strategize implementation we need this additional time.

MTW Asset Building Program Updates: Elizabeth Miller shared a slide show to review information regarding the Asset Building Program. HUD provided 3 options, Asset Building Program, Rent Reporting option, Housing Authority designed option. We opted for the Housing Authority designed option since we already have the rent reporting program in place.

We already operate a rent reporting (credit building program) which we will be working on expanding to project-based vouchers for properties HACC owns but my not be operating. The homeownership savings account portion will serve 25 clients, there will be eligibility requirements (i.e., annual income, financial education, credit score). Informational Sessions will be held this Fall. Savings account will be similar to Family Self-Sufficiency Escrow Account. Enrollment activities are anticipated to begin by January 2024.

Elizabeth reviewed changes from the original submission of the MTW supplement that were also provided in the Summary document.

Simplified Rent Calculations – MTW Waivers: 400 clients per caseload at this time. Not sufficient funding for more Occupancy Specialists. This causes delays in processes and communication.

Simplifying rent calculations will benefit clients. Currently rent is calculated at 30% of income for rent and utilities. If HACC removes deductions, client's burden on this would be a 2% increase, so HACC is reducing amount to 28.5%. Deductions will be removed such as: elderly/disabled allowance, dependent allowance, and medical expenses. Rent eligibility at move-in will be 28.5% – 40% of income. This applies to Public Housing and Voucher clients.

Updated Income Calculation Changes – HOTMA changes: Clients sign every year that they don't have assets over $5,000. Benchmark is now $50,000. Clients can self-certify assets if they are under $50,000. This applies to Public Housing and Voucher clients.

Families will not be allowed to receive assistance if they have over $100,000 in total assets or property ownership in real property where the family could live. This is not an option, a new rule.

Over-income households in Public Housing will be provided a notice to vacate (this will be implemented January 1, 2024). HUD will no longer assist for units where an over-income household is occupying. Currently, HACC has 3 households that will be receiving these notices, and they have been aware of their over-income status.

Earned Income Disallowance (EID) will be ending – effective January 1, 2024. Those who currently have an active EID can utilize the remaining months of the exclusion (safe harbor). This is not an option.

Alternate Re-Examination Schedule: For clients where their entire household is on a fixed income and who are elderly/disabled, will be on a triennial review schedule (re-examination). Interims (i.e. rent increases) will be processed, but annual income will not be reviewed until the 3rd year.

Inspection Process Change: We pay an outside consultant currently to inspect units that we own. With this change we will save money by being able to use an in-house inspector.

Project-Based Voucher (PBV) Program Changes:

<u>Rent Reasonableness</u> **-** Removing the costs from having outside consultants complete rent reasonable for units that we own. We will be able to utilize staff to complete this evaluation, a third-party system is utilized for this – the same system used by the consultants.

<u>Limiting Portability</u> - Clients who have a Project-Based Voucher will need to remain in the unit for 24 months before requesting to relocate. There will be exceptions to this rule such as domestic violence or reasonable accommodation.

<u>Eliminating PBV Selection Process</u> - We will have more flexibility in awarding PBVs to our own properties without as much process.

Tenant Based Voucher Waitlist Changes (general policy change): HACC has been given special purpose vouchers for several different programs (i.e., RLRA, SPC, FYI). We partner with the Continuum of Care Coordinated Housing Access (CHA), who receive calls from those at risk of homeless or facing homelessness. In aligning these special purpose vouchers with CHA, we will be able to remove the preferences on the waitlist. These preferences will be assisted through the CHA rather than through the tenant based voucher waitlist, and will allow clients who have been on this waitlist to have the opportunity for housing.

HACC will be removing many preferences and adding new preferences to the waitlist, including work-focused households (those who will need less subsidy) and a local preference (those residing in Clackamas County to reduce ports). Will be reviewing the impacts of these preference changes and looking to be sure there are no desperate impacts.

Project Based Voucher (PBV) Waitlist Changes:

Changing from Property general waitlists. PBVs give opportunity to the property but we set criteria for how they can be used. We were finding that having a general waitlist for all the properties was not working well to serve household needs. Some properties are designed to meet the needs of a specific population and it is best to match households to that property that meet the criteria of the population the property is intended to serve. Will be working with referral-based waitlists and site-based waitlists now to help better match households with housing opportunities that meet their needs.

Next Steps:
All comments will be included in RAB attachment and will go to Annual Plan Revision. We will bring it to the Housing Authority Board and for a Public Hearing. All comments will be taken into consideration and the Plan will be revised throughout the engagement period. Final Annual Plan and MTW Revision will go to board approval for final approval and then to HUD for approval.

Attachments to the Summary:
Waivers details, Impact analysis, Hardship policies and Safe Harbor waivers are attached and will be part of the MTW Supplement, Attachment "M" in the Annual Plan.

Additional Questions and Answer Time:

Staff remained to allow residents to ask questions as they would like or folks could also leave if they needed to.

<u>Paraphrased Comments, Questions & Answers collected throughout the meeting:</u>

Jeremy – Were the office hours reduced? I noticed the email says 6pm but the office door states 5pm close time.
Erin – Some staff work until 6pm, but the lobby closes at 5pm.

Misty – Would like to participate but doesn't utilize email, asked for correspondence to be mailed to her.
Erin - Materials were mailed to RAB members but will send another copy of the materials when sending out the minutes.

Arnold – Where are you in the review process for the tenant protection vouchers?
Devin – Hopefully will be receiving feedback from HUD soon granting those vouchers.

Grace – Where are you at on repositioning the scattered sites and will they be redeveloped or sold?
Devin – Early phases of planning, creating homeownership opportunities with Resident Services (approx. 25% sell through Community Land Trust). Clients developing IDAs and savings accounts, hoping to allow clients time to save for opportunity of homeownership. Biggest burden on HACC because distance between units, they will be sold, not re-developed. Proceeds will be going towards a new development for housing.

Jeremy – Are the Clackamas Heights units going to be removed and replaced, if so, will we be relocated?
Devin – Increase overall number of units, existing units removed and replaced with 200-250 new units. You will have opportunity to relocate with voucher and receive assistance with the process of relocation/cost.

Darcey – Is OCVM going to be affected by any of this?
Devin – HACC will be able to provide some of the new units at CH to those that will be relocated when work starts at OCVM. Reposition all of PH, which includes OCVM. It will be the last site to reposition.

Irisa – Will these relocation vouchers be able to port?
Devin – Yes, you can port with the voucher.
Toni – Confirmed that this is true, you can port within the entire US.

Ann – I have a question about the new requirement to work….
Toni – Clarified that there is not a requirement to work, the title can be deceiving. Will explain more in next portion of meeting.

Darcey – Concerned about moving and then sharing a wall with someone who is distributing/making drugs.
Toni – Contact PM/LE if issue so they can address it properly.

Darcey – Can't we drug test clients?
Toni – Housing First model through HUD, you house people first. Dry housing is available among specific properties. All must be tested, Fair Housing issue.

Sara – Shared feedback about how she needs help as she returns to work and has income, she would rather just quit because she can't get ahead, but she has goals to provide home for children.
Toni – As we go along in this meeting you will hear how you will be helped by these new policies.
Grace – Reach out to Jemila, I was able to pay off debt to HACC by working in the garden and delivering flyers.

Brian – Will rent reporting be available to voucher clients as well?
Elizabeth – Yes, some specific sites will participate in rent reporting. Contact Resident Services for more information or if interested.

Venus – 25 clients per year (Saving Asset Program)?
Toni – 25 total, we have to see how this goes before expanding it.

Venus – Can an IDA be coupled with this savings program?
Toni – Yes, you can combine resources.

Irisa – It is difficult to find employers that will hire me, and I can only work part-time, are there opportunities for me in these program?
Toni – Yes, the Family Self-Sufficiency Program has changed and allows for those who can't work full-time to successfully participate.

Brian – How do I find employment?
Toni – There are agencies that can assist with job search.

Brian – Will I still get the money for my electric?
Toni – Yes, you will still receive an utility allowance.

Grace – Is this a universal change for all clients in agency? I'm a large household and have multiple children with a disability, removal of the deduction scares me.
Toni – Yes, it is a universal change. You'll be included in the hardship (automatic not requested).

Ann – Finding the term "Moving-to-Work" is confusing. Double checked, found that there are no work requirements so you can scratch that off your worry list.
Irisa – Perfect.

Irisa – If I leave Clackamas County by porting, would I lose these changes?
Toni – It depends on the County you are moving to, you would need to ask them.

Tami – Can I get a packet mailed to me?
Toni – Yes, please put your name in the chat if you would like a packet mailed, if you would like it emailed, please note that in the chat.

Jeremy – So I wouldn't need to document all of the medical expenses anymore?
Toni – Correct, it makes it easier for the clients with paperwork.

Tami – What about moving costs for those who are over-income (Public Housing)?
Toni – We will be unable to assist with funds to move. Resident Services are working with them to prepare them for the transition.

Tami – If the head of household has a fixed income (Social Security) but their adult child has wages, can the household be eligible for the triennial review?
Toni – No, the entire household has to be fixed income.

Tami – My annual is in September, will that change?
Toni – No, we made that change last year. Annuals remain the same for Voucher clients.

Venus – Why are there third-party inspectors now?
Toni – Many years ago there were landlords that weren't keeping up their properties and pocketing the funds.

Brian – Is there a way to make the client stay in Clackamas County with the Voucher for 12 months before porting?
Toni – Already our policy.

Venus – Is there outreach to all populations?
Toni – We have a requirement under RLRA to show statistics that we are making a difference and that our outreach to BIPOC is strong. We are trying to make our systems universal and adding better BIPOC engagement for our programs as well.

Arnold – When are the Hillside rent statement going to be resumed correctly?
Toni – Yardi reporting should now be corrected but encouraged residents not to rely on rent statements to remind them to pay their rent as they are not normally provided by market rate landlords.

Arnold– Do we have a solution for laundry room in the Hillside Park redevelopment plan?
Toni – We are still working out the location of where it will be located at the site but there is a plan to provide the laundry facilities to residents with a portable laundry truck system.

Arnold – How quickly will households at Hillside Park be relocated? Is it 5 a month?
Toni – We are working toward 10 spots at a time or 59 families in first phase of redevelopment so it will take about 5 or 6 months relocate all the families for Phase I.

Helen – Will the food market continue at Hillside Park during redevelopment?
Toni – Yes, it will just be moved more towards Hillside Manor.

Misty - What is timeline of Phase 2?
Toni – Demolition of phase 1 first also laundry room to be demolished. Phase one will be completely built and then those relocating for phase 2 will have the option of moving into the new units completed in Phase 1.

Brian – Is Easton Ridge owned by the Housing Authority?
Toni – Yes, we own it, but a third-party property management company operates it (Quantum). It is a mixed income project that we try to keep affordable in our local property portfolio.

Brian – Unhappy with the neighborhood he is living in and the Portland creep he sees close to Easton Ridge. Where can he go to get a good rent amount in a better neighborhood? Do you have properties in better neighborhoods.
Toni – Easton Ridge is located on the boundary with Portland. You may want to look into other Project based opportunities coming online soon such as Good Shepard Village in Happy Valley, Las Flores in Oregon City, development in Lake Oswego or Bear Creek.

Laura – Concerned about an inspector that made her feel uncomfortable taking pictures of her family room at her unit at Hillside Park. She thought it was creepy.
Toni – We can and do take pictures if we feel like we have to, but don't typically. HUD takes pictures of everything when they are doing inspections. Taking pictures can show if work has been done or needs to be done.

Erin to provide materials to those who request by email or by mail along with minutes to all.

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

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

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

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

certify that the Revision of the Annual PHA Plan for fiscal year 2023 of

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

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

Clackamas County
Local Jurisdiction Name

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

The Housing Authority of Clackamas County works closely with Community Development on creating the Clackamas County consolidated planning cycle(s) and PHA planning cycle(s) in accordance with the regulations 24 CFR part 91, for consolidated plan program participants, and24 CFR part 903, for PFIA's to jointly complete the Assessment of Fair Housing Plan.

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

Name of Authorized Official: Commissioner Tootie Smith	Title: Housing Authority Board Chair
Signature:	Date: 10/05/2023

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

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

Certifications of Compliance with PHA Plan and Related Regulations ***(Standard, Troubled, HCV-Only, and High Performer PHAs)***	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 3/31/2024**

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

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

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

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

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

Housing Authority of Clackamas County	**OR001**
PHA Name	PHA Number/HA Code

_X_ **Mid-Year Revision of Annual PHA Plan for Fiscal Year 2023-24**

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

Name of Executive Director - Toni Karter, Interim Executive Director	Name Board Chairman – Commissioner Tootie Smith, Chair
Toni Karter 10/10/2023	Tootie Smith
Signature Date	Signature Date 10/05/2023

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.
Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

MTW Supplement – Amended Annual Submission

PHA Name: Housing Authority of Clackamas County
PHA Code : OR001
MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023
PHA Program Type: Combined
MTW Cohort Number: Asset Building
MTW Supplement Submission Type: Amended Annual Submission **-** **Updated to align with HUD Conditional Approval 12/29/23**

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

1. Efficiencies gained will be used to redirect staff toward activities that have a higher value for the client, such as building trusting relationships, connecting clients to resources, and educating clients on the impacts of financial
2. decisions.
3. 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.
4. 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 order to meet Housing Opportunity Through Modernization Act (HOTMA) implementation timelines, HACC is revising their MTW Supplement and requesting additional waivers which intersect with HOTMA changes mid-year in addition to the activities related to its obligations under the Asset Building cohort in this first fiscal year Supplement to the PHA Plan.

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented

t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
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)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
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
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing & Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
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
11. MTW Self-Sufficiency Program	
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
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
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
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
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

2.d. - Rent Reasonableness – 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 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.

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.

Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. HACC will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls. properties it owns, manages, and controls.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Please explain or upload a description of the quality assurance method. 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)*
Please explain or upload a description of the rent reasonableness determination method. HACC relies on the Rent Reasonable Nelrod EZRRD Model, which offers a third party database of rents to determine rent reasonableness of all County units. This analysis is based on the unit amenities, age, location, and other factors. EZRRD uses its five-method analysis system to compare multiple features per unit for a more in-depth analysis, and automatically identifies the three best comparables based on the system's objective market analysis. *(No document is attached)*

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

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

HACC proposes waiving certain provisions of the following policies:

i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act

ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

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

decisions were made:

i. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.

ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.

iii. If a family moves into a new unit, HACC will process the change without reviewing the household’s income.

iv. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household’s income decreases by 10% or more.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

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

Does the MTW activity apply to all public housing developments? The MTW activity applies to all developments	

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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.

N/A

Does this MTW activity require a hardship policy?

Yes - This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

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

3.b. – Alternative Reexamination Schedule for Households (HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

Yes

What considerations led the MTW agency to modify the hardship policy?

The hardship policy was modified due to the removal of waiver requests 1.g, 1.h. 1.r, 1.s. which were originally included with 3.a, 3.b in the hardship policy.

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes - This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

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

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

HACC interim policies are as follows:

i. HACC will allow households to request an interim if the household's income decreases by 10% or more.

ii. HACC will apply the most recent payment standard and utility allowance during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.

HACC will allow a maximum of 2 interims per year.

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

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

HACC proposes waiving certain provisions of the following policies:

i. Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act

ii. 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2)

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

i. Approved rent increases will use an interim 50058 and will apply the most current payment standard and utility allowance. This will not result in an income review.

ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.

iii. If a family moves into a new unit, HACC will process the change without reviewing the household's income.

iv. Interims due to decreases in income will follow HOTMA rules, which stipulates an interim will be done if the household's income decreases by 10% or more.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

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

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

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

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

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

Applies to all tenant-based and project-based.

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

N/A

Does this MTW activity require a hardship policy?

Provided Already - This document is attached.

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

No

Does the MTW activity require an impact analysis?

Provided Already - This document is attached.

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

HACC interim policies are as follows:

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

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

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

HACC proposes waiving certain provisions of Section 8(o)(11) of the 1937 Act, 24 CFR Part 982.352(b)(iv), and 24 CFR Part

983.103(f). Waiving these provisions will allow HACC to eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, or controls.

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

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

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

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

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

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

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

N/A

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

No

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

Following will explain the quality assurance method:

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)

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

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

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

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

housing for targeted populations.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

N/A

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

No

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

50.00%

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

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

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

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

needs of the local community.

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

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

The MTW activity applies to all assisted households

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

N/A

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.

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to 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. N/A
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

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

E.	Agency-Specific Waiver(s).
E.1	**Agency-Specific Waiver(s) for HUD Approval:** 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. 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. 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.
	Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year? No Agency-Specific Waivers are being requested.
E.2	**Agency-Specific Waiver(s) for which HUD Approval has been Received: Does the MTW agency have any approved Agency-Specific Waivers?** MTW Agency does not have approved Agency-Specific Waivers

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	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.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2023	$1,306,533	$1,197,157	$109,376	2031-09-30
2022	$0	$0	$0	2030-09-30
2021	$0	$0	$0	2029-09-30

G.	MTW Statutory Requirements.
G.1	**75% Very Low Income – Local, Non-Traditional.** 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.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	**0**

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

G.2	Establishing Reasonable Rent Policy.

Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?

No

Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.

MTW agency has not yet established a rent reform policy to encourage employment and self-sufficiency.

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

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

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

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

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

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

H.	Public Comment

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

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

I.	Evaluations.

No known evaluations.

The HARDSHIP POLICY and IMPACT ANALYSIS attachments for Waivers 3.a and 3.b and MTW certification follow.

HARDSHIP POLICY for MTW Waivers 3.a and3.b.

FINANCIAL HARDSHIP EXEMPTION FROM MTW RE-EXAMINATION POLICIES

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

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

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

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

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

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

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

Definitions Used in this Analysis

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

Impact Analysis Method

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

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

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

RESULTS

Financial Impact to the Agency

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

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

	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	
	Triennials		
	- 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
	Agency Impact		
c	- Annual cost savings due to reduction in number of reviews	$28,142	((g1 x a) + (h1 x b) - (i1 x b) - (j1 x a)) / 3
d	- Increase in HAP expenditures annually	$64,506	e1 + e2
e	- Total annual cost savings (loss)	($36,364)	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-	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.

#	Question	Answer	
	sufficiency, and/or housing choice	Self-sufficiency	HACC believes that allowing households to increase their income without an impact on rent will encourage households to increase their income and work to become self-sufficient.
		Housing choice	HACC does not anticipate any impact on housing choice.
5	Impact on the agency's 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.

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 (**07/01/2023**), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

(1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.

(5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at24 C.F.R. Part 146.

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

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

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

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.

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

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

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.

(22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.

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

Housing Authroity of Clackamas County	***OR001***
MTW PHA NAME	***MTW PHA NUMBER/HA CODE***

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

Tootie Smith	***Housing Authority Board Chair***
NAME OF AUTHORIZED OFFICIAL	***TITLE***
	10/05/2023
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's Mid-Year Revision of the 2023 Annual Plan and its related Attachments, including the Moving to Work Supplement	Resolution No. 1979 *Page 1 of 2*

Whereas, the Housing Authority of Clackamas County ("HACC") is required to submit a revision to HACC's 2023 Annual Plan and its attachments, including the Moving to Work ("MTW") Supplement to the US Department of Housing and Urban Development ("HUD"), for annual funding and approval in order to comply with the Housing Opportunity Through Modernization Final Rule, 88 Federal Register 9600, issued February, 14, 2023; and

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

Whereas, a Resident Advisory Board Meeting and public hearing with the HACC were advertised in the Oregonian on July 28, 2023 and open to the public to review and provide comments regarding the draft of the revised Annual Plan and its attachments, including the MTW Supplement; and

Whereas, the revised Annual Plan and its certifications and attachments, including the MTW Supplement, were informed by input and recommendations from the Resident Advisory Board at its meeting on August 8, 2023; and

Whereas, the revised Annual Plan and its attachments, including the MTW Supplement drafts, were made available for public review and comment from August 10, 2023 through September 25, 2023, both online and in hard copy form at the various locations listed in the Annual Plan; and

Whereas, the revised Annual Plan and its attachments were discussed, and testimony was taken and recorded, at a public hearing in front of the Housing Authority of Clackamas County Board of Commissioners on September 21, 2023; and

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

Whereas, the revised Annual Plan and its related attachments, including the MTW Supplement, were revised are to be submitted to HUD no later than October 18, 2023, at least 75 days prior to the effective date of January 1, 2024;

Attachment N:
Annual Plan Resolution

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

In the Matter of Approving the Housing Authority's Mid-Year Revision of the 2023 Annual Plan and its related Attachments including the Moving to Work Supplement	Resolution No. 1979 *Page 2 of 2*

NOW THEREFORE, IT IS HEREBY RESOLVED that the Housing Authority of Clackamas County Board of Commissioners reviewed HACC's Mid-Year Revision of the 2023 Annual Plan and its attachments, including the MTW Supplement, and hereby formally approves the same; and

MAY IT ALSO BE RESOLVED that the Housing Authority of Clackamas County Board of Commissioners hereby authorizes and delegates signing authority to Commissioner Tootie Smith, Chair, to sign all documents reasonably necessary to implement the Mid-Year Revision of the 2023 Annual Plan on behalf of HACC; and

MAY IT ALSO BE RESOLVED that the Housing Authority of Clackamas County Board of Commissioners hereby directs the Executive Director of the Housing Authority to ensure the appropriate submission of these documents to HUD no later than October 18, 2023.

DATED this 5th day of October, 2023.

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

____
Chair

____
Recording Secretary

Approved as to form:

__________________________ 09/26/2023
County Counsel Date

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

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

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

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

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

22. The PHA provides assurance as part of this certification regarding its streamlined annual PHA Plan that:
(i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
(ii) The changes were duly approved by the PHA board of directors (or similar governing body); and
(iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.

Housing Authority of Clackamas County	**OR001**
PHA Name	PHA Number

Streamlined Annual PHA Plan Mid-Year Revision for Fiscal Year: **2023-2024**

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

Name of Authorized Official	Title
Commissioner Tootie Smith	Housing Authority Board Chair
Signature X *Tootie Smith*	Date 10/05/2023

Attachment O:

Public Notice & Comments

Public Notice - January 6, 2023

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

Public Comments from Public Hearing on March 16, 2023

Video of the hearing can be found at: https://youtu.be/ZCyvAIAptM8

Toni Karter, Interim Executive Director, gave a presentation regarding the 2023 Annual Plan and MTW Supplement which is lightly summarized below – see video for full detail.

Outlined the Requirements from HUD for the Annual Plan and Supplement.

Explained the purpose of the Annual Plan and Supplement

The Plan highlights achievements and new activities.

Reviewed the timeline for Annual Plan and where the draft plan was posted. Comment period to end 3/20/22.

Resident engagement and comments are detailed in the plan attachments

Policy changes are detailed in the plan. Highlighted changes towards our goals of:

- Reducing screening barriers and compliance requirements for clients – reduce need of "original documents"
- Reduce risk of homelessness between moves – allowing limited overlap of rent during moves.
- Increase housing stability overall - mostly in Public Housing through HOTMA option using an alternate rent. If over income, they will pay a higher rent. Even if at 80% AMI, folks are at risk of homelessness. This allows the households to stay housed in our difficult market and provides additional income for the Housing Authority.

Capital Fund spending outlined in attachments

Audit – will be updated from the posted draft to the newest audit which was just completed recently (after this was posted). Findings will be added, and the information about our plan of action included.

MTW – MTW status adds more funding flexibility. Discussed with our residents and drafted the MTW supplement to start slow on implementing changes. Focused on self-sufficiency activities - credit building and savings accounts (for our Asset Building Cohort) this year. We will be reviewing more policies and engaging with residents before adding more changes for MTW until next year.

Next steps:

Open for additional comments and questions until 4/20/23.

New regulations (HOTMA) – may require revisions of our plan mid-year. We will bring it back later as needed once we understand the impacts of the new regulations fully.

Bringing back April 4th and then for approval on consent agenda April 6th.

Submission to HUD by April 13th.

Questions and staff answers summarized. Text in () was added for clarification or from staff after the hearing.

<u>(Public hearing opened).</u>

Commissioner comments/questions were called for first.

Q: With the ~ 30M in funding from HUD, have we targeted rural area?

Staff A:– the Housing Choice Voucher allows anyone in the program to choose where they want to live so they can use them in the rural areas. If we look at our stats, majority of clients are not living in the rural areas.

Q: Is any of the money being used in the southern cities such as Sandy Estacada, Molalla, Sandy, Colton or even Canby.

Staff A: We are using money in all those areas, yes.

Q: There are a lot of apartment buildings coming online in those areas (Sandy, Estacada, Molalla, Sandy, Canby) but are all those market rate?

Staff A: We have a new complex called Molalla apartments that will be affordable housing and there are some units in those that we will be subsidizing.

Q: Is that on Highway 211?

Staff A: I am not sure of the exact address.

C: That is okay. That is good to know though as there is a great need for that.

Q: You say you are subsidizing some of those units and that is fine as it reduces homelessness but is rent assistance part of this too?

Staff A: Yes.

C: Rent Assistance is a very worthy goal, too.

Staff A: (Staff agrees)

Q: We are moving from owning public housing, is that correct?

Staff A: Yes

Q: We build units but they are only affordable for a certain number of years and then they revert back to market rat, correct?

Staff A: Yes, there is a 30 year required affordability period and then you can renew that. As a Housing Authority and our mission, we would renew for all our properties. There are some properties that are not Housing Authority owned that are coming up for renewal, they have met their 30-year term. There is a first right of refusal for those if they stay affordable, someone else like a non-profit, buys it to keep it affordable or go back to private market which is tracked through the state.

Q: So you as the owner of those properties, will renew. Do we track how many (of these properties) move into the unaffordable category (back to the private market)?

Staff A: The state does that.

Q: Is it possible to get that information and is that happening in our County to a great degree or not?

Staff A: It happens in all counties, and we have gotten notices from the state when they think one is coming up to the deadline (30 years). They usually give us a few years in advance so everyone has the opportunity to think about do we have the funds, how do we get the funds, can we take over on this property. They also notify us if they have a good lead on someone. Notices come to the Housing Authority, and they notify us if they think they have someone who wants to keep it affordable so we don't have to take it on, we can just support that entity.

C/Q: You mentioned the new plan will reduce screening barrier, how will that effect our Clackamas County residents/citizens who are in need of housing support. Also let me add: This last month, the Oregon Health Authority mentioned that are 62,000 people in Oregon needing food support that were not federally recognized and therefore the State could not give them that support. Question is, we have a considerable amount of poverty in Clackamas County and we have a lot of people who need housing support, so does the reduction of screening barriers like you mentioned, will that harm or help the residents of this county?

Staff A: That will help. Right now, we are denying clients who cannot meet basic document requirements, we are denying clients because of criminal background screening criteria and the federal government really only requires us to deny someone if they are a sex offender, have manufactured meth in public housing before and we are going down to that bar. We are also required to screen out someone if they have been assisted in other federal assistance and have done program violations – up to 7 years is what our policy was and we are reducing that to 3 years so if they haven't done anything wrong in the past 3 years we are not denying them. We are opening the door wider instead of making it more narrow.

Q: Is there a waitlist for affordable housing and supportive housing? And how long is it?

Staff A: Each property is different --- (for Housing Authority properties)

C: No, I want total amount in Clackamas County. I heard it at one time it was 8000 people and that is very dated.

Staff A: Yes, and it has been 3-5 years that people sit without assistance.

Q: Will this 30M (annual funding from HUD to the Housing Authority) reduce the time on the waitlist?

We hope so.

Q: Are there other projects online, coming aboard that will help reduce the time on the waitlist for people and how many units is that?

Staff A: Absolutely. All of our developments in the pipeline, our goal is to get 1500.

C/Q: So there is probably 800-500 online to help reduce that.

Staff A: Correct and by the end of next year almost 500 new ones are coming online.

C: Great thank you.

C/Q: Conversations like this remind me how much paperwork and administration it costs to manage these programs and dollars and I am not looking for an answer, but I always wonder what the cost is to administer every federal dollar and cost to administer every state dollar, and local dollars when it come to these. supportive housing services or whatever it may be. Contract administration requires people and time and dollars. I am anxiously awaiting the numbers on the Point in Time Count to see if we are gaining any traction. I would think it would be. hopefully it looks hopeful that we are making ground. If the point and time count shows our housing population growing when we are building and buildings throughout the region, I am not sure what we are going to do.

Staff A: Meeting yesterday with Vahid Brown draft numbers (not final numbers but preliminary) are down.

C: Okay good

Staff A: We are very excited about that.

Q: When will we be privy to that information?

Staff A: I am not sure, but they are looking over the numbers now and it is a draft

Q: That is interesting and barres a larger conversation that I have been having regionally and statewide, so I need to know that. Thank you very much.

Call for other public commenters in the room that want to speak

No additional people in the room to speak regarding the Annual Plan or Supplement

No additional people online to speak regarding the Annual Plan or Supplement

<u>Public hearing closed</u>

Additional comments/questions collected from the public comment period ending 3/20/23:

C: No comments received by email or phone. No further comments from residents.

A: Would like to work on further public engagement activities next year.

Staff feedback:

Q: How many changes will come with MTW this first year?

A: We are taking it slowly this year and just doing the minimum for our cohort. We will engage with stakeholders, staff, residents, etc. more over the next year to incorporate more waivers in following years. We need to fully understand our options and there was not enough time in our short time frame for the Annual Plan cycle.

Q: An audit was completed between draft posting and final submission to HUD. Will we be updating the plan to include the new audit findings and action plan.

A: Yes, the new audit information will be updated for the final version of the Annual Plan and Supplement is submitted for board approval. The change was mentioned in the public hearing, as well.

Q: Double check the HOTMA required changes that take effect for Public Housing on June 14 – have we chosen alternate rent or termination option for over income families.

A: We included language in the draft, in our presentation to the RAB, and in the public hearing saying we would use the alternate rent option and would adopt the final rule language in our ACOP. Staff is working on fully updating the ACOP for changes required in section 103 and will post the fully updated to HOTMA requirements version by June 14, 2023 implementation.

2023 Annual Plan and MTW Supplement Mid-year Revision

July 28, 2023 – Public Notice in the Oregonian

Public notice for 2023-24 Annual Plan Revision Meetings
A resident meeting to review the Housing Authority of Clackamas County's (HACC) revisions to the 2023 Annual Plan and Moving to Work (MTW) Supplement is scheduled for August 8, 2023 at 10am via Zoom. Resident Advisory Board members, residents and the public are encouraged to attend. Email efernald@clackamas.us to register. In addition, a Public Hearing regarding the revisions to the 2023 Annual Plan & MTW Supplement is planned for 9/21/23 at 10am in person and via zoom. Meeting links, materials, and any schedule changes may be found at: https://www.clackamas.us. All residents and the public are welcome to attend both meetings and to provide comment for consideration. Written comments may be submitted to: efernald@clackamas.us. 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 Revisions of the 2023 Annual Plan & MTW Supplement will be available for review from 8/10/23-9/25/23 at: https://www.clackamas.us/housingauthority/plansandreports, 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 during open hours.

Public Comments from Public Hearing on September 21, 2023

Video of the hearing can be found at: https://youtu.be/hIOoxNcaCiE

Q: Shull – With these changes you mentioned there would be a cost savings on money paid out to contractors, but can you do that without adding additional FTE?

Answer: Yes

Q: Shull – How do you go about ensuring Clackamas County residents get priority on housing placement?

Answer: When doing an application or coordinated housing access entry they are asked where they are from and where they are coming from. That is the place we would check on the Clackamas County residency.

No additional comments/questions from the public hearing were received.

Other Feedback received during public comment period ending 9/25/23:

Note: The public was invited and encouraged to attend the RAB meeting as well as the public hearing. Notes from the RAB meeting are included in Attachment J.

Q: Attachment F: Substantial Deviation and Significant Amendment was confusing about which circumstances pertained to which type of plan and required Capital Fund Program language was missing.

A: Staff reorganized the structure and updated language for the Capital Fund Program section for clarity and added new required language in Attachment F.

Attachment P:
FY 2022 Audit

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

Component Unit Financial Statements
and Supplementary Information

For the Fiscal Year Ended June 30, 2022

Prepared by:

Housing Authority of Clackamas County
Finance Department

INTRODUCTORY SECTION

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

CLACKAMAS COUNTY, OREGON
2051 Kaen Road
Oregon City, Oregon 97045

COMMISSIONERS AS OF JUNE 30, 2022

Name	Term Expires
Tootie Smith, Chair 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2024
Paul Savas, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2027
Sonya Fischer, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2022
Mark Shull, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2024
Martha Schrader, Commissioner 2051 Kaen Road Oregon City, Oregon 97045	December 31, 2024
Ann Leenstra, Commissioner (Appointed) 2051 Kaen Road Oregon City, Oregon 97045	March 1, 2024

Note:
Commissioner Sonya Fisher's Term ended on December 31st, 2022,

Commissioner Paul Savas previous term ended on December 31st, 2022, and current term is from 2023-2027.

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

CLACKAMAS COUNTY, OREGON
2051 Kaen Road
Oregon City, Oregon 97045

ADMINISTRATIVE OFFICES

Housing Authority of Clackamas County
13930 South Gain Street
Oregon City, Oregon 97045

LEGAL COUNSEL
Steven Madkour
Office of County Counsel
Clackamas County, Oregon
2051 Kaen Road
Oregon City, Oregon 97045

County Administrator
Gary Schmidt
2051 Kaen Road
Oregon City, Oregon 97045

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

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FINANCIAL SECTION

REPORT OF INDEPENDENT AUDITORS

Report of Independent Auditors

Board of County Commissioners of
Clackamas County, Oregon, as Governing Body of
Housing Authority of Clackamas County
Oregon City, Oregon

Report on the Audit of the Financial Statements

Qualified and Unmodified Opinions

We have audited the governmental activities and the aggregate discretely presented component units of the Housing Authority of Clackamas County, Oregon (the Authority), a component unit of Clackamas County, Oregon, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements as listed in the table of contents.

Qualified Opinion on the Aggregate Discretely Presented Component Units

In our opinion, based on our report and the reports of other auditors, except for the effects of the matter described in the Basis for Qualified and Unmodified Opinions section of our report, the accompanying financial statements referred to above present fairly, in all material respects, the financial position of the aggregate discretely presented component units of the Authority, as of June 30, 2022, and the changes in financial position thereof for the year ended in accordance with accounting principles generally accepted in the United States of America. We did not audit the financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, or Webster Road Housing LP which represent 100% of the assets, net position, and revenues of the aggregate discretely presented component units as of June 30, 2022. Except for Webster Road Housing LP, those statements were audited by other auditors whose report has been furnished to us, and our opinions, insofar as it relates to the amounts included for Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, and Hillside Manor LP, are based solely on the report of the other auditors.

Unmodified Opinion on the Governmental Activities

In our opinion, the accompanying financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities of the Housing Authority of Clackamas County, Oregon as of June 30, 2022, and the respective changes in financial position and cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Qualified and Unmodified Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards (Government Auditing Standards)*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified and unmodified audit opinions. The financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP were not audited in accordance with *Government Auditing Standards*.

Matter Giving Rise to Qualified Opinion on the Aggregate Discretely Presented Component Units

The financial statements of Webster Road Housing LP have not been audited, and we were not engaged to audit the Webster Road Housing LP financial statements as part of the Authority's basic financial statements. Webster Road Housing LP's financial statements are included in the Authority's basic financial statements as a discretely presented component unit and represent 10 percent, 5 percent and 0 percent of the assets, net position, and revenues, of the Authority's aggregate discretely presented component units.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, no such opinion is expressed.

- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control–related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis and the schedules of OPEB and Pension information, as listed in the table of contents, be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Supplementary Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the Authority's basic financial statements. The supplementary information and the schedule of expenditures of federal awards, as listed on the table of contents, as required by Title 2 U.S. *Code of Federal Regulations (CFR) Part 200*, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, are presented for purposes of additional analysis and are not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the accompanying supplementary information and the schedule of expenditures of federal awards is fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Information

Management is responsible for the other information included in the annual report. The other information comprises the introductory section but does not include the basic financial statements and our auditor's report thereon. Our opinions on the basic financial statements do not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the basic financial statements, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the basic financial statements, or the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated February 24, 2023 on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Authority's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control over financial reporting and compliance.

Other Reporting Required by Minimum Standards for Audits of Oregon Municipal Corporations

In accordance with the *Minimum Standards for Audits of Oregon Municipal Corporations*, we have issued our report dated February 24, 2023, on our consideration of the Authority's compliance with certain provisions of laws, regulations, contracts, and grant agreements, including the provisions of Oregon Revised Statutes as specified in Oregon Administrative Rules 162-010-000 through 162-010-0330 of the *Minimum Standards for Audits of Oregon Municipal Corporations*. The purpose of that report is to describe the scope of our testing of compliance and the results of that testing and not to provide an opinion on compliance.

Ashley Osten

Ashley Osten, Partner
For Moss Adams LLP
Portland, Oregon
February 24, 2023

MANAGEMENT'S DISCUSSION AND ANALYSIS

The Management of the Housing Authority of Clackamas County (the Authority) offers readers of our financial statements this narrative overview and analysis of the financial activities of the Authority for the fiscal year ended June 30, 2022. All amounts, unless otherwise indicated, are expressed in thousands of dollars.

Financial Highlights

- Our assets exceeded our liabilities (net position) at the close of the fiscal year by $61,585, an increase of $20,881 over the prior fiscal year. Of this amount, $25,573 (unrestricted net position) may be used to meet our ongoing obligations to provide low-cost housing.
- The Authority's total assets were $173,480, a net increase of $49,416 from the prior fiscal year, primarily due to an increase in notes receivable from development activity.
- Total liabilities were $111,158, an increase of $26,106 from the prior fiscal year primarily as a result of recording debt related to development activity.
- Net Position increased by $20,881, due to the net of recording property acquired for development of housing units by the Authority and net of Oregon Public Employees Retirement System (OPERS) expenses for employee retirement benefits. Authority received Metro Grant in the amount of $5,457 to fund development projects for the purpose of creating equitable housing and economic opportunities.
- Total operating revenues were $55,628, an increase of $16,374, mainly from an increase in Voucher income and grant activity.
- Total operating expenses were $34,555, decrease of $116 due primarily to the net impact of Voucher housing payments, OPERS and development expenses incurred during the year. Total non-operating expenses, net were $755 in 2022 and $1,905 in 2021.
- Capital contributions amounted to $563, primarily from HUD, which were used for the acquisition of capital assets, whereas in 2021 the amount was $488.

Overview of the Financial Statements

The discussion and analysis are intended to serve as an introduction to the Authority's basic financial statements. The basic financial statements consist of the Statement of Net Position, Statement of Revenues, Expenses and Changes in Net Position and Statement of Cash Flows along with the notes to the basic financial statements. We encourage readers to consider the information presented here in conjunction with these financial statements.

Overview of the Financial Statements (Continued)

Complementing these statements and notes is the supplementary information, which provides additional detail about the Authority's operations.

The Statement of Net Position presents information on all the Authority's assets, deferred outflows of resources, liabilities and deferred inflows of resources, with the differences reported as net position. Over time, increases or decreases in net position may serve as a useful indicator of whether our financial position is improving or deteriorating.

The Statement of Revenues, Expenses and Changes in Net Position present information showing how the Authority's net position changed during the year. All changes in net position are reported as soon as the underlying event giving rise to the change occurs, regardless of the timing of the related cash flows.

The Statement of Cash Flows is an analysis of the change in the Authority's cash balance during the year. The cash position may differ materially from the Statement of Revenues, Expenses and Changes in Net Position.

The basic financial statements include the following four discretely presented component units: Easton Ridge, LLC, Pedcor, Investments 2016-CLV LP, Hillside Manor LP and Webster Road Housing LP. Discretely presented component unit information can be found in the notes to the basic financial statements. Complete financial statements can be obtained from the Authority at PO Box 1510, 13930 S. Gain St., Oregon City, OR 97045, except for Webster Road Housing LP, which is unaudited.

Authority Financial Analysis

Net Position

The following provides summary of the Authority's net position for 2022 and 2021:

	2022	2021
	$(000's)	
Assets:		
Assets, excluding capital assets	$ 159,474	$ 109,800
Capital assets	14,006	14,264
Total assets	173,480	124,064
Deferred outflows of resources	1,889	2,075
Liabilities:		
Current liabilities	25,323	7,258
Noncurrent liabilities	85,835	77,794
Total liabilities	111,158	85,052
Deferred inflows of resources	2,626	382
Net position:		
Net investment in capital assets	10,112	10,267
Restricted	25,900	7,449
Unrestricted	25,573	22,988
Total net position	$ 61,585	$ 40,704

Authority Financial Analysis (Continued)

As noted earlier, net position may serve over time as a useful indicator of whether a government's financial condition is improving or declining. In the case of the Authority, assets exceeded liabilities by $61,585 at the close of the most recent fiscal year.

Sixteen percent of the Authority's net position, $10,112, reflects its net investment in capital assets, primarily housing, less any related debt used to acquire those assets that are still outstanding. Forty-two percent of the Authority's net position, $25,900, consists of cash for capital replacement and cash restricted for future HAP payments. These cash reserves are producing interest revenue. The unrestricted net position of the Authority is available for future use to provide program services and the remaining debt service.

The total net position of the Authority increased by $20,881 during the current fiscal year. Net investment in capital assets decreased by $155, primarily due to depreciation offset by additions during the year. Restricted net position increased by $18,451, primarily due to amounts restricted for Mainstream vouchers, debt service, and Metro Bond Fund projects. The unrestricted net position of the Authority increased by $2,585 primarily due to development activities net of recording the impact of Oregon PERS liabilities.

Changes in Net Position

The following provides a summary of the Authority's change in net position for 2022 compared to 2021:

	2022	2021
	$(000's)	
Operating revenues:		
Intergovernmental revenues	$ 33,152	$ 24,541
Rental income	2,676	2,566
Other revenue	19,800	12,147
Total operating revenues	55,628	39,254
Expenses:		
Housing assistance payments	23,257	19,497
Other operating expenses	11,298	15,174
Non-operating expense, net	755	1,905
Total expenses	34,555	36,576
Net income before contributions	20,318	2,678
Capital contributions	563	488
Change in net position	20,881	3,166
Net position, beginning of year	40,704	37,538
Net position, end of year	$ 61,585	$ 40,704

Authority Financial Analysis (Continued)

Operating revenues increased by $16,374 or 41.7% over the prior year. Increases over the prior year's revenues resulted primarily from the Metro grant fees, developer fees, an increase in Voucher rental income, and increased rents in the area. Total operating expenses decreased by $116 due primarily to a net of decreased HAP payments and costs associated with development.

Capital Asset and Debt Analysis

The Authority's total investment in capital assets decreased by $258 from the prior fiscal year, due to depreciation offset by additions during the year. Long-term debt increased $10,510 primarily a result of the continuation of construction work on Webster Road, a 48-unit permanent supportive housing project located in Gladstone, Oregon.

Additional information relating to capital assets and long-term debt may be found in Notes 5 and 6, respectively.

Economic Factors

A majority of the Authority's programs are dependent on federal funding. The Housing Choice voucher program (the "Program") has two primary funding components: The Housing Assistance Payment (HAP) which can only be used for rent assistance payments to landlords and the administrative fee funding to cover the costs of administering the Program. The administrative fee was funded at only ~84% of fee eligibility during the fiscal year and are further limited to the number of vouchers leased. During this fiscal year, the Program was authorized to serve 1,875 families but due to average rental assistance needed per family exceeding the HAP funding received on average per family, the Authority utilized 100% of its rental assistance dollars and was only able to serve 98% of its vouchers. COVID-19 shutdowns impacted many residents causing loss of work which increased the amount of HAP paid. The Authority has increased caseloads with reduced staff and streamlined operations, but still has been forced to subsidize administrative costs with funds from local projects which do not have federal restrictions on their use. The Authority continues to receive new awards of funding and expects relatively flat funding for HUD existing programs in the coming year. New awards with no increases in staffing would equate to more stable program cost coverage with increased administrative fees.

In May of 2020, voters in the Metro region passed the Supportive Housing Services measure (Measure 26-210). The measure will raise money for supportive housing services for people experiencing homelessness or at risk of experiencing homelessness. Clackamas County will receive 21.33% of the total revenue generated by Measure 26-210 to provide services such as: rent assistance, mental health services, addiction and recovery services, employment assistance, and peer support services. The Authority is

Economic Factors (Continued)

working in conjunction with Clackamas County and Clackamas County's department of Health, Housing and Human Services to implement Measure 26-210. In 2022 there was a decrease in SHS metro funds moved to the new Housing Division.

The Authority's Public Housing subsidy for calendar year 2022 was about 90% of subsidy eligibility while the physical needs assessment is about three times the amount funded by HUD.

Financial Contact

The financial statements are designed to present users (citizens, taxpayers, customers, investors and creditors) with a general overview of the Authority's finances and to demonstrate the Authority's accountability. If you have any questions about the report or need additional information, please contact the Housing Authority of Clackamas County at PO Box 1510, 13930 S. Gain St., Oregon City, OR 97045.

BASIC FINANCIAL STATEMENTS

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

STATEMENT OF NET POSITION

JUNE 30, 2022

	Housing Authority of Clackamas County	Discretely Presented Component Units
ASSETS:		
Current assets:		
Cash and cash equivalents	$ 5,724,679	$ 2,303,427
Investments	2,627,768	-
Accounts receivable, net of allowance for doubtful accounts of $100,928	5,487,677	144,985
Notes receivable	275,000	-
Accrued interest on notes receivable, net of allowance of $6,194,268	1,726,045	-
Inventory	20,137	-
Other assets	282,511	497,382
Total current assets	16,143,817	2,945,794
Restricted assets:		
Cash	23,855,247	6,061,137
Investments with fiscal agent	431,544	-
Non-current assets:		
Notes receivable, net of current portion	119,042,871	-
Other assets	-	538,207
Capital assets not being depreciated	3,898,984	17,254,018
Capital assets being depreciated	10,107,275	114,277,083
TOTAL ASSETS	173,479,737	141,076,239
DEFERRED OUTFLOW OF RESOURCES	1,889,147	-
TOTAL ASSETS AND DEFERRED OUTFLOW OF RESOURCES	175,368,885	141,076,239
LIABILITIES:		
Current liabilities:		
Accounts payable and accrued expenses	2,283,471	6,074,919
Tenant deposits payable from restricted assets	134,760	232,536
Unearned revenue	21,811,240	116,609
Other current liabilities payable from restricted assets	421,012	4,470,484
Current portion of long-term liabilities	672,503	14,191,202
Total current liabilities	25,322,986	25,085,750
Non-current liabilities:		
Other - notes payable	-	89,098,663
Long-term liabilities, net of current	85,834,781	-
TOTAL LIABILITIES	111,157,767	114,184,413
DEFERRED INFLOW OF RESOURCES	2,626,060	-
NET POSITION:		
Net investment in capital assets	10,112,501	28,241,236
Restricted	25,899,798	4,734,903
Unrestricted	25,572,758	(6,084,313)
TOTAL NET POSITION	$ 61,585,058	$ 26,891,826

See notes to basic financial statements

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION

YEAR ENDED JUNE 30, 2022

	Housing Authority of Clackamas County	Discretely Presented Component Units
OPERATING REVENUES:		
Rental income	$ 2,676,390	$ 5,358,125
HUD PHA operating grants	2,648,218	-
Voucher income	21,677,004	-
Other government grants	8,826,456	-
Other income	19,799,979	50,337
Total operating revenues	55,628,047	5,408,462
OPERATING EXPENSES:		
Housing assistance payments	23,257,052	-
Administrative expenses	6,352,392	931,071
Tenant services	278,812	-
Utilities	845,803	654,105
Ordinary maintenance and operations	2,077,006	590,240
General expenses	508,024	185,447
Other expenses	403,039	-
Depreciation and amortization	833,398	2,775,041
Total operating expenses	34,555,525	5,135,904
OPERATING INCOME:	21,072,522	272,558
NON-OPERATING REVENUE (EXPENSE):		
Investment return (loss)	(35,333)	4,003
Interest expense	(719,651)	(2,151,163)
Other	-	(18,933)
Total non-operating expense	(754,984)	(2,166,093)
NET INCOME (LOSS) BEFORE CAPITAL CONTRIBUTIONS	20,317,538	(1,893,535)
Capital contributions	563,181	17,373,400
CHANGE IN NET POSITION	20,880,719	15,479,865
NET POSITION, June 30, 2021	40,704,339	11,411,961
NET POSITION, June 30, 2022	$ 61,585,058	$ 26,891,826

See notes to basic financial statements

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

STATEMENT OF CASH FLOWS

YEAR ENDED JUNE 30, 2022

	Housing Authority of Clackamas County
CASH FLOWS FROM OPERATING ACTIVITIES:	
Received from grants	$ 50,920,593
Received from tenants	2,627,316
Payments to suppliers	(4,347,336)
Payments for housing subsidies	(23,257,052)
Payments to employees	(5,845,417)
Other	19,737,830
NET CASH FROM OPERATING ACTIVITIES	39,835,934
CASH FLOWS FROM NONCAPITAL FINANCING ACTIVITIES:	
Payments received from notes	365,000
Purchase of notes	(31,591,365)
NET CASH FROM NONCAPITAL FINANCING ACTIVITIES	(31,226,365)
CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES:	
Purchases of capital assets	(576,469)
Capital grants received	563,181
Principal payments on long-term debt	(883,288)
Proceeds received from long-term debt	11,393,307
Interest paid on long-term debt	(719,651)
NET CASH FROM CAPITAL AND RELATED FINANCING ACTIVITIES	9,777,080
CASH FLOWS FROM INVESTING ACTIVITIES:	
Reinvested dividends	(35,333)
Purchases of Investments	(1,096,037)
NET CASH FROM INVESTING ACTIVITIES	(1,131,370)
NET INCREASE IN CASH AND CASH EQUIVALENTS	17,255,279
CASH AND CASH EQUIVALENTS, June 30, 2021	12,324,648
CASH AND CASH EQUIVALENTS, June 30, 2022	$ 29,579,926
RECONCILIATION OF OPERATING INCOME TO NET CASH FROM OPERATING ACTIVITIES:	
Operating income	$ 21,072,522
Adjustments to reconcile operating income (loss) to net cash from operating activities:	
Depreciation and amortization	833,398
OPEB and pension expense	(118,650)
Change in assets and liabilities:	
Increase in inventory	(922)
Increase in other assets	(32,326)
Increase in accounts receivable	(62,149)
Increase in accounts payable and accrued expenses	555,417
Increase in tenant deposits	8,851
Increase in compensated absences	367,696
Decrease in other liabilities	(498,894)
Increase in unearned revenue	17,710,991
NET CASH FROM OPERATING ACTIVITIES	$ 39,835,934

See notes to basic financial statements

NOTES TO BASIC FINANCIAL STATEMENTS

1. REPORTING ENTITY AND DESCRIPTION OF OPERATIONS

The Housing Authority of Clackamas County (the Authority) is a municipal corporation established under Oregon Revised Statutes Chapter 456 to provide low-cost housing to individuals meeting criteria established by the U.S. Department of Housing and Urban Development (HUD). As provided by statute, the Clackamas County Board of County Commissioners (the Board) is the governing body of the Authority. HUD provides the Authority with funding for the construction of low-income housing through the purchase of notes and bonds issued by the Authority and guarantees payment of the notes and bonds through grants. In addition, HUD provides rental subsidies and administrative fees for the operation of most of the programs.

The Authority, under the criteria of the Government Accounting Standards Board (GASB), is considered a component unit of Clackamas County, Oregon (the County) because the Board of County Commissioners also governs the Authority. This relationship allows the County to impose its will on the Authority. The County reports the Authority as a blended component unit since the County's H3S Department management has operational responsibility for the Authority.

The Authority is a partner in four discretely presented component unit tax credit projects:

1) Easton Ridge Apartments, a 264-unit apartment complex located in Clackamas, Oregon. Easton Ridge Apartments was financed with proceeds from bonds issued by the Authority and an equity contribution made by the Enterprise Development Corp on March 6, 2013. The Project's fiscal year-end is December 31, and its fiscal year ending December 31, 2021 is included in these basic financial statements.

2) Rosewood Terrace, a 212-unit apartment complex located in Happy Valley, Oregon. Rosewood Terrace is financed with proceeds from bonds issued by the Authority and an equity contribution made by Pedcor. Rosewood Terrace's fiscal year end is December 31, and its fiscal year ended December 31, 2021 is included as part of these basic financial statements.

3) Hillside Manor Limited Partnership (HMLP), a 100-unit apartment building in Milwaukie, Oregon. Hillside Manor is the Authority's first conversion from Public Housing under HUD's Rental Assistance Demonstration Program (RAD) and became effective June 1, 2020. HMLP's fiscal year end is December 31, and its fiscal year ending December 31, 2021 is included in these basic financial statements.

4) (Unaudited) Webster Road Housing Limited Partnership, a 48-unit apartment complex located in Gladstone, Oregon. Webster Road is financed with proceeds from various sources, including tax-exempt bonds, OHCS, Metro Housing Bond, HACC, and HOME funds. Webster Road was still under construction as of June 2022. Webster Road's fiscal year end is December 31, and its initial fiscal year ending December 31, 2021, is included in these basic financial statements.

These projects are considered a component unit and included in the Authority because, under GASB 61 guidelines, in management's professional judgment, the projects exclusion would

1. REPORTING ENTITY AND DESCRIPTION OF OPERATIONS (Continued)

render the financial statements misleading due to its close financial relationship to the Authority. Discrete presentation, as opposed to blended presentation, is appropriate as the projects are not fiscally dependent on the Authority. Certain information may be presented differently in these financial statements to conform to the presentation of the primary government than in those of separately issued component unit financial statements because the limited partnerships do not follow government accounting standards for reporting purposes. Complete financial statements may be obtained from the Authority at PO Box 1510, 13930 S. Gain St., Oregon City, OR 97045.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Measurement Focus and Basis of Accounting

The basic financial statements are reported using the economic resources measurement focus and accrual basis of accounting. Revenues are recorded when earned, and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows. Non-exchange transactions, in which the Authority receives value without giving equal value in exchange, include grants and entitlements. Revenue from grants and entitlements is recognized when earned.

The Authority distinguishes operating revenues and expenses from non-operating items. Operating revenues and expenses generally result from providing services in connection with the Authority's ongoing operations. The principal operating revenues are rental charges and grant revenue. Operating expenses include housing assistance payments, tenant services, administrative expenses, and depreciation on capital assets. All revenues and expenses not meeting this definition are reported as non-operating revenues and expenses.

Cash, Cash Equivalents and Investments

The Authority's cash and cash equivalents consist of cash on hand, deposits, and short-term investments with original maturities of three months or less. ORS 294.035 authorizes the Authority to invest in general obligations of the United States and its agencies, debt obligations of the state of Oregon, California, Idaho, and Washington and their political subdivisions, banker's acceptances, corporate indebtedness, commercial paper, repurchase agreements, time certificates of deposit, fixed or variable life insurance contracts, and the State Treasurer's Local Government Investment Pool (LGIP).

Restricted cash and investments include bond fund deposits, replacement reserves, and Public Housing disposition proceeds. Bond fund deposits are held in trust by the bond trustee and are restricted for the payment of interest and principal on the bonds. Replacement reserves are held by a trustee or the Authority and are restricted for the payment of capital expenditures deemed necessary by the Authority. Disposition proceeds are held in an escrow account and are restricted to the replacement of Public Housing or project-based Vouchers. These investments are stated at amortized cost, which approximates fair value.

Accounts Receivable

Accounts receivable represent amounts due from HUD and tenants. Based on historical information, the Authority estimates the amounts due from tenants, may be uncollectible. No allowance for doubtful accounts is considered necessary for HUD receivables. Accounts receivable subject to the allowance for doubtful accounts was $5,588,605.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Inventory

Inventory is stated at cost (first-in, first-out method).

Capital Assets

Capital assets are recorded at the original or estimated original cost. Donated capital assets are recorded at their acquisition value on the date donated. The Authority defines capital assets as assets with an initial cost of more than $5,000 and an estimated useful life in excess of one year. Maintenance and repairs that do not add to the asset's value or materially extend the assets' lives are not capitalized. Capital assets are depreciated using the straight-line method over the estimated useful lives (ranging from five to thirty years) of the related assets.

Accrued Compensated Absences and Sick Pay

Compensated absences are recorded as a liability on the Statement of Net Position. Sick pay is not accrued as it does not vest and is paid when leave is taken.

Bond Premium, Discount, and Issuance Costs

Bond premiums and discounts are amortized on a method that approximates the effective interest method over the related bond repayment period. The unamortized bond premium is added to bonds payable. Bond issuance costs are expensed.

Long-Term Debt

Long-term debt consists of loans, notes and bonds issued to finance the construction and acquisition of low-income housing.

Deferred Inflows and Outflows of Resources.

In addition to assets, the statement of net position will sometimes report a separate section for deferred outflows of resources. This separate financial statement element, *deferred outflows of resources*, represents a consumption of net assets that applies to a future period and, so, will not be recognized as an outflow of resources (expense/expenditure) until then.

In addition to liabilities, the statement of net position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element, *deferred inflows of resources*, represents an acquisition of net assets that applies to a future period and, so, will not be recognized as an inflow of resources (revenue) until then.

Pensions

For purposes of measuring the net pension liability, deferred outflows of resources and deferred inflows of resources related to pensions, and pension expense, information about the fiduciary net position of the Oregon Public Employees Retirement System (OPERS) and additions to/deductions from OPERS's fiduciary net position have been determined on the same basis as they are reported by OPERS. For this purpose, benefit payments (including refunds of employee contributions) are recognized when due and payable in accordance with the benefit terms. Investments are reported at fair value.

Other Post-Employment Benefits Obligations

The Authority's total OPEB liability is recognized as a long-term liability in the proprietary fund

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

statements. The OPEB liability is actuarially determined.

Budgets

The Authority does not have an annual appropriated budget for the year ended June 30, 2022. Budgets are created for each HUD grant to meet financial management and control objectives. The Authority utilizes these budgets as operational tools but is not required to and does not adopt a legally appropriated budget as defined by GASB. Therefore, budgetary comparisons are not reported in these financial statements.

Net Position

Net Investment in Capital Assets – This represents the Authority's investment in capital assets, net of depreciation and outstanding debt obligations related to those capital assets. To the extent debt has been incurred but not yet expended for capital assets, such amounts are not included as a component of invested in capital assets, net of related debt.

Restricted – This represents resources for which the Authority is legally or contractually obligated to spend resources in accordance with restrictions imposed by third parties.

Unrestricted – Resources used for the Authority's general operations, which aren't restricted by third parties. When an expense is incurred that can be paid using either restricted or unrestricted resources, the Authority's policy first applies expense toward restricted resources.

Use of Estimates

The preparation of basic financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the basic financial statements and reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Statement of Cash Flows

For purposes of the Statement of Cash Flows, the Authority considers cash and cash equivalents with remaining maturities of three months or less at the time of purchase to be cash or cash equivalents. The Authority does not consider LGIP or fiscal agent investments to be cash equivalents since the funds own investments with maturities of over three months.

Adoption of new GASB pronouncements

During the fiscal year ended June 30, 2022 the Authority implemented the following GASB pronouncements:

GASB Statement No. 87, Leases, Issued June 2017

The Authority implemented GASB 87, Leases for the year ended June 30, 2022. The adoption of this standard did not have an impact on Authority's financial statements as all of the Authority leases are short term in nature.

3. CASH, CASH EQUIVALENTS AND INVESTMENTS

Cash, cash equivalents and investments are comprised of:

		Unristericted		Restricted		Total
Deposits	$	5,724,679	$	23,855,247	$	29,579,926
Investments with Fiscal Agent		-		431,544		431,544
Oregon Treasurer's Local						
Local Government Investment Pool		2,627,768		-		2,627,768
	$	8,352,448	$	24,286,791	$	32,639,240

Deposits with Financial Institutions

Custodial credit risk on deposits is the risk that in the event of a bank or credit union failure, the Authority's deposits may not be returned. The Authority does not have a formal policy addressing custodial credit risk. In order to minimize the risk, state statutes require bank and credit unions holding public funds become members of the Oregon Public Funds Collateralization Program (PFCP), a multiple institution collateral pool created by the Office of the State Treasurer. To qualify, participating banks and credit unions must pledge collateral against any public fund deposits in excess of deposit insurance. The amount of collateral is set by the PFCP between 10% and 110% of each bank's public fund deposits based on their net worth and level of capitalization. Although the PFCP creates a shared liability structure for participating bank and credit union depositories, it does not guarantee that all funds are 100% protected. At June 30, 2022, the carrying amount of deposits was $30,369,399 and the bank balance was $30,369,288. Of the Authority's June 30, 2022 bank balance deposit, $2,028,363 was covered by the FDIC and $28,341,036 was collateralized by the PFCP.

At June 30, 2022, investments include the Oregon Treasurer's Local Government Investment Pool (LGIP). The investment in the LGIP is stated at fair value, which approximates cost and is the same as the value of its pool shares. Pool shares are not subject to leveling requirements.

The Oregon State Treasurer administers the LGIP. The LGIP is an open-ended no-load diversified portfolio offered to any agency, political subdivision or public corporation of the State who by law is made the custodian of, or has control of, any fund. The LGIP is commingled with the State's short-term funds. In seeking to best serve local government in Oregon, the Oregon Legislature established the Oregon Short-Term Fund Board, which is not registered with the U.S. Securities and Exchange Commission as an investment company. The purpose of the Board is to advise the Oregon State Treasurer in the management and investment of the LGIP. The LGIP is not currently rated by an independent rating agency.

Investments Measured at Fair Value

Per GASB Statement No. 72, Fair Value is described as an exit price. Fair Value measurements assume a transaction takes place in a government's principal market or a government's most advantageous market in the absence of a principal market. The fair

3. CASH, CASH EQUIVALENTS AND INVESTMENTS (Continued)

value also, should be measured assuming that general market participants would act in their economic best interest. Fair value does not take into consideration transaction costs.

Securities classified in Level 1 of the fair value hierarchy and are valued using prices quoted in active markets for those securities. Securities classified in Level 2 of the fair value hierarchy are valued using a variety of pricing techniques, including but not limited to fundamental analytical data related to the securities, values of baskets of securities, market interest rates, matrix calculated prices, and purchase price. Level 3 fair value is determined using significant unobservable inputs.

Cash and cash equivalents and the Oregon Short-Term funds investment pool are not measured at fair value and, thus are not subject to the fair value disclosure requirements. Investments with fiscal agent are recorded at amortized coat and as such are also not subjected to leveling requirements.

The Authority's investment policy limits investment maturities to three years as a means of managing its exposure to fair value losses arising from increasing interest rates. For purposes of this schedule, 100% of the amounts in Oregon's local government investment pool are considered to be less than 3 years to maturity.

Maturity	Minimum %	Actual %
Less than 1,080 days	100%	100%

Credit Risk

Oregon Revised Statutes limit the types of investments that the Authority may have. The Authority is in compliance with these statutes at June 30, 2022. The Authority is also in compliance with its investment policy. The Authority follows the County's credit risk policy which minimizes credit risk by; limiting exposure to poor credits and concentrating the investments in the safest types of securities; pre-qualifying the financial institutions, broker/dealers, intermediaries, and advisors with which the Authority will do business; diversifying the investment portfolio so that potential losses on individual securities will be minimized; and actively monitoring the investment portfolio holdings for ratings changes, changing economic/market conditions, etc.

Custodial Credit Risk

Custodial risk is the risk that, in the event of failure of the counterparty, the Authority will not be able to recover the value of its investments that are in the possession of an outside party. At June 30, 2022, Authority investments in the amount of $0 are subject to custodial credit risk.

4. NOTES RECEIVABLE

The Notes Receivable balance at June 30, 2022 is $123,988,659. This balance resulted from the Easton Ridge asset sale to Easton Ridge LLC, amounts related to Pedcor/Rosewood Station construction, the conversion of Hillside Manor from Public Housing to a LIHTC property, construction of the Webster Road Project, and Metro bonds loaned to the Fuller Road project.

	Beginning Balance	Additions	Reductions	Ending Balance
Easton Ridge LLC notes receivable	$ 15,113,342	$ -	$ (365,000)	$ 14,748,342
Easton Ridge LLC mortgage loan receivable	15,774,389	489,006	-	16,263,395
Rosewood Station Dispo. notes receivable	1,757,475	-	-	1,757,475
Rosewood Station notes receivable	33,010,555	417,003	-	33,427,558
Hillside Manor LLC	5,821,858	257,289	-	6,079,147
Hillside Manor LLC, Sponsor Loan #1	551,051	2,551,717	-	3,102,768
Hillside Manor LLC, Construction Loan	13,591,913	939,948	-	14,531,861
Webster Road LLC, Metro Bond	2,939,209	-	-	2,939,209
Webster Road LLC, PSH Funds	1,069,472	-	-	1,069,472
Webster Road LLC, HACC Seller Loan	1,770,056	-	-	1,770,056
Webster Road LLC, Construction Loan	112,500	10,472,318	-	10,584,818
Fuller Road, Metro Bond	4,500,000	-	-	4,500,000
Good Shepherd	-	7,630,014	-	7,630,014
Maple Apartments	-	8,834,070	-	8,834,070
	$ 96,011,820	$ 31,591,365	$ (365,000)	$ 127,238,184

	Gross Notes and Interest Receivable	Uncollectible Allowance Rate	Uncollectible Allowance	Notes and Interest Receivable, net
Easton Ridge LLC notes receivable	$ 14,748,342	0.00%	$ -	$ 14,748,342
Easton Ridge LLC mortgage loan receivable	16,263,395	24.22%	3,938,395	$ 12,325,000
Rosewood Station Dispo. notes receivable	1,757,475	8.68%	152,475	$ 1,605,000
Rosewood Station notes receivable	33,427,558	0.00%	-	$ 33,427,558
Hillside Manor LLC	6,079,147	5.46%	331,647	$ 5,747,500
Hillside Manor LLC, Sponsor Loan #1	3,102,768	11.79%	365,935	$ 2,736,833
Hillside Manor LLC, Construction Loan	14,531,861	9.67%	1,405,816	$ 13,126,045
Webster Road LLC, Metro Bond	2,939,209	0.00%	-	$ 2,939,209
Webster Road LLC, PSH Funds	1,069,472	0.00%	-	$ 1,069,472
Webster Road LLC, HACC Seller Loan	1,770,056	0.00%	-	$ 1,770,056
Webster Road LLC, Construction Loan	10,584,818	0.00%	-	$ 10,584,818
Fuller Road, Metro Bond	4,500,000	0.00%	-	$ 4,500,000
Good Shepherd	7,630,014	0.00%	-	$ 7,630,014
Maple Apartments	8,834,070	0.00%	-	$ 8,834,070
	$ 127,238,184		$ 6,194,268	$ 121,043,916

The Authority loaned $16,603,341 of proceeds from its 2013 Series A Bond financing to Easton Ridge LLC. Easton Ridge LLC has agreed to pay the Authority amounts equal to the principal and interest requirements on the 35 year 2013 Series A Bonds of $862,600 per year. Principal payments totaled $365,000 in 2022. The County has provided a contingent loan

4. NOTES RECEIVABLE (Continued)

agreement in the event earnings from the project and the principal and interest reserve fund are not sufficient to pay required annual amounts. The Authority has a mortgage loan to the Project in the amount of $12,325,000 as part of the sale agreement. The mortgage earns 3.1% interest on the outstanding balance. The mortgage repayment is contingent on available excess revenue of the project and does not have specific payment amounts or repayment time terms.

Rosewood Station is under construction, initially funded with a loan from the Authority of disposition funds in the amount of $1,605,000 accruing simple interest at 3.0%. As of June 30, 2022 Rosewood Station had drawn down $33,427,558 for construction which is included in the note receivable balance.

Hillside Manor was converted from Public Housing through a sale to Hillside Manor Limited Partnership. Hillside Manor LLC is a single member LLC owned by HACC as the general partner in the partnership. Upon sale Hillside Manor Limited Partnership issued a seller note for the purchase in the amount of $2,551,717 which accrues interest at a rate of 1.15% compounded annually. The note is due on December 31, 2070. Hillside Manor also has two additional loans for construction: 1) Sponsor Loan #1 with 1% simple interest and 2) a construction loan that has drawn down $14,531,861.

Webster Road, which is under construction, was funded with a loan from the Authority of Metro Housing Bond funds in the amount of $2,939,209 accruing interest at 2.08% compounded annually, a sellers note in the amount of $1,770,056 accruing interest at 2.08% compounded annually, an Oregon Permanent Supportive Housing Capital program note from the state of for $2,400,000, of which $1,069,472 has been drawn down with an interest rate of 0.00%, and a construction loan in the amount of $10,584,818 as of June 30, 2022.

Fuller Road Metro Bond project under construction that is partially funded by Metro Housing Bonds issued as a loan from HACC. As of June 30, 2022 HACC had released $4,500,000 of the $8,570,000 of Metro Bonds for the project with simple interest accruing at a rate of 1.0%.

Good Shepherd Village Metro Bond Project under construction that is partially funded by Metro Project Housing Bond, issued a loan from first Regional Affordable Housing bond fund NOFA, has released $7,630,014 of the $18,330,000 accruing interest of 1% per annum compounding annually.

Maple Apartments Metro Bond Project under construction that is partially funded by Metro Housing Bond, issued a loan from first Regional Affordable Housing bond fund NOFA, has released $8,834,070 of the $15,903,000 accruing interest at 3.75% per annum compounding annually.

5. CAPITAL ASSETS

Capital assets activity for the year was as follows:

	Balance July 1, 2021	Increases	Decreases	Total	Balance June 30, 2022
Capital Assets not being depreciated:					
Land	$ 3,898,984	$ -	$ -	$ -	$ 3,898,984
Total capital Assets not being depreciated	3,898,984	-	-	-	3,898,984
Capital Assets being depreciated:					
Buildings & Improvements	40,534,982	619,397	(68,690)	550,707	41,085,689
Furniture and equiptment	753,955	32,700	(6,937)	25,763	779,718
Total Capital Assets being depreciated:	41,288,937	652,097	(75,627)	576,470	41,865,407
Less Accumulated depreciation:					
Building and Improvements	(30,275,811)	(812,747)	-	(812,747)	(31,088,558)
Furniture and Equiptment	(648,922)	(20,652)	-	(20,652)	(669,574)
Total Accumulated depreciation	(30,924,733)	(833,398)	-	(833,398)	(31,758,131)
Total capital Assets being depreciated, net	10,364,204	(181,302)	(75,627)	(256,929)	10,107,275
Total Capital Assets, net	**$14,263,188**	**$ (181,302)**	**$ (75,627)**	**$ (256,929)**	**$14,006,259**

Depreciation expense for the Authority was $833,398 for the year ended June 30, 2022.

6. LONG-TERM LIABILITIES

The Authority’s long term debt is comprised of mortgage notes, loans and bonds. Mortgage notes payable were incurred to purchase low income housing and are payable from rents received and the net cash flows from operations.

Loans payable totaling $54,282 include amounts due to Farmers Home Administration and the State of Oregon for the purchase, construction, repair and improvement of property. Under terms of the agreements with the State of Oregon, a certain portion of the loans are forgiven yearly as long as the Authority operates the facilities as low-income housing. If the Authority ceases to operate these facilities as low-income housing, the loans become payable when the Authority sells the property.

The Authority has received deferred payment loans from Clackamas County for various residential rehabs of low-income properties. If the loans are defaulted by failing to conform to any covenants or conditions of the agreements, all principal and interest and all other amounts are due immediately. The loans payable to Clackamas County of $1,613,796 were obtained to construct and purchase low income housing units. $1,357,319 of this balance is noninterest bearing and requires no payments as long as the Authority operates the facility as low-income housing.

6. LONG-TERM LIABILITIES (Continued)

The Authority issued 2013 Series A revenue bonds in the original amount of $16,550,000 to finance the rehabilitation of the Easton Ridge Apartments (the Project). The Series A bonds have maturities and/or mandatory redemption dates ranging from September 1, 2015 to September 1, 2049, and bear interest ranging from 1.75% to 4.0%. Interest payments are due on March 1 and September 1 of each year until the entire principal balance is retired and all accrued interest is paid. The Project's assets, all net operating income and certain other revenues of the Authority, are pledged as collateral, in an amount equal to the sum of outstanding principal and interest, or $24,200,875. The pledge will remain in effect until the revenue bonds are paid in full. As of June 30, 2022 pledged debt service was $863,175 for the coming year. The Authority received pledged interest in the amount of $489,006 for 2013 Series A bond interest at June 30, 2022. Pursuant to the bond documents, the Authority is subject to certain restrictive covenants related to the use of bond proceeds and other funds provided by operations of the Project. The contingent loan agreement with the County requires Easton Ridge LLC to maintain a 1.10 to 1.0 debt service coverage once the project achieves stabilization. The operating agreement requires that in order to eliminate the operating deficit contribution requirement, the Authority establish and collect rents sufficient to produce a required debt service coverage on the Series A bonds of at least 1.20 to 1 for two consecutive years, beginning at least three years after project stabilization. A failure to maintain the above ratios does not constitute a default. Amount outstanding on the 2013 Series A revenue bonds was $14,550,007 as of June 30, 2022.

Rosewood Station construction continued with draws against the construction bonds during the year ended June 30, 2022. These bonds bear interest at 2.25%, per annum through April 1, 2022. Commencing May 1, 2021, the interest rate is LIBOR plus 0.75% provided the rate shall never be less than 3.00% or greater than 8.00%, per annum. Amount outstanding at June 30, 2022 was $33,427,558.

Clayton Mohr Commons is 24 units of veteran housing has a mortgage of $1,997,014 bearing an interest rate of 5.5%. Principal and interest are due monthly based on a 30 year amortization. The mortgage has a 20 year term and is due in July 2040.

Webster Road began construction in June 2021 and had draws against the construction loans during the year ended June 30, 2022. These loans bear interest at LIBOR plus 2.00%, per annum. Amount outstanding at June 30, 2022 was $16,363,555.

Hillside Manor is a 100 unit Public Housing conversion undergoing an occupied rehabilitation. Draws against the construction loans totaled $14,775,006 bearing an interest rate of 2.50% at June 30, 2022.

6. LONG-TERM LIABILITIES (Continued)

Changes in long-term debt are as follows:

	Beginning Balance	Additions	Reductions	Ending Balance
Loans Payable (Interest 0% to 1%)	$ 53,961	$ 321	$ -	$ 54,282
Mortgage Notes Payable (Interest 2% to 11%)	2,325,628	-	(328,614)	1,997,014
Loans Payable to Clackamas County	1,616,988	-	(3,192)	1,613,796
Rosewood Station Construction Bonds	33,010,555	417,003	-	33,427,558
Hillside Manor Construction Bonds	14,271,341	503,665	-	14,775,006
Webster Road Construction Bonds	5,891,237	10,472,318	-	16,363,555
2013 Easter Ridge A Bonds				
Payable (Interest 1.75% to 4.0%)	15,060,000		(550,000)	14,510,000
Bond Premium	41,489	-	(1,482)	40,007
	15,101,489	-	(551,482)	14,550,007
Total	$ 72,271,199	$ 11,393,307	$ (883,288)	$ 82,781,218

Future maturities are as follows:

Fiscal Year	Loans Payable	Mortgage Notes Payable	Loan Payable to Clackamas County	Construction Bonds	2013 A Easton Ridge Bonds Payable	Total	Interest
2023	$ -	$ 7,705	$ -	$ -	$ 275,000	$ 282,705	$ 421,012
2024	15,532	49,351	42,824	-	295,000	402,707	573,369
2025	-	50,502	43,687	-	310,000	404,189	560,211
2026	-	49,091	44,570	-	320,000	413,661	543,975
2027-2031	-	200,570	125,396	-	1,800,000	2,125,966	2,047,994
2032-2036	-	296,341	-	-	2,150,000	2,446,341	2,351,250
2037-2041	-	1,343,454	-	-	2,600,000	3,943,454	1,852,000
2042-2046	-	-	-	-	3,150,000	3,150,000	1,284,200
2047-2051	-	-	-	-	3,650,007	3,650,007	1,391,031
Undetermined	38,750	-	1,357,319	64,566,119	-	65,962,188	-
	$ 54,282	$ 1,997,014	$ 1,613,796	$ 64,566,119	$ 14,550,007	$ 82,781,218	$ 11,025,042

None of the above agreements are subject to federal arbitrage regulations.

6. LONG-TERM LIABILITIES (Continued)

Changes in long-term liabilities:

	Beginning Balance	Additions	Reductions	Ending Balance	Due Within One Year
Compensated Absences	$ 389,945	$ 389,799	$ (22,103)	$ 757,641	$ 389,798
Total OPEB Liability	274,829	-	37,465	312,294	-
Net Pension Liability	5,203,232	-	(2,547,101)	2,656,131	-
Loans & Notes Payable	3,996,577	321	(331,806)	3,665,092	7,705
Bonds Payable	68,274,622	11,392,986	(551,482)	79,116,126	275,000
Total	$ 78,139,205	$ 11,783,106	$ (3,415,027)	$ 86,507,284	$ 672,503

7. PENSION PLAN

General Information about the Pension Plan
Name of the pension plan: The Oregon Public Employees Retirement System (OPERS) is a cost-sharing multiple-employer defined benefit plan.

Plan description. Employees of the Authority are provided with pensions through OPERS. All the benefits of OPERS are established by the Oregon legislature pursuant to Oregon Revised Statute (ORS) Chapters 238 and 238A. OPERS issues a publicly available financial report

that can be obtained at https://www.oregon.gov/pers/Documents/Financials/ACFR/2022-ACFR.pdf.

Benefits provided under Chapter 238-Tier One / Tier Two

Pension Benefits. The OPERS retirement allowance is payable monthly for life. It may be selected from 13 retirement benefit options. These options include survivorship benefits and lump-sum refunds. The basic benefit is based on years of service and final average salary. A percentage (2.0 percent for police and fire employees, 1.67 percent for general service employees) is multiplied by the number of years of service and the final average salary. Benefits may also be calculated under either a formula plus annuity (for members who were contributing before August 21, 1981) or a money match computation if a greater benefit results.

A member is considered vested and will be eligible at minimum retirement age for a service retirement allowance if he or she has had a contribution in each of five calendar years or has reached at least 50 years of age before ceasing employment with a participating employer (age 45 for police and fire members). General service employees may retire after reaching age 55. Police and fire members are eligible after reaching age 50. Tier One general service employee benefits are reduced if retirement occurs prior to age 58 with fewer than 30 years of service. Police and fire member benefits are reduced if retirement occurs prior to age 55 with fewer than 25 years of service. Tier Two members are eligible for full benefits at age 60. The ORS Chapter 238 Defined Benefit Pension Plan is closed to new members hired on or after August 29, 2003.

7. PENSION PLAN (Continued)

1. *Death Benefits.* Upon the death of a non-retired member, the beneficiary receives a lump-sum refund of the member's account balance (accumulated contributions and interest). In addition, the beneficiary will receive a lump-sum payment from employer funds equal to the account balance, provided one or more of the following conditions are met:

- Member was employed by a OPERS employer at the time of death,
- Member died within 120 days after termination of OPERS-covered employment,
- Member died as a result of injury sustained while employed in a OPERS-covered job, or
- Member was on an official leave of absence from an OPERS-covered job at the time of death.

2. *Disability Benefits.* A member with 10 or more years of creditable service who becomes disabled from other than duty-connected causes may receive a non-duty disability benefit. A disability resulting from a job-incurred injury or illness qualifies a member (including OPERS judge members) for disability benefits regardless of the length of OPERS-covered service. Upon qualifying for either a non-duty or duty disability, service time is computed to age 58 (55 for police and fire members) when determining the monthly benefit.

3. *Benefit Changes After Retirement.* Members may choose to continue participation in a variable equities investment account after retiring and may experience annual benefit fluctuations due to changes in the market value of equity investments.

Under ORS 238.360 monthly benefits are adjusted annually through cost-of-living changes. Under current law, the cap on the COLA in fiscal year 2015 and beyond will vary based on

1.25 percent on the first $60,000 of annual benefit and $750 plus 0.15 percent on annual benefits above $60,000.

Benefits provided under Chapter 238A-OPSRP Pension Program (OPSRP DB).

1. *Pension Benefits.* The ORS 238A Defined Benefit Pension Program provides benefits to members hired on or after August 29, 2003.
This portion of the OPSRP provides a life pension funded by employer contributions. Benefits are calculated with the following formula for members who attain normal retirement age:

Police and fire: 1.8 percent is multiplied by the number of years of service and the final average salary. Normal retirement age for police and fire members is age 60 or age 53 with 25 years of retirement credit. To be classified as a police and fire member, the individual must have been employed continuously as a police and fire member for at least five years immediately preceding retirement.

General service: 1.5 percent is multiplied by the number of years of service and the final average salary. Normal retirement age for general service members is age 65, or age 58 with 30 years of retirement credit.

A member of the OPSRP pension program becomes vested on the earliest of the following dates: the date the member completes 600 hours of service in each of five calendar years, the date the member reaches normal retirement age, and, if the pension program is terminated, the date on which termination becomes effective.

7. PENSION PLAN (Continued)

2. *Death Benefits.* Upon the death of a non-retired member, the spouse or other person who is constitutionally required to be treated in the same manner as the spouse, receives for life 50 percent of the pension that would otherwise have been paid to the deceased member.

3. *Disability Benefits.* A member who has accrued 10 or more years of retirement credits before the member becomes disabled or a member who becomes disabled due to job-related injury shall receive a disability benefit of 45 percent of the member's salary determined as of the last full month of employment before the disability occurred.

4. *Benefit Changes After Retirement.* Under ORS 238A.210 monthly benefits are adjusted annually through cost-of-living changes. Under current law, the cap on the COLA in fiscal year 2015 and beyond will vary based on 1.25 percent on the first $60,000 of annual benefit and $750 plus 0.15 percent on annual benefits above $60,000.

Contributions:

OPERS funding policy provides for monthly employer contributions at actuarially determined rates. These contributions, expressed as a percentage of covered payroll, are intended to accumulate sufficient assets to pay benefits when due. This funding policy applies to the PERS Defined Benefit Plan and the Other Postemployment Benefit Plans.

Employer contribution rates during the period were based on the December 31, 2019 actuarial valuation. The rates based on a percentage of payroll, first became effective July 1, 2021. The state of Oregon and certain schools, community colleges, and political subdivisions have made lump sum payments to establish side accounts, and their rates have been reduced.

Employer contributions for the year ended June 30, 2022 were $588,815.

Actuarial Valuations:

The employer contribution rates effective July 1, 2021, through June 30, 2023, were set using the entry age normal actuarial cost method. For the Tier One/Tier Two component of the PERS Defined Benefit Plan, this method produced an employer contribution rate consisting of (1) an amount for normal cost (the estimated amount necessary to finance benefits earned by the employees during the current service year), (2) an amount for the amortization of unfunded actuarial accrued liabilities, which are being amortized over a fixed period with new unfunded actuarial accrued liabilities being amortized over 20 years. For the OPSRP Pension Program component of the PERS Defined Benefit Plan, this method produced an employer contribution rate consisting of (a) an amount for normal cost (the estimated amount necessary to finance benefits earned by the employees during the current service year), (b) an amount for the amortization of unfunded actuarial accrued liabilities, which are being amortized over a fixed period with new unfunded actuarial accrued liabilities being amortized over 16 years.

7. PENSION PLAN (Continued)

Actuarial Methods and Assumptions:

Valuation Date	December 31, 2019
Measurement Date	June 30, 2021
Experience Study Report	2018, published July 24, 2019
Actuarial Cost Method	Entry Age Normal
Asset Valuation Method	Market value of assets
Actuarial Assumptions:	
Inflation Rate	2.40 percent
Long-term expected rate of return	6.90 percent
Discount rate	6.90 percent
Projected salary increases	3.40 percent
Cost of living adjustments (COLA)	Blend of 2.00% COLA and graded COLA (1.25%/0.15%) in accordance with *Moro* decision; blend based on service.
Mortality	***Healthy retirees and beneficiaries:*** Pub-2010 Healthy Retiree, sex-distinct, generational with Unisex, Social Security Data Scale, with job category adjustments and set-backs as described in the valuation. ***Active members:*** Pub-2010 Employee, sex-distinct, generational with Unisex, Social Security Data Scale, with job category adjustments and set-backs as described in the valuation. ***Disabled retirees:*** Pub-2010 Disable retiree, sex-distinct, generational with Unisex, Social Security Data Scale, with job category adjustments and set-backs as described in the valuation.

Actuarial valuations of an ongoing plan involve estimates of the value of projected benefits and assumptions about the probability of events far into the future. Actuarially determined amounts are subject to continual revision as actual results are compared to past expectations and new estimates are made about the future. Experience studies are performed as of December 31 of even numbered years. The methods and assumptions shown above are based on the 2018 Experience Study, which reviewed experience for the four-year period ending on December 31, 2018.

Discount Rate:
The discount rate used to measure the total pension liability was 6.90 percent for the Defined Benefit Pension Plan. The projection of cash flows used to determine the discount rate assumed that contributions from plan members and those of the contributing employers are made at the contractually required rates, as actuarially determined. Based on those assumptions, the pension plan's fiduciary net position was projected to be available to make all projected future benefit payments of current plan members. Therefore, the long-term expected rate of return on pension

7. PENSION PLAN (Continued)

plan investments for the Defined Benefit Pension Plan was applied to all periods of projected benefit payments to determine the total pension liability.

Depletion Date Projection
GASB 68 generally requires that a blended discount rate be used to measure the Total Pension Liability (the Actuarial Accrued Liability calculated using the Individual Entry Age Normal Cost Method). The long-term expected return on plan investments may be used to discount liabilities to the extent that the plan's Fiduciary Net Position (fair value of assets) is projected to cover benefit payments and administrative expenses. A 20-year high quality (AA/Aa or higher) municipal bond rate must be used for periods where the Fiduciary Net Position is not projected to cover benefit payments and administrative expenses. Determining the discount rate under GASB 68 will often require that the actuary perform complex projections of future benefit payments and asset values. GASB 68 (paragraph 67) does allow for alternative evaluations of projected solvency, if such evaluation can reliably be made. GASB does not contemplate a specific method for making an alternative evaluation of sufficiency; it is left to professional judgment.

The following circumstances justify an alternative evaluation of sufficiency for Oregon PERS:

- Oregon PERS has a formal written policy to calculate an Actuarially Determined Contribution (ADC), which is articulated in the actuarial valuation report.
- The ADC is based on a closed, layered amortization period, which means that payment of the full ADC each year will bring the plan to a 100% funded position by the end of the amortization period if future experience follows assumption.
- GASB 68 specifies that the projections regarding future solvency assume that plan assets earn the assumed rate of return and there are no future changes in the plan provisions or actuarial methods and assumptions, which means that the projections would not reflect any adverse future experience which might impact the plan's funded position.

Based on these circumstances, it is PERS independent actuary's opinion that the detailed depletion date projections outlined in GASB 68 would clearly indicate that the Fiduciary Net. Position is always projected to be sufficient to cover benefit payments and administrative expenses. *Assumed Asset Allocation:*

Asset Class/Strategy	**Target Allocation**	
Cash	0.0	%
Debt Securities	20.0	
Public Equity	32.5	
Private Equity	17.5	
Real Estate	12.5	
Alternative Equity	15.0	
Risk Parity	2.5	
Total	100.0	%

7. PENSION PLAN (Continued)

Long-Term Expected Rate of Return:

To develop an analytical basis for the selection of the long-term expected rate of return assumption, in May 2019 the PERS Board reviewed long-term assumptions developed by both Milliman's capital market assumptions team and the Oregon Investment Council's (OIC) investment advisors. The table below shows Milliman's assumptions for each of the asset classes in which the plan was invested at that time based on the OIC long-term target asset allocation. The OIC's description of each asset class was used to map the target allocation to the asset classes shown below. Each asset class assumption is based on a consistent set of underlying assumptions and includes adjustment for the inflation assumption. These assumptions are not based on historical returns, but instead are based on a forward-looking capital market economic model.

Long-Term Expected Rate of Return [1] Asset Class	Target Allocation	Annual Arithmetic Return [2]	20-Year Annualized Geometric Mean	Annual Standard Deviation
Global Equity	30.62 %	7.11 %	5.85 %	17.05 %
Private Equity	25.50	11.35	7.71	30.00
Core Fixed Income	23.75	2.80	2.73	3.85
Real Estate	12.25	6.29	5.66	12.00
Master Limited Partnerships	0.75	7.65	5.71	21.30
Infrastructure	1.50	7.24	6.26	15.00
Commodities	0.63	4.68	3.10	18.85
Hedge Fund of Funds - Multistrategy	1.25	5.42	5.11	8.45
Hedge Fund Equity - Hedge	0.63	5.85	5.31	11.05
Hedge Fund - Macro	5.62	5.33	5.06	7.90
US Cash	-2.50 [3]	1.77	1.76	1.20
Assumed Inflation - Mean			2.40 %	1.65 %

[1] Based on the OIC Statement of Investment Objectives and Policy Framework for the Oregon Public Employees Retirement Fund, including revisions adopted at the OIC meeting on June 2, 2021.
[2] The arithmetic mean is a component that goes into calculating the geometric mean. Expected rates of return are presented using the geometric mean, which the Board uses in setting the discount rate.
[3] Negative allocation to cash represents levered exposure from allocation to Risk Parity strategy.

7. PENSION PLAN (Continued)

Sensitivity of the Authority's proportionate share of the net pension liability to changes in the discount rate. The following presents the Authority's proportionate share of the net pension liability calculated using the discount rate of 6.90 percent, as well as what the Authority's proportionate share of the net pension liability would be if it were calculated using a discount rate that is 1-percentage point lower (5.90 percent) or 1-percentage-point higher (7.90 percent) than the current rate:

	Rate 1% Decrease (5.90%)	Discount Rate (6.90%)	Rate 1% Increase (7.90%)
Proportionate share of the net pension liability	$5,203,262	$2,656,131	$514,445

Pension plan fiduciary net position. Detailed information about the pension plan's fiduciary net position is available in the separately issued OPERS financial report.

Pension Liabilities, Pension Expense, and Deferred Outflows of Resources and Deferred Inflows of Resources Related to Pensions

At June 30, 2022, the Authority reported a liability of $2,656,131 for its proportionate share of the net pension liability. The net pension liability was measured as of June 30, 2021, and the total pension liability used to calculate the net pension asset was determined by an actuarial valuation as of December 31, 2019 and rolled forward to June 30, 2021.

The Authority's proportion of the net pension liability was based on the Authority's projected long-term contribution effort as compared to the total projected long-term contribution effort of all employers.

Rates of every employer have at least two major components:

1. Normal Cost Rate: The economic value, stated as a percent of payroll, for the portion of each active member's total projected retirement benefit that is allocated to the upcoming year of service. The rate is in effect for as long as each member continues in OPERS-covered employment. The current value of all projected future Normal Cost Rate contributions is the Present Value of Future Normal Costs (PVFNC). The PVFNC represents the portion of the projected long-term contribution effort related to future service.

2. UAL Rate: If system assets are less than the actuarial liability, an Unfunded Actuarial Liability (UAL) exists. UAL can arise in a biennium when an event such as experience differing from the assumptions used in the actuarial valuation occurs. An amortization schedule is established to eliminate the UAL that arises in a given biennium over a fixed period of time if future experience follows assumption. The UAL Rate is the upcoming year's component of the cumulative amortization schedules, stated as a percent of payroll. The present value of all projected UAL Rate contributions is simply the Unfunded Actuarial

7. PENSION PLAN (Continued)

3. Liability (UAL) itself. The UAL represents the portion of the projected long-term contribution effort related to past service.

Looking at both rate components, the projected long-term contribution effort is just the sum of the PVFNC and the UAL. The PVFNC part of the contribution effort pays for the value of future service while the UAL part of the contribution effort pays for the value of past service not already funded by accumulated contributions and investment earnings.

The UAL has Tier 1/Tier 2 and OPSRP pieces. The Tier 1/Tier 2 piece is based on the employer's Tier 1/Tier 2 pooling arrangement. If an employer participates in one of the two large Tier 1/Tier 2 rate pools [State & Local Government Rate Pool (SLGRP) or School Districts Rate Pool], then the employer's Tier 1/Tier 2 UAL is just their pro-rata share of their pool's UAL. The pro-rata calculation is based on the employer's payroll in proportion to the pool's total payroll. For example, if the employer's payroll is one percent of the pool's total payroll, the employer will be allocated one percent of the pool's UAL. The OPSRP piece of the UAL follows a parallel pro-rata approach, as OPSRP experience is mandatorily pooled at a state-wide level. Employers that do not participate in a Tier 1/Tier 2 pooling arrangement, who are referred to as "Independent Employers", have their Tier 1/Tier 2 UAL tracked separately in the actuarial valuation.

An employer's PVFNC depends on both the normal cost rates charged on the employer's payrolls, and on the underlying demographics of the respective payrolls. For OPERS funding, employers have up to three different payrolls, each with a different normal cost rate: (1) Tier 1/Tier 2 payroll, (2) OPSRP general service payroll, and (3) OPSRP police and fire payroll.

The employer's Normal Cost Rates for each payroll are combined with system-wide present value factors for each payroll to develop an estimated PVFNC. The present value factors are actuarially determined at a system level for simplicity and to allow for the PVFNC calculations to be audited in a timely, cost-effective manner.

Since many governments in Oregon have sold pension obligation bonds and deposited the proceeds with OPERS (referred to as side accounts or transitional liability or surplus), adjustments are required. After each employer's projected long-term contribution effort is calculated, that amount is reduced by the value of the employer's side account, transitional liability/surplus, and pre-SLGRP liability/surplus (if any). This is done as those balances increase/decrease the employer's projected long-term contribution effort because side accounts are effectively pre-paid contributions.

At June 30, 2022, the Authority's proportion was 0.02219643 percent.

7. PENSION PLAN (Continued)

For the year ended June 30, 2022, the Authority recognized pension expense of $336,720. On June 30, 2022, the Authority reported deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:

	Deferred Outflow of Resources	Deferred Inflow of Resources
Differences between expected and actual experience	$248,631	$ -
Changes of assumptions	664,910	6,990
Net difference between projected and actual earnings on investments	-	1,966,131
Changes in proportionate share	128,113	378,105
Differences between employer contributions and proportionate share of system contributions	218,594	-
Total (prior to post-measurement date contributions)	1,260,248	2,351,408
Contributions made subsequent to measurement date	588,815	-
Total Deferred Outflow/Inflow of Resources	$1,891,063	2,351,408
Net Deferred Outflow/(Inflow) of Resources		$(460,345)

$588,815 reported as deferred outflows of resources related to pensions resulting from the Authority's contributions subsequent to the measurement date will be recognized as a reduction of the net pension liability in the year ended June 30, 2023. The average of the expected remaining service lives of all employees that are provided with pensions through PERS (active and inactive employees) determined at July 1, 2019, the beginning of the measurement period ended June 30, 2021, is 5.3 years.

Other amounts reported as deferred outflows of resources and deferred inflows of resources related to pensions will be recognized in pension expense as follows:

Employer subsequent fiscal years	Deferred Outflow/(Inflow) of Resources (prior to post-measurement date contributions)
Fiscal Year 2023	$(203,300)
Fiscal Year 2024	(201,500)
Fiscal Year 2025	(256,588)
Fiscal Year 2026	(481,336)
Fiscal Year 2027	51,563
Total	$(1,091,160)

7. PENSION PLAN (Continued)

Defined Contribution Plan

OPSRP Individual Account Program (OPSRP IAP)

Pension Benefits
Participants in OPERS defined benefit pension plans also participate in their defined contribution plan. An IAP member becomes vested on the date the employee account is established or on the date the rollover account was established. If the employer makes optional employer contributions for a member, the member becomes vested on the earliest of the following dates: the date the member completes 600 hours of service in each of five calendar years, the date the member reaches normal retirement age, the date the IAP is terminated, the date the active member becomes disabled, or the date the active member dies.

Upon retirement, a member of the OPSRP Individual Account Program (IAP) may receive the amounts in his or her employee account, rollover account, and vested employer account as a lump-sum payment or in equal installments over a 5-, 10-, 15-, 20-year period or an anticipated life span option. Each distribution option has a $200 minimum distribution limit.

Death Benefits
Upon the death of a non-retired member, the beneficiary receives in a lump sum the member's account balance, rollover account balance, and vested employer optional contribution account balance. If a retired member dies before the installment payments are completed, the beneficiary may receive the remaining installment payments or choose a lump-sum payment.

Contributions
The Authority has chosen to pay the employees contributions to the plan. 6 percent of covered payroll is paid for general service employees and 9 percent of covered payroll is paid for firefighters and police officers. Contributions for the year were $194,637.

Recordkeeping
PERS contracts with VOYA Financial to maintain IAP participant records.

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS

A. General Information about the OPEB Plan

Plan name: Retiree Implicit Medical Benefit Plan

Plan description: The Authority administers a single-employer defined benefit healthcare plan per the requirements of a collective bargaining agreement. Per Oregon State law, the plan provides the opportunity for post-retirement healthcare insurance for eligible retirees and their spouses through the Authority's group health insurance plans which cover both active and retired participants. The Authority does not pay any portion of the retiree's healthcare insurance; however, the retired employee receives an implicit benefit of a lower healthcare premium which is spread among the cost of active employee premiums.

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS (Continued)

The Authority has not established a trust fund to supplement the costs for the other post-employment benefit (OPEB) liability related to this implicit benefit. The Authority pays none of the premium of health insurance coverage for retirees from age 58 to age 65. The Authority's regular healthcare benefit providers underwrite the retirees' policies. Retirees may not convert the benefit into an in-lieu payment to secure coverage under independent plans.

The Authority's annual OPEB cost is calculated based on an amount actuarially determined in accordance with the guidance of GASB Statement No. 75. The Authority is included in the Clackamas County Actuarial Valuation report.

Total OPEB Liability

The Authority's total OPEB liability of $312,294 was measured as of June 30, 2022, and was determined by an actuarial valuation as of that date.

Actuarial assumptions and other inputs. The total OPEB liability in the June 30, 2021 actuarial valuation was determined using the following actuarial assumptions and other inputs, applied to all periods included in the measurement, unless otherwise specified.

Discount rate	3.69%
Salary increases	3.00%
General inflation rate	2.50%

The discount rate was based on the Fidelity High Grade 20 Year General Obligation Municipal Bond Index.

The demographic actuarial assumptions used in the valuation are based on the 2021 experience study of the Oregon Public Employees Retirement System, except for the different basis used to project future mortality improvements.

Mortality rates were based on the MacLeod Watts Scale 2021.

Changes in the Total OPEB Liability and related ratios

		Total OPEB Liability
Balance at 6/30/21		$ 274,829
Changes during year		
	Service cost	21,997
	Interest	5,624
	Changes in assumptions	17,693
	Benefit payments	(7,849)
Balance at 6/30/22		$ 312,294

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS (Continued)

Total OPEB liability as a percentage of covered employee payroll was 7.72%.

Sensitivity of Liabilities to Changes in the Discount Rate and Healthcare Cost Trend Rate. The following presents the total OPEB liability of the Authority, as well as what the Authority's total OPEB liability would be if it were calculated using a discount rate that is 1% lower or 1% higher than the current discount rate. The discount rate used for the fiscal year end 2022 is 3.69%. Healthcare cost trend rate was assumed to start at 5.7% (effective January 2022) and arrive an ultimate rate of 4.0% for years 2076 and later. The impact of a 1% increase or decrease in these assumptions is shown in the chart below:

Change in Discount Rate	1% Decrease (2.69%)	Current Discount Rate (3.69%)	1% Increase (4.69%)
Total OPEB Liability	$329,419	$312,294	$247,400

Change in Healthcare Cost Trend Rate	1% Decrease In Current Trend	Current Trend	1% Increase In Current Trend
Total OPEB Liability	$237,806	$312,294	$342,654

Deferred Inflows and Outflows as of Fiscal Year End and Expected Future Recognition

The table below shows deferred resources as of the fiscal year end June 30, 2022.

HACC Members Implicit	Deferred Outflows of Resources	Deferred Inflows of Resources
Changes of Assumptions	$ 16,228	$ 28,615
Differences Between Expected and Actual Experience	-	91,774
Total	$ 16,228	$ 120,389

In addition, future recognition of these deferred inflows and outflows of resources is shown below.

For Fiscal Year Ending June 30		HACC Members Implicit
2023	$	(12,791)
2024		(12,791)
2025		(12,791)
2026		(12,791)
2027		(12,791)
Thereafter		(40,206)
Total	$	(104,161)

8. OTHER POST-EMPLOYMENT BENEFITS OTHER THAN PENSIONS (Continued)

B. Retirement Health Insurance Account (RHIA)

Due to the immaterial nature of GASB Statement No. 75 as it relates to the Authority's exposure under the Oregon Public Employees Retirement System (OPERS) RHIA, the Authority has chosen not to disclose RHIA under this GASB Statement.

The Authority contributes to the Retirement Health Insurance Account (RHIA) for each of its eligible employees. RHIA is a cost-sharing multiple-employer defined benefit other post-employment benefit plan administered by OPERS. RHIA pays a monthly contribution toward the cost of Medicare companion health insurance premiums of eligible retirees.

Oregon Revised Statute (ORS) 238.420 established this trust fund. Authority to establish and amend the benefit provisions of RHIA resides with the Oregon Legislature. The plan is closed to new entrants after January 1, 2004. OPERS issues a publicly available financial report that includes financial statements and required supplementary information. That report may be obtained by writing to Oregon Public Employees Retirement System, P.O. Box 23700, Tigard, Oregon 97281-3700.

Because RHIA was created by enabling legislation (ORS 238.420), contribution requirements of the plan members and the participating employers were established and may be amended only by the Oregon Legislature. ORS require that an amount equal to $60 or the total monthly cost of Medicare companion health insurance premiums coverage, whichever is less, shall be paid from the Retirement Health Insurance Account established by the employer, and any monthly cost in excess of $60 shall be paid by the eligible retired member in the manner provided in ORS 238.410. To be eligible to receive this monthly payment toward the premium cost the member must: (1) have eight years or more of qualifying service in PERS at the time of retirement or receive a disability allowance as if the member had eight years or more of creditable service in PERS, (2) receive both Medicare Parts A and B coverage, and (3) enroll in a PERS-sponsored health plan. A surviving spouse or dependent of a deceased PERS retiree who was eligible to receive the subsidy is eligible to receive the subsidy if he or she (1) is receiving a retirement benefit or allowance from PERS or (2) was insured at the time the member died and the member retired before May 1, 1991.

For fiscal year 2022, participating employers are contractually required to contribute to RHIA at a rate assessed each year by OPERS. The Authority's contributions to RHIA for the years ended June 30, 2022 were $1,052, which equaled the required contribution for the year.

9. RISK MANAGEMENT

The Authority is exposed to various risks of loss related to torts; theft or damage to and destruction of assets; errors and omissions; and natural disasters for which the Authority carries commercial insurance. The Authority does not engage in risk financing activities where the risk is retained (self-insurance) by the Authority. For the past three years, insurance coverage has been sufficient to cover any losses.

10. COMMITMENTS

The Authority has no construction and legal commitments under contracts at June 30, 2021. The Authority has a commitment to cover up to $922,000 of operating deficits for Easton Ridge LLC for at least the next three years.

11. DISCRETELY PRESENTED COMPONENT UNITS

Combining financial information for the discretely presented component units at December 31, 2021 are as follows:

	Easton Ridge LLC	Pedcor Investments 2016-CLV LP	Hillside Manor LP	(Unaudited) Webster Road Housing LP	Total
ASSETS:					
Current assets:					
Cash and cash equivalents	$ 1,661,331	$ 534,091	$ 95,592	$ 12,413	$ 2,303,427
Accounts receivable	60,120	-	84,865	-	144,985
Other assets	98,889	366,382	32,111	-	497,382
Total current assets	1,820,340	900,473	212,568	12,413	2,945,794
Restricted assets:					
Cash	3,710,429	78,779	577,589	1,694,340	6,061,137
Non-current assets:					
Other assets	-	-	-	538,207	538,207
Capital assets not being depreciated depreciated	3,236,221	3,917,276	-	10,100,521	17,254,018
Capital assets being depreciated	27,506,963	58,649,686	26,186,378	1,934,056	114,277,083
TOTAL ASSETS	36,273,953	63,546,214	26,976,535	14,279,537	141,076,239
LIABILITIES:					
Current liabilities:					
Accounts payable and accrued expenses	18,569	757,769	3,477,447	1,821,134	6,074,919
Tenant deposits payable from restricted assets	149,409	72,696	10,431	-	232,536
Unearned revenue	90,347	-	26,262	-	116,609
Other current liabilities payable	4,412,737	-	-	57,747	4,470,484
Current portion of long-term debt	-	-	14,191,202	-	14,191,202
Total current liabilities	4,671,062	830,465	17,705,342	1,878,881	25,085,750
Other - notes payable	27,608,858	42,057,006	8,299,217	11,133,582	89,098,663
TOTAL LIABILITIES	32,279,920	42,887,471	26,004,559	13,012,463	114,184,413
NET POSITION:					
Net investment in capital assets	3,134,326	20,509,956	3,695,959	900,995	28,241,236
Restricted	3,710,429	78,779	577,589	368,106	4,734,903
Unrestricted	(2,850,722)	70,008	(3,301,572)	(2,027)	(6,084,313)
TOTAL NET POSITION	$ 3,994,033	$ 20,658,743	$ 971,976	$ 1,267,074	$ 26,891,826

11. DISCRETELY PRESENTED COMPONENT UNITS (Continued)

	Easton Ridge LLC	Pedcor Investments 2016-CLV LP	Hillside Manor LP	(Unaudited) Webster Road Housing LP	Total
OPERATING REVENUES:					
Rental income	$ 2,843,233	$ 1,641,478	$ 873,414	$ -	$ 5,358,125
Other income	47,569	-	2,768	-	50,337
Total operating revenues	2,890,802	1,641,478	876,182	-	5,408,462
OPERATING EXPENSES:					
Administrative expenses	389,176	364,011	177,884	-	931,071
Utilities	339,391	111,489	203,225	-	654,105
Ordinary maintenance and operations	398,044	85,380	106,816	-	590,240
General expenses	148,271	14,328	22,848	-	185,447
Depreciation and amortization	929,735	1,461,278	384,028	-	2,775,041
Total operating expenses	2,204,617	2,036,486	894,801	-	5,135,904
OPERATING INCOME (LOSS)	686,185	(395,008)	(18,619)	-	272,558
NON-OPERATING REVENUE (EXPENSE):					
Interest income	3,972	31	-	-	4,003
Interest expense	(1,093,621)	(936,626)	(120,916)	-	(2,151,163)
Other	2,086	-	(23,046)	2,027	(18,933)
Total non-operating revenue (expense)	(1,087,563)	(936,595)	(143,962)	2,027	(2,166,093)
LOSS BEFORE CAPITAL CONTRIBUTIONS	(401,378)	(1,331,603)	(162,581)	2,027	(1,893,535)
Capital contributions (distributions)	-	17,373,400	-	-	17,373,400
CHANGE IN NET POSITION	(401,378)	16,041,797	(162,581)	2,027	15,479,865
NET POSITION at beginning of the year	4,395,411	4,616,946	1,134,557	1,265,047	11,411,961
NET POSITION at end of the year	$ 3,994,033	$ 20,658,743	$ 971,976	$ 1,267,074	$ 26,891,826

12. SUBSEQUENT EVENTS

On August 18, 2022, the Board of Commissioners approved loaning $3,000,000 to MHNW 20 Marylhurst LP to finance its purchase Marylhurst Commons. The project will consist of 100 one- to three-bedrooms units, including 40 units of Permanent Supportive Housing serving families who have experienced houselessness or are at risk of becoming houseless. The 60 year loan begins September 2022, and accrues interest of 1% per year.

REQUIRED SUPPLEMENTARY INFORMATION

REQUIRED SUPPLEMENTARY INFORMATION
FOR THE YEAR ENDED JUNE 30, 2022

Schedule of Changes in the Authority's Total OPEB Liability and Related Ratios:

GASB 75

Total OPEB Liability	**FY 2022**	**FY 2021**	**FY 2020**	**FY 2019**	**FY 2018**
Service Cost	$ 21,997	$ 21,929	$ 19,623	$ 14,746	$ 14,498
Interest	5,624	9,053	10,893	12,563	12,408
Changes of benefit terms	-	-	-	-	-
Differences between expected and actual experience	-	(99,869)	-	(22,343)	-
Changes of assumptions	17,693	(525)	8,095	20,023	(1,150)
Benefit payments	(7,849)	(6,711)	(32,128)	(25,641)	(29,342)
Total OPEB Liability - Beginning	274,829	350,952	344,469	345,121	348,707
Total OPEB Liability - Ending (a)	$ 312,294	$ 274,829	$ 350,952	$ 344,469	$ 345,121
Plan fiduciary net position					
Contributions - employer	$ -	$ -	$ -	$ -	$ 29,342
Net investment income	-	-	-	-	-
Benefit payments	-	-	-	-	(29,342)
Net change in plan fiduciary net postion	-	-	-	-	-
Plan fiduciary net position - Beginning	-	-	-	-	-
Plan fiduciary net position - Ending (b)	$ -	$ -	$ -	$ -	$ -
Total OPEB liability - ending (a)-(b)	$ 312,294	$ 274,829	$ 350,952	$ 344,469	$ 345,121
Covered-employee payroll	$ 3,416,860	$ 3,002,516	$ 2,774,135	$ 2,458,570	$ 2,164,052
Total OPEB liability as a percentage of covered-employee payroll	9.14%	9.15%	12.65%	14.01%	15.95%

This schedule is presented to illustrate the requirements to show information for 10 years. However, until a full 10-year trend is compiled, the Authority is showing two year presentation.

REQUIRED SUPPLEMENTARY INFORMATION
FOR THE YEAR ENDED JUNE 30, 2022

Schedule of Authority's Pension Contributions

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Contractually required contribution	$ 588,815	$ 636,600	$ 623,700	$ 416,000	$ 446,991
Contributions to the contractually required contribution	(588,815)	(636,600)	(623,700)	(416,000)	(446,991)
	$ -	$ -	$ -	$ -	$ -
Authority's covered payroll	$ 3,295,847	$ 2,934,000	$ 2,442,000	$ 2,459,000	$ 2,450,000
Contribution as a percentage of covered payroll	17.9%	21.7%	25.5%	16.9%	18.2%

	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013	FY 2012
Contractually required contribution	$ 348,000	$ 309,000	$ 273,000	$ 278,000	$ 290,000	$ 287,000
Contributions to the contractually required contribution	(348,000)	(309,000)	(273,000)	(278,000)	(290,000)	(287,000)
	$ -	$ -	$ -	$ -	$ -	$ -
Authority's covered employee payroll	$ 2,353,000	$ 2,058,000	$ 2,025,000	$ 2,087,000	$ 2,113,000	$ 2,087,000
Contribution as a percentage of covered payroll	14.8%	15.0%	13.5%	13.3%	13.7%	13.8%

REQUIRED SUPPLEMENTARY INFORMATION
FOR THE YEAR ENDED JUNE 30, 2022

Schedule of Authority's Proportionate Share of Net Pension Liability

	FY 2022	FY 2021	FY 2020	FY 2019	FY 2018
Authority's proportion of the net pension liability (asset)	0.02219643%	0.02384254%	0.02242230%	0.02415869%	0.02640814%
Authority's proportionate share of the net pension liability (asset)	$ 2,656,131	$ 5,203,262	$ 3,878,521	$ 3,659,723	$ 3,559,827
Authority's covered employee payroll	$ 2,934,000	$ 2,442,000	$ 2,459,000	$ 2,450,000	$ 2,353,000
Authority's proportionate share of the net pension liability (asset) as a percentage of its covered employee payroll	90.5%	213.1%	157.7%	149.4%	151.3%
Plan fiduciary net position as a percentage of the total pension liability	75.8%	75.8%	80.2%	82.1%	81.1%

	FY 2017	FY 2016
Authority's proportion of the net pension liability (asset)	0.02813710%	0.03017175%
Authority's proportionate share of the net pension liability (asset)	$ 4,224,032	$ 1,732,299
Authority's covered employee payroll	$ 2,058,000	$ 2,025,000
Authority's proportionate share of the net pension liability (asset) as a percentage of its covered employee payroll	205.2%	85.5%
Plan fiduciary net position as a percentage of the total pension liability	80.5%	91.9%

SUPPLEMENTARY INFORMATION

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2022

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Pedcor Rosewood Station	Hillside Manor LLC	Webster Road LLC
ASSETS:									
CURRENT ASSETS:									
Cash - unrestricted	$ 1,044,792	$ 75,380	$ 1,214,197	$ 1,844,742	$ -	$ 87,717	$ -	134,507	$
Investments	467,274	-	-	320,870	-	994,442	-	-	-
Accounts receivable:									
PHA projects	-	-	-	-	-	-	-	-	-
HUD other programs	-	-	48	-	37,176	-	-	-	-
Other governments	-	-	-	-	-	-	-	-	-
Miscellaneous	36,195	2,084		50,533	-	484,777	-	-	-
Tenants - rent/misc	57,685	12,718	280,086	-	-	-	-	-	-
Tenants - fraud	-	-	12,438	-	-	-	-	-	-
Allowance for doubtful accounts:									
Rents	(4,312)	-	(96,616)	-	-	-	-	-	-
Other		-	(16,504)	-	-	-	-	-	-
Fraud recovery	-	-	(3,409)	-	-	-	-	-	-
Notes receivable	-	-	-	-	-	275,000	-	-	-
Accrued interest	-	-		-	-	4,028,396	-		-
Allowance for Accrued Interest	-	-		-	-	(2,302,352)	-		-
	89,568	14,802	176,043	50,533	37,176	2,485,821	-	-	-
Prepaid expenses and other assets	27,399	-	158,084	86,998	-	100	-	-	-
Inventory	-	-	85,390	-	-	-	-	-	-
Allowance for obsolete inventory	922	-	(66,175)	-	-	-	-	-	-
Due from other funds	-		-	-					
TOTAL CURRENT ASSETS	1,629,954	90,182	1,567,539	2,303,143	37,176	3,568,080	-	134,507	-
RESTRICTED CASH AND INVESTMENTS:									
Other than security deposits	531,017	121,258	191,031	22,400,156	-	431,544	-	-	-
Security deposits	11,914	1,856	103,930	-	-	-	-	-	-
	542,931	123,114	294,960	22,400,156	-	431,544	-	-	-
NONCURRENT ASSETS:									
Notes receivable	-	-	1,605,000	20,964,084	-	26,798,341	33,427,558	19,884,334	16,363,555
Capital Assets:									
Land	827,388	78,500	2,522,548	-	-	-	-	-	-
Buildings and improvements	3,614,120	1,179,633	23,441,784	-	863,878	-	-	-	-
Furniture and equipment - dwellings	-	-	-	-	-	-	-	-	-
Furniture and equipment - administration	44,037	-	564,145	37,316	27,150	-	-	-	-
Site improvements	-	-	4,725,935	-	5,198	-	-	-	-
Construction in progress	-	-	-	-	-	-	-	-	-
Accumulated depreciation	(3,115,567)	(1,068,869)	(25,818,925)	(37,316)	(54,222)	-	-	-	-
Total Capital Assets	1,369,978	189,264	5,435,486	-	842,004	-	-	-	-
TOTAL ASSETS	3,542,863	402,560	8,902,985	45,667,382	879,180	30,797,965	33,427,558	20,018,841	16,363,555
DEFERRED OUTFLOWS OF RESOURCES	258,013	15,768	688,741	485,949	-	-	-	-	-
TOTAL ASSETS and DEFERRED OUTFLOWS OF RESOURCES	3,800,876	418,328	9,591,726	46,153,331	879,180	30,797,965	33,427,558	20,018,841	16,363,555

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2022

Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program (ROSS)	Shelter Plus Care	Metro Supportive Housing Program	Eliminations	Total
$ 545,689	$ 105,672	$ 141,819	$ 43,078	$ 3,086	$ -	$ -	$ 484,000	$ -	$ 5,724,679
-	-	-	-	58,345	-	-	786,837	-	2,627,768
-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	(37,224)	-
-	-	-	-	-	-	-	4,669,698	-	4,669,698
13,898	-	-		32,407	-	-	-	-	619,893
-	-	-	-	-	-	-	-	-	350,489
-	-	-	-	-	-	-	-	-	12,438
		-							-
-	-	-	-	-	-	-	-	-	(100,928)
-	-	-	(44,000)	-	-	-	-	-	(60,504)
-	-	-	-	-	-	-	-	-	(3,409)
-	-	-	-	-	-	-	-	-	275,000
-	-	-	-	-	-	-	-	-	4,028,396
-	-	-	-	-	-	-	-	-	(2,302,352)
13,898	-	-	(44,000)	32,407	-	-	4,669,698	(37,224)	7,488,722
-	-	-	9,930	-	-	-	-	-	282,511
-	-	-	-	-	-	-	-	-	85,390
-	-	-	-	-	-	-	-	-	(65,253)
						-	-	-	-
559,586	105,672	141,819	9,008	93,838	-	-	5,940,535	(37,224)	16,143,817
235,555	-	-	108,587	131,726	-	-	-	-	24,150,873
-	-	-	5,977	12,241	-	-	-	-	135,918
235,555	-	-	114,564	143,967	-	-	-	-	24,286,791
-	-	-	-	-	-	-	-	-	119,042,871
-	-	-	380,548	90,000	-	-	-	-	3,898,984
-	-	-	5,906,842	1,348,300	-	-	-	-	36,354,556
-	-	-	-	20,069	-	-	-	-	20,069
57,702	-	-	23,064	6,236	-	-	-	-	759,649
-	-	-	-	-	-	-	-	-	4,731,133
-	-	-	-	-	-	-	-	-	-
(54,721)	-	-	(301,320)	(1,307,191)	-	-	-	-	(31,758,132)
2,980	-	-	6,009,133	157,413	-	-	-	-	14,006,259
798,121	105,672	141,819	6,132,705	395,219	-	-	5,940,534	(37,224)	173,479,737
433,053	19,982	-	-	9,445	-	-	(21,804)	-	1,889,147
1,231,174	125,654	141,819	6,132,705	404,664	-	-	5,918,730	(37,224)	175,368,885

(Continued)

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2022

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Rosewood Station	Hillside Manor LLC	Webster Road LLC
LIABILITIES:									
CURRENT LIABILITIES:									
Accounts payable	$ 44	$ -	$ -	$ -	$ -	$ -	$ -	-	$ -
Accrued wages	-	-	97,898	77,867	-				
Accrued compensated absences	389,799	-		-	-	-	-	-	-
Accrued interest payable	-	-	-	-	-	421,012	-	-	-
Accounts payable HUD PHA programs	-	-	-	-	-	-	-	-	-
Accounts payable - other government	-	-	-	-	-	-	-	-	-
Tenant security deposits	11,914	1,856	103,930	-	-	-	-	-	-
Unearned revenue	-	-	1,232	21,838,916	-	-	-	-	-
Current portion of long-term debt		7,705	-	-	-	275,000	-	-	-
Other current liabilities	375,738	62,249	152,723	8,519	-	-	-	-	-
Accrued liabilities	79,187	21,525	206,229	87,524	37,176	-	-	-	-
TOTAL CURRENT LIABILITIES	856,682	93,335	562,012	22,012,826	37,176	696,012	-	-	-
NONCURRENT LIABILITIES:									
Long-term debt, net of current portion	3,396	20,032	-	-	-	14,550,006	33,427,558	14,271,341	16,363,555
Long-term debt, payable to Clackamas County	400,784	540,000	-	-	-	-	-	-	-
Accrued compensated absences - noncurrent	252,178	-	115,664	-	-	-	-	-	-
Other noncurrent liabilities - Pension & OPEB liability	443,310	18,896	1,214,176	1,038,776	-	-	-	-	-
	-								
TOTAL NONCURRENT LIABILITIES	1,099,667	578,928	1,329,841	1,038,776	-	14,550,006	33,427,558	14,271,341	16,363,555
TOTAL LIABILITIES	1,956,350	672,263	1,891,852	23,051,602	37,176	15,246,018	33,427,558	14,271,341	16,363,555
DEFERRED INFLOWS OF RESOURCES	248,568	24,424	653,461	748,928	-	-	-	-	-
NET POSITION:									
Net investment in capital assets	965,798	(378,473)	5,435,486	-	842,004	-	-	-	-
Restricted	542,931	123,114	294,960	22,400,156		431,544	-	-	-
Unrestricted	87,229	(23,000)	1,315,966	(47,354)	-	15,120,402	-	5,747,500	-
TOTAL NET POSITION	$ 1,595,958	$ (278,359)	$ 7,046,413	$ 22,352,802	$ 842,004	15,551,947	-	5,747,500	-

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2022

Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program	Shelter Plus Care 2002	Metro Supportive Housing Program	Eliminations	Total
$ -	$ -	$ -	$ 10,240	$ 18,738	$ -	$ -	$ -	$ -	$ 29,023
75,232	-	-	-	-	-	-	82,524	-	333,520
-	-	-	-	-	-	-	-	-	389,799
-	-	-	-	-	-	-	-	-	421,012
-	-		-	-	-	-	-	-	-
-	-		-	-	-	-	-	-	-
-	-	-	5,977	11,083	-	-	-	-	134,760
-	(33,433)	-		4,524	-	-	-	-	21,811,240
-	-	-			-	-	-	-	282,705
245,397	-	-	238,484	-	-	-	413,724	-	1,496,834
20,816	-	-	8,885	(25)	-	-	-	(37,224)	424,093
341,444	(33,433)	-	263,586	34,320	-	-	496,248	(37,224)	25,322,985
-	-	-	2,220,574	28,256	-	-	-	-	80,884,717
-	-	-	673,012	-	-	-	-	-	1,613,796
-	-	-	-	-	-	-	-	-	367,842
699,745	28,544	-	-	9,353	-	-	(484,375)	-	2,968,425
699,745	28,544	-	2,893,586	37,610	-	-	(484,375)	-	85,834,781
1,041,190	(4,889)	-	3,157,171	71,930	-	-	0 11,874	(37,224)	111,157,765
475,314	21,580	-	-	29,541	-	-	424,244	-	2,626,060
2,980	-	-	3,115,548	129,157	-	-	-	-	10,112,501
1,854,539	-	-	108,587	143,967	-	-	-	-	25,899,798
(2,142,848)	108,963	141,819	(248,601)	30,069	-	-	5,482,613	-	25,572,758
$ (285,329)	$ 108,963	$ 141,819	$ 2,975,533	$ 303,193	$ -	$ -	$ 5,482,613	$ -	$ 61,585,058

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF REVENUES, EXPENSES AND CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2022

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Hillside Manor LLC
REVENUES:							
Tenant rental revenue	$ 484,941	$ 82,407	$ 1,564,026	$ -	$ -	$ -	-
Tenant revenue - other	13,231	19,006	44,487	-	-	-	-
Total Tenant Revenue	498,172	101,413	1,608,512	-	-	-	-
HUD PHA operating grants	-	-	2,076,293	-	471,168	-	-
HUD PHA capital grants	-	-	-	-	563,181	-	-
Mgmt fee	-	-	-	325,368		-	-
Asset mgmt fee	-	-	-	53,400	-	-	-
Bookkeeping fee	-	-	-	39,233	-	-	-
Other Fees	-	-	-	127,186	-	-	-
Other government grants	-	-	-	-	-	-	-
Voucher income	-	-	-	-	-	-	-
Investment income	16,255	-	3,149	3,147	-	7,154	-
Fraud recovery	-	-	9,692	-	-	-	-
Other revenue	921,843	28,002	1,172	17,736,119	-	585,075	-
Investment income restricted	-	-	54	13,536	-	-	-
Gain(Loss) on sale of fixed assets	-	-	-	-	-	-	-
TOTAL REVENUES	1,436,270	129,415	3,698,871	18,297,989	1,034,349	592,229	-
OPERATING EXPENSES:							
Administrative:							
Salaries	201,664	27,426	397,741	857,279	-	-	-
Employee benefit contributions	10,403	2,561	182,139	583,226	-	-	-
Audit fees	998	-	11,107	13,852	5,363	-	-
Management fees	-	-	325,368	-	-	-	-
Bookkeeping fee	-	-	39,233	-	-	-	-
Office expense	510,379	4,133	244,227	358,526	3,084	-	-
Legal expense	(518)	-	5,298	133	-	-	-
Travel expense	-	-	571	7,236	-	-	-
Asset mgmt fee	-	-	53,400	-	-	-	-
Other	(57)	-		2,675	127,186	-	-
Tenant Services:							
Salaries	-	-	103,145	-	-	-	-
Relocation costs	-	-	-	-	2,795	-	-
Employee benefit contributions	-	-	67,093	-	-	-	-
Other expenses	-	-	45,681	(24,808)		-	-
Utilities:							
Water	10,087	3,728	212,430	4,006	-	-	-
Electricity	5,045	10,629	30,494	10,941	-	-	-
Gas	549	-	3,148	3,818	-	-	-
Sewer	26,855	12,311	425,816	8,999	-	-	-
Ordinary Maintenance and Operations:							
Labor	36,348	18,198	628,071	7,541	-	-	-
Employee benefit contributions	20,403	7,220	367,010	3,031	-	-	-
Materials	14,326	19,604	188,782	840	-	-	-
Contract costs	69,765	13,952	497,718	2,511	14,776	-	-
Protective Services:							
Contract costs	32,407	-	22,356	351	-	-	-
General Expenses:							
Property insurance	20,243	4,054	122,651	-	-		
Liability insurance	2,505	621	17,426	5,374	-	-	-
Workers' compensation	931	433	14,575	1,776	-	-	-
All other insurance	976	-	7,137	-	-	-	-
Other expenses	62	-	2,777	52,508		-	-
Payment in lieu of taxes	-	-	87,738	-	-	-	-
Bad debt - tenant rents	(38)	516	7,487	-	-	-	-
Bad debt - other	454	16,258		-	-	-	-
Severance expense	-	-		-	-	-	-
Interest expense	1,987	399	-	-	-	585,075	-
TOTAL OPERATING EXPENSES	965,775	142,043	4,110,617	1,899,813	153,204	585,075	-
INCOME (LOSS) BEFORE OTHER EXPENSES	470,495	(12,628)	(411,746)	16,398,176	881,145	7,154	-

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)
CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE

JUNE 30, 2022

Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program (ROSS)	Shelter Plus Care Program	Metro Supportive Housing Program	Eliminations	Total
$ -	$ -	$ -	$	$ 194,982	$ -	$ -	$ -	$ -	$ 2,326,356
-	-	-	265,289	8,023	-	-	-	-	350,034
-	-	-	265,289	203,005	-	-	-	-	2,676,390
-	-	-	-	-	100,757	-	-	-	2,648,218
-	-	-	-	-	-	-	-	-	563,181
-	-	-	-	-	-	-	-	(325,368)	-
-	-	-	-	-	-	-	-	(53,400)	-
-	-	-	-	-	-	-	-	(39,233)	-
-	-	-	-	-	-	-	-	(127,186)	(0)
-	-	-	-	-	-	-	8,826,456	-	8,826,456
19,122,464	2,103,063	38,418	-	-	-	413,058	-	-	21,677,004
1,549	177	265	-	329	-	-	-	-	32,025
49,600	-	-	-	-	-	-	-	-	59,292
35,844	-	432,632	-		-	-	-	-	19,740,687
-	-	-	(80,948)		-	-	-	-	(67,358)
-	-	-	-	-	-	-	-	-	-
-	-								
19,209,458	2,103,240	471,315	184,341	203,334	100,757	413,058	8,826,456	(545,187)	56,155,894
736,219	36,359	4,977	28,691	33,604	93,557	27,000	874,600	-	3,319,118
371,253	19,184	2,067	5,147	0	-	-	321,819	-	1,497,798
12,624	664	-	-	-	-	-	4,649	-	49,257
-	-	-	19,572	19,774	-	-	-	(325,368)	39,346
4,365	-	-	-	-	-	-	1,609	(39,233)	5,973
189,437	12,059	7	1,604	2,354	7,200	-	19,014	-	1,352,024
247	13	-	6,511	2,483	-	-	24,932	-	39,099
409	22	149	474	348	-	-	6,978	-	16,186
-	-	-	-	-	-	-	-	(53,400)	-
3,493	-	6,151	6,320	6,862	-	-	8,145	(127,186)	33,591
									-
45,116	-	-	-	-	-	-	-	-	148,261
-	-	-	-	-		-	-	-	2,795
36,485	-	-	-	-	-	-	-	-	103,578
-	-	-	-	-	-	-	3,305	-	24,178
		-							-
-	-	-	2,128	34,581	-	-	-	-	266,960
-	-	-	6,330	6,731	-	-	-	-	70,169
-	-	-	-		-	-	-	-	7,515
-	-	-	27,179		-	-	-	-	501,160
									-
-	-	-	6,915	21,333	-	-	-	-	718,406
-	-	-	-	10,421	-	-	-	-	408,085
1,192	61	-	1,470	4,106	-	-	-	-	230,381
101	5	-	33,399	49,052	-	-	38,856	-	720,134
									-
167	9	-	-		-	-	-	-	55,290
									-
-	-	-	-	3,419	-	-	-	-	150,367
7,459	393	-	10,915	6,097	-	-	1,013	-	51,803
1,291	72	-	-		-	-		-	19,079
1,591	84	-	-		-	-	-	-	9,788
60,770	-	-	-	10,373	-	-	31,775	-	158,265
-	-	-	6,006	-	-	-	-	-	93,744
-	-	-	300	-	-	-	-	-	8,265
-	-	-	-	-	-	-	-	-	16,712
-	-	-	-	-	-	-	-	-	-
-	-	-	132,189	-	-	-	-	-	719,651
1,472,222	68,926	13,351	295,151	211,535	100,757	27,000	1,336,694	(545,187)	10,836,978
17,737,235	2,034,314	457,964	(110,811)	(8,201)	-	386,058	7,489,761	-	45,318,917

(Continued)

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF REVENUES, EXPENSES AND CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE)

JUNE 30, 2022

	State and Local Projects	Clackamas Apartments	Low Rent Public Housing SF 274	Central Office Program	Capital Grant Program	Easton Ridge LLC	Hillside Manor LLC
OTHER EXPENSES:							
Extraordinary maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Casualty losses recovered	-	-	66,938	-	-	-	-
Grant Expense	280,810	-	-	-	-	-	-
Housing assistance payments	-	-	-	-	-	-	-
Housing assistance payments - port-in	-	-	-	-	-	-	-
Depreciation	99,085	39,724	400,020	-	42,786	-	-
TOTAL OTHER EXPENSES	379,895	39,724	466,958	-	42,786	-	-
NET INCOME (LOSS)	90,600	(52,353)	(878,704)	16,398,176	838,359	7,154	-
OPERATING TRANSFER	(959,489)	-	872,880	959,489	(872,880)	-	-
INCREASE (DECREASE) IN NET POSITION	(868,889)	(52,353)	(5,824)	17,357,665	(34,521)	7,154	-
NET POSITION, June 30, 2021	2,464,847	(226,006)	7,052,237	4,995,137	876,525	15,544,793	5,747,500
NET POSITION, June 30, 2022	$ 1,595,958	(278,359)	7,046,413	22,352,802	842,004	15,551,947	5,747,500
	-	-	-	-	-	-	-
OTHER INFORMATION:							
Debt principal payment	$ 3,396	$ 7,705	$ -	$ -	$ -	$ -	$

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

COMBINING SCHEDULE OF NET POSITION (FINANCIAL DATA SCHEDULE)
CHANGES IN NET POSITION (FINANCIAL DATA SCHEDULE

JUNE 30, 2022

Rental Assistance Vouchers SF-0018V	Mainstream Vouchers	Emergency Housing Vouchers	Clayton Mohr Commons	Arbor Terrace Apartments	Resident Self Sufficiency Program	Shelter Plus Care Program	Metro Supportive Housing Program	Eliminations	Total
$ -	$ -	$ -	$ -	$ 0	$ -	$ -	$ -	$ -	$ -
-	-	-	-	-	-	-	-	-	66,938
-	-	-	-	-	-	-	-	-	280,810
18,329,848	2,117,636	404,301	-	-	-	386,058	1,987,158	-	23,225,001
32,051	-	-	-	-	-	-	-	-	32,051
5,960	-	-	200,880	44,943	-	-	-	-	833,398
18,367,858	2,117,636	404,301	200,880	44,943	-	386,058	1,987,158	-	24,438,198
(630,623)	(83,321)	53,663	(311,691)	(53,145)	-	-	5,502,603	-	20,880,719
-	-	-		-	-	-	-		-
(630,623)	(83,321)	53,663	(311,691)	(53,145)	-	-	5,502,603	-	20,880,719
345,294	192,284	88,156	3,287,224	356,338	-	-	(19,990)	-	40,704,339
(285,329)	108,963	141,819	2,975,533	303,193	-	-	5,482,613	$ -	$ 61,585,058
-	-	-	-	-			-		-
$ -	$ -	$ -	$ -	$	$ -	$ -	$ -		$ 11,101

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

FINANCIAL DATA SCHEDULE - COMBINING SCHEDULE OF NET POSITION - PUBLIC HOUSING DETAIL

JUNE 30, 2022

	AMP 1	AMP 2	AMP 3	AMP 4	Total Low Rent Public Housing and Capital Grant Program
ASSETS:					
CURRENT ASSETS:					
Cash:					
Cash - unrestricted	$ 157,780	$ 320,985	$ 672,346	$ 63,086	$ 1,214,197
Cash - security deposits	22,890	37,609	18,081	25,350	103,930
Total Cash	180,670	358,593	690,427	88,436	1,318,126
Accounts Receivable:					
HUD	2,062	32,747	1,208	1,208	37,225
Tenants	59,600	115,296	24,550	80,640	280,086
Allowance for doubtful accounts:					
Rents	(18,164)	(42,056)	(9,363)	(27,032)	(96,616)
Other	(3,354)	(12,316)	(833)	(1)	(16,504)
Fraud recovery	(1,833)	(1,069)	57	(563)	(3,409)
Fraud recovery	3,431	5,976	549	2,483	12,438
Total Accounts Receivable	41,742	98,577	16,167	56,734	213,220
Prepaid expenses and other assets	33,785	64,868	25,508	33,923	158,084
Inventory	85,390	-	-	-	85,390
Allowance for obsolete inventories	(66,175)	-	-	-	(66,175)
TOTAL CURRENT ASSETS	275,411	522,038	732,102	179,093	1,708,645
RESTRICTED CASH AND INVESTMENTS	8,815	57,408	5,844	118,963	191,031
NONCURRENT ASSETS:					
Notes receivable	-	1,605,000	-	-	1,605,000
Capital Assets:					
Land	19,541	2,425,542	10,772	66,693	2,522,548
Buildings and improvements	5,105,795	13,608,021	2,397,617	3,194,229	24,305,661
Furniture and equipment - administration	447,064	62,451	27,121	54,659	591,295
Site and leasehold improvements	783,911	1,372,818	1,271,525	1,302,879	4,731,133
Accumulated depreciation	(5,758,364)	(12,690,262)	(3,458,147)	(3,966,373)	(25,873,145)
TOTAL NONCURRENT ASSETS	597,947	4,778,570	248,888	652,087	6,277,492
TOTAL ASSETS	882,173	6,963,017	986,834	950,143	9,782,167
DEFERRED OUTFLOWS OF RESOURCES	148,178	270,424	127,086	143,054	688,742
TOTAL ASSETS and DEFERRED OUTFLOWS OF RESOURCES	1,030,352	7,233,440	1,113,920	1,093,197	10,470,909
LIABILITIES:					
CURRENT LIABILITIES:					
Accrued wages	21,978	32,723	20,548	22,650	97,898
Tenant security deposits	31,705	62,592	23,925	144,313	262,536
Unearned revenue	-	100		1,132	1,232
Accrued liabilities	43,015	120,735	20,790	58,865	243,405
TOTAL CURRENT LIABILITIES	96,698	216,150	65,263	226,960	605,071
NONCURRENT LIABILITIES:					
Accrued compensated absences - noncurrent	20,326	46,379	28,431	20,528	115,664
Other noncurrent liabilities - Pension & OPEB liability	267,907	469,879	241,037	235,353	1,214,176
TOTAL NONCURRENT LIABILITIES	288,233	516,257	269,468	255,882	1,329,841
TOTAL LIABILITIES	384,931	732,408	334,731	482,842	1,934,911
DEFERRED INFLOWS OF RESOURCES	136,664	244,736	111,518	160,543	653,461
NET POSITION:					
Net investment in capital assets	597,947	4,778,570	248,888	652,087	6,277,492
Restricted	31,705	95,017	23,925	144,313	294,960
Unrestricted	(120,895)	1,382,710	394,858	(346,589)	1,310,084
TOTAL NET POSITION	$ 508,757	$ 6,256,297	$ 667,671	$ 449,811	$ 7,882,536

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

FINANCIAL DATA SCHEDULE - COMBINING SCHEDULE OF REVENUES AND EXPENSES - PUBLIC HOUSING DETAIL

YEAR ENDED JUNE 30, 2022

	AMP 1 :: 501			AMP 2 :: 502			AMP 3 :: 503		
	Operating	Capital Fund	Total	Operating	Capital Fund	Total	Operating	Capital Fund	Total
REVENUES:									
Tenant rental revenue	$ 322,864	$ -	$ 322,864	$ 727,586	$ -	$ 727,586	$ 258,002	$ -	$ 258,002
Tenant revenue - other	7,651	-	7,651	30,903	-	30,903	6,530	-	6,530
HUD PHA grants	458,943	104,268	563,211	628,422	153,625	782,047	437,956	101,467	539,423
HUD PHA capital grants	-	62,895	62,895	-	366,666	366,666	-	15,221	15,221
Investment income	479	-	479	934		934	1,275		1,275
Investment income restricted	-	-	-	54		54	-	-	-
Fraud recovery	6,240	-	6,240	-	-	-	-	-	-
Other revenue	721	-	721	380	-	380	-	-	-
Gain (loss) on sale of fixed assets	-	-	-	-	-	-	-	-	-
TOTAL REVENUE	796,898	167,163	964,061	1,388,279	520,291	1,908,570	703,764	116,688	820,451
EXPENSES:									
Administrative:									
Administrative salaries	99,444		99,444	138,531		138,531	59,348		59,348
Auditing fees	2,914	1,196	4,110	3,920	1,751	5,671	1,326	1,208	2,534
Employee benefit contributions	45,620		45,620	61,702		61,702	31,984		31,984
Office expense	56,597	3,084	59,681	79,783		79,783	40,960		40,960
Legal expense	683		683	1,077		1,077	1,643		1,643
Travel expense	208		208	130		130	113		113
Other	-	28,360	28,360		41,536	41,536	-	28,645	28,645
	205,466	32,640	238,106	285,142	43,287	328,429	135,375	29,853	165,228
Tenant services:									
Salaries	23,031	-	23,031	33,677	-	33,677	23,219	-	23,219
Relocation costs	-	375	375	-	2,126	2,126	-		-
Employee benefit contributions	14,981	-	14,981	21,906	-	21,906	15,103	-	15,103
Other expenses	15,250	-	15,250	21,621	-	21,621	2,753	-	2,753
	53,261	375	53,636	77,203	2,126	79,329	41,075	-	41,075
Utilities:									
Water	43,729	-	43,729	75,326	-	75,326	40,209	-	40,209
Electricity	7,441	-	7,441	1,875	-	1,875	7,797	-	7,797
Gas	49	-	49	1,149	-	1,149	1,016	-	1,016
Sewer/Other utilities	107,123	-	107,123	129,627	-	129,627	65,232	-	65,232
	158,342	-	158,342	207,977	-	207,977	114,253	-	114,253
Ordinary maintenance and operations:									
Labor	117,782	-	117,782	238,089	-	238,089	105,036	-	105,036
Materials	38,213	-	38,213	86,079	-	86,079	17,550	-	17,550
Contracts	94,436	357	94,793	214,207	4,371	218,578	62,165	-	62,165
Employee benefits	66,811	-	66,811	142,677	-	142,677	64,269	-	64,269
	317,243	357	317,600	681,053	4,371	685,424	249,019	-	249,019
Protective services:									
Contract costs	10,556	-	10,556	146	-	146	1,097	-	1,097
General:									
Property insurance	23,609	-	23,609	49,265	-	49,265	19,947	-	19,947
Liability insurance	3,843	-	3,843	5,734	-	5,734	3,941	-	3,941
Workers' compensation	2,728	-	2,728	5,442	-	5,442	2,376	-	2,376
All other insurance	1,603	-	1,603	2,301	-	2,301	1,603	-	1,603
Other	801		801	995		995	429		429
Payments in lieu of taxes	16,180	-	16,180	51,101	-	51,101	14,137	-	14,137
Bad Debt - rent	6,780	-	6,780	5,496	-	5,496	1,591	-	1,591
Bad debt - other		-	-		-	-		-	-
Management fee	72,836	-	72,836	107,046	-	107,046	72,587	-	72,587
Accounting fee	8,783	-	8,783	12,908	-	12,908	8,753	-	8,753
Asset management fee	12,000	-	12,000	17,400	-	17,400	12,000	-	12,000
	149,163	-	149,163	257,688	-	257,688	137,365	-	137,365
Other:									
Extraordinary maintenance	-	-	-	-	-	-	-	-	-
Casualty losses recovered	11,531	-	11,531	55,407	-	55,407	-	-	-
Grant Expense	-	-	-	-	-	-	-	-	-
Depreciation expense	36,854	18,894	55,748	283,783	16,342	300,125	25,772	921	26,693
	48,385	18,894	67,279	339,190	16,342	355,532	25,772	921	26,693
TOTAL EXPENSES:	942,417	52,266	994,683	1,848,400	66,126	1,914,526	703,956	30,774	734,730
EXCESS (DEFICIENCY) OF OPERATING REVENUES OVER OPERATING EXPENSES	(145,520)	114,897	(30,623)	(460,120)	454,165	(5,956)	(192)	85,914	85,722
OTHER FINANCING SOURCES (USES):									
Operating transfers in	70,897	-	70,897	103,840		103,840	71,614	-	71,614
Equity transfers	41,969	(41,969)	-	375,950	(375,950)	-	17,746	(17,746)	-
Operating transfers out	-	(70,897)	(70,897)	-	(103,840)	(103,840)	-	(71,614)	(71,614)
Special Item (Net gain/loss)	-	-	-	-	-	-	-	-	-
	112,866	(112,866)	-	479,790	(479,790)	-	89,360	(89,360)	-
EXCESS (DEFICIENCY) OF REVENUE OVER EXPENSE	$ (32,654)	$ 2,031	$ (30,623)	$ 19,670	$ (25,625)	$ (5,956)	$ 89,168	$ (3,446)	$ 85,722

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

FINANCIAL DATA SCHEDULE - COMBINING SCHEDULE OF REVENUES AND EXPENSES - PUBLIC HOUSING DETAIL

YEAR ENDED JUNE 30, 2022

AMP 4 :: 504			Low Rent Public Housing and Capital Grant Program Total
Operating	Capital Fund	Total	
$ 255,573	$ -	$ 255,573	$ 1,564,026
(597)	-	(597)	44,487
550,972	111,809	662,781	2,547,461
-	118,399	118,399	563,181
460		460	3,149
-	-	-	54
3,452	-	3,452	9,692
70	-	70	1,172
-	-	-	-
809,931	230,208	1,040,139	4,733,221
100,418		100,418	397,741
2,947	1,208	4,155	16,470
42,833		42,833	182,139
66,886		66,886	247,310
1,895		1,895	5,298
120		120	571
	28,645	28,645	127,186
215,098	29,853	244,951	976,715
23,219	-	23,219	103,145
-	294	294	2,795
15,103	-	15,103	67,093
6,057	-	6,057	45,680
44,378	294	44,672	218,713
53,166	-	53,166	212,430
13,381	-	13,381	30,494
934	-	934	3,148
123,834	-	123,834	425,816
191,315	-	191,315	671,887
167,164	-	167,164	628,071
46,940	-	46,940	188,782
126,910	10,048	136,958	512,494
93,253	-	93,253	367,010
434,267	10,048	444,315	1,696,357
10,557	-	10,557	22,356
29,830	-	29,830	122,651
3,908	-	3,908	17,426
4,029	-	4,029	14,575
1,630	-	1,630	7,137
551		551	2,777
6,320	-	6,320	87,738
(6,380)	-	(6,380)	7,487
	-	-	-
72,898	-	72,898	325,368
8,790	-	8,790	39,233
12,000	-	12,000	53,400
133,576	-	133,576	677,792
-	-	-	-
-	-	-	66,938
-	-	-	-
53,611	6,629	60,240	442,806
53,611	6,629	60,240	509,744
1,082,802	46,824	1,129,626	4,773,564
(272,871)	183,384	(89,487)	(40,344)
71,613	-	71,613	317,964
119,250	(119,250)	-	-
-	(71,613)	(71,613)	(317,964)
-	-	-	-
190,863	(190,863)	-	-
$ (82,008)	$ (7,479)	$ (89,487)	$ (40,344)

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF REVENUES, EXPENSES AND CHANGES IN NET POSITION FOR RENTAL ASSISTANCE VOUCHERS

JUNE 30, 2022

REVENUES:	
HUD administrative fee	$ 1,974,920
Fraud revenue (half of $49,600 in UNP)	24,800
Other	40,209
Total revenues	2,039,929
EXPENSES:	
Administrative salaries	781,336
Employee benefits	407,739
Other administrative costs	270,908
Insurance	10,342
Other general (Port-In)	32,051
Total expenses	1,502,375
EXCESS OF EXPENSES OVER REVENUES	537,555
UNRESTRICTED NET POSITION, June 30, 2021	345,294
UNRESTRICTED NET POSITION, June 30, 2022	$ 882,849
HAP REVENUE:	
HUD Housing Assistance Payments revenue	$ 17,579,240
Fraud revenue (half of $49,600 in RNP)	24,800
Total HAP revenue	17,604,040
HAP EXPENSES	16,330,946
EXCESS OF HAP REVENUES OVER EXPENSES	1,273,094
RESTRICTED NET POSITION, June 30, 2021	581,445
RESTRICTED NET POSITION, June 30, 2022	$ 1,854,539

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF CLACKAMAS APARTMENTS CASH BALANCE

JUNE 30, 2022

Cash:	
Cash and cash equivalents - unrestricted	$ 75,380
Cash and cash equivalents - restricted	1,856
Total	77,236
Less current obligations:	
Trust deed interest payable (15 days of interest)	54
Accounts payable (due within 30 days)	-
Accrued expenses	21,525
Tenant/resident security deposits	1,856
Unearned revenue	-
Total current obligations	23,435
Cash balance in excess of current obligations	$ 53,801

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF CAPITAL FUND PROGRAM

YEAR ENDED JUNE 30, 2022

	Capital Fund Program Grant Approved	Capital Fund Program Grant Expended
Public Housing Capital Fund 2019	$ 1,231,737	$ 1,231,737

SINGLE AUDIT SECTION

MOSSADAMS

Report of Independent Auditors on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards*

Board of County Commissioners of
Clackamas County, Oregon, as Governing Body of
Housing Authority of Clackamas County
Oregon City, Oregon

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States (*Government Auditing Standards)*, the financial statements of the governmental activities and the aggregate discretely presented component units of the Housing Authority of Clackamas County, Oregon (the Authority), a component unit of Clackamas County, Oregon, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, and have issued our report thereon dated February 24, 2023. Our report includes a qualified opinion on the financial statements of the aggregate discretely presented component unit as Webster Road Housing LP have not been audited. Our report includes a reference to other auditors who audited the financial statements of the aggregate discretely presented component units, except for Webster Road Housing LP, as described in our report on the Authority's financial statements. The financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, and Webster Road Housing LP were not audited in accordance with *Government Auditing Standards*, and accordingly, this report does not include reporting on internal control over financial reporting or compliance and other matters associated with the aggregate discretely presented component units or that are reported on separately by those auditors who audited the financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, and Hillside Manor LP.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We did identify a certain deficiency in internal control, described in the accompanying scheduling of findings and questioned costs as item 2022-001 that we consider to be a significant deficiency.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

The Authority's Response to the Finding

Government Auditing Standards requires the auditor to perform limited procedures on the Authority's response to the finding identified in our audit and described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Moss Adams LLP

Portland, Oregon
February 24, 2023

Report of Independent Auditors on Compliance for Each Major Federal Program and Report on Internal Control Over Compliance Required by the Uniform Guidance

Board of County Commissioners
Clackamas County, Oregon, as a Governing Body of
Housing Authority of Clackamas County
Oregon City, Oregon

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the Housing Authority of Clackamas County, Oregon's (the Authority), a component unit of Clackamas County, Oregon, compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of the Authority's major federal programs for the year ended June 30, 2022. The Authority's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, the Authority complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2022.

Basis for Opinion on Each Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States *(Government Auditing Standards)*; and the audit requirements of Title 2 U.S. *Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of the Authority's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to the Authority's federal programs.

Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Authority's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Authority's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards,* and the Uniform Guidance, we

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the Authority's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the Authority's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Report on Internal Control Over Compliance

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Moss Adams LLP

Portland, Oregon
February 24, 2023

HOUSING AUTHORITY OF CLACKAMAS COUNTY
(A component unit of Clackamas County, Oregon)

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

YEAR ENDED JUNE 30, 2022

Federal Grantor / Program Title	Assistance Listing Number	Expenditures
DIRECT FROM:		
U.S. Department of Housing and Urban Development:		
Public and Indian Housing	14.850	$ 2,076,293
Public Housing Capital Fund	14.872	1,034,349
Housing Choice Vouchers	14.871	19,840,081
Mainstream Vouchers	14.879	2,186,562
Housing Voucher Cluster		22,026,642
Residential Opportunity and Supportive Services - Service Coordinators	14.870	100,757
Shelter Plus Care	14.238	413,058
Total U.S. Department of Housing and Urban Development		25,651,099
TOTAL EXPENDITURES OF FEDERAL AWARDS		$ 25,651,099

The accompanying notes are an integral part of this schedule.

NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

YEAR ENDED JUNE 30, 2022

Note 1. Basis of Presentation

The accompanying schedule of expenditures of federal awards (the "Schedule") includes the federal grant activity of the Housing Authority of Clackamas County, Oregon (the "Authority"), a component unit of Clackamas County, Oregon, under programs of the federal government for the year ended June 30, 2022. The information in this schedule is presented in accordance with the requirements of Title 2 U.S. *Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principle, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the schedule presents only a selected portion of the operations of the Authority, it is not intended to and does not represent the financial position, changes in net position or cash flows of the Authority.

Note 2. Summary of Significant Accounting Policies

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in 2 CFR 200, Subpart E (Cost Principles), wherein certain types of expenditures are not allowable or are limited as to reimbursement. The Authority did not elect to use the 10% de minimis indirect cost rate allowed under the Uniform Guidance.

Note 3. Subrecipients

All expenditures reported on this schedule were for the federal award activity of the Authority and no related funds for any of the programs were provided to subrecipients for the year ended June 30, 2022.

Note 4. PPE (Unaudited)

The Authority did not receive donated personal protective equipment (PPE) for the fiscal year ended June 30, 2022.

Section I - Summary of Auditor's Results

Financial Statements

Type of report the auditor issued on whether the financial statements audited were prepared in accordance with GAAP:

Unmodified – Governmental activities of Housing Authority of Clackamas County

Qualified – Aggregate discretely presented component units

Internal control over financial reporting:

- Material weakness(es) identified? ☐ Yes ☒ No
- Significant deficiency(ies) identified? ☒ Yes ☐ None reported

Noncompliance material to financial statements noted? ☐ Yes ☒ No

Federal Awards

Internal control over major federal programs:

- Material weakness(es) identified? ☐ Yes ☒ No
- Significant deficiency(ies) identified? ☐ Yes ☒ None reported

Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? ☐ Yes ☒ No

Identification of major federal programs and type of auditor's report issued on compliance for major federal programs:

Assistance Listing Number	*Name of Federal Program or Cluster*	*Type of Auditor's Report Issued on Compliance for the Major Federal Program*
14.850	Public and Indian Housing	*Unmodified*
14.871, 14.879	Housing Voucher Cluster	*Unmodified*

Dollar threshold used to distinguish between type A and type B programs: $ 769,533

Auditee qualified as low-risk auditee? ☒ Yes ☐ No

Section II - Financial Statement Findings

FINDING 2022-001—Significant Deficiency in Internal Control over Financial Reporting – Financial Statement Preparation

Criteria – Financial statements should be appropriately presented and disclosed fairly at appropriate amounts, and include all relevant transactions that have occurred, all required disclosures, and be clearly expressed and understandable. In doing so, the financial statements must meet the requirements of generally accepted accounting principles (GAAP) by following financial reporting standards of the Governmental Accounting Standards Board (GASB). Financial statement preparers balance preparing the most accurate financial statement possible, with doing that task in a timely manner.

Condition – The Authority prepared financial statements for audit, which required significant edits before the auditors could issue an opinion. While there were no material misstatements identified in the financial statements, the volume of misstatements was significant. In addition, the financial statements were not prepared for audit in a timely manner.

Context – The Authority is tasked with submitting unaudited financial statements to the US Department of Housing and Urban Development (HUD) by August 31, and filing the audited financial statements to the State of Oregon by December 31. The HUD deadline was not met, and the State deadline was extended to February 28, 2023. If the initial draft of the financial statements was prepared in a complete and accurate manner, the State of Oregon extension would not be necessary.

Effect – Additional time was needed for Authority staff to complete a complete, accurate, and understandable financial statement.

Cause – The Authority's Deputy Director of Finance, responsible for financial statement preparation, departed the Authority in January 2022. The current year financial statement preparer was new to the Authority, and did not have prior experience with GASB reporting entities. In addition, the financial statements prepared for audit were not reviewed by another individual.

Recommendation – We recommend the Authority's financial statements be prepared by someone with the skills, knowledge and experience to do so. The Authority could identify someone with that skillset, or they could have current staff trained to obtain that knowledge base. Furthermore, the financial statements should be reviewed by someone who is familiar with GASB financial statement reporting requirements. Such financial statement preparation and review should be scheduled to meet the reporting requirements of both HUD and the State of Oregon.

Response – Management agrees with the recommendation.

Section III - Federal Award Findings and Questioned Costs

None reported

UNIT NAME- Housing Authority Clackamas County (HACC)
A Component Unit of Clackamas County, Oregon
Schedule of Findings and Questioned Costs for the Year ending June 30, 2022

The Authority concurs with the modified opinion and recommendations in this letter. The combination of the former Deputy Director of Finance for Housing Authority Clackamas County leaving his position, other staff turnover of key program personnel, and new staff, including the financial statement preparer, at the Authority contributed negatively to the outcomes. The current labor market has posed challenges to replace personnel as timely as hoped. Concurrently, a new ERP system (Yardi) was implemented, presenting additional challenges, and consuming additional staff time to meet financial data and reporting requirements. New staff brought into the Authority have had these competing priorities on top of the normal demands of learning new roles.

This response letter and the items listed below will serve as our Corrective Action Plan to rectify the deficiencies and current internal controls recommended.

Audit Recommendation- Finding 2022-01

- Finance Manager was hired 1/9/23 and will ultimately be responsible for ensuring adherence to Corrective Action Plan items.

- The Financial Statement Preparer and at least two other staff will be trained to obtain the required knowledge base in GASB reporting requirements and submission of filing financial statements to U.S. Department of Housing and Urban development (HUD) and State of Oregon. This will create versatility amongst unit staff to allow at least one or more reviewers of the statements once prepared.

  Start date: immediately and ongoing.

- Training classes have been initiated and will continue to be offered.

  Start date: immediately and ongoing registrations.

- Establish an internal process of centralizing storage of financial documents including loans, agreements, invoices, grants etc. Relevant Housing Authority staff will be instructed and trained in the new process.

  Start date: March 1st, 2023 - ongoing.

- Monthly calendars and proactive reminders to be implemented, monitored and maintained to enable ample time to meet timely submissions and deadlines.

  Start date: February 21, 2023

- Review of policies and procedures to allow for better reconciliations, monthly closings and tangible benefits of business operations, in order to enable gaps to be identified as well as best practices in generally accepted accounting principles (GAAP) and internal control procedures. As internal controls are changed, policies and procedures will also be reexamined and amended if appropriate.

  Start date: March 1st, 2023 - ongoing.

Signature: **Date:** 2/24/2023

REPORT OF INDEPENDENT AUDITORS REQUIRED BY OREGON STATE REGULATIONS

MOSSADAMS

Report of Independent Auditors Required by Oregon State Regulations

Board of County Commissioners of
Clackamas County, Oregon, as Governing Body of
Housing Authority of Clackamas County
Oregon City, Oregon

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the governmental activities and the aggregate discretely presented component units of the Housing Authority of Clackamas County, Oregon (the Authority), a component unit of Clackamas County, Oregon, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, and have issued our report thereon dated February 24, 2023. Our report includes a qualified opinion on the financial statements of the aggregate discretely presented component unit as Webster Road Housing LP have not been audited. We did not audit the financial statements of Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, Hillside Manor LP, or Webster Road Housing LP which represent 100% of the assets, net position, and revenues of the aggregate discretely presented component units as of June 30, 2022. Except for Webster Road Housing LP, those statements were audited by other auditors whose report has been furnished to us, and our opinions, insofar as it relates to the amounts included for Easton Ridge, LLC, Pedcor Investments 2016-CLV LP, and Hillside Manor LP, are based solely on the report of the other auditors.

Compliance

As part of obtaining reasonable assurance about whether the Authority's basic financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, including provisions of Oregon Revised Statutes (ORS) as specified in Oregon Administrative Rules (OAR) 162-010-0000 to 162-010-0330, of the Minimum Standards for Audits of Oregon Municipal Corporations, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion.

We performed procedures to the extent we considered necessary to address the required comments and disclosures which included, but were not limited to, the following:

- Accounting records and internal control
- Public fund deposits
- Indebtedness
- Insurance and fidelity bonds
- Programs funded from outside sources
- Investments
- Public contracts and purchasing

In connection with our testing, nothing came to our attention that caused us to believe the Authority was not in substantial compliance with certain provisions of laws, regulations, contracts, and grant agreements, including the provisions of ORS as specified in OAR 162-010-0000 through 162-010-0330 of the Minimum Standards for Audits of Oregon Municipal Corporations.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We did identify a certain deficiency in internal control, described in the accompanying scheduling of findings and questioned costs as item 2022-001 that we consider to be a significant deficiency.

The Authority's Response to the Finding

The Authority's response to the finding identified in our audit is described in the accompanying schedule of findings and responses. The Authority's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. Accordingly, this communication is not suitable for any other purpose.

This report is intended solely for the information and use of the Board of County Commissioners and management of the Authority and the Oregon Secretary of State and is not intended to be and should not be used by anyone other than these parties.

Ashley Osten

Ashley Osten, Partner,
For Moss Adams LLP
Portland, Oregon
February 24, 2023