




# ANNUAL PLAN FOR FISCAL YEAR 2019

5 YEAR PLAN FOR FISCAL  
YEARS 2015-2019

 541-682-3755

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## 5 Year Plan for Fiscal Years 2015-2019 Annual Plan for Fiscal Year 2019

# Homes for Good Housing Agency

177 Day Island Road  
Eugene, OR 97401

### **Public Hearing**

Wednesday, May 23, 2018  
2:30 p.m.

Board of County Commissioners Conference Room  
Public Service Building  
125 East 8th Avenue  
Eugene, OR, 97401

### **Written Comments**

Due June 11, 2018  
Contact: Wesley Lucas  
[wlucas@homesforgood.org](mailto:wlucas@homesforgood.org)  
(541) 682-2565

If you are in need of a reasonable accommodation in regard to this meeting or this plan, please contact Wesley Lucas at the phone number or email address above, at least 24 hours prior to the meeting time.

# **EXECUTIVE SUMMARY**

**APRIL 27, 2018**

The Agency is required by Section 511 of the Quality Housing and Work Responsibility Act of 1998 (and ensuing HUD requirements) to submit a 5-Year and Annual Plan to HUD. This year the Agency is only required to submit an Annual Plan covering FY 2019, which begins October 1<sup>st</sup>, 2018 and ends September 30<sup>th</sup>, 2019.

As in previous years, the focus of the Plan is to identify the programs and services provided under the Public Housing (PH) and Section 8 Tenant Based Assistance Programs and to allow public access and comment on those programs and services. The Work Responsibility Act requires that housing authorities work with their Public Housing Resident Advisory Boards (RAB) on the planning and development of the Plan. In order to meet this requirement, the Agency began meeting with the RAB in January 2018.

This booklet contains the following components which are all part of the required submission to HUD.

Section I PHA Annual Plan Update HUD form 50075-HP

Section II Attachments and Appendices supporting HUD form 50075-HP

Supporting Documentation has been updated as needed and the updates have been summarized in the attachments & appendices. The Supporting Documentation, along with this booklet, are available for inspection at both the Day Island and Fairview administration offices, and by contacting the resident commissioners who each have a notebook containing all supporting documents. Supporting Documents include, among other things, the current Section 8 Administrative Plan, Public Housing Admissions and Continued Occupancy Policies (ACOP), flat rent methodology and schedule, Agency Budgets, Public Housing Maintenance Plan, and the Agency Audit.

In January 2018, the Agency changed names from Housing and Community Services Agency of Lane County (HACSA) to Homes for Good Housing Agency (Homes for Good). Due to the production dates of various documents, both names may appear in this plan.

## **Public Notice –**

The publication of this booklet begins the 45 day comment period required by the regulations. During this comment period, on May 23<sup>rd</sup> 2018, the Agency will hold a public hearing to address questions and comments on the Plan. Following the comment period, the Agency will submit the Plan to the Homes for Good Board of Commissioners for approval, followed by electronic submission to HUD no later than July 18<sup>th</sup>, 2018.

**SECTION I**  
**PHA Annual Plan Update**

**HUD Form 50075-HP**

<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, 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.** 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 of 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, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> <b>PHA Name:</b> <u>Homes for Good Housing Agency</u> <b>PHA Code:</b> <u>OR006</u>  <b>PHA Type:</b> <input type="checkbox"/> Small <input checked="" type="checkbox"/> <b>High Performer</b>  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>10/2018</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units:</b> <u>695</u> <b>Number of Housing Choice Vouchers (HCVs):</b> <u>3065</u>  <b>Total Combined:</b> <u>3760</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> <b>Annual Submission</b> <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.         </p> <p style="text-align: center;"> <b>The Plan and Plan Elements are available at the Day Island Administrative Building, the Fairview Administrative Building (which includes the AMP 200, 300, and 500 offices), Laurelwood Homes (AMP 100), Parkview Terrace (AMP 400), and Village Oaks (which includes the AMP 600 office). The Plan and Plan Elements will be provided to each Resident Advisory Board member, and will be available on the Homes for Good website. Supporting documents are available in the Day Island and Fairview Administrative Buildings, and staff members are available upon request to help explain program documents.</b> </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)         </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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		PH	HCV																								
Lead PHA:																											

<b>B.</b>	<b>Annual Plan Elements</b>
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual PHA Plan</b> submission?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.  <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.  <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.  <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.  <input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.  <input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.  <input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.  <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.  <input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p style="text-align: center;"><b>Please see <a href="#">Attachment 1: Deconcentration Policy</a></b></p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p style="text-align: center;"><b>Please see <a href="#">Attachment 2: Revision of PHA Plan Elements</a></b></p>
<b>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.  <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.  <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.  <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.  <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.  <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.  <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.  <input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p style="text-align: center;"><b>Please See <a href="#">Attachment 3: PHA Plan New Activities</a></b></p>
<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p style="text-align: center;"><b>Please see <a href="#">Attachment 4: Progress Report</a></b></p>
<b>B.4.</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p style="text-align: center;"><b>Please see <a href="#">Attachment 5: 2016 FY Audit</a></b></p>

<b>Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.2</b>	<p><b>Civil Rights Certification.</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.3</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p style="text-align: center;">Please See <a href="#">Attachment 6: Resident Advisory Board (RAB) Comments</a></p>
<b>C.4</b>	<p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD 50077-SL</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>D   Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).	
<b>D.1</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD on August 9<sup>th</sup>, 2017</p>

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

## A. PHA Information. All PHAs must complete this section.

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. Annual Plan.

### B.1 Revision of 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. 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 and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(1\)](#)) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#)) and 24 CFR §903.12(b).

**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. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD’s website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD’s website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Conversion of Public Housing.** 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(i))

**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.

**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 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 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 SM-HP.

**C.2 Civil Rights Certification.** Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, 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 AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

**C.3 Resident Advisory Board (RAB) comments.** If the RAB provided comments to 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.4 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. (24 CFR §903.15)

**D. Statement of Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

**D.1 Capital Improvements.** In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: “See HUD Form 50075.2 approved by HUD on XX/XX/XXXX.”

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

Public reporting burden for this information collection is estimated to average 16.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

# SECTION II

## PHA Annual Plan Update

Attachments & Appendices Supporting  
HUD Form 50075-HP

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# **ATTACHMENT 1: DECONCENTRATION POLICY**

## **Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]**

The PHA'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 the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA'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 a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA 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, the PHA must comply with the following steps:

**Step 1.** The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

#### Homes for Good Policy

Homes for Good will determine the average income of all families in all covered developments on an annual basis.

**Step 2.** The PHA 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, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

#### Homes for Good Policy

Homes for Good will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

**Step 3.** The PHA 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 (federal poverty level or 30 percent of median income, whichever number is higher).

**Step 4.** The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

**Step 5.** Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

#### Homes for Good Policy

For developments outside the EIR Homes for Good will take the following actions to provide for deconcentration of poverty and income mixing:

Existing features and adding incentives and marketing to attract higher income families to lower income developments, to include, but not be limited to:

Family choice annually between income-based and flat rent

Community collaborations

Self-sufficiency programs and partnerships

Rent incentive(s)

# **ATTACHMENT 2: REVISION OF PHA PLAN ELEMENTS**

## **STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS**

See [Appendix A: Housing Needs & Strategy](#)

## **DECONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION, AND ADMISSIONS**

See [Appendix B: Admin Plan Modifications](#)

See [Appendix C: ACOP Modifications](#)

Deconcentration Update for Public Housing:

Homes for Good has analyzed each of the Public Housing developments for concentrations of poverty, based on current records in February 2018. AMP 100 (Laurelwood Homes) and Pengra Court (part of AMP 200) were the only Public Housing complexes where the average resident incomes were below the Homes for Good Established Income Range (EIR) for Public Housing without an explanation that was acceptable to HUD staff.

Homes for Good will take the following actions to deconcentrate poverty:

### **At Pengra Court (part of AMP 200):**

1. Homes for Good will admit only families between the Very Low and Low Income ranges (50%-80% AMI) until we have met our deconcentration goals. This strategy was included in the 2017 Annual Plan.
2. Homes for Good will market the Family Self Sufficiency Program to current residents

### **At Laurelwood Homes (AMP 100):**

1. Homes for Good will market the Family Self Sufficiency Program to current residents

Feb 2018 Public Housing Deconcentration Analysis	Income by Property				# of HHs	0-30% AMI		30-50% AMI		50-80%AMI		80%+ AMI		Explanation; or 2018-2019 Income Mixing Measures
	Average	% EIR	Median	% EIR		#	%	#	%	#	%	#	%	
AMP 200 – McKenzie Village	\$ 15,927	91.5%	\$ 12,358	85.4%	170	111	65.3%	33	19.4%	21	12.4%	5	2.9%	Within EIR
AMP 200 – Pengra Court	\$ 13,929	80.1%	\$ 12,115	83.8%	22	14	63.6%	4	18.2%	4	18.2%	0	0.0%	<b>Measures:</b> <b>1. Limit admissions to Low Income (50%-80%AMI) households</b> <b>2. Promote Family Self Sufficiency Program.</b>
AMP 200 – Springfield Scattered Sites	\$ 23,569	135.5%	\$ 20,904	144.5%	15	5	33.3%	4	26.7%	5	33.3%	1	6.7%	Scattered Site: Deconcentrated by design
AMP 300 – Eugene Scattered Sites	\$ 19,407	111.5%	\$ 16,330	112.9%	83	52	62.7%	10	12.0%	20	24.1%	1	1.2%	Within EIR
AMP 300 – Maplewood Meadows	\$ 21,139	121.5%	\$ 20,890	144.4%	37	23	62.2%	3	8.1%	7	18.9%	4	10.8%	A few above-low-income families are skewing the results. % of VLI households is otherwise normal. HUD considers this explanation to be reasonable per email from Dan Esterling on 2/9/2018
AMP 500 – Veneta Scattered Sites	\$ 19,457	111.8%	\$ 17,285	119.5%	20	12	60.0%	4	20.0%	4	20.0%	0	0.0%	Scattered Site: Deconcentrated by design
AMP 100 – Laurelwood Homes	\$ 13,379	76.9%	\$ 12,996	89.9%	28	19	67.9%	7	25.0%	2	7.1%	0	0.0%	<b>Measures:</b> <b>1. Promote Family Self Sufficiency Program.</b>
Established Income Range (EIR) Upper Bound	\$ 20,008	115.0%	\$ 16,632	115.0%										
Overall Totals	\$ 17,398	100.0%	\$ 14,463	100.0%	375	236	62.9%	65	17.3%	63	16.8%	11	2.9%	
Established Income Range (EIR) Lower Bound	\$ 14,788	85.0%	\$ 12,294	85.0%										

## FINANCIAL RESOURCES

PROGRAM	BEGINNING RESERVE	FEDERAL REVENUE	RENT	INTEREST	OTHER	TOTAL
<b>Community Services</b>						
Fleet	\$ 156,200	\$ -	\$ -	\$ -	\$ 62,469	\$ 218,669
Madrone	(4,200)	435,333	-	-	-	431,133
Emergency Housing Assistance	(4,600)	10,000	-	-	-	5,400
Pay for Success	-	-	-	-	51,401	51,401
Weatherization	(203,012)	1,724,082	-	-	-	1,521,070
Development	(1,686,684)	-	-	-	3,934,100	2,247,416
Asset Management	303,900	-	-	-	281,756	585,656
Corporate	412,502	-	-	-	470,950	883,452
ROSS	(216,027)	82,268	-	-	-	(133,759)
Family Self Sufficiency	-	312,632	-	-	-	312,632
Family Shelter House	31,981	-	12,000	-	-	43,981
Herran Center	551,565	-	257,544	-	-	809,109
Signpost House	15,800	-	95,830	-	400	112,030
Shelter Plus Care	(389,910)	478,459	-	-	-	88,549
Housing Plus	(1,250)	-	-	-	3,000	1,750
	<b>(1,033,735)</b>	<b>3,042,774</b>	<b>365,374</b>	<b>-</b>	<b>4,804,076</b>	<b>7,178,489</b>
<b>Housing</b>						
Public Housing & COCC	2,188,707	1,902,694	2,108,041	-	1,675,960	7,875,402
Abbie Lane	354,258	160,000	88,000	-	1,400	603,658
Fourteen Pines	402,665	306,000	169,008	-	6,145	883,818
Village Oaks	(31,484)	109,012	314,200	-	4,400	396,128
Firwood	289,090	-	574,055	-	1,600	864,745
Camas Place	39,752	-	237,926	-	5,208	282,886
Norseman	310,583	-	291,564	-	7,013	609,160
Jacob's Lane	365,151	-	319,573	-	11,316	696,040
Laurel Gardens	217,944	-	203,243	-	5,140	426,327
Capital Fund	-	965,595	-	-	-	965,595
Walnut Park	182,281	-	210,821	-	4,575	397,677
The Orchards	95,237	-	171,264	-	2,000	268,501
Sheldon Village I	353,768	-	253,216	-	6,361	613,345
Sheldon Village II	256,922	-	201,628	-	5,808	464,358
	<b>5,024,874</b>	<b>3,443,301</b>	<b>5,142,539</b>	<b>-</b>	<b>1,736,926</b>	<b>15,347,640</b>
<b>Rental Assistance</b>						
Vouch&MR	2,232,407	18,366,185	-	-	-	18,366,185
	<b>2,232,407</b>	<b>18,366,185</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>18,366,185</b>
<b>TOTALS</b>	<b>\$ 6,223,546</b>	<b>\$ 24,852,260</b>	<b>\$ 5,507,913</b>	<b>\$ -</b>	<b>\$ 6,541,002</b>	<b>\$ 40,892,314</b>

\*BEGINNING RESERVE represents managements estimate of net resources as of the beginning of the fiscal year.



## **RENT DETERMINATION**

See [Appendix C: ACOP Modifications](#)

## **HOMEOWNERSHIP PROGRAMS**

See [Appendix B: Admin Plan Modifications](#)

## **SAFETY AND CRIME PREVENTION**

See [Appendix C: ACOP Modifications](#)

## **PET POLICY**

See [Appendix C: ACOP Modifications](#)

## **SUBSTANTIAL DEVIATION**

No Changes

## **SIGNIFICANT AMENDMENT/MODIFICATION**

No changes

# **ATTACHMENT 3: PHA PLAN NEW ACTIVITIES**

## **HOPE VI OR CHOICE NEIGHBORHOODS**

No New Activities

## **MIXED FINANCE MODERNIZATION OR DEVELOPMENT**

No New Activities

## **DEMOLITION OR DEPOSITION**

Homes for Good is evaluating the remaining public housing portfolio to determine if Demo/Disposition or a RAD conversion is appropriate. If it is determined to be appropriate, Homes for Good may submit a Demo/Dispo application for a portion or the remainder of its public housing portfolio but there is not yet a timeline for when such an application would occur.

## **CONVERSION OF PUBLIC HOUSING TO TENANT-BASED ASSISTANCE**

No New Activities

## **CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED ASSISTANCE UNDER RAD**

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing access to private sources of capital to repair and preserve its affordable housing assets. Homes for Good submitted applications for participation in the RAD program in November of 2013. Homes for Good plans to convert 112 of its scattered sites to Project Based Vouchers (PBV) and transfer assistance to new sites under the guidelines of PIH Notice 2012-32, REV-2 and any successor notices. Homes for Good received a RAD Portfolio Award for 112 units and a CHAP (Commitment to Enter into Housing Assistance Payments) award for 56 of those units in March of 2015. Homes for Good submitted a revised multi-phase application in May of 2016 which resulted in a new CHAP being issued in August of 2016 that will allow conversion of the units as follows:

AMP 200 Springfield Sites (Partial Conversion): AMP 200 OR000600200 includes 20 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converts 3 units of public housing, transfers the assistance to Richardson Bridge (an existing Homes for Good development), and disposes of the former PH units for affordable housing purposes. The sale of the scattered sites is in progress. The next phase will transfer the remaining 17 units to a new housing development. Application for the second phase will be made prior to July 1, 2018. The remaining units in AMP 200 will remain unchanged.

AMP 300, Eugene Scattered Sites (Partial Conversion): AMP 300 OR000600300 includes 92 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converts 9 units of public housing, transfers the assistance to Richardson Bridge (an existing Homes for Good development), and disposes of the former PH units for affordable housing purposes. The sale of the

scattered sites is currently in progress. The next phase will transfer the remaining 83 units to a new development. Application for the second phase will be made prior to July 1, 2018. The remaining units in AMP 300 will remain unchanged.

Homes for Good is evaluating the remaining public housing portfolio to determine if RAD conversion is appropriate. If it is determined to be appropriate, Homes for Good may submit a RAD application for a portion or the remainder of its public housing portfolio.

### **PROJECT-BASED VOUCHERS**

It is Homes for Good's intention to publish Request for Proposal(s) in 2018 in order to award Project Based Vouchers. Homes for Good received notification from the Director of Field Monitoring and Evaluation at HUD in December 2017 approving the issuance of up to 100 Project Based Vouchers for our PHA's jurisdiction. Homes for Good intends to utilize Project Based Vouchers to increase the availability of affordable housing stock in our community along with potentially increasing access to supportive services for families that we serve. In implementing the use of Project Based Vouchers Homes for Good will adhere to the Administrative Plan for; owner proposals, Housing Quality Standards, development and completion of Rehabilitated and Newly Constructed units, Housing Assistance Payment Contracts, selection of Project Based Program participants, occupancy of Project Based units, determining rents to owners and distributing payments to owners.

### **UNITS WITH APPROVED VACANCIES FOR MODERNIZATION**

No New Activities

### **OTHER CAPITAL GRANT PROGRAMS**

Homes for Good applied for the Lead-Based Paint Capital Fund Program. Homes for Good is also evaluating the possibility of applying for Emergency Safety and Security Grants. The agency does not plan to apply for any other Capital Grants.

# **ATTACHMENT 4: PROGRESS REPORT**

## **GOAL 1 OBJECTIVE: INCREASE THE NUMBER OF AFFORDABLE HOUSING UNITS.**

### Indicators:

- Build and/or purchase 180 housing units using a mix of local and federal funding.
- Maintain Public Housing vacancies at 3% or less.
- Increase voucher total as private landlords opt-out of their current contracts. Estimated increase is 20 – 50 vouchers.

**Update for FY 2019 Annual Plan** – Homes for Good is in the process of rehabilitating 32 units, and has applied for funding for an additional 50 units. The Rent Assistance Division expanded housing stock in our jurisdiction by allowing Shared Housing as an option under the Tenant Based Voucher Program. The agency currently has 3065 vouchers in total, including 2817 Tenant Based Vouchers, 236 VASH, and 12 RAD PBV. The overall vacancy rate for Public Housing during FY 2017 was 1.2%.

## **GOAL 2 OBJECTIVE: CONTINUE TO RECEIVE HIGH PERFORMER STATUS.**

### Indicators:

- Obligate all Capital Funds within 24 months of grant award.
- Expend all Capital Funds within 48 months of grant award.
- Comply with the financial reporting requirements of Asset Management.
- Comply with the new PHAS requirements (when published) to continue to receive high performer status.
- Submit all PHAS reports within required timelines.
- Meeting Capital Fund, financial reporting, and PHAS reporting requirements.

**Update for FY 2019 Annual Plan** – Homes for Good Capital Funds are being obligated and expended in compliance with HUD's deadlines. The agency received High Performer status for Public Housing in FY 2017, with a score of 95.

## **GOAL 3 OBJECTIVE: IMPROVE COMMUNITY QUALITY OF LIFE AND ECONOMIC VITALITY.**

### Indicators:

- Continue to encourage and promote resident involvement by maintaining the level of resident-elected Tenant Advisory Group (TAG) representation at the majority of Public and Assisted Housing complexes.
- Assist residents in maintaining Resident Newsletters at the majority of Public and Assisted Housing complexes.
- Annually monitor income levels by development to deconcentrate poverty. Bring higher income PH households into lower income developments and vice versa, if necessary.
- Continue giving preference to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units).

**Update for FY2019 Annual Plan** – The Resident Advisory Board (RAB, previously called the TAG) continues to be actively engaged in the annual plan process and has representatives from nine of the Public and Assisted Housing Complexes as well as two representatives from the Section 8 program. All complexes receive either a monthly or quarterly newsletter with resources and information related to their community. Elderly-disabled preferences remain the same as well as deconcentration strategy.

#### **GOAL 4 OBJECTIVE: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS.**

##### Indicators:

- Maintain a minimum enrollment of 135 families in the Family Self-Sufficiency (FSS) Program.
- Maintain a minimum representation of 15 community service agencies on the Family Self-Sufficiency Advisory Board.
- Promote the FSS Program within the Section 8 Program by presenting FSS information at a minimum of 50% of the new tenant briefings for new Section 8 participants.
- Continue the promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.
- Assist a minimum of two FSS participants a year in purchasing a home.
- Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.

**Update for FY2019 Annual Plan** – Homes for Good currently has 155 participants enrolled in the FSS program and there are 16 agencies on the FSS Advisory Board. A video about FSS is shown at every Section 8 briefing and brochures are mailed with annual review packets to Section 8 and Public Housing tenants. Four FSS families bought a home last year and we have 24 open IDA accounts.

#### **GOAL 5 OBJECTIVE: TO PROVIDE DECENT, SAFE AND SANITARY HOUSING FOR VERY LOW INCOME FAMILIES WHILE MAINTAINING THEIR RENT PAYMENTS AT AN AFFORDABLE LEVEL.**

##### Indicators:

- Review the payment standard yearly and monitor the private market rents so Section 8 families have a greater opportunity to rent outside of poverty areas and increase the supply of housing choices.
- Allow two person households to rent a zero bedroom unit (studio apartment) which allows greater housing opportunities for those households.
- The Section 8 Supervisor will perform quality control inspections of recently completed Housing Quality Standards (HQS) inspections to maintain, decent, safe, and sanitary housing for at least 34 families per year.
- Coordinate and transition privately subsidized families to the Section 8 Voucher Program.

**Update for FY 2019 Annual Plan** – In the past year, Homes for Good’s Landlord Liaison provided 4 Housing Quality Standards educational workshops to 42 landlords. Homes for Good’s Landlord Liaison will continue offering Housing Quality Standards educational workshops in FY19.

**GOAL 6 OBJECTIVE: TO PROMOTE A HOUSING PROGRAM THAT MAINTAINS QUALITY SERVICE AND INTEGRITY WHILE PROVIDING AN INCENTIVE TO PRIVATE PROPERTY OWNERS TO RENT TO VERY LOW INCOME FAMILIES.**

Indicators:

- Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program.
- A HACSA staff member serves on the board for the local Rental Owners Association.
- Monitor the payment standards and area rents on the private market to keep Section 8 families' portion of rent affordable and allow the Agency to serve the same number of families as in previous years.

**Update for FY 2019 Annual Plan** – Homes for Good's Landlord Liaison offered 7 Housing Choice Voucher educational workshops to 70 landlords. Homes for Good's Landlord Liaison will continue offering educational workshops to landlords in FY19.

Homes for Good partnered with Sheltercare's Housing Retention program to provide landlords education and resources to prevent eviction for at-risk tenants. Homes for Good will continue collaborating with the Housing Retention program in FY19.

Homes for Good's Landlord Liaison partnered with Lane County Behavioral Health Division to provide one educational workshop to 45 area supportive service providers specific to Housing Placement and Retention. Homes for Good's Landlord Liaison will continue offering educational opportunities to area supportive service providers through collaboration with Lane County Behavioral Health Division in FY19.

Implemented a no interest loan program for Section 8 deposit money in partnership with Community Lending Works. Beth Ochs continues to serve on the board of the Rental Owner's Association. Various staff members also attend the general monthly membership meeting.

**GOAL 7 OBJECTIVE: MAINTAIN SECTION 8 HOMEOWNERSHIP PROGRAM (WITH SUBSIDY ASSISTANCE)**

Indicators:

- Provide information to participants from our community partners about the availability of down payment assistance and accessible low interest loans.
- Keep Section 8 participants informed of the program through briefings and informational mailings when program reopens.

**Update for the FY 2019 Annual Plan** – Homes for Good is serving participants through the Section 8 Homeownership program. Two families bought houses in the past year and we continue to work with interested participants to refer them to NEDCO for homeownership education classes and the Family Self-Sufficiency Program to help them prepare for homeownership. Section 8 Housing Specialists are aware of the program and refer participants when appropriate.

# **ATTACHMENT 5: 2016 FY AUDIT**

## **FINDING No. 2016-001 – CFDA 14.850 – PUBLIC HOUSING**

**Criteria or Specific Condition** – In the case where a Central Office Cost Center (COCC) chooses to centralize functions that directly support a project (e.g., central maintenance), it must charge each project using a fee-for-service approach, with the exception of charges for rent collections, resident services, security/protective services, waiting lists, and work-order processing (see section 7.10 of the Supplement to Handbook 7475.1). Each project must be charged for the actual services received and only to the extent that such amounts are reasonable. Guidance on fee reasonableness for centralized service fees is provided in Section 7.10 in the Supplement to HUD Handbook 7475.1. HUD considers any fees that are within HUD guidance to be reasonable. Public Housing Agencies (“PHAs”) are requested to consult with HUD regarding any fees that depart from HUD guidance and HUD will provide its view on the reasonableness of the fees. Any fees above the HUD guidelines that have not been approved by HUD need to be reviewed in detail to determine if the additional costs are justified by local conditions or other factors (24 CFR section 990.280(d)).

**Condition** – HACSA should conform to Financial Report Model No.1 PHAs under Asset Management with COCC as described in HUD Accounting Brief #16 and is required to use a fee-for-service approach for asset management costs incurred by PHAs. During the year ended September 30, 2016, HACSA used a mixed model of a fee-for-service and allocated overhead.

**Effect** – HACSA was not in compliance with HUD regulations with regards to the allocation of asset management costs for Public Housing for its interim reports.

**Cause** – In the prior year, HACSA was using only a fee-for-service approach for asset management costs for Public Housing while using allocated overhead for other programs. During the year ended September 30, 2016, HACSA’s overhead allocation computation from COCC to various programs other than Public Housing was revamped to reflect more accurate allocation ratios based on adequate cost drivers for various activities. During this process, it was an oversight to include Public Housing as part of this overhead allocation analysis.

**Recommendation** – We recommend overhead costs allocation analysis to be closely reviewed by the directors who have thorough understanding of the compliance requirements of the major federal programs.

**Response** – HACSA removed \$444,119 of overhead allocation charges from COCC to Public Housing as part of the year-end closing process. Going forward, the finance director and deputy director will closely review the analysis of overhead allocations to ensure compliance with HUD requirements for Public Housing. In May of 2017, HACSA engaged Casterline Associates P.C., a HUD expert, to review HACSA’s overhead allocation plan and to provide best practice recommendations.

# **ATTACHMENT 6: RESIDENT ADVISORY BOARD (RAB)**

## **COMMENTS**

Homes for Good staff presented the Annual PHA Plan at various stages of development during the first four Resident Advisory Board (RAB) meetings of 2018. Questions and comments were taken during each meeting. Comments about the proposed changes are listed below, with Homes for Good's response.

### **January 11<sup>th</sup> Meeting**

Homes for Good staff asked what areas RAB wanted to see changes to policy. RAB wanted to see changes to Inspections. After discussion, Homes for Good staff determined that the issue with inspections was not at the level of policy, but at the level of adherence to procedures.

### **February 8<sup>th</sup> Meeting**

Staff presented expected changes to the overall PHA Plan Elements, and asked again what areas RAB wanted to see changes to policy. RAB's comments dealt with enforcement of existing policies; primarily the pet and service animal policies.

### **March 8<sup>th</sup> Meeting**

Staff presented a list of expected changes to ACOP and the Admin Plan and asked for RAB feedback. RAB was supportive of the proposed policy change of returning to doing interim reexaminations when the family's income goes up.

### **April 12<sup>th</sup> Meeting**

Staff presented a draft of the line-by-line changes to ACOP and the Admin Plan and asked for feedback. RAB had no comments during the meeting, nor did any RAB members submit comments by email or phone prior to April 20<sup>th</sup>.

Homes for Good will seek additional comments on the final PHA Plan and Elements during the May 10<sup>th</sup> RAB meeting, and during the public hearing at the Board meeting on May 23<sup>rd</sup>.



# **APPENDIX A: HOUSING NEEDS & STRATEGY**

The assessment of the impediments to fair housing and fair housing plan strategies, submitted by Homes for Good with its Annual PHA Plan for the Fiscal Year beginning October 1, 2015, was developed with input from the City of Eugene and the City of Springfield Consolidated plan 2015.

As a first step in this effort Homes for Good conducted an assessment of the impediments and barriers to fair housing as part of its Annual PHA Plan for the Fiscal Year beginning October 1, 2015. This was developed with input during the 2015 City of Eugene and the City of Springfield Consolidated planning process and consultation with many community partners. Its effectiveness is reviewed and measured and annually so that strategies can be adjusted as necessary. Through this work it was found that the two primary issues related to housing need are 1) The lack of affordable units and; 2) Significant barriers to providing equal access to units that are available.

## **Families with incomes below 30 percent of area median income (extremely low-income).**

Unless, otherwise noted, all information below is from the 2015 Eugene-Springfield Consolidated Plan. In Eugene-Springfield 44% of households in the plan area have extremely low, very low or low-moderate income. HUD provided numbers in the Consolidated plan indicated that 14.8% of total households were identified as extremely low income (less than 30% AMI) and 12.3% as low income (between 30 and 50% AMI). More households with children under age 6 (55%) and households with people over age 75 (54%) have low-incomes.

The 2015 Eugene-Springfield Consolidated Plan notes that housing costs in the Eugene-Springfield area have risen sharply over the past 25 years while incomes have risen slowly, forcing many households to pay more for housing than is affordable. Households paying more than 30% of household income are considered to have a 'housing cost burden'. A majority of the renters in Eugene (54%) and Springfield (51%) are considered housing cost burdened, while approximately a third of home-owners are also cost burdened (Eugene – 32%, Springfield – 33%). The elderly make up 15% of the very low income with a housing cost burden.

Low and very low-income people need increased access to quality affordable rental housing. There are a total of 31,055 low-income renter households in Eugene, and 7,335 in Springfield.

A significant majority of low-income renters experience a housing cost burden, overcrowding, and/or substandard housing conditions (Eugene – 78%, Springfield – 76%).

A significant majority of low-income renters spend more than 30% of their income on housing costs (Eugene – 76%, Springfield – 74%).

A large percentage of low-income renters spend more than 50% of their income on housing costs (Eugene – 51%, Springfield – 34%).

## **Elderly families and families with disabilities**

Elderly make up 13.9% (Renter) and 33.7% (Owner) of the total households with a severe housing cost burden by income. A severe housing cost burden indicates that over 50% of the income is spent on housing.

The Consolidated Plan also indicates that about 14% of population in the Cities of Eugene and Springfield lives with one or more disabilities (29,125 people). Persons with disabilities face a number of barriers

related to mobility, transportation, housing, employment, and access to services. In addition, persons with disabilities report many instances of discrimination.

### **Households of various races and ethnic groups residing in the jurisdiction**

In most income categories, there are racial or ethnic groups which are experiencing a disproportionately greater need than the needs of the income category as a whole. For people with very low-incomes (30-50% MFI), American Indian/Alaskan Native and Black/African Americans experience a disproportionately greater need than the general population. For people with low-incomes (50-80% MFI), Black/African Americans experience a disproportionate level of need. For people with moderate income (80%-100 MFI), Asian, Latino, and Black/African American experience a disproportionately greater need than the income category as a whole. In Eugene and Springfield, there are approximately 13% of the people who identified as a minority race in the 2010 census. There are five census tracts where a higher percentage (17%-23%) of people identified as a minority race.

Hispanic households experience a disproportionately greater incidence of housing cost burden compared to the entire population, with 53% of the Hispanic households paying more than 30% of their income for housing costs. Asian households experience a disproportionately greater incidence of severe housing cost burdens compared to the entire population; 35% of Asian households spend more than 50% of their income on housing costs.

Black/African American households experience a disproportionately greater need with severe housing problems in both very low-income (30-50% AMI) and moderate income (80-100% AMI) categories. Severe housing problem exist when a household experiences one or more of the following housing problems: lacks complete kitchen facilities, lacks complete plumbing facilities, has over 1.5 people per room, and a housing cost burden over 50%. Both Asian and Hispanic low-income (50-80% AMI) households experience a disproportionate number of severe housing problems.

**Affordability and supply** - The lack of availability rental and owner occupied units for low-income residents, as indicated by the significant waiting lists for public housing, and the difficulty experienced by Section 8 voucher-holders in trying to find affordable available housing. Additionally, vacancy rates remain low, at 2% for Eugene owner-occupied and rental housing, and 2% in Springfield for owner-occupied housing and 3% for renter units. Data from Oregon Housing and Community Services further supports this need indicating there is a deficit of over 2,700 affordable housing units in Lane County in 2016.

Our strategies to increase the availability of affordable, accessible housing include aggressively pursuing additions to the housing supply through the use of government subsidies and incentives as well as public/private partnerships. During 2016-17 Homes for Good completed construction on 2 multi-family housing complexes. The first, named Bascom Village, is a 101 unit complex which was developed in two phases. Phase I, developed by St. Vincent de Paul, has 51 units and was ready for occupancy in October, 2015. Phase II, completed by Homes for Good in 2016, has 48 units and is 100 percent occupied. In 2017 Homes for Good completed a project called The Oaks at 14<sup>th</sup>. This project, constructed in partnership with Sponsor's Inc., houses 54 ex-offenders and provides them wrap-around supportive services. Homes for Good is currently rehabbing an existing affordable housing development 32-unit affordable housing development. This will ensure these units are not lost from the inventory of affordable units. At the present time there are over 3 other projects in the development pipeline, which are target an additional 200 units including a Housing First project targeted to the homeless.

**Impediments to Fair Housing** - While some of the identified impediments are not directly related to the federal Fair Housing Act, as a Public Housing Authority that sponsors the Fair Housing Council of Oregon,

Homes for Good continues to believe that the lack of availability of affordable, accessible housing is a problem in our community and therefore, had maintained its efforts to promote affordable, accessible housing in addition to our efforts to overcome the more specific impediments which are directly related to the federal Fair Housing Act. Three major impediments to providing equal housing to populations were identified in development of the annual plan as follows:

Limited Awareness of Fair Housing Policies in the Broader Community;  
Cultural differences and language barriers which inhibit access to fair housing, and;  
People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes.

**Impediment: Limited awareness of fair housing policies in the broader community. Strategies to address this impediment include:**

Participating in community engagement and is very involved in area- wide Fair Housing planning and efforts.

Joining various relevant boards, including the Rental Owners Association (ROA), Human Rights Commission, Housing Policy Board, United Way Equity Coalition and Poverty Homeless Commission.

Executive Director Jacob Fox is on the Poverty and Homelessness Board, and chairs their facilities committee; in that position Jacob strives to further the goals of Fair Housing.

Rent Assistance Division Director Beth Ochs has joined the board of the Eugene/Springfield Rental Owners Association (ROA). In that role, Beth makes regular presentations to the ROA on topics related to Fair Housing.

Real Estate Development Director, Steve Ochs is on the Housing Policy Board which sets local policy regarding housing and works to further Fair Housing Goals.

Using every opportunity to make regular presentations to Springfield/Eugene groups including Eugene City Club, the University of Oregon, Chambers of Commerce and the Fair Housing Conference.

Collaborating to create a central, county-wide housing waiting list so that when an individual contacts any agency in the County they will have access to all housing opportunities from numerous providers.

Homes for Good continues to support Blacks in Government at their annual celebration and educational event.

Homes for Good mandated a 4 hour all-staff training in Fair Housing laws.

Updated Fair Housing information was added during a recent revision of the Section 8 program briefing packets.

Section 8 Division leadership participates annually in the University of Oregon Internship Fair. This is an opportunity to inform students about Homes for Good's work in the community to promote Fair Housing.

Homes for Good has produced updated maps showing concentrations of poverty in Lane County.

Homes for Good has a presence on the Human Rights Commission and the United Way Equity Coalition.

**Impediment: Cultural differences and language barriers which inhibit access to fair housing. Strategies to address this impediment include:**

Support of the work of the Inclusion Council (IC), an internal committee charged with scheduling training sessions for employees that focus on cultural differences. All employees are required to attend two per year. For the coming year, the IC has a goal to provide eight training sessions.

Conduct targeted recruitments for bilingual employees. At the present time there are 7 bilingual employees (English/Spanish). Homes for Good also has staff members proficient in German, Polish, Hindi and French.

Homes for Good is a participant in the Centro Latino Americano Health Fair.

Homes for Good, along with staff from Centro Latino Americano, administered a Meyer Memorial Grant aimed at creating educational materials about fair housing and access to low income housing for Spanish speaking community members.

One of the products of the regional Equity and Opportunity Assessment was the creation of a composite map that shows where in the community there are more vulnerable populations living. The composite map combines people with Latino ethnicity, minority, youth, seniors, single headed households, and persons with a disability to see which census tracts have the greatest number of populations that may experience marginalization or disadvantages. Homes for Good uses this map to target outreach.

**Impediment: People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes. Strategies to address this impediment include:**

Quarterly meetings at VA to expedite referrals for homeless vets

Administer an Emergency Housing Assistance (EHA) grant which assists VASH voucher holders with miscellaneous costs related to lease-up.

Quarterly meetings with Shelter Plus Case service providers to expedite referrals for S+C Program

Homes for Good and Shelter Plus Care program staff has recalculated rent-reasonableness, making it easier for participants to find affordable units in good neighborhoods.

Provide sufficient ADA units in public housing and LIHTC housing

Working closely with residents to ensure reasonable accommodations are approved when appropriate.

National Alliance on Mental Illness (NAMI) provides resident services at New Winds, an 18-unit LIHTC project in Florence, Oregon

Homes for Good, in partnership with Lane County, is working to expand the Housing First movement for people with disabilities or other barriers to housing.

In addition to these specific strategies Homes for Good has made a strong commitment to promoting Fair Housing rights and Fair Housing choice by providing information regarding Fair Housing and Fair Housing choice to applicants, residents and staff. Following is a list of actions that Homes for Good has taken:

The Fair Housing logo "Equal Housing Opportunity" is prominently displayed on location signs at Homes for Good's two administrative offices and at its various housing complexes

The Fair housing logo is prominently displayed on signs/banners at various Homes for Good locations, announcing the availability of low-income rental units

The Fair Housing logo is on Homes for Good letterhead and business cards

The Agency's Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed in the lobbies of the two administrative offices and in public areas at its various housing complexes

The Agency's Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed on the website: [www.HomesforGood.org](http://www.HomesforGood.org)

Homes for Good's Public Housing Intake Coordinator, is listed on the Policy of Nondiscrimination on the Basis of Disability/Handicap Status, and in the Statement of Policy, as Homes for Good's 504/ADA Coordinator.

HUD Form 928.1 ("We Do Business in Accordance With the Federal Fair Housing Law" poster) is prominently displayed in English and Spanish in Homes for Good's two administrative offices and in public areas at the various housing complexes

HUD Form 1686-FHEO (\*Fair Housing – It's Your Right\* Pamphlet) is available in English and Spanish in the two administrative offices

\*Filing a Housing 'Discrimination Complaint\* - a pamphlet created by Consumer Action with funding from the U.S Department of Housing and Urban Development (HUD) is available in English and Spanish at Homes for Good's two administrative offices

Applicants or residents with questions about Fair Housing issues are referred, or directed via website link, to the Fair Housing Council of Oregon, Legal Aid Services of Oregon (LSAO) or Lane County Law & Advocacy Center (LCLAC), the Oregon Advocacy Center (OAC), the Lane Independent Living Alliance (LILA), the Oregon Bureau of Labor and Industries (BOLI), and/or to the US Department of Housing & Urban Development (HUDF) / Office of Fair Housing and Equal Opportunity (FHEO)

Homes for Good has a long-standing Policy on Reasonable Accommodation, which is recognized in the Pacific Northwest among public Housing Authorities and by the regional HUD office as being comprehensive , well-written, and well-implemented

Homes for Good's Policy on Reasonable Accommodation is prominently displayed in both administrative offices and in public areas of its various housing complexes. It is available to any applicant or resident and is included in the Admin Plan and Admissions and Continued Occupancy Policies. It is also posted on Homes for Good's website at [www.HomesforGood.org](http://www.HomesforGood.org)

Applicants for, and recipients of, housing assistance from Homes for Good are advised of their right to request a reasonable accommodation to their disability. Information regarding reasonable accommodations is provided on the pre-application for assistance, in initial determination of ineligibility, in the public housing and assisted housing lease agreements, in notices of eviction, in periodic resident newsletters, and discussed during the intake process during any informal settlement discussions and during other discussions with applicants and/or residents when inquiries are made about accommodating disabilities.

Under the terms of a voluntary compliance agreement between the us department of HUD/FHEO and Homes for Good's pre application for housing assistance requests information from applicants – which is not used in determining their eligibility for housing regarding their ethnicity, race, and disability status. This information is recorded and retained and available to HUD upon request

Homes for Good created the diversity committee in April 2000. That committee was renamed the Inclusion Council in 2012. As a function of that committee, Homes for Good has completed outreach presentations to agencies representing youth, seniors/elderly, persons with physical and/or mental disabilities, and minorities, to help assure that a broad base of the community has access to information about the availability of housing. This outreach effort continues on an ongoing basis and representatives from a number of those social service/advocacy agencies serve on Homes for Good's family self-sufficiency advisory board, the inclusion council has also done outreach at the Festival Latina, the Asian celebration, project homeless connect, and other community gatherings

Homes for Good maintains reception staff – as well as other staff in all departments that have ongoing contact with residents who are bilingual/bicultural in Spanish and English

Homes for Good has also worked to increase the ability of low income community members to access housing by developing an innovative program in cooperation with community lending-works, the lending arm of NEDCO (neighborhood economic development corporation), to assist applicants to its agency-owned housing programs, in obtaining loans to cover the cost of their security deposits, as they lease up with Homes for Good. Homes for Good indemnifies the loans, guaranteeing payment to NEDCO, should the applicant default.

# **APPENDIX B: ADMIN PLAN MODIFICATIONS**

## **HIGHLIGHTS:**

### **Throughout:**

- Name Change
- HUD Form number Updates
- VAWA Updates
- Other minor regulatory changes
- Minor changes to increase clarity of existing policies

### **Chapter 3: Eligibility**

- Change requirement for inclusion in family from 51% custody or greater to 50% custody or greater
- Added option for additional background checks

### **Chapter 7: Verification**

- Assets totaling \$5,000 or less to be reviewed every three years rather than annually

### **Chapter 15: Special Housing Types**

- Addition of Single Room Occupancy & Shared Housing as Special Housing Programs

**KEY MODIFICATIONS TO THE HOMES FOR GOOD  
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)  
PROPOSED EFFECTIVE DATE 10-1-18**

<b>Section</b>	<b>Previous Policy</b>	<b>Proposed Policy</b>	<b>Required Change</b>	<b>Impact</b>
<b>Throughout</b>	<b>HACSA</b>	<b>Homes for Good</b>	No	Agency rebranding process
<b>1-I.D.</b>	The PHA's administrative plan is applicable to the operation of the Housing Choice Voucher program. In addition, the administrative plan addresses policies for the following special programs: <ul style="list-style-type: none"> <li>• Family Self Sufficiency</li> <li>• Single room occupancy (SRO)</li> <li>• Homeownership</li> <li>• Veterans Affairs Supportive Housing (VASH)</li> </ul>	The PHA's administrative plan is applicable to the operation of the Housing Choice Voucher program. In addition, the administrative plan addresses policies for the following special programs: <ul style="list-style-type: none"> <li>• <b>Project Based Voucher (PBV) &amp; Rental Assistance Demonstration Project Based Voucher (RAD PBV)</b></li> <li>• Family Self Sufficiency</li> <li>• Single room occupancy (SRO)</li> <li>• Homeownership</li> <li>• Veterans Affairs Supportive Housing (VASH)</li> </ul>	No	Added Clarity
<b>1-II.D.</b>	N/A	24 CFR Part 100: The Fair Housing Act	Yes	HUD Regulation
<b>2-I.A.</b>	State protected classes in addition to already federal protected classes, and in addition to those protections offered under the Equal Access in Housing Final Rule include: <ul style="list-style-type: none"> <li>• Sex (includes pregnancy)</li> <li>• Retaliation for opposing an unlawful employment practice</li> <li>• Association with a member of a protected class</li> <li>• Age (18 or older)</li> <li>• Family relationship</li> </ul> State discrimination law also prohibits a person from refusing to sell, lease, or rent any real property because of an individual's source of income.	In addition to Federal law, the State of Oregon recognizes Sexual orientation, marital status, and source of income as additional protected classes. Furthermore City of Eugene adds Ethnicity and domestic partnership status.	Yes	Align with federal, state, and local protected classes.
<b>3-I.C.</b>	N/A	In accordance with Notice PIH 2017-08, for HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers, when the veteran is the	Yes	HUD Regulation



Section	Previous Policy	Proposed Policy	Required Change	Impact
		perpetrator of domestic violence, dating violence, sexual assault, or stalking, the victim must continue to be assisted. Upon termination of the perpetrator's HUD-VASH voucher, the victim should be given a regular HCV if one is available, and the perpetrator's HUD-VASH voucher should be used to serve another eligible family. If a regular HCV is not available, the victim will continue to use the HUD-VASH voucher, which must be issued to another eligible family upon the voucher's turnover.		
<b>3-I.E.</b>	A marriage partner includes the partner in a "common law" marriage as defined in state law. The term "spouse" does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse.	A marriage partner includes the partner in a "common law" marriage as defined in state law. The term "spouse" does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse. <b>In the case of a common law marriage, to be recognized by the PHA, the marriage must meet the requirements of the state where the common-law marriage occurred.</b>	No	Provides guidance on as to how the PHA will define common law marriage as the state of Oregon does not have common law marriage.
<b>3-I.F.</b>	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family <b>51 percent</b> or more of the time.	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family <b>50 percent</b> or more of the time.	No	Provides a parent the opportunity to house a child when the parents have joint custody.
<b>3-I.J</b>	Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than <b>51 percent</b> of the time, are not subject to the time limitations of guests as described above.	Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than <b>50 percent</b> of the time, are not subject to the time limitations of guests as described above.	No	Provides a parent the opportunity to house a child when the parents have joint custody.
<b>3-III.B.</b>	The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the	The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the	No	Expands housing opportunities to those who are actively engaged in

Section	Previous Policy	Proposed Policy	Required Change	Impact
	household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.	household member who engaged in the criminal activity has completed <b>or is currently participating</b> in a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.		rehabilitation programs
<b>3-III.B.</b>	<i>Currently engaged in</i> is defined as any use of illegal drugs during the previous six months.	<i>Currently engaged in</i> is defined as any use of illegal drugs during the previous six months. <b>However, if the PHA is able to verify the household member who engaged in the illegal drug activity has completed, or is actively engaged, in a supervised drug rehabilitation program approved by the PHA, then the PHA will admit an otherwise eligible family.</b>	No	Expands housing opportunities to those who are actively engaged in rehabilitation programs.
<b>3-III.D.</b>	The PHA will perform a criminal background check through local law enforcement for every adult household member. If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, the PHA may request a fingerprint card and, if so, will request information from the National Crime Information center (NCIC).	The PHA will perform criminal background checks through the Oregon State Police Law Enforcement Data System (LEDS) database and Oregon court records (OJIN) or a commercial screening company for all adult household members. If the adult household member has resided outside the state of Oregon in the last 3 years, if the results of the criminal background check through LEDS indicates there has been criminal activity outside the state of Oregon, or the adult household member self-discloses out-of-state criminal activity in the last 3 years a commercial screening company will be used. If the adult household member has resided in Oregon for the last 3 years and there is no indication of out-of-state criminal activity the PHA will use the Oregon State Police Law Enforcement Data System (LEDS) database and Oregon court records (OJIN) to conduct the criminal background check.	No	Ensures applicants residing in the PHA's jurisdiction prior to application are screened in the same manner as applicants residing outside the PHA's jurisdiction at time of application.
<b>3-III.F.</b>	If based on a criminal record or sex offender registration information, an applicant family	If based on a criminal record or sex offender registration information, an applicant family	Yes	Added clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>appears to be ineligible the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 14 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 14-day period, <b>the denial of admission will stand.</b> A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal review process.</p>	<p>appears to be ineligible the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 14 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 14-day period, <b>the PHA will proceed with issuing the notice of denial of admission.</b> A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal review process.</p>		
<b>3-III.G.</b>	Form HUD 5382	<b>Form HUD 5380 &amp; HUD 5382</b>	Yes	Compliance with VAWA regulations
<b>4-I.D.</b>	<p><b>The PHA will send written notification of the preliminary eligibility determination within 14 business days of receiving a complete application.</b>  Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list. Applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers and according to any preference(s) for which they qualify.</p>	<p>Upon successful completion of an application the applicant will be provided a computer generated receipt from the HAPPY software waiting list. It is the responsibility of the applicant to retain this receipt as proof of successful application submission.  Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list. Applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers and according to any preference(s) for which they qualify.  <b>All successful applicant submissions will enter into a lottery. Those randomly selected will receive a letter assigning them their lottery number. Those who are not selected thru the random lottery process will receive a letter stating they</b></p>	No	Added clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<b>were not selected.</b>		
<b>4-II.E.</b>	While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number. The changes <b>may</b> be submitted in writing, via telephone, in person, or by email, and a note added to the applicant's <b>electric</b> file.	While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number. The changes <b>must</b> be submitted in writing, via telephone, in person, or by email, and a note added to the applicant's file.	No	Added clarity
<b>4-II.F.</b>	If the notice is returned by the post office the applicant will be removed from the waiting list without further notice.	If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice. If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 14 business days to respond from the date the letter was re-sent.	No	Increases an applicant's opportunity to apply for housing if the applicant has moved.
<b>4-III.C.</b>	N/A	<b>Under this policy selected is defined as the date in which the voucher was issued.</b>	No	Added clarity
<b>4-III.D.</b>	If a notification letter is returned to the PHA, the family will be removed from the waiting list without further notice.	If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.	No	Increases an applicant's opportunity to apply for housing if the applicant has moved.
<b>5-I.B.</b>	If the notice is returned by the post office, the applicant will be denied and their name will not be placed back on the waiting list.	If the notice is returned by the post office with no forwarding address, the applicant will be denied and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated.	No	Increases an applicant's opportunity to apply for housing if the applicant has moved.
<b>5-I.B.</b>	Information about the protections afforded by the Violence against Women Act of 2013 (VAWA) to victims of domestic violence, dating violence, sexual assault, and stalking (see section 16-IX.C)	The form HUD-5380 domestic violence certification form and the form HUD-5382 notice of occupancy rights, which contains information on VAWA protections for victims of domestic violence, dating violence, sexual assault, and stalking	Yes	Compliance with VAWA regulations
<b>5-II.E.</b>	The PHA will approve extensions beyond 120	The PHA will approve additional extensions only	No	Allows a family the

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>days only if an extension is necessary as a reasonable accommodation for a person with disabilities. In such case, the PHA will decide whether to approve or deny an extension in line with the PHA's Reasonable Accommodation process.</p>	<p>in the following circumstances:  It is necessary as a reasonable accommodation for a person with disabilities.  It is necessary due to reasons beyond the family's control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:  <ul style="list-style-type: none"> <li>Serious illness or death in the family</li> <li>Other family emergency</li> <li>Obstacles due to employment</li> <li>Whether the family has already submitted requests for tenancy approval that were not approved by the PHA</li> <li>Whether family size or other special circumstances make it difficult to find a suitable unit</li> </ul> Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.  All requests for extensions to the voucher term must be made in writing and submitted to the PHA prior to the expiration date of the voucher (or extended term of the voucher).  The PHA will decide whether to approve or deny an extension request within 14 business days of the date the request is received, and will immediately provide the family written notice of its decision.</p>		<p>possibility of additional time to locate housing when the reason housing was not found was beyond the family's control.</p>
<b>6-I.B.</b>	<p>Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family <b>51 percent</b> or more of the</p>	<p>Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family <b>50 percent</b> or more of the</p>	No	<p>Allows parents with joint custody to decide who will receive subsidy and avoid legal</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	time.	time.		processes.
<b>6-I.G.</b>	The PHA will initially set the imputed asset passbook rate within 0.75 percent of the national rate established by the Federal Deposit Insurance Corporation (FDIC). The PHA will review the passbook rate annually, in December of each year. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be adjusted accordingly. Changes to the passbook rate will take effect on January 1 following the December review.	The PHA will initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC). The PHA will review the passbook rate annually, in December of each year. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate. Changes to the passbook rate will take effect on February 1 following the December review.	No	Allows for sufficient notice to tenant of change.
<b>6-III.D.</b>	At reexamination, the PHA must use the PHA current utility allowance schedule [24 CFR 982.517(d)(2)]	At reexamination, the PHA must use the PHA current utility allowance schedule HCV GB, p. 18-8	Yes	HCV Guidebook reference
<b>Throughout Chapter 7</b>	HUD's Verification Hierarchy [Notice PIH 2010-19]	HUD's Verification Hierarchy [Notice PIH 2017-12]	Yes	PIH Notice update
<b>7-I.D.</b>	The PHA <b>will</b> send third-party verification forms directly to the third party.	The PHA <b>may</b> send third-party verification forms directly to the third party.	No	Allows flexibility for tenant to provide verification
<b>7-I.D.</b>	For families with net assets totaling \$5,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and <b>every year thereafter.</b>	For families with net assets totaling \$5,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and <b>every three years thereafter.</b>	No	Families with assets below \$5,000 only have to provide bank statement every 3 years.
<b>8-I.E.</b>	If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical	If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or	Yes	Provides Clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an <b>environmental intervention</b> blood lead level, the PHA must complete a <b>risk assessment</b> of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider. <b>The risk assessment</b> must be completed in accordance with program requirements, and the result of the <b>risk assessment</b> must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner. Within 30 days after receiving the <b>risk assessment</b> report from the PHA, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330]. If the owner does not complete the "hazard reduction" as required, the dwelling unit is in violation of HQS and the PHA will take action in accordance with Section 8-II.G. PHA reporting requirements, and data collection and record keeping responsibilities related to children with an <b>environmental intervention</b> blood lead level are discussed in Chapter 16.</p>	<p>medical health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an <b>elevated</b> blood lead level, the PHA must complete an <b>environmental investigation</b> of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider. The <b>environmental investigation</b> must be completed in accordance with program requirements, and the result of the <b>environmental investigation</b> must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner. Within 30 days after receiving the <b>environmental investigation</b> report from the PHA, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330]. If the owner does not complete the "hazard reduction" as required, the dwelling unit is in violation of HQS and the PHA will take action in accordance with Section 8-II.G. PHA reporting requirements, and data collection and record keeping responsibilities related to children with an <b>elevated</b> blood lead level are discussed in Chapter 16.</p>		
<b>8-II.B.</b>	<p>If utility service is not available for testing at the time of the initial inspection, the PHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. The PHA will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by the PHA.</p>	<p>If utility service (electric, gas, water) is not available for testing at the time of the initial inspection, the PHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. The PHA will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by the PHA.</p>	No	Allows a family to provide written verification of trash service.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		If the family is responsible for supplying the trash service, the PHA will allow the trash service to be placed in the unit after the unit has met all other HQS requirements. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon certification from the family that the trash service has been installed. Trash service is defined as: a garbage can with a lid that will be transported to a recycling/trash center on a regular basis or service from a local trash removal provider such as Sanipac or Lane Apex.		
<b>8-III.B.</b>	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination.	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination. <b>If the requested increase is determined unreasonable then the owner will need to provide three comparable unassisted units.</b>	No	Aligns with the PHA's process of providing rent comparable when not owner provided.
<b>8-III.D.</b>	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination.	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination. <b>If the requested increase is determined unreasonable then the owner will need to provide three comparable unassisted units.</b>	No	Aligns with the PHA's process of providing rent comparable when not owner provided.
<b>Exhibit 8-1</b>	Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must: <ul style="list-style-type: none"> <li>• Disclose known lead-based paint hazards to prospective tenants before the lease is signed,</li> <li>• provide all prospective families with "Protect Your Family from Lead in Your Home",</li> </ul>	Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must: <ul style="list-style-type: none"> <li>• Disclose known lead-based paint hazards to prospective tenants before the lease is signed,</li> <li>• provide all prospective families with "Protect</li> </ul>	Yes	Provides clarity



Section	Previous Policy	Proposed Policy	Required Change	Impact
	<ul style="list-style-type: none"> <li>Stabilize deteriorated painted surfaces and conduct hazard reduction activities when identified by the PHA</li> <li>Notify tenants each time such an activity is performed</li> <li>Conduct all work in accordance with HUD safe practices</li> <li>As part of ongoing maintenance ask each family to report deteriorated paint.</li> </ul> <p>For units occupied by <b>environmental intervention</b> blood lead level (lead poisoned) children under six years of age, a <b>risk assessment</b> must be conducted (paid for by the PHA). If lead hazards are identified during the <b>risk assessment</b>, the owner must complete hazard reduction activities.</p> <p>See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.</p>	<p>Your Family from Lead in Your Home",</p> <ul style="list-style-type: none"> <li>Stabilize deteriorated painted surfaces and conduct hazard reduction activities when identified by the PHA</li> <li>Notify tenants each time such an activity is performed</li> <li>Conduct all work in accordance with HUD safe practices</li> <li>As part of ongoing maintenance ask each family to report deteriorated paint.</li> <li><b>Maintain covered housing without deteriorated paint if there is child under six in the family.</b></li> </ul> <p>For units occupied by <b>elevated</b> blood lead level (lead poisoned) children under six years of age, an <b>environmental investigation</b> must be conducted (paid for by the PHA). If lead hazards are identified during the <b>environmental investigation</b>, the owner must complete hazard reduction activities <b>within 30 days</b>.</p> <p>See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.</p>		
<b>9-I.B.</b>	<p>Completed RTA (<b>including the proposed dwelling lease</b>) must be submitted as hard copies, in-person, by mail, or by fax. The family may not submit, and the PHA will not process, more than one (1) RTA at a time. When the family submits the RTA the PHA will review the RTA for completeness. If the RTA is incomplete (<b>including lack of signature by family, owner, or both</b>), or if the dwelling lease is not submitted with the RTA, the PHA will notify the family and the owner of the deficiencies.</p> <p>Missing information and/or missing documents</p>	<p>Completed RTA must be submitted as hard copies, in-person, by mail, <b>email</b>, or by fax. The family may not submit, and the PHA will not process, more than one (1) RTA at a time. When the family submits the RTA the PHA will review the RTA for completeness. If the RTA is incomplete (including lack of signature by family, owner, or both) the PHA will notify the family and the owner of the deficiencies.</p> <p>Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, <b>email</b>, or by fax. If the PHA deems</p>	No	Allows e-mail as an acceptable method to provide documents to the PHA.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	will only be accepted as hard copies, in-person, by mail, or by fax. If the PHA deems necessary, the PHA will accept missing information over the phone, clearly noting the changes in red and noting who authorized the change.	necessary, the PHA will accept missing information over the phone, clearly noting the changes in red and noting who authorized the change.		
<b>9-I.E.</b>	If the dwelling lease is incomplete or incorrect, the PHA will notify the family and the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, or by fax. The PHA will not accept missing and corrected information over the phone	If the dwelling lease is incomplete or incorrect, the PHA will notify the family and the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, <b>email</b> , or by fax. The PHA will not accept missing and corrected information over the phone	No	Allows e-mail as an acceptable method to provide documents to the PHA.
<b>10-I.A.</b>	<p>If a family requests permission to move with continued assistance based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will request documentation in accordance with section 16-IX.D of this plan.</p> <p>The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.</p> <p>The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan.</p>	<p>If a family requests permission to move with continued assistance or for an external transfer to another covered housing program operated by the PHA based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will request that the resident request the emergency transfer using form HUD-5383, and the PHA will request documentation in accordance with section 16-IX.D of this plan.</p> <p>The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.</p> <p>Before granting an emergency transfer, the PHA will ensure the victim is eligible to receive continued assistance based on the citizenship or immigration status of the victim.</p> <p>The PHA has adopted an emergency transfer</p>	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
		plan, which is included as Exhibit 16-3 to this plan, and discusses external transfers to other covered housing programs.		
<b>10-II.B.</b>	For participating families approved to move under portability, the PHA will issue a new voucher within 14 business days of the PHA's written approval to move. The initial term of the voucher will be <b>120 days</b> .	For participating families approved to move under portability, the PHA will issue a new voucher within 14 business days of the PHA's written approval to move. The initial voucher term will be <b>60 calendar days</b> .	No	Allows the PHA to issue vouchers for an initial term of 60 days.
<b>10-II.C.</b>	The PHA will send a copy of the updated HUD-50058 by regular mail no later than <b>10</b> business days after the effective date of the reexamination.	The PHA will send a copy of the updated HUD-50058 by regular mail no later than <b>14 business days</b> after the effective date of the reexamination.	No	Aligns with other PHA policies that provide 14 business days.
<b>11-I.C.</b>	An advocate, interpreter, or other assistant may assist the family in the reexamination process. The family and the PHA must execute a certification attesting to the role and the assistance provided by any such third party.	An advocate, interpreter, or other assistant may assist the family in the reexamination process.	No	Streamlines the ability for the advocate to provide assistance for the family.
<b>11-II.D.</b>	Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, or in person.	Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, <b>email</b> , or in person.	No	Allows flexibility for tenant to provide verification by further defining acceptable format.
<b>11-III.B.</b>	At reexamination, the PHA must use the PHA current utility allowance schedule [24 CFR 982.517(d) (2)].	At reexamination, the PHA must use the PHA current utility allowance schedule HCV GB, p. 18-8].	Yes	Guidebook Reference
<b>12-I.E.</b>	The PHA will not terminate a family's assistance because of the family's failure to meet its obligations under the Family Self-Sufficiency program.	Additionally, per the alternative requirements listed in the Federal Register notice dated December 29, 2014, PHAs are no longer permitted to terminate assistance to a family due to the family's failure to meet its obligations under the Family Self-Sufficiency (FSS) contract of participation [FR Notice 12/29/14].	Yes	Allows families to participate in the Family Self Sufficiency Program without losing Section 8 assistance.
<b>12-II.E.</b>	Even when a victim poses an actual and	In order to demonstrate an actual and imminent	Yes	Clarifies evidence

Section	Previous Policy	Proposed Policy	Required Change	Impact
	imminent threat, however, HUD regulations authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat" [24 CFR 5.2005(d) (3)].	threat, the PHA must have objective evidence of words, gestures, actions, or other indicators. Even when a victim poses an actual and imminent threat, however, HUD regulations authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat" [24 CFR 5.2005(d) (3)].		necessary to determine whether the victim of domestic violence is a threat to others.
<b>12-II.E.</b>	Whether the threat is likely to happen within a <b>short period of time</b>	Whether the threat is likely to happen within an <b>immediate time frame.</b>	No	Factors in immediate time frame when determining whether a program participant domestic violence victim is a threat to others on the property.
<b>12-II.E.</b>		If the perpetrator remains in the unit, the PHA continues to pay the owner until the PHA terminates the perpetrator from the program. The PHA must not stop paying HAP until 30 days after the owner bifurcates the lease to evict the perpetrator. The PHA may pay HAP for the full month if the 30-day period will end mid-month [Notice PIH 2017-08]. If the perpetrator is the only participant eligible to receive assistance, the PHA will provide any remaining participant a chance to establish eligibility for the program. If the remaining participant cannot do so, the PHA will provide them with 30 days to establish eligibility for another housing program prior to termination of the HAP contract.	Yes	Clarifies assistance term for domestic violence perpetrators.
<b>EXHIBIT 12-1</b>	N/A	The family must not engage in abusive or violent behavior towards PHA personnel. Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be	No	Provides protection for staff

Section	Previous Policy	Proposed Policy	Required Change	Impact
		considered abusive or violent behavior. Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.		
<b>13-II.E.</b>	In all cases, the HAP contract terminates at the end of the calendar month that follows the calendar month in which the PHA gives written notice to the owner. The owner is not entitled to any housing assistance payment after this period, and must return to the PHA any housing assistance payment received after this period.	In accordance with HUD requirements, the PHA will never pay HAP for any month after the month the family vacates the unit. This includes the death of the sole family member. In all other cases HAP would terminate the end of the month following the month the Landlord is notified.	No	Provides clarity for when HAP will and will not be paid.
<b>13-II.E.</b>	<b>N/A</b>	The subsidy between the old unit and the new unit will not overlap for more than five (5) calendar days.	No	Provides clarity for when HAP will and will not be paid.
<b>CH 15</b>	Families will be permitted to use the Homeownership option. Families will not be permitted to use any other special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.	Families will be permitted to use the Homeownership option. <b>Families will be permitted to use the Single Room Occupancy.</b> <b>Families will be permitted to use the Shared Housing.</b> Families will not be permitted to use any other special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.	No	Expanding housing opportunities by opening up Shared Housing.
<b>15-VII.F.</b>	If required by the PHA, families must attend and complete post-purchase ongoing homeownership counseling.	Remove language	No	No longer an available option.
<b>15-VII.H.</b>	As a check against predatory lending, the PHA will review the financing of each purchase transaction, including estimated closing costs. The PHA will review the loans for features, such as balloon payments, adjustable rate mortgages, and unusually high interest rates, all of which are prohibited. The PHA also will not approve "seller financing" or "owner-held" mortgages. Beyond these basic criteria, the PHA will rely on the lenders to determine that the loan will be affordable to program participants.	As a check against predatory lending, the PHA will review the financing of each purchase transaction, including estimated closing costs. The PHA will review the loans for features, such as balloon payments, adjustable rate mortgages, and unusually high interest rates, all of which are prohibited. The PHA also will not approve "seller financing" " <b>rent to own agreements</b> " or "owner-held" mortgages. Beyond these basic criteria, the PHA will rely on the lenders to determine that the loan will be	No	Added Clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
		affordable to program participants.		
<b>15-VII.I.</b>	Effective with new homeownership clients starting the program January 1, 2017 or later, homeownership clients are required to meet with their designated Housing Specialist in an in-person interview annually, either at the HACSA office or in the client's home. At this meeting the family must provide documentation of money spent on home repairs or provide documentation showing that they are saving at least the amount of their monthly maintenance/repair allowance. For new clients starting the program effective January 1, 2017 or later, inspections will be done on a semi-annual basis. Results of this inspection will be discussed with the client at an annual meeting with agency staff that will be scheduled within two weeks of the inspection. The family will be encouraged to make necessary repairs and potential budgeting and access to community resources to assist with repairs will be discussed at this meeting. Clients will not be required to do repairs as a condition for ongoing assistance.	Effective with new homeownership clients starting the program January 1, 2017 or later, homeownership clients may request to meet with their designated Housing Specialist in an in-person interview annually, either at the Homes for Good office or in the client's home. At this meeting the family must provide documentation of money spent on home repairs or provide documentation showing that they are saving at least the amount of their monthly maintenance/repair allowance.	No	Aligns with HQS rules
<b>15-VII.K.</b>	The PHA's housing assistance payment will be paid directly to the lender. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.	The PHA's housing assistance payment will be normally paid directly to the lender, <b>unless the lender will only accept one payment per month. If the lender refuses multiple monthly payments, the PHA will pay the HAP directly to the client.</b> If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.	No	Added Clarity
<b>15-VII.L.</b>	The PHA issues transfer vouchers for <b>120 days</b> .	The PHA issues transfer vouchers for <b>60 calendar days</b> .	No	Allows the PHA to issue vouchers for an initial term of 60 days.
<b>15-VII.N.</b>	The PHA may also deny or terminate assistance for violation of participant obligations described	The PHA may also deny or terminate assistance for violation of participant obligations described	Yes	Regulation change

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	in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy.	in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy, <b>with the exception of failure to meet obligations under the Family Self-Sufficiency program as prohibited under the alternative requirements set forth in FR Notice 12/29/14.</b>		
<b>16-II.B.</b>	Changes to payment standard amounts will be effective on December 1st of every year unless, based on the proposed FMRs, it appears that one or more of the PHA's current payment standard amounts will be outside the basic range when the final FMRs are published. In that case, the PHAs payment standards will be effective October 1st instead of December 1st. If the PHA has already processed reexaminations that will be effective on or after October 1st, and the effective date of the payment standards is October 1st, the PHA will make retroactive adjustments to any such reexaminations if the new payment standard amount is higher than the one used by the PHA at the time the reexamination was originally processed.	Changes to payment standard amounts will be effective on January 1st of every year, or within three months of the FMR effective date. The effective date is applicable both to HUD-required revisions and to discretionary revisions.	Yes	Allows PHA to modify Payment Standards within three months of FMR changes even when the FMR change results in the Payment Standard being outside of the 90% to 100% FMR range.
<b>16-III.C.</b>	A copy of the hearing must be furnished promptly to the family.	The hearing officer will mail a "Notice of Hearing Decision" to the PHA and to the participant within 14 business days from the date of the hearing. This notice will be sent by first-class mail. The participant will be mailed the original "Notice of Hearing Decision". A copy of the "Notice of Hearing Decision" will be maintained in the PHA's file.	No	Provides clarity
<b>16-III.C.</b>	The PHA will mail a "Notice of Final Decision" including the hearing officer's report to the participant and their representative. This notice will be sent by first-class mail. The participant will be mailed the original "Notice of Final Decision" and a copy of the "Notice of Final Decision" will be maintained in the PHA's file.	The Division Director has the authority to determine that the PHA is not bound by the decision of the hearing officer because the PHA was not required to provide a hearing, the decision exceeded the authority of the hearing officer, the decision conflicted with or contradicted HUD regulations, requirements, or	No	Provides clarity on regulation for how a PHA is to respond to the decision making of the hearings officer.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		the decision was otherwise contrary to federal, state, or local laws. In such a case, the PHA will mail a "Notice of Final Decision" to the PHA and the participant within 14 business days. The "Notice of Final Decision" will be sent by first-class mail. A copy of this notice will be maintained in the PHA's file.		
<b>16-IV.B.</b>	If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA <b>will</b> ban the owner from future participation in the program and pursue other modes of collection.	If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA <b>may</b> ban the owner from future participation in the program and pursue other modes of collection.	No	Provides the PHA flexibility on whether to ban or not ban landlords who do not repay HAP.
<b>16-VI.B.</b>	N/A	The PHA must keep confidential records of all emergency transfer requested by victims of domestic violence, dating violence, sexual assault, and stalking under the PHA's Emergency Transfer Plan, as well as the outcomes of such requests, and retain the records for a period of three years [24 CFR 5.2002(e)(12)].	Yes	Provides privacy for victims of domestic violence.
<b>16-VII.A.-C</b>	"Environmental Intervention Blood Lead Level"	"Elevated Blood Lead Level"	Yes	Provides clarity
<b>16-VII.B.</b>	The <b>PHA</b> must report the name and address of a child identified as having an <b>environmental intervention</b> blood lead level to the public health department within 5 business days of being so notified by any other medical health care professional.	The <b>owner</b> must report the name and address of a child identified as having an <b>elevated</b> blood lead level to the public health department within 5 business days of being so notified by any other medical health care professional. <b>The owner must also notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days. The PHA may collaborate with the owner on the notification process, such as by agreeing with the owner to provide the required notifications on the owner's behalf.</b>	Yes	Provides clarity
<b>16-VII.B.</b>	The PHA will provide the public health	Upon notification by the owner, the PHA will	Yes	Provides clarity.



Section	Previous Policy	Proposed Policy	Required Change	Impact
	department written notice of the name and address of any child identified as having an environmental intervention blood lead level.	provide the public health department written notice of the name and address of any child identified as having an elevated blood lead level within five business days. Upon notification by the owner, the PHA will notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days.		
<b>16-IX.C.</b>	N/A	The PHA is not limited to providing VAWA information at the times specified in the above policy. If the PHA decides to provide VAWA information to a participant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases the PHA make alternative delivery arrangements that will not put the victim at risk.	Yes	Compliance with VAWA regulations
<b>16-IX.C.</b>	N/A	Whenever the PHA has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim. When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room. The victim may, but is not required to, designate an attorney, advocate, or other	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
		secure contact for communications regarding VAWA protections.		
<b>16-IX.C.</b>	The PHA will provide owners and managers with information about their rights and obligations under VAWA <b>when they begin their participation in the HCV program and at least annually thereafter.</b>	The PHA will provide owners and managers with information about their rights and obligations under VAWA <b>annually.</b>	Yes	Compliance with VAWA regulations
<b>16-IX.D.</b>	(1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim	(1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.	Yes	Compliance with VAWA regulations
<b>16-IX.D.</b>	The PHA may, in its discretion, extend the deadline for 14 business days. Any extension granted by the PHA will be in writing.	The PHA may, in its discretion, extend the deadline for 14 business days. <b>In determining whether to extend the deadline, the PHA will consider factors that may contribute to the victim’s inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim’s need to address health or safety issues.</b> Any extension granted by the PHA will be in writing. <b>Once the victim provides documentation, the PHA will acknowledge receipt of the documentation within 10 business days.</b>	Yes	Compliance with VAWA regulations
<b>16-IX.D.</b>	In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide	In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>acceptable third-party documentation, as described above (forms 2 and 3) within 30 calendar days of the date of the request for third-party documentation. <b>The PHA must honor any court orders issued to protect the victim or to address the distribution of property.</b></p>	<p>acceptable third-party documentation, as described above (forms 2 and 3) <b>The PHA may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the PHA.</b> Individuals have 30 calendar days to return third-party verification to the PHA. If the PHA does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the PHA must hold separate hearings for the tenants [Notice PIH 2017-08].</p>		
<b>16-IX.D.</b>	<p>If presented with conflicting certification documents (two or more forms HUD-5382) from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. The family will have 30 calendar days from the date of request by the PHA to provide this documentation.</p>	<p>If presented with conflicting certification documents from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. When requesting third-party documents, the PHA will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation. If the PHA does not receive third-party documentation within the required timeframe (and any extensions) the PHA will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, the PHA will hold separate hearings for the applicants or tenants.</p>	Yes	Compliance with VAWA regulations
<b>16-IX.D.</b>	<p>The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse</p>	<p>The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of</p>	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
	in accordance with 24 CFR 5.2007(b).	abuse in accordance with 24 CFR 5.2007(b). <b>HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.</b>		
<b>EXHIBIT 16-5</b>	SAMPLE NOTICE TO HOUSING CHOICE VOUCHER OWNERS AND MANAGERS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)	MODEL OWNER NOTIFICATION OF RIGHTS AND OBLIGATIONS	Yes	Compliance with VAWA regulations
<b>CH. 17</b>	N/A	PIH 2017-21	Yes	HUD Regulation
<b>17-I.A.</b>	The PHA may project-base an additional 10 percent of its units above the 20 percent program limit, if the units	The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. <b>The units may be distributed among one, all, or a combination of the categories as long as the total number of units does not exceed the 10 percent cap. Units qualify under this exception if the units</b>	Yes	Regulation provides definitions of what families are to be served under additional use of PBV.
<b>17-I.A.</b>	Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302).	Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.	Yes	Regulation provides definitions of what families are to be served under additional use of PBV.
<b>17-I.A.</b>	The PHA <b>will not</b> set aside units above the 20 percent program limit.	The PHA <b>may</b> set aside units above the 20 percent program limit.	No	Provides the PHA the option to set aside units.
<b>17-I.A.</b>	In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. In order to be excepted, the unit must meet the following conditions: <ul style="list-style-type: none"> <li>• The unit must be covered under a PBV HAP contract that first became effective on or after 4/18/17; and</li> <li>• In the five years prior to the date the PHA either issued the RFP or selected the project, the unit either:</li> </ul>	In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after 4/18/17.	Yes	Provides clarity.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>- Received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for Elderly (Section 202), Housing for Persons with Disabilities (section 811), Rent Supplement (Rent Supp), or Rental Assistance Program (RAP); or</p> <p>- The unit was subject to a rent restriction through a loan or insurance program as a result of Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for Elderly Persons (Section 202), or Housing for Persons with Disabilities (Section 811)</p> <p>Units that have previously received either PBV or HCV assistance are not covered under the exception.</p>			
<b>17-I.A.</b>	N/A	The PHA may project-base any units not subject to the 20 percent cap.	No	Provides clarity
<b>17-II.B.</b>	N/A	The PHA may attach PBVs to projects owned by the PHA as described above.	No	Provides clarity
<b>17-II.B.</b>	N/A	Any additional requirements will be noted in the Request for Proposal.	No	Allows PHA to produce Request for Proposals that give information as needed to the respondent for specific proposal requests.
<b>17-II.B.</b>	In addition, the PHA will publish its notice for selection of PBV proposals for two consecutive days in the same newspapers and trade journals the PHA used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program. The PHA will also post the notice of owner selection on its electronic web site.	The PHA will post the notice of owner selection on its electronic web site.	No	Removes the need to publish PBV awards in the Register Guard.
<b>17-II.F.</b>	<p>Exceptions are allowed and PBV units are not counted against the 25 percent or 25-unit per project cap if:</p> <ul style="list-style-type: none"> <li>• The units are exclusively for elderly families</li> <li>• The units are for households eligible for</li> </ul>	<p>As of April 18, 2017, units are not counted against the 25 percent or 25-unit per project cap if:</p> <ul style="list-style-type: none"> <li>• The units are exclusively for elderly families</li> <li>• The units are for households eligible for</li> </ul>	Yes	Provides clarity.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>supportive services available to all families receiving PBV assistance in the project</p> <ul style="list-style-type: none"> <li>The project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates</li> </ul>	<p>supportive services available to all families receiving PBV assistance in the project</p> <ul style="list-style-type: none"> <li>If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].</li> </ul>		
17-II.F.	<p>If a family at the time of initial tenancy is receiving, and while the resident of an excepted unit has received, FSS supportive services or any other supportive services as defined in the PHA administrative plan, and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit.</p>	<p>The PHA will evaluate supportive services based on community need.</p>	No	<p>Allows a variety of supportive service options to be implemented based on community need.</p>
17-II.F.	<p>The PHA <b>will not</b> provide assistance for excepted units. Beyond that, the PHA will not impose any further cap on the number of PBV units assisted per project.</p>	<p>The PHA <b>may</b> provide assistance for excepted units.</p>	No	<p>Allows the PHA the option to provide assistance for excepted units.</p>
17-III.D.	<p>The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date, and must determine whether the units substantially comply with HQS. To qualify as existing housing, units must substantially comply with HQS on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with HQS, <b>unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS</b></p>	<p>The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date, and must determine whether the units substantially comply with HQS. To qualify as existing housing, units must substantially comply with HQS on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with HQS.</p>	No	<p>Provides clarity on PHA policy</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<b>inspection as a result of only non-life-threatening conditions.</b>			
<b>17-III.D.</b>	The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not enter into a HAP contract covering a unit until the unit fully complies with HQS, <b>unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions.</b>	The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not enter into a HAP contract covering a unit until the unit fully complies with HQS.	No	Provides clarity on PHA policy
<b>17-III.D.</b>	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS.	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS, <b>unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions or if the unit passed an alternative inspection.</b>	Yes	Regulations provide clarification on potential HQS options.
<b>17-IV.B.</b>	The PHA will enter into the Agreement with the owner within <b>10</b> business days of receiving both environmental approval and notice that subsidy layering requirements have been met, and before construction or rehabilitation work is started.	The PHA will enter into the Agreement with the owner within <b>14</b> business days of receiving both environmental approval and notice that subsidy layering requirements have been met, and before construction or rehabilitation work is started.	No	Aligns with other PHA policies that provide 14 business days.
<b>17-V.B.</b>	For existing housing, the HAP contract will be executed within <b>10</b> business days of the PHA determining that all units pass HQS. For rehabilitated or newly constructed housing, the HAP contract will be executed within <b>10</b> business days of the PHA determining that the units have been completed in accordance with the agreement to enter into HAP, all units meet HQS, and the owner has submitted all required evidence of completion.	For existing housing, the HAP contract will be executed within <b>14</b> business days of the PHA determining that all units pass HQS. For rehabilitated or newly constructed housing, the HAP contract will be executed within <b>14</b> business days of the PHA determining that the units have been completed in accordance with the agreement to enter into HAP, all units meet HQS, and the owner has submitted all required evidence of completion.	No	Aligns with other PHA policies that provide 14 business days.
<b>17-VI.C.</b>	The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. The PHA	The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. The PHA	No	Provides information on current PBV waiting lists

Section	Previous Policy	Proposed Policy	Required Change	Impact
	currently has waiting lists for the following PBV projects: <b>Under RAD PBV conversion PHA reserves the right to add additional waiting lists as needed to manage a PBV program.</b>	currently has waiting lists for the following PBV projects: <b>PHA reserves the right to add additional waiting lists as needed to manage a PBV program.</b> <b>Richardson Bridge – 2 bedroom &amp; 3 bedroom waiting lists. With a total of 12 PBV.</b>		
<b>17-VII.C.</b>	N/A	Emergency Transfers under VAWA [Notice PIH 2017-08] Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4). HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.	Yes	Provides housing options for victims of domestic violence.
<b>17-VII.C.</b>	N/A	When the victim of domestic violence, dating violence, sexual assault, or stalking has lived in the unit for less than one year, the PHA will provide several options for continued assistance. The PHA will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible. If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or	Yes	Compliance with VAWA regulations



Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>assistance in the PHA's public housing program. Such a decision will be made by the PHA based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such families must be selected from the waiting list for the applicable program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking in both its HCV and public housing programs in order to expedite this process. See Section 4-III.C. of this administrative plan.</p> <p>If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, the PHA will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.</p> <p>If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to the PHA's public housing program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking as part of the public housing ACOP in order to expedite this process.</p>		
<b>17-VII.D.</b>	<p>The PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:</p> <ul style="list-style-type: none"> <li>• The units are exclusively for elderly families</li> <li>• The units are for households eligible for</li> </ul>	<p>As of April 17, 2018 the PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:</p> <ul style="list-style-type: none"> <li>• The units are exclusively for elderly families</li> </ul>	Yes	Provides clarity.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>supportive services available to all families receiving PBV assistance in the project</p> <ul style="list-style-type: none"> <li>The project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates</li> </ul>	<ul style="list-style-type: none"> <li>The units are for households eligible for supportive services available to all families receiving PBV assistance in the project</li> <li>If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].</li> </ul>		
<b>17-VIII.B.</b>	N/A	The PHA may apply SAFMRs to the PHA's PBV program.	Yes	Provides the option to apply SAFMRs.
<b>18-II.C.</b>	N/A	The definition of control/ownership provided under Notice PIH 2012-32, REV-3 (listed above) is used specifically to determine whether a PHA retains control over a project for purposes of HUD's requirement for ownership or control of the covered project under RAD. For purposes of determining whether an independent entity will perform certain functions for the project, the definition of PHA-owned under Notice PIH 2017-21 is used. This is the same definition used for standard PBV units. In some cases, a project may meet the RAD definition of ownership or control, but may not be considered PHA-owned for purposes of requiring an independent entity.	Yes	Provides clarity.
<b>18-III.D.</b>	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS.	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS, <b>unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions or if the unit passed an alternative inspection.</b>	Yes	Regulations provide clarification on potential HQS options.
<b>18-III.D.</b>	N/A	The PHA will not provide assistance in turnover units until the unit fully complies with HQS.	Yes	Added Clarity
<b>18-IV.C.</b>	The PHA <b>will not</b> float assistance among	The PHA <b>may</b> float assistance among	No	Provides the PHA the

Section	Previous Policy	Proposed Policy	Required Change	Impact
	unoccupied units within the project.	unoccupied units within the project.		option to move units within a project to provide housing.
<b>18-IV.F.</b>	The PHA <b>will</b> provide vacancy payments to the owner. The HAP contract with the owner will contain the amount of the vacancy payment and the period for which the owner will qualify for these payments.	The PHA <b>may</b> provide vacancy payments to the owner. The HAP contract with the owner will contain the amount of the vacancy payment and the period for which the owner will qualify for these payments.	No	Allows the PHA to address vacancy payments in the HAP Contract.
<b>18-V.E.</b>	The PHA <b>will not</b> offer any preferences for the RAD PBV program or for particular PBV projects or units.	The PHA <b>may</b> offer any preferences for the RAD PBV program or for particular PBV projects or units.	No	Allows the PHA the ability to serve special need populations within PBV.
<b>18-VI.E.</b>	The PHA will maintain a combined, agency-wide waiting list for all standard PBV and RAD PBV families wishing to exercise mobility after one year of tenancy. This list will be maintained separately from the tenant-based HCV list. Families on the choice mobility waiting list will be given priority over families on the tenant-based waiting list. The choice mobility waiting list will be organized by date and time of the family's written request to exercise choice mobility. The list will also identify whether families live in standard or RAD PBV units.	PBV and RAD PBV families wishing to exercise mobility after one year of tenancy will be maintained amongst the tenant-based HCV list, and will be denoted with a preference point. This preference point will drive the family to the top of the tenant-based HCV list. Families on the choice mobility waiting list will be given priority over families on the tenant-based waiting list. The choice mobility waiting list will be organized by date received of the family's written request to exercise choice mobility.	No	Provides clarity
<b>18-VI.E.</b>	N/A	Emergency Transfers under VAWA	Yes	Compliance with VAWA regulations

# **APPENDIX C: ACOP MODIFICATIONS**

## **HIGHLIGHTS:**

### **Throughout:**

- Name Change
- HUD Form number Updates
- VAWA Updates
- Other minor regulatory changes
- Minor changes to increase clarity of existing policies

### **Chapter 3: Eligibility**

- Change requirement for inclusion in family from 51% custody or greater to 50% custody or greater
- Added option for additional background checks

### **Chapter 4: Applications, Waiting List and Tenant Selection**

- Create a new preference for applicants who are participating in case-management, with an organization with whom Homes for Good has an MOU outlining such a preference.

### **Chapter 5: Occupancy Standards and Unit Offers**

- Increase Maximum Occupancy Standard by one, for each unit size

### **Chapter 8: Leasing and Inspections**

- New adults must sign the lease or a new lease

### **Chapter 9: Reexaminations**

- Resume conducting Interims for changes to income that would result in an increase in rent under two circumstances:
  - New sources of income
  - When an Interim has already been processed that decreased rent

### **Chapter 10: Pets**

- Changes to pet verification timelines

### **Chapter 14: Grievances and Appeals**

- Cost of copying hearing documents changed from \$5 plus \$0.05 per page to simply \$0.25 per page

**KEY MODIFICATIONS TO THE HOMES FOR GOOD  
ADMISSIONS AND CONTINUED OCCUPANCY POLICIES (ACOP)  
PROPOSED EFFECTIVE DATE 10-1-18**

<b>Section</b>	<b>Previous Policy</b>	<b>Proposed Policy</b>	<b>Required Change</b>	<b>Impact</b>
<b>Throughout</b>	<b>HACSA</b>  <b>www.hacsa.org</b>	<b>Homes for Good</b>  <b>www.homesforgood.org</b>	Yes	Agency rebranding process
<b>Throughout</b>	Notice PIH <b>2010-19</b>  Notice PIH <b>2015-13</b>	Notice PIH <b>2017-12</b>  Notice PIH <b>2017-23</b>	Yes	Updated versions of same notices
<b>3-I.F</b>	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family <b>51</b> percent or more of the time.	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family <b>50</b> percent or more of the time.	No	Added Clarity
<b>3-I.J</b>	Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the public housing unit more than <b>51</b> percent of the time, are not subject to the time limitations of guests as described above.	Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the public housing unit more than <b>50</b> percent of the time, are not subject to the time limitations of guests as described above.	No	Added Clarity
<b>3-II.A</b>	To be income eligible, <b>the annual income of an applicant must be within the low-income limit.</b>	To be income eligible, <b>a family must be a low-income family.</b>	No	Added clarity
<b>3-III.A</b> <b>3-III.F</b>	In addition, HUD requires or permits the PHA to deny admission based on certain types of current or past behaviors of family members as discussed in this part. The PHA's authority in this	In addition, HUD requires or permits the PHA to deny admission based on certain types of current or past behaviors of family members as discussed in this part. The PHA's authority in this	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
	area is limited by the Violence against Women Act of 2013 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been the victim of domestic violence, dating violence, sexual assault, or stalking [24 CFR 5.2005(b)].	area is limited by the Violence against Women Act of 2013 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis <b>or as a direct result of the fact</b> that the applicant is or has been the victim of domestic violence, dating violence, sexual assault, or stalking [24 CFR 5.2005(b)].		
<b>3-III.F</b>	VAWA 2013 expanded notification requirements to include the obligation for PHAs to provide applicants who are denied assistance with a <b>notice of VAWA rights and the form HUD-5382</b> at the time the applicant is denied.	VAWA 2013 expanded notification requirements to include the obligation for PHAs to provide applicants who are denied assistance with a <b>VAWA Notice of Occupancy Rights (form HUD-5380) and a domestic violence certification form (HUD-5382)</b> at the time the applicant is denied.	Yes	Compliance with new VAWA guidance
<b>3-III.F</b>	<p>The PHA acknowledges that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history (e.g., a poor credit history, a record of previous damage to an apartment, a prior arrest record) that would warrant denial under the PHA’s policies.</p> <p><b>Therefore, if HACSA makes a determination to deny admission to an applicant family, the HACSA will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and a copy of the form HUD-5382.</b></p>	<p>Homes for Good acknowledges that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history (e.g., a poor credit history, <b>poor rental history</b>, a record of previous damage to an apartment, a prior arrest record) <b>due to adverse factors</b> that would warrant denial under Homes for Good’s policies.</p> <p><b>While Homes for Good is not required to identify whether adverse factors that resulted in the applicant’s denial are a result of domestic violence, dating violence, sexual assault, or stalking, the applicant may inform Homes for Good that their status as a victim is directly related to the grounds for the denial. Homes for Good</b></p>	No	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p><b>will request that the applicant provide enough information to Homes for Good to allow Homes for Good to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim.</b></p> <p>Homes for Good will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and a copy of the form HUD-5382.</p>		
<b>3-III.D</b>	<p>HACSA will perform criminal background checks through <b>local law enforcement</b> or a commercial screening company for all adult household members.</p> <p>If the results of the criminal background check indicate there may have been past criminal activity, but the results are inconclusive, or if the applicant resided outside of the state of Oregon, HACSA may request a fingerprint electronically and may request information from the National Crime Information Center (NCIC).</p> <p>HACSA may use the Oregon State Police Law Enforcement Data System (LEDS) database and court records or a commercial screening company to screen applicants for admission.</p>	<p>Homes for Good will perform criminal background checks through the <b>Oregon State Police Law Enforcement Data System (LEDS) database and Oregon court records (OJIN)</b> or a commercial screening company for all adult household members.</p> <p><b>If the adult household member has resided in Oregon for the last 3 years and there is no indication of out-of-state criminal activity Homes for Good will use the Oregon State Police Law Enforcement Data System (LEDS) database and Oregon court records (OJIN) to conduct the criminal background check.</b></p> <p><b>An additional layer of screening (for example, through a commercial screening company or the National Crime</b></p>	No	Allows for a more-similar screening process for in-state and out-of-state applicants

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Information Center) will be used if: the adult household member has resided outside the state of Oregon in the last 3 years, the results of the criminal background check through LEDS indicates there has been criminal activity outside the state of Oregon, or the adult household member self-discloses out-of-state criminal activity in the last 3 years.</p>		
3-III.E	<p>HACSA will require the applicant to submit evidence of the household member's successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.</p>	<p>Homes for Good may require the applicant to submit evidence of the household member's successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.</p>	No	<p>Provide greater flexibility in evaluating case-by-case circumstances</p>
4-III.B	-N/A-	<p>Homes for Good will apply a waiting list preference worth 5 points for applicants who are case-managed by a service provider with whom the Homes for Good Property Management Division has a signed Memorandum of Understanding (MOU) outlining such a preference. The preference will be specific to the properties and service providers covered by the MOU.</p>	No	<p>Creates a new preference by which Homes for Good can more effectively partner with local agencies to address community needs.</p>
4-III.B	-N/A-	<p>Homes for Good has mixed population developments at the following properties:</p> <ul style="list-style-type: none"> <li>• Portion of AMP 100 Laurelwood Homes (1-bedroom units)</li> <li>• Portion of AMP 200 McKenzie Village (1-bedroom units)</li> <li>• AMP 400 Parkview Terrace</li> </ul>	No	<p>Reflects existing designations from HUD for Mixed Population (Elderly/Disabled) developments</p>



Section	Previous Policy	Proposed Policy	Required Change	Impact
		<ul style="list-style-type: none"> <li>• <b>AMP 500 Lindeborg Place</b></li> <li>• <b>AMP 500 Veneta Villa</b></li> <li>• <b>AMP 600 Cresview Villa</b></li> <li>• <b>AMP 600 Riverview Terrace</b></li> </ul>		
<b>4-III.B</b>	HACSA has <b>designated elderly/non-elderly disabled designated housing at this time.</b>	Homes for Good has <b>no properties designated for elderly families or disabled families.</b>	No	Corrects typo
<b>4-III.E</b>	HACSA will notify a family of their eligibility within 14 calendar days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.	<p>Homes for Good will notify a family of their eligibility within 14 calendar days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.</p> <p><b>Homes for Good will expedite the administrative process for determining eligibility to the extent possible for applicants who are admitted to the public housing program as a result of an emergency transfer from another Homes for Good program.</b></p>	No	Compliance with new VAWA guidance
<b>4-III.E</b>	<b>Upon making an eligibility determination,</b> the PHA must provide the family a notice of VAWA rights as <b>noted in</b> the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act of 2013, and as outlined in 16-VII.C. <b>The notice and self-certification form must accompany the written notification of eligibility determination.</b> This notice must be provided in both of the following instances: (1) when a family <b>is notified of its eligibility;</b> or	The PHA must provide the family a notice of VAWA rights ( <b>form HUD-5380</b> ) as <b>well as</b> the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act of 2013, and as outlined in 16-VII.C. <b>at the time the applicant is provided assistance or at the time the applicant is denied assistance.</b> This notice must be provided in both of the following instances: (1) when a family <b>actually begins receiving assistance (lease execution);</b> or (2) when a	Yes	Compliance with new VAWA guidance

Section	Previous Policy			Proposed Policy			Required Change	Impact																					
	(2) when a family is notified of its ineligibility.			family is notified of its ineligibility.																									
<b>5-I.B</b>	Foster children will be included in determining unit size.			<p><b>Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.</b></p> <p>Foster children will be included in determining unit size. <b>The family may add foster children to the household as long as it does not overcrowd the unit based on Homes for Good’s occupancy standards.</b></p> <p><b>Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.</b></p> <p><b>Children in the process of being adopted will be considered when determining unit size.</b></p> <p><b>Children who will live in the unit less than 50 percent of the time will not be considered when determining unit size.</b></p>			No	Added Clarity, based on new guidance about family composition.																					
<b>5-I-B</b>	<table border="1"> <thead> <tr> <th data-bbox="289 1162 470 1268">BEDROOM SIZE</th> <th data-bbox="474 1162 655 1268">MINIMUM NUMBER OF PERSONS</th> <th data-bbox="659 1162 865 1268">MAXIMUM NUMBER OF PERSONS</th> </tr> </thead> <tbody> <tr> <td data-bbox="289 1271 470 1328"><b>0</b></td> <td data-bbox="474 1271 655 1328">1</td> <td data-bbox="659 1271 865 1328"><b>1</b></td> </tr> <tr> <td data-bbox="289 1331 470 1377">1</td> <td data-bbox="474 1331 655 1377">1</td> <td data-bbox="659 1331 865 1377"><b>2</b></td> </tr> <tr> <td data-bbox="289 1380 470 1425">2</td> <td data-bbox="474 1380 655 1425">2</td> <td data-bbox="659 1380 865 1425"><b>4</b></td> </tr> </tbody> </table>			BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS	<b>0</b>	1	<b>1</b>	1	1	<b>2</b>	2	2	<b>4</b>	<table border="1"> <thead> <tr> <th data-bbox="898 1162 1079 1268">BEDROOM SIZE</th> <th data-bbox="1083 1162 1264 1268">MINIMUM NUMBER OF PERSONS</th> <th data-bbox="1268 1162 1449 1268">MAXIMUM NUMBER OF PERSONS</th> </tr> </thead> <tbody> <tr> <td data-bbox="898 1271 1079 1393"><b>Small 1-Bedroom Units at Veneta Villa</b></td> <td data-bbox="1083 1271 1264 1393">1</td> <td data-bbox="1268 1271 1449 1393"><b>2</b></td> </tr> <tr> <td data-bbox="898 1396 1079 1438">1</td> <td data-bbox="1083 1396 1264 1438">1</td> <td data-bbox="1268 1396 1449 1438"><b>3</b></td> </tr> </tbody> </table>			BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS	<b>Small 1-Bedroom Units at Veneta Villa</b>	1	<b>2</b>	1	1	<b>3</b>	No	Added Clarity, compliance with guidance from Fair Housing Council of Oregon
BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS																											
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<b>5-II.C</b>	<b>Offers made by telephone will be confirmed by letter.</b> Offers made by mail will be given three additional days.	Offers made <b>solely</b> by mail will be given three additional days <b>for mailing time.</b>	No	Added Clarity															
<b>6-I.C</b>	When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the <b>reexamination interview</b> date.	When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the date <b>of receipt by Homes for Good.</b>	No	Added Clarity															
<b>6-III.D</b>	Revised public housing <b>maximum</b> rents will be applied to a family's rent calculation at the first annual reexamination after the revision is adopted.	Revised public housing <b>flat</b> rents will be applied to a family's rent calculation at the first annual <b>or interim</b> reexamination after the revision is adopted.	No	Added Clarity															
<b>6-II.E</b>	The cost of <b>service</b> animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.	The cost of animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.	No	Added Clarity															
<b>7-I.B</b>	Any documents used for verification must be the original or valid copy and generally must be dated within 60 days of the date <b>they are provided to</b> HACSA. The documents must not be damaged, altered or in any way illegible.	Any documents used for verification must be the original or valid copy and generally must be dated within 60 days of the date <b>requested by</b> Homes for Good. The documents must not be damaged, altered or in any way illegible.	No	Added Clarity															
<b>7-II.C</b>	Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify <b>and</b>	Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify	No	Added Clarity															

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p><b>calculate</b> earned income, unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.</p>	<p>earned income, <b>and to verify and calculate</b> unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.</p>		
<p><b>7-II.H</b></p>	<p><b>HACSA will require verification of VAWA preference or the need for reasonable accommodation preference, for families residing in Section 8 properties managed by HACSA.</b></p> <p><b>Verification of VAWA may include, but not be limited to, any of the resources listed on form HUD-50066.</b></p> <p><b>Verification of need for reasonable accommodation will be pursuant to HACSA's reasonable accommodation policy.</b></p>	<p><b>Homes for Good offers a preference for victims of domestic violence, dating violence, sexual assault or stalking living in Section 8 properties managed by HACSA, (currently Abbie Lane, Fourteen Pines, and Village Oaks) or holding a Housing Choice Voucher issued by Homes for Good, whose situation requires moving out of the current unit – as described in Section 4-III.B. To verify that applicants qualify for the preference, Homes for Good will follow documentation requirements outlined in Section 16-VII.D.</b></p> <p><b>Homes for Good also offers a preference for persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by Homes for Good, or holding a Housing Choice Voucher issued by Homes for Good, who cannot be reasonably accommodated in those properties. To verify that applicants qualify for the preference, Homes for Good will follow documentation requirements outlined in Homes for Good's reasonable</b></p>	<p>No</p>	<p>Clarifies verification process for preferences.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		accommodation policy.		
<b>8-I.A</b>	PHAs must adopt smoke-free policies, which must be implemented no later than July <b>18</b> , 2018. <b>A model</b> policy is attached as Exhibit 8-1.	PHAs must adopt smoke-free policies, which must be implemented no later than July <b>30</b> , 2018. <b>The</b> policy is attached as Exhibit 8-1.	Yes	None.
<b>8-I.D</b>	If, for any reason, any member of the household ceases to reside in the unit, the lease may be amended by drawing a line through the person's name. The head of household and HACSA will be required to initial and date the change.	If, for any reason, any member of the household ceases to reside in the unit, the lease may be amended by drawing a line through the person's name, <b>or by a lease amendment</b> . The head of household and Homes for Good will be required to initial and date the change.	No	More consistent paperwork
<b>8-I.D</b>	If a new household member is a minor approved by HACSA to reside in the unit, the person's name and birth date will be added to the existing lease. The head of household and HACSA will be required to sign and date the change.	If a new household member is a minor approved by Homes for Good to reside in the unit, the person's name and birth date will be added to the existing lease <b>through an amendment</b> . The head of household, <b>all adults</b> , and Homes for Good will be required to sign and date the change. <b>When a minor turns 18 the family will need to sign a new lease.</b>	No	More consistent paperwork. Ensures new residents and household members who are turning 18 have seen and had a chance to read the lease.
<b>8-I.E</b>	If the resident transfers to another unit, HACSA will transfer the security deposit to the new unit. If the security deposit in the new unit is higher, the tenant will be required to pay the difference between the "old" and "new" unit. The tenant will be billed for any maintenance or other charges due for the "old" unit.	If the resident transfers to another unit, Homes for Good will transfer the security deposit to the new unit, <b>including transfers due to RAD</b> . If the security deposit in the new unit is higher, the tenant will be required to pay the difference between the "old" and "new" unit. The tenant will be billed for any maintenance or other charges due for the "old" unit.	No	Added clarity
<b>8-I.F</b>	-N/A-	<b>Homes for Good may grant requests for relief from surcharges from excess utility consumption of Homes for Good-furnished</b>	No	None at this time – because Homes for Good does not charge

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p><b>utilities as a reasonable accommodation where Homes for Good deems an exception is appropriate to meet the needs of elderly, ill, or disabled residents. In determining whether to grant this request, Homes for Good will consider special factors affecting utility usage that are not within the control of the resident, such as the need for medical equipment. Residents may request relief in accordance with Section 2-II.C. of this ACOP. Homes for Good will process such requests in accordance with Section 2-II.E. of this ACOP.</b></p> <p><b>Notice of the availability of procedures for requesting relief (including the Homes for Good representative with whom initial contact may be made by the resident) and the Homes for Good criteria for granting requests, will be included in each notice to residents of changes in utility allowances or surcharges as well as to new residents as part of the lease orientation.</b></p>		<p>for excess utilities. This change is recommended by Nan McKay.</p>
<b>8-II.B</b>	HACSA will inspect all occupied units annually using HUD's Uniform Physical Condition Standards (UPCS).	Homes for Good <b>or a contractor</b> will inspect all occupied units annually using HUD's Uniform Physical Condition Standards (UPCS).	No	Added clarity
<b>8-II.C</b>	Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for HACSA to enter the unit.	Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for Homes for Good to enter the unit <b>within 7 days from the date of request.</b>	No	Added clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
8-II.C	If no one is at home, the inspector will enter the unit, conduct the inspection and leave the resident a copy of the inspection report.	If no one is at home <b>for the preventative maintenance inspection</b> , the inspector will enter the unit, conduct the inspection and leave the resident a copy of the inspection report. <b>For other entries when a resident is not home, Homes for Good will leave a notice of the date, time, and purpose of entry.</b>	No	Added clarity
9-III.C	HACSA will <b>only</b> conduct interim reexaminations for families that qualify for the earned income disallowance (EID), <b>and</b> only when the EID family's rent will change as a result of the increase.	<b>Homes for Good will conduct an interim reexamination if the change is from a new source of income, or if the family has received an interim reexamination since their last annual that resulted in a decrease in rent.</b> Homes for Good will <b>also</b> conduct interim reexaminations for families that qualify for the earned income disallowance (EID), <b>but</b> only when the EID family's rent will change as a result of the increase.	No	Returns to a policy of completing interims that increase rent
9-III.C	If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, HACSA will note the information in the tenant file, but will not conduct an interim reexamination unless the family requests an interim to increase rent. An example would be an FSS participant whose increases in rent are deposited into his or her FSS escrow account.	If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, <b>Homes for Good will conduct an interim reexamination if the change is from a new source of income, or if the family has received an interim reexamination since their last annual that resulted in a decrease in rent. Otherwise,</b> Homes for Good will note the information in the tenant file, but will not conduct an interim reexamination unless the family requests an interim to increase rent. An example would be an FSS participant whose increases in rent are	No	Returns to a policy of completing interims that increase rent.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		deposited into his or her FSS escrow account.		
<b>10-II.B.</b>	<b>Pet authorization will be renewed annually and will be coordinated with the annual reexamination date.</b>	-N/A-	No	Reduced paperwork burden
<b>10-II.B.</b>	Residents who have been approved to have a pet must enter into a pet agreement with HACSA, or the approval of the pet will be withdrawn.	Residents who have been approved to have a pet must enter into a pet agreement with Homes for Good <b>prior to bringing the pet onto the premises</b> , or the approval of the pet will be withdrawn.	No	Added clarity
<b>10-II.C</b>	-N/A-	<b>PHAs may not require pet owners to obtain or carry liability insurance.</b>  <b>PHAs may not require that cats be declawed.</b>	Yes	Compliance with new guidance
<b>10-II.D</b>	The following animals are not considered common household pets:  Reptiles Insects Arachnids Wild animals or feral animals Pot-bellied pigs Animals used for commercial breeding	The following animals are not considered common household pets:  Reptiles Insects Arachnids Wild animals or feral animals Pot-bellied pigs <b>Ferrets</b> <b>Hedgehogs</b> <b>Sugar Gliders</b> Animals used for commercial breeding	No	Added Clarity
<b>10-II.D</b>	Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration <b>and annually, in conjunction with the resident's</b>	Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration.	No	Reduced paperwork burden



Section	Previous Policy	Proposed Policy	Required Change	Impact
	annual reexamination.			
10-II.D	<b>Residents are not permitted to exercise pets or permit pets to deposit waste on project premises outside of the areas designated for such purposes.</b>	-N/A-	No	Added clarity; there are no designated pet areas.
10-II.D	The designated responsible party must not be another resident of HACSA-managed housing.	The designated responsible party must not be another resident of Homes for Good-managed housing. <b>The responsible party's information will be updated at the time of the annual recertification.</b>	No	Added Clarity
10-II.D	Pets that are not owned by a resident are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals or wildlife.	Pets that are not owned by a resident are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals or wildlife. <b>Residents may however have bird feeders.</b>	No	Added clarity
11-I.C	<b>Approximately 60 days prior to the end of the lease term,</b> HACSA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement.	<b>As the part of the annual recertification process,</b> Homes for Good will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement.	No	Added Clarity
12-I.B	For instances of domestic violence, dating violence, sexual assault, or stalking, the threat may be established through documentation outlined in section 16-VII.D, <b>or by any proof accepted by the PHA.</b>  The PHA will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. The PHA will	For instances of domestic violence, dating violence, sexual assault, or stalking, the threat may be established through documentation outlined in section 16-VII.D. <b>In order to request the emergency transfer, the requestor must submit an emergency transfer request form (HUD-5383) (Exhibit 16-4 of this ACOP), although, Homes for Good may waive this requirement in order</b>	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
	allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available.	<p><b>to expedite the transfer process.</b></p> <p>Homes for Good will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. Homes for Good will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available. <b>Homes for Good defines immediately available as a vacant unit, that is ready for move-in within a reasonable period of time, not to exceed 60 days.</b></p>		
<b>12-I.C</b>	-N/A-	<b>If the emergency transfer is necessary to protect a victim of domestic violence, dating violence, sexual assault, or stalking, Homes for Good will follow procedures outlined in Exhibit 16-4.</b>	Yes	Compliance with new VAWA guidance
<b>12-III.C</b>	<p>Exceptions to the good record requirement may be made when it is to HACSA's advantage to make the transfer.</p> <p>Exceptions <b>may</b> also be made when HACSA determines that a transfer is necessary to protect the health or safety of a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking and who provides documentation of abuse in accordance with section 16-VII.D of this ACOP.</p>	<p>Exceptions to the good record requirement may be made when it is to Homes for Good's advantage to make the transfer.</p> <p>Exceptions <b>will</b> also be made when Homes for Good determines that a transfer is necessary to protect the health or safety of a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking and who provides documentation of abuse in accordance with section 16-VII.D of this ACOP. <b>Tenants who are not in good standing may still request an emergency transfer under VAWA.</b></p>	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
12-III.F	-N/A-	<p><b>In order to request the emergency transfer under VAWA, the resident will be required to submit an emergency transfer request form (HUD-5383) (Exhibit 16-4 of this ACOP). Homes for Good may, on a case-by-case basis, waive this requirement and accept a verbal request in order to expedite the transfer process. If Homes for Good accepts an individual’s statement, Homes for Good will document acceptance of the statement in the individual’s file in accordance with 16-VII.D. of this ACOP. Transfer requests under VAWA will be processed in accordance with the Homes for Good Emergency Transfer Plan (Exhibit 16-3).</b></p>	Yes	Compliance with new VAWA guidance
12-IV.B.	<p>Transfers will be processed in the following order:</p> <p>1. Emergency transfers (hazardous maintenance conditions)</p>	<p>Transfers will be processed in the following order:</p> <p>1. Emergency transfers (hazardous maintenance conditions, <b>VAWA</b>)</p>	Yes	Compliance with new VAWA guidance
13-III.F.	<p>VAWA provides that no person may deny assistance, tenancy, or occupancy rights to public housing to a tenant <b>solely</b> on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, if the tenant or affiliated individual is the victim or threatened victim of such domestic violence,</p>	<p>VAWA provides that no person may deny assistance, tenancy, or occupancy rights to public housing to a tenant on the basis <b>or as a direct result</b> of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, if the tenant or affiliated individual is the victim or threatened victim of such domestic</p>	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
	dating violence, sexual assault, or stalking [FR Notice 8/6/13].	violence, dating violence, sexual assault, or stalking [FR Notice 8/6/13].		
<b>13-III.F</b>	-N/A-	<b>In order to demonstrate an actual and imminent threat, the PHA must have objective evidence of words, gestures, actions, or other indicators.</b>	Yes	Compliance with new VAWA guidance
<b>13-III.F</b>	<p>In determining whether a public housing tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:</p> <p>Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, sexual assault, or stalking</p> <p>Whether the threat is a physical danger beyond a speculative threat</p> <p>Whether the threat is likely to happen within a <b>short period of time</b></p>	<p>In determining whether a public housing tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:</p> <p>Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, sexual assault, or stalking</p> <p>Whether the threat is a physical danger beyond a speculative threat</p> <p>Whether the threat is likely to happen within <b>an immediate time frame</b></p>	Yes	Compliance with new VAWA guidance
<b>13-III.F</b>	-N/A-	<b>However, perpetrators should be given no more than 30 days' notice of termination in most cases. The PHA must not initiate eviction procedures against ineligible remaining family members until 30 days after the lease bifurcation [Notice PIH</b>	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<b>2017-08].</b>		
<b>13-IV.D</b>	All notices of lease termination will include <b>information about the protection against termination provided by the Violence against Women Reauthorization Act of 2013 (VAWA) for victims of domestic violence, dating violence, sexual assault, or stalking (see section 16 VII.C). The PHA will also include</b> a copy of the form HUD-5382 and <b>a notice of VAWA rights</b> to accompany the termination notice. Any tenant who claims that the cause for termination involves <b>(a) criminal acts of physical violence against family members or others or (b) incidents of</b> domestic violence, dating violence, sexual assault, or stalking of which the tenant or affiliated individual of the tenant is the victim will be given the opportunity to provide documentation in accordance with the policies in sections 13 III.F and 16-VII.D.	All notices of lease termination will include a copy of the forms HUD-5382 and <b>HUD-5380</b> to accompany the termination notice. Any tenant who claims that the cause for termination involves domestic violence, dating violence, sexual assault, or stalking of which the tenant or affiliated individual of the tenant is the victim will be given the opportunity to provide documentation in accordance with the policies in sections 13 III.F and 16-VII.D.	Yes	Compliance with new VAWA guidance
<b>14 – cost of copying</b>	cost of <b>\$5.00 initially and \$.05</b> per page.	cost of <b>\$.25</b> per page	No	Simplified policy, aligns with Section 8
<b>14-II.A</b>	HACSA will <b>conduct any recording of the informal hearing.</b>	<b>If the family chooses to record the hearing, HACSA will also record the hearing.</b>	No	Added Clarity
<b>14-III.D</b>	HACSA will accept requests for an informal settlement of a grievance either orally or in writing, to the HACSA office within 5 working days of the HACSA nonpayment of rent notice, 5 working days for lease termination notice, and	HACSA will accept requests for an informal settlement of a grievance either orally or in writing, to the HACSA office within 5 working days of the HACSA nonpayment of rent notice, 5 working days <b>(or prior to the termination</b>	No	Added Clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
	14 calendar days for any other <b>grievance</b> .	<b>date)</b> for lease termination notice, and 14 calendar days for any other <b>grievable event</b> .		
<b>14-III.G</b>	If the complainant would like HACSA to record the proceedings by audiotape, the request must be made to HACSA by 12:00 p.m. on the business day prior to the hearing. HACSA will record the proceedings.	If the complainant would like HACSA to record the proceedings by audiotape, the request must be made to HACSA by 12:00 p.m. on the business day prior to the hearing. HACSA will record the proceedings <b>if the complainant records</b> .	No	Added Clarity
<b>16-II.B</b>	Alternatively, the PHA may set flat rents at no less than 80 percent of the applicable small area FMR (SAFMR) for metropolitan areas, or <b>80</b> percent of the applicable unadjusted rents for nonmetropolitan areas.	Alternatively, the PHA may set flat rents at no less than 80 percent of the applicable small area FMR (SAFMR) for metropolitan areas, or <b>100</b> percent of the applicable unadjusted rents for nonmetropolitan areas.	Yes	Compliance with new Flat Rent guidance
<b>16-II.B</b>	The 2015 Appropriations Act permits PHAs to request an exception flat rent that is lower than either 80 percent of the FMR or SAFMR/unadjusted rent if the PHA can demonstrate that these FMRs do not reflect the market value of a particular property or unit.	The 2015 Appropriations Act permits PHAs to request an exception flat rent that is lower than either 80 percent of the FMR or SAFMR <b>or 100 percent of the</b> unadjusted rent if the PHA can demonstrate that these FMRs do not reflect the market value of a particular property or unit.	Yes	Compliance with new Flat Rent guidance
<b>16-II.B</b>	In determining flat rents, PHAs must consider the following: <ul style="list-style-type: none"> <li>• Location</li> <li>• Quality</li> <li>• Unit size</li> <li>• Unit type</li> <li>• Age of <b>property</b></li> <li>• Amenities at the property and in immediate neighborhood</li> <li>• Housing services provided</li> </ul>	In determining flat rents, PHAs must consider the following: <ul style="list-style-type: none"> <li>• Location</li> <li>• Quality</li> <li>• Unit size</li> <li>• Unit type</li> <li>• Age of <b>the unit</b></li> <li>• Amenities at the property and in immediate neighborhood</li> <li>• Housing services provided</li> </ul>	Yes	Compliance with new Flat Rent Guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<ul style="list-style-type: none"> <li>Maintenance provided by the PHA</li> <li>Utilities provided by the PHA</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance provided by the PHA</li> <li>Utilities provided by the PHA <b>and/or landlord for (comparable units in the market study)</b></li> <li><b>The PHA must provide a corresponding key explaining the calculations used for determining the valuation for each factor.</b></li> </ul>		
<b>16-II.B</b>	<p>PHAs must receive written HUD approval before implementing exception flat rents. PHAs <b>that use exception flat rents must conduct a new market analysis, and obtain HUD approval, annually.</b></p> <p>PHAs are now required to apply a utility allowance to flat rents. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.</p>	<p>PHAs must receive written HUD approval before implementing exception flat rents. PHAs <b>with a previously approved flat rent exception request may submit a written request to extend the approved flat rents for up to two additional years, provided local market conditions remain unchanged. Detailed information on how to request exception flat rents can be found in Notice PIH 2017-23.</b></p> <p>PHAs are now required to apply a utility allowance to flat rents <b>as necessary</b>. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.</p>	Yes	Compliance with new Flat Rent guidance
<b>16-II.B</b>	<p>No later than 90 days after <b>HUD publishes</b> new annual FMRs/SAFMRs/unadjusted rent, PHAs must revise flat rents as necessary based changes to the FMR/SAFMR/unadjusted rent. <b>The PHA must offer changes to the flat rent to all new admissions and to existing families at the next annual rent option.</b></p> <p>If</p>	<p>No later than 90 days after <b>the effective date of the</b> new annual FMRs/SAFMRs/unadjusted rent, PHAs must <b>implement new</b> flat rents as necessary based changes to the FMR/SAFMR/unadjusted rent <b>or request an exception.</b></p>	Yes	Compliance with new Flat Rent guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-V.B	-N/A-	<b>The PHA must keep confidential records of all emergency transfer requested under the PHA’s Emergency Transfer Plan, and the outcomes of such requests, and retain the records for a period of three years, or for a period of time as specific in program regulations [24 CFR 5.2002(e)(12)].</b>	Yes	Compliance with new VAWA guidance
16-V.B	<b>During the term of each public housing tenancy, and for at least four years thereafter, the PHA will keep</b> all documents related to a family’s eligibility, tenancy, and termination.	<b>The PHA will keep the last three years of the Form HUD-50058 and supporting documentation, and for at least three years after end of participation</b> all documents related to a family’s eligibility, tenancy, and termination.	Yes	Compliance with new record-retention guidance
16-V.B	In addition, the PHA will keep the following records for at least <b>four</b> years: <ul style="list-style-type: none"> <li>• An application from each ineligible family and notice that the applicant is not eligible</li> <li>• Lead-based paint records as required by 24 CFR 35, Subpart B</li> <li>• Documentation supporting the establishment of flat rents <b>and the public housing maximum rent</b></li> <li>• Documentation supporting the establishment of utility allowances and surcharges</li> <li>• Documentation related to PHAS</li> <li>• Accounts and other records supporting PHA budget and financial statements for the program</li> </ul>	In addition, the PHA will keep the following records for at least <b>three</b> years: <ul style="list-style-type: none"> <li>• An application from each ineligible family and notice that the applicant is not eligible</li> <li>• Lead-based paint records as required by 24 CFR 35, Subpart B</li> <li>• Documentation supporting the establishment of flat rents</li> <li>• Documentation supporting the establishment of utility allowances and surcharges</li> <li>• Documentation related to PHAS</li> <li>• Accounts and other records supporting PHA budget and financial statements for the program</li> <li>• Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final</li> </ul>	Yes	Compliance with new record-retention guidance



Section	Previous Policy	Proposed Policy	Required Change	Impact
	<ul style="list-style-type: none"> <li>Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule</li> <li>Other records as determined by the PHA or as required by HUD</li> </ul>	<p>rule</p> <ul style="list-style-type: none"> <li><b>Confidential records of all emergency transfers related to VAWA requested under the PHA’s Emergency Transfer Plan and the outcomes of such requests</b></li> <li>Other records as determined by the PHA or as required by HUD</li> </ul>		
<b>16-VI</b>	<b>Environmental Intervention</b> Blood Lead Level	<b>Elevated</b> Blood Lead Level (EBLL)	Yes	Compliance with new Lead guidance
<b>16-VI.A</b>	HACSA will provide written notice of each known case of a child with an EBLL to the HUD field office within five business days of receiving the information.	Homes for Good will provide written notice of each known case of a child with an EBLL to the HUD field office, <b>and to HUD’s Office of Lead Hazard Control (OLHCHH)</b> , within five business days of receiving the information.	Yes	Compliance with new Lead guidance
<b>16-VII.C</b>	Whenever HACSA has reason to suspect that providing information about VAWA to a public housing tenant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim.	Whenever Homes for Good has reason to suspect that providing information about VAWA to a public housing tenant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim <b>or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, Homes for Good may decide not to send mail regarding VAWA protections to the victim’s unit if Homes for Good believes the perpetrator may have access to the victim’s mail, unless requested by the victim.</b>  <b>When discussing VAWA with the victim,</b>	No	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p><b>Homes for Good will take reasonable precautions to ensure that no one can overhear the conversation such as having conversations in a private room.</b></p> <p><b>The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.</b></p>		
<b>16-VII.D</b>	<p>The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:</p> <p>(1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim.</p>	<p>The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:</p> <p>(1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. <b>The form may be filled out and submitted on behalf of the victim.</b></p>	Yes	Compliance with new VAWA guidance
<b>16-VII.D</b>	<p>HACSA may, at its discretion, extend the deadline for an additional 14 calendar days. If an extension is granted, HACSA will provide the extension in writing.</p>	<p>Homes for Good may, at its discretion, extend the deadline for an additional 14 calendar days. <b>In determining whether to extend the deadline, Homes for Good will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to</b></p>	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p><b>address health or safety issues.</b> If an extension is granted, Homes for Good will provide the extension in writing.</p> <p><b>Once the victim provides documentation, Homes for Good will acknowledge receipt of the documentation within 14 calendar days.</b></p>		
<b>16-VII.D</b>	<p>In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). The PHA must honor any court orders issued to protect the victim or to address the distribution of property.</p>	<p>In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). <b>The PHA may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the PHA.</b> The PHA must honor any court orders issued to protect the victim or to address the distribution of property. <b>Individuals have 30 calendar days to return third-party verification to the PHA. If the PHA does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the PHA must hold separate hearings for the tenants [Notice PIH 2017-08].</b></p>	Yes	Compliance with new VAWA guidance
<b>16-VII.D</b>	-N/A-	<b>When requesting third-party documents,</b>	Yes	Compliance with new

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p><b>the PHA will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation.</b></p> <p><b>If the PHA does not receive third-party documentation within the required timeframe (and any extensions) the PHA will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, the PHA will hold separate hearings for the applicants or tenants.</b></p>		VAWA guidance
<b>16-VII.D</b>	The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b)..	The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). <b>HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.</b>	Yes	Compliance with new VAWA guidance
<b>16-VII.D</b>	If HACSA <b>may</b> accepts an individual's statement or other corroborating evidence of domestic violence, dating violence, sexual assault, or stalking, HACSA will document acceptance of the statement or evidence in the individual's file.	If Homes for Good accepts an individual's statement or other corroborating evidence ( <b>as provided by the victim</b> ) of domestic violence, dating violence, sexual assault, or stalking, Homes for Good will document acceptance of the statement or evidence in the individual's file.	No	Correct typo and provide added clarity