



ANNUAL PLAN FOR FISCAL YEAR 2022



541-682-3755



www.homesforgood.org



100 West 13th Avenue, Eugene, OR 97401

Streamlined Annual PHA Plan <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>PHA Name: _____ PHA Code: _____</p> <p>PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performer</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____</p> <p>Total Combined _____</p> <p>PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <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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B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission? Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input type="checkbox"/> Financial Resources. <input type="checkbox"/> <input type="checkbox"/> Rent Determination. <input type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input type="checkbox"/> Pet Policy. <input type="checkbox"/> <input type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input 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>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p>

B.4.	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>Other Document and/or Certification Requirements.</p>	
C.1	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p>Form 50077-ST-HCV-HP, <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>
C.2	<p>Civil Rights Certification.</p> <p>Form 50077-ST-HCV-HP, <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>
C.3	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input 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>
C.4	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>D Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
D.1	<p>Capital Improvements. 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>

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. (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(j))

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.”

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.



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Attachment B.1 Revision of PHA Plan Elements

Statement of Housing Needs and Strategy for Addressing Housing Needs

The assessment of the impediments to fair housing and fair housing plan strategies, was developed with input from the City of Eugene and the City of Springfield Consolidated plan 2020.

As a first step in this effort Homes for Good assessed 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 2020 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 homeowners are also cost burdened (Eugene – 32%, Springfield – 33%). The elderly makes 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 is 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.

Homes for Good is addressing this need in a variety of ways which include:

- New Construction
- Administrative
- Preservation
- Development Pipeline

New Construction

7 New Construction projects are recently completed or currently underway totaling 224 units with total budgets over \$62 million

<p>Market District Commons (\$17 million total budget)</p>	<p>This 50-unit project is the culmination of 6 years of pre-development planning and is a cornerstone of an unprecedented level of investment in downtown revitalization.</p> <p>Completed construction in October of 2020.</p> <p>15 Project Based Section 8 vouchers awarded to the project.</p> <p>These units will be prioritized for veterans experiencing homelessness and people with disabilities.</p>
<p>The Commons on MLK (\$13 million total budget)</p>	<p>This 51-unit project completed construction in January of 2021 is a powerful partnership with Lane County to implement the priorities/goals of the Poverty and Homelessness Board.</p> <p>The project has received the following capital commitments - \$3mm from OHCS for a non-competitive housing first project, \$500k from Trillium, \$750k from the Federal Home Loan Bank, \$540k from the Oregon Health Authority, \$500k from Pacific Source, \$1.1mm from the City of Eugene and we have two outstanding requests of \$500k each from Kaiser and Peace Health.</p> <p>The project has received the following supportive services commitments - \$180k from Pacific Source and \$250k each from Kaiser and Pacific Source.</p> <p>51 Project Based Section 8 vouchers have been awarded to the project.</p>
<p>Sarang (1 of 2 projects part of \$32mm Rental Assistance Demonstration Preservation RAD replacement Project.)</p>	<p>This 49-unit project is one of two different sites in one financial transaction. for Good received approval from HUD through the RAD program to sell 100 single family homes and duplexes that receive a Public Housing rental/operating subsidy and converting these subsidies to a Section 8 subsidy that will be place into 100 newly constructed units. This project be complete in June of 2021 and will produce 49 of the units in Eugene.</p>
<p>Hayden Bridge Landing (2nd RAD replacement project)</p>	<p>This 70-unit project is the second site in the one financial transaction and will be complete in June of 2021. This project will produce the remaining 53 replacement of the units in Springfield with attached rental subsidy and an additional 17 units that will provide much needed one-bedroom units.</p>
<p>Legion Cottages</p>	<p>This 4-unit tiny home project in Cottage Grove was completed in December of 2020 and is providing much needed housing for homeless veterans.</p>
<p>The Keystone</p>	<p>This 15-unit Permanent Supportive Housing development in Eugene will serve homeless families and includes 15 PBVs. It began construction in January of 2021 and will be complete in fall of 2021.</p>
<p>The Nel</p>	<p>This 45-unit Permanent Supportive Housing development in Eugene will serve homeless individuals and includes 45 PBVs. It will begin construction in May 2021 and will be complete in Spring of 2022.</p>

Administrative

100 West 13 th Ave	\$10 mm acquisition and renovation of new administrative headquarters at in Eugene completed in May 2020
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Preservation

Sheldon Village	<p>\$4.3mm preservation project for Sheldon Village through comprehensive rehabilitation.</p> <p>This 78-unit project that was built in 2 phases in 2004 and 2005. Capital needs assessment completed in 2015 indicated significant envelope and water intrusion issues.</p> <p>Comprehensive rehabilitation completed in late 2019</p>
Future RAD Conversions	<p>Homes for Good is looking at future phases of converting the remaining public housing through the RAD process.</p> <p>Preservation of Federal Subsidies in Lane County – Homes for Good is looking at several developments that may need preservation work to preserve ongoing federal subsidies.</p>

Development Pipeline

Lazy Days	Homes for Good is in a Purchase agreement to purchase part of a mobile home park up the McKenzie River that was destroyed in the Holiday Farm fire. The park will be used for temporary and permanent housing.
Turnkey	Lane County acquired a 50-unit hotel that it is using to house people displaced by wildfires. Once that use is complete the property will be transferred to Homes for Good and converted to Permanent Supportive Housing.
Glenwood	Homes for Good acquired property in Glenwood that will be used for a future development of 100 to 150 units.
Springfield	Homes for Good is looking to acquire property in Springfield to facilitate Early Learning Hubs paired with affordable housing.
Rural Lane County	Homes for Good is working with Lane County and the cities of Cottage Grove and Florence to acquire land for rural affordable housing projects
Permanent Supportive Housing	Homes for Good is working with Lane County and has identified several sites in the Metro area that will be used for future PSH projects.

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:

1. Limited Awareness of Fair Housing Policies in the Broader Community;
2. Cultural differences and language barriers which inhibit access to fair housing, and;
3. 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 Lane County Poverty and Homeless Board.

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 continues to serve on the board of the Lane County Rental Owner's Association (ROA). This board meets monthly. As of June 2020, the ROA has 1228 members representing 16,764 rental properties in Lane County. Homes for Good's Landlord Liaison, Travis Baker also routinely participates in the ROA. Travis attends the monthly general membership meeting, provides informational seminars on Homes for Good's housing programs and submits monthly articles to the ROA newsletter.

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.

Homes for Good continues to support Blacks in Government and NAACP at their annual celebrations and educational events.

Homes for Good is planning a 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.

Homes for Good staff participate 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 is actively in engaged in placing the briefing, which include maps noting concentrations of poverty within Lane County, on its website. Placement on the website will create ease of access to those we serve and will allow Homes for Good to continue to provide housing even with social distance measures in place, given COVID-19.

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:

We are working on our Diversity, Equity and Inclusion initiative which includes staff education and an equity centered service and programing. We will be creating an Equity Strategy Team to help guide our work.

Conduct targeted recruitments for bilingual employees. At the present time there are 11 bilingual employees (English/Spanish). Homes for Good also has 4 staff members proficient in German, Dutch, Czech, Polish, Hindi and French.

Homes for Good has implemented a Language Access Plan, which will provide access to translation services as needed for participants as well as provide our most commonly used forms in various languages.

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. Waiver requests to HUD to allow CARES Act funds to be utilized for deposits and fees.

Administer an Emergency Housing Assistance (EHA) grant which assists Mainstream voucher holders with miscellaneous costs related to lease-up. Mainstream Vouchers serve non-elderly disabled persons.

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

Provide sufficient ADA units in public housing and LIHTC housing.

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

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

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 administrative office 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 (HUD) / 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 administrative office 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

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, retained, and available to HUD upon request

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.

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 DevNW (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 DevNW, should the applicant default.

Financial Resources

HOMES FOR GOOD HOUSING AGENCY BUDGET - SUMMARY OF RESOURCES - FY 2020

PROGRAM	BEGINNING RESERVE	FEDERAL REVENUE	RENT	OTHER	TOTAL
Community Services					
Development	9,900,000	-	245,000	25,295,000	35,440,000
Weatherization	47,000	1,117,000	-	648,000	1,812,000
Shelter Plus Care	5,000	817,000	-	-	822,000
Herran Center	497,000	-	259,000	-	756,000
Signpost House	279,000	-	90,000	-	369,000
Family Self Sufficiency	-	287,000	-	-	287,000
VA Per Diem	-	150,000	-	-	150,000
Family Shelter House	50,000	-	62,000	-	112,000
ROSS	-	88,000	-	-	88,000
Emergency Housing Assistance	-	34,000	-	-	34,000
Homes for Good Foundation	-	-	-	2,000	2,000
	10,778,000	2,493,000	656,000	25,945,000	39,872,000
Housing					
Public Housing	1,542,000	1,588,000	2,019,000	40,000	5,189,000
Firwood	198,000	-	600,000	1,800	799,800
Norseman	395,000	-	300,000	-	695,000
Jacob's Lane	233,000	-	400,000	10,500	643,500
Sheldon Village Apartments	-	-	600,000	4,300	604,300
Village Oaks	147,000	92,000	400,000	7,000	646,000
Fourteen Pines	302,000	286,000	200,000	4,000	792,000
Laurel Gardens	143,000	-	200,000	5,900	348,900
Walnut Park	63,000	-	250,000	4,000	317,000
The Orchards	27,000	-	250,000	1,500	278,500
Abbie Lane	165,000	225,000	100,000	1,000	491,000
Camas Place	47,000	-	200,000	-	247,000
Capital Fund	-	1,494,000	-	-	1,494,000
	3,262,000	3,685,000	5,519,000	80,000	12,546,000
Rental Assistance	1,984,000	21,746,000	-	-	23,730,000
Central Office Cost Center	-	-	685,000	2,708,000	3,393,000
TOTALS	\$ 16,024,000	\$ 27,924,000	\$ 6,860,000	\$ 28,733,000	\$ 79,541,000



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**KEY MODIFICATIONS TO THE HOMES FOR GOOD
PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) FISCAL YEAR 2022
EFFECTIVE DATE 10-1-2021 TO 9-30-2022**

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) FISCAL YEAR 2022
PROPOSED EFFECTIVE DATE 10-1-2021**

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.B. REQUIRED DENIAL OF ADMISSION	The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past three years for drug-related criminal activity, if the PHA is able to verify that the 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.	The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past three years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed or is currently participating in a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime is no longer living in the household.	No	Allows households to maintain housing during recovery.
3-III.B. REQUIRED DENIAL OF ADMISSION	Currently engaged in is defined as any use of illegal drugs during the previous six months.	Currently engaged in is defined as any use of illegal drugs during the previous three months.	No	Allows households to gain stability early during recovery.
3-III.D. SCREENING	The PHA will deny admission to an applicant family if the PHA determines that the family:	The PHA may deny admission to an applicant family if the PHA determines that the family:	No	Allows flexibility by the PHA in favor of the tenant. Fairness will be maintained through written procedures.
3-III.D. SCREENING	The PHA will consider the family's history with respect to the following factors:	The PHA may consider the family's history with respect to the following factors:	No	Allows flexibility by the PHA in favor of the tenant. Fairness will be maintained through written procedures.
3-III.D. SCREENING	In order to determine the suitability of applicants the PHA will examine applicant history for the past five years.	In order to determine the suitability of applicants the PHA may examine applicant history for the past three years. Such background checks may include:	No	Allows flexibility by the PHA in favor of the tenant. Fairness will be maintained through written procedures.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	Such background checks will include:			

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.E. CRITERIA FOR DECIDING TO DENY ADMISSION	The PHA 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.	The PHA may require the applicant to submit evidence of the household member's successful completion of or active engagement in a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.	No	Allows households to gain stability early during recovery.
4-I.B. APPLYING FOR ASSISTANCE	<p>A lack of credit history will not disqualify someone from becoming a public housing resident, but a poor credit rating may.</p> <p>Applicants with no rental payment history will also be asked to provide the PHA with alternative references. The references will be requested to complete a verification of the applicant's ability to pay rent if no other documentation of ability to meet financial obligations is available. The applicant will also be required to complete a checklist documenting their ability to meet financial obligations.</p>	Paragraphs deleted	No	Reduces barriers to housing for households experiencing homelessness or housing instability.

Section	Previous Policy	Proposed Policy	Required Change	Impact
4-I.B. APPLYING FOR ASSISTANCE	<p>Families may obtain application forms from the PHA's office during normal business hours. Pre-applications may also be downloaded from the PHA website. Families may also request – by telephone or by mail – that an application form be sent to the family via first class mail.</p> <p>Completed applications must be returned to the PHA by mail, electronically, by fax, or submitted in person during normal business hours. Applications must be filled out completely in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will notify the family of the additional information required.</p>	Deleted paragraphs	No	Reflects the PHA move to an electronic pre-application portal.
4-I.D. PLACEMENT ON THE WAITING LIST	Applicants will be placed on the waiting list according to PHA preference(s) and the date and time their complete application is received by the PHA.	Applicants will be placed on the waiting list according to PHA preference(s) and a random selection and ranking method assigned at the time the waiting list closes.	No	Allows applicants with limited technology, limited technology skills, or schedule barriers to not be penalized by an inability to apply immediately at the opening of a wait list, in order to be housed sooner.

Section	Previous Policy	Proposed Policy	Required Change	Impact
4-I.D. PLACEMENT ON THE WAITING LIST	<p>The PHA will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5). Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines (as long as the unit is not overcrowded according to PHA standards and local codes). However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition.</p>	<p>Deleted paragraph</p>	<p>No</p>	<p>The PHA will allow families to choose the correct bedroom size for their household within occupancy standards, rather than assigning one.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
4-II.B. ORGANIZATION OF THE WAITING LIST	<p>The waiting list will contain the following information for each applicant listed:</p> <p>Name and social security number (if applicable) of head of household</p> <p>Unit size required (number of family members)</p> <p>Amount and source of annual income</p> <p>Accessibility requirement, if any</p> <p>Date and time of application or application number</p> <p>Household type (family, elderly, disabled)</p> <p>Admission preference, if any</p> <p>Race and ethnicity of the head of household</p> <p>The specific site(s) selected (only if PHA offers site-based waiting lists)</p>	<p>The waiting list will contain the following information for each applicant listed:</p> <p>Name and social security number (if applicable) of head of household</p> <p>Unit size required (number of family members)</p> <p>Amount and source of annual income</p> <p>Accessibility requirement, if any</p> <p>Random selection number</p> <p>Household type (family, elderly, disabled)</p> <p>Admission preference, if any</p> <p>Race and ethnicity of the head of household</p> <p>The specific site(s) selected (only if PHA offers site-based waiting lists)</p>	<p>No</p>	<p>Reflects that the head of household is not required to be a citizen or eligible noncitizen.</p> <p>Includes the shift to a random selection method for ordering the wait list.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES</p>	<p>While the family is on the waiting list, the family must inform the PHA, within 14 calendar days, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing, via telephone, in person, or by email, and a note added to the applicant's file.</p> <p>Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.</p>	<p>While the family is on the waiting list, the family must inform the PHA, as soon as possible, of changes in preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing, via telephone, in person, or by email, and a note added to the applicant's file.</p> <p>Deleted paragraph</p>	<p>No</p>	<p>An applicant's position on the wait list will only be reassessed when they come to the top of the wait list.</p>
<p>4-II.F. UPDATING THE WAITING LIST</p>	<p>The waiting list will be updated as needed to ensure that all applicant information is current and timely.</p> <p>To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify</p>	<p>The waiting list will be updated as needed to ensure that all applicant information is current and timely.</p> <p>To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by</p>	<p>No</p>	<p>Extends the deadline to respond for households that have been waiting a long time for housing. Mail delays or not residing at their mailing address may disadvantage some households in response times.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.</p> <p>The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 14 calendar days from the date of the PHA letter.</p> <p>If the family fails to respond within 14 calendar days, the family will be removed from the waiting list without further notice.</p> <p>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.</p> <p>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 calendar days to respond from</p>	<p>which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list without further notice.</p> <p>The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 30 calendar days from the date of the PHA letter.</p> <p>If the family fails to respond within 30 calendar days, the family 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.</p> <p>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 30 calendar days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
	the date the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.			
4-III.B. SELECTION METHOD	Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.	Families will be selected from the waiting list based on preference and a random selection ranking method at the time the waiting list closes. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.	No	Reflects a change to the random selection method for fairness.

Section	Previous Policy	Proposed Policy	Required Change	Impact
5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS	Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be assessed on a case-by-case basis, if the family agrees that the unit will meet their daily living needs, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition.	Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be assessed on a case-by-case basis, if the family agrees that the unit will meet their daily living needs, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition. Requests need supervisor approval.	No	Ensures greater consistency in permitting exceptions to normal policy.

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>5-II.B. NUMBER OF OFFERS</p>	<p>Applicants will receive one offer to a suitable unit in the site-based location indicated by the applicant. If the offer is rejected without good cause, the application for that location will be withdrawn., and the applicant will be offered the next suitable unit that becomes available at another site-based location indicated by the application. The second unit offer will be the final offer, unless there is good cause for refusing the offer.</p> <p>If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.</p> <p>Each applicant gets a maximum of two offers. The two offers will be at different site-based locations.</p>	<p>Applicants will receive one offer to a suitable unit in the site-based location indicated by the applicant. If the offer is rejected without good cause, the application for that bedroom-size wait list will be withdrawn.</p> <p>If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.</p>	<p>No</p>	<p>Supports the shift to site-based, bedroom-size wait lists.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>5-II.C. TIME LIMIT FOR UNIT OFFER ACCEPTANCE OR REFUSAL</p>	<p>Applicants must accept or refuse a unit offer within 3 business days of the date of the unit offer. Applicants who fail to respond within three business days will be considered to have refused the unit.</p> <p>Offers made solely by mail will be given three additional days for mailing time.</p>	<p>Applicants must accept or refuse a unit offer within 3 business days of the date of the unit offer. Applicants who fail to respond within three business days will be considered to have refused the unit.</p> <p>Offers made solely by mail will be given three additional days for mailing time.</p> <p>Applicants who fail to respond within 3 business days will not be removed from the wait list.</p>	<p>No</p>	<p>Reduces barriers for households experiencing housing instability or homelessness.</p>
<p>5-II.D. REFUSALS OF UNIT OFFERS</p>	<p>When an applicant rejects the second unit offer without good cause, the PHA will remove the applicant's name from the waiting list for all site-based developments, and send notice to the family of such removal. The notice will inform the family of their right to request an informal hearing and the process for doing so (see Chapter 14).</p>	<p>When an applicant rejects the unit offer without good cause, the PHA will remove the applicant's name from the waiting list for the bedroom-size wait list, and send notice to the family of such removal. The notice will inform the family of their right to request an informal hearing and the process for doing so (see Chapter 14).</p>	<p>No</p>	<p>Supports the shift to site-based, bedroom-size wait lists.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
5-II.E. ACCESSIBLE UNITS	<p>When offering an accessible unit to a non-disabled applicant, the PHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features of the unit and there is another unit available for the non-disabled family. This requirement will be a provision of the lease agreement.</p>	<p>When offering an accessible unit to a non-disabled applicant, the PHA will require the applicant to agree to move to an available non-accessible unit within 30 calendar days when either a current resident or an applicant needs the features of the unit and there is another unit available for the non-disabled family. This requirement will be a provision of the lease agreement.</p>	No	Clarifies existing timeframe.
9-I.D. CONDUCTIN G ANNUAL REEXAMINAT IONS	<p>At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. The PHA will use the Law Enforcement Data System (LEDS) to verify the information provided by the tenant.</p>	<p>At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state.</p>	No	Removes a screening method that will no longer be available.
9-III.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITIO N	<p>All families, those paying income-based rent, flat rent, and fair market rent must report all changes in family and household composition that occur between annual reexaminations (or annual updates).</p> <p>The PHA will conduct interim reexaminations to account for any changes in household</p>	<p>All families, those paying income-based rent, flat rent, and fair market rent must report all changes in family and household composition that occur between annual reexaminations (or annual updates).</p> <p>The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.</p> <p>The PHA will not conduct a reexamination of income when a new</p>	No	Clarifies the process of adding individuals to in-place households.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>composition that occur between annual reexaminations.</p>	<p>family member is added. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member.</p> <p>However, if the new member qualifies for a dependent deduction, an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
12-I.B. EMERGENCY TRANSFERS	<p>The PHA will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. The PHA will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available. The PHA defines immediately available as a vacant unit, that is ready for move-in within a reasonable period of time, not to exceed 60 days. If an internal transfer to a safe unit is not immediately available, the PHA will assist the resident in seeking an external emergency transfer either within or outside the PHA's programs.</p>	<p>The PHA will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. The PHA will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available. The PHA defines immediately available as a vacant unit, that is ready for move-in within a reasonable period of time, not to exceed 60 calendar days. If an internal transfer to a safe unit is not immediately available, the PHA will assist the resident in seeking an external emergency transfer either within or outside the PHA's programs.</p>		<p>Clarifies an existing timeframe.</p>
12-II.B. TYPES OF PHA REQUIRED TRANSFERS	<p>If the relocation plan calls for transferring public housing families to other public housing units, affected families will be placed on the transfer list.</p>	<p>If the relocation plan calls for transferring public housing families to other public housing units, affected families will be placed on the Demolition, Disposition, Revitalizations, or Rehabilitation transfer list and the bedroom-size wait list at the property they selected.</p>	<p>No</p>	<p>Clarifies how RAD household transfers will be tracked and audited.</p>

<p>12-III.B. TYPES OF RESIDENT REQUESTED TRANSFERS</p>	<p>The types of requests for transfers that the PHA will consider are limited to requests for transfers to alleviate a serious or life threatening medical condition, transfers due to a threat of physical harm or criminal activity, reasonable accommodation, transfers to a different unit size as long as the family qualifies for the unit according to the PHA's occupancy standards, and transfers to a location closer to employment. No other transfer requests will be considered by the PHA.</p> <p>The PHA will consider the following as high priority transfer requests:</p> <p>When a transfer is needed to alleviate verified medical problems of a serious or life-threatening nature</p> <p>When there has been a verified threat of physical harm or criminal activity. Such circumstances may, at the PHA's discretion, include an assessment by law enforcement indicating that a family member is the actual or potential victim of a criminal attack, retaliation for testimony, or a hate crime.</p> <p>When a family requests a transfer as a reasonable</p>	<p>The types of requests for transfers that the PHA will consider are limited to requests for transfers to alleviate a serious or life threatening medical condition, transfers due to a threat of physical harm or criminal activity, reasonable accommodation, transfers to a different unit size as long as the family qualifies for the unit according to the PHA's occupancy standards, and transfers to a location closer to employment or education. No other transfer requests will be considered by the PHA.</p> <p>The PHA will consider the following as high priority transfer requests:</p> <p>When a transfer is needed to alleviate verified medical problems of a serious or life-threatening nature</p> <p>When there has been a verified threat of physical harm or criminal activity. Such circumstances may, at the PHA's discretion, include an assessment by law enforcement indicating that a family member is the actual or potential victim of a criminal attack, retaliation for testimony, or a hate crime.</p> <p>When a family requests a transfer as a reasonable accommodation. Examples of a reasonable accommodation transfer include, but are not limited to, a transfer to a first floor unit for a person with mobility impairment, or a transfer to a unit with accessible features</p> <p>The PHA will consider the following as regular priority transfer requests:</p> <p>When a family requests a larger bedroom size unit even though the family does not meet the PHA's definition of overcrowded, as long as the family meets the PHA's occupancy standards for the requested size unit</p>	<p>No</p>	<p>Allows transfer requests for educational opportunities. Removes a 25 mile requirement and the necessity of the PHA to make a public transportation accessibility determination.</p>
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Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>accommodation. Examples of a reasonable accommodation transfer include, but are not limited to, a transfer to a first floor unit for a person with mobility impairment, or a transfer to a unit with accessible features</p> <p>The PHA will consider the following as regular priority transfer requests:</p> <p>When a family requests a larger bedroom size unit even though the family does not meet the PHA's definition of overcrowded, as long as the family meets the PHA's occupancy standards for the requested size unit</p> <p>When the head of household or spouse is employed or in an educational or training program 25 miles or more from the public housing unit., has no reliable transportation, and public transportation is not adequate</p> <p>Transfers requested by the tenant are considered optional for the tenant.</p>	<p>When a household member is employed or in an educational or training program outside city limits from the public housing unit.</p> <p>Transfers requested by the tenant are considered optional for the tenant.</p>		

<p>12-III.C. ELIGIBILITY FOR TRANSFER</p>	<p>Except where reasonable accommodation is being requested, the PHA will only consider transfer requests from residents that meet the following requirements:</p> <p>Have not engaged in criminal activity that threatens the health and safety of residents and staff</p> <p>Owe no back rent or other charges, or have a pattern of late payment</p> <p>Have no housekeeping lease violations or history of damaging property</p> <p>Can get utilities turned on in the name of the head of household (applicable only to properties with tenant-paid utilities)</p> <p>A resident with housekeeping standards violations or lease enforcement or termination of tenancy in progress will not be transferred until the resident passes a follow-up housekeeping inspection.</p>	<p>Except where reasonable accommodation is being requested, the PHA will only consider transfer requests from residents that meet the following requirements:</p> <p>Have no lease enforcement or termination of tenancy in progress</p> <p>Have no current housekeeping lease violations or history of damaging property</p> <p>A resident with housekeeping standards violations or lease enforcement or termination of tenancy in progress will be sent a transfer request denial letter until the resident passes a follow-up housekeeping inspection or all lease enforcement has been cured.</p> <p>Exceptions to the good record requirement may be made with Division director approval.</p> <p>Exceptions will also be made when the PHA 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. Tenants who are not in good standing may still request an emergency transfer under VAWA.</p>	<p>No</p>	<p>Clarifies existing policy.</p>
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	<p>Exceptions to the good record requirement may be made with Division director approval.</p> <p>Exceptions will also be made when the PHA 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. Tenants who are not in good standing may still request an emergency transfer under VAWA.</p> <p>If a family requested to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines, the family will not be eligible to transfer to a larger size unit for a period of two years from the date of admission, unless they have a change in family size or composition, or it is needed as a reasonable accommodation.</p>			
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<p>12-III.F. HANDLING OF REQUESTS</p>	<p>The PHA will respond by approving the transfer and putting the family on the transfer list, by denying the transfer, or by requiring more information or documentation from the family, such as documentation of domestic violence, dating violence, sexual assault, or stalking in accordance with section 16-VII.D of this ACOP.</p>	<p>The PHA will respond by approving the transfer and putting the family on the transfer list and the bedroom-size wait list at the properties they selected, by denying the transfer, or by requiring more information or documentation from the family, such as documentation of domestic violence, dating violence, sexual assault, or stalking in accordance with section 16-VII.D of this ACOP.</p>		<p>Reflects the shift to site-based, bedroom-size specific wait lists.</p>
<p>13-III.B. MANDATORY LEASE PROVISIONS</p>	<p>The PHA will terminate the lease for drug-related criminal activity engaged in on or off the premises by any tenant, member of the tenant's household or guest, and any such activity engaged in on the premises by any other person under the tenant's control.</p>	<p>The PHA may terminate the lease for drug-related criminal activity engaged in on or off the premises by any tenant, member of the tenant's household or guest, and any such activity engaged in on the premises by any other person under the tenant's control.</p>		<p>Provides additional flexibility to keep individuals housed.</p>

<p>13-III.B. MANDATORY LEASE PROVISIONS</p>	<p>The PHA will terminate the lease when the PHA determines that a household member is illegally using a drug or the PHA determines that a pattern of illegal use of a drug interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p>A pattern of illegal drug use means more than one incident of any use of illegal drugs during the previous six months.</p> <p>The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of household members related to the use of illegal drugs.</p> <p>A record of arrest(s) will not be used as the basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>	<p>The PHA may terminate the lease when the PHA determines that a household member is illegally using a drug or the PHA determines that a pattern of illegal use of a drug interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p>A pattern of illegal drug use means more than one incident of any use of illegal drugs during the previous six months.</p> <p>The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of household members related to the use of illegal drugs.</p> <p>A record or records of arrest(s) will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>	<p>No</p>	<p>Provides additional flexibility to keep individuals housed.</p>
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<p>13-III.B. MANDATORY LEASE PROVISIONS</p>	<p>The PHA will terminate the lease when a covered person engages in any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including PHA management staff residing on the premises) or by persons residing in the immediate vicinity of the premises.</p> <p>Immediate vicinity means within a three-block radius of the premises. The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of covered persons related to the criminal activity.</p> <p>A record of arrest(s) will not be used as the basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>	<p>The PHA may terminate the lease when a covered person engages in any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including PHA management staff residing on the premises) or by persons residing in the immediate vicinity of the premises.</p> <p>Immediate vicinity means within a three-block radius of the premises. The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of covered persons related to the criminal activity.</p> <p>A record or records of arrest(s) will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>		<p>Provides additional flexibility to keep individuals housed.</p>
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<p>13-III.B. MANDATORY LEASE PROVISIONS</p>	<p>The PHA will terminate the lease if the PHA determines that a household member has engaged in abuse or a pattern of abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p>A pattern of such alcohol abuse means more than one incident of any such abuse of alcohol during the previous six months. The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of household members related to the abuse of alcohol.</p> <p>A record of arrest(s) will not be used as the basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>	<p>The PHA may terminate the lease if the PHA determines that a household member has engaged in abuse or a pattern of abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p>A pattern of such alcohol abuse means more than one incident of any such abuse of alcohol during the previous six months.</p> <p>The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of household members related to the abuse of alcohol.</p> <p>A record or records of arrest(s) will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>	<p>No</p>	<p>Provides additional flexibility to keep individuals housed.</p>
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<p>13-III.B. MANDATORY LEASE PROVISIONS</p>	<p>The PHA will may terminate the lease if the PHA determines that a household member has furnished false or misleading information concerning illegal drug use, alcohol abuse, or rehabilitation of illegal drug users or alcohol abusers.</p>	<p>The PHA may terminate the lease if the PHA determines that a household member has furnished false or misleading information concerning illegal drug use, alcohol abuse, or rehabilitation of illegal drug users or alcohol abusers.</p>	<p>No</p>	<p>Provides additional flexibility to keep individuals housed.</p>
<p>13-III.B. MANDATORY LEASE PROVISIONS</p>	<p>The PHA will terminate the lease for the following violations of tenant obligations under the lease:</p> <p>Failure to make payments due under the lease, including nonpayment of rent (see Chapter 8 for details pertaining to lease requirements for payments due);</p>	<p>The PHA may terminate the lease for the following violations of tenant obligations under the lease:</p> <p>Failure to make payments due under the lease, including nonpayment of rent (see Chapter 8 for details pertaining to lease requirements for payments due);</p>	<p>No</p>	<p>Provides additional flexibility to keep individuals housed.</p>
<p>13-III.C. OTHER AUTHORIZED REASONS FOR TERMINATION</p>	<p>The PHA will terminate the lease for the following reasons.</p>	<p>The PHA may terminate the lease for the following reasons.</p>	<p>No</p>	<p>Changing from “will” to “may” gives the PHA additional flexibility on lower severity lease violations, such as pet violations, unreported children in the home, and failure to make repayment agreement payments on time.</p> <p>The goal is to keep residents in their home. The PHA will utilize the written progressive lease enforcement procedure and work with families to</p>

				problem-solve issues rather than immediately sending lease termination notices.
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13-III.D. ALTERNATIVES TO TERMINATION OF TENANCY	As a condition of the family's continued occupancy, the head of household must certify that the culpable household member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former household member's current address upon PHA request.	As a condition of the family's continued occupancy, the head of household must certify that the culpable household member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit.	No	Removes a burden from households to provide proof that they may not have control over or access to.
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<p>13-III.E. CRITERIA FOR DECIDING TO TERMINATE TENANCY</p>	<p>The PHA will consider the following facts and circumstances before deciding whether to terminate the lease for any of the HUD required lease provisions or for any other reasons: The seriousness of the offending action, especially with respect to how it would affect other residents' safety or property The extent of participation or culpability of the leaseholder, or other household members, in the offending action, including whether the culpable member is a minor, a person with disabilities, or (as discussed further in section 13-III.F) a victim of domestic violence, dating violence, sexual assault, or stalking The effects that the eviction will have on other family members who were not involved in the action or failure to act The effect on the community of the termination, or of the PHA's failure to terminate the tenancy The effect of the PHA's decision on the integrity</p>	<p>The PHA will consider the following facts and circumstances before deciding whether to terminate the lease for any of the HUD required lease provisions or for any other reasons: The seriousness of the offending action, especially with respect to how it would affect other residents' safety or property The extent of participation or culpability of the leaseholder, or other household members, in the offending action, including whether the culpable member is a minor, a person with disabilities, or (as discussed further in section 13-III.F) a victim of domestic violence, dating violence, sexual assault, or stalking The effects that the eviction will have on other family members who were not involved in the action or failure to act The effect on the community of the termination, or of the PHA's failure to terminate the tenancy The effect of the PHA's decision on the integrity of the public housing program</p>	<p>No</p>	<p>Prioritizes keeping people housed over waiting list admissions.</p>
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	of the public housing program The demand for housing by eligible families who will adhere to lease responsibilities			
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<p>13-III.E. CRITERIA FOR DECIDING TO TERMINATE TENANCY</p>	<p>In determining whether to terminate the lease for illegal drug use or a pattern of illegal drug use, or for abuse or a pattern of abuse of alcohol, by a household member who is no longer engaging in such use or abuse, the PHA will consider whether such household member is or has successfully completed a supervised drug or alcohol rehabilitation program. For this purpose the PHA will require the tenant to submit evidence of the household member's or successful completion of a supervised drug or alcohol rehabilitation program.</p>	<p>In determining whether to terminate the lease for illegal drug use or a pattern of illegal drug use, or for abuse or a pattern of abuse of alcohol, by a household member who is no longer engaging in such use or abuse, the PHA will consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program. For this purpose the PHA will require the tenant to submit evidence of the household member's participation in or successful completion of a supervised drug or alcohol rehabilitation program.</p>	<p>No</p>	<p>Provides flexibility in keeping people housed during recovery.</p>
<p>13-IV.D. LEASE TERMINATION NOTICE</p>		<p>If the PHA offers remote hearings, the notice will also state that the resident may request a remote hearing.</p> <p>If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the resident informing them of the right to request a hearing, the resident will be notified that the hearing will be conducted remotely. The resident will be informed of the processes involved in a remote hearing and that the PHA will provide technical assistance, if needed, before the hearing.</p>	<p>Yes</p>	<p>Updates to new technology and addresses current global conditions.</p>

14-III.G. PROCEDURES GOVERNING THE HEARING	If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 30 minutes. If the tenant appears within 20 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 30 minutes of the scheduled time, they will be considered to have failed to appear.	If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 20 minutes. If the tenant appears within 20 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 20 minutes of the scheduled time, they will be considered to have failed to appear.	No	Alignment with Section 8
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**KEY MODIFICATIONS TO THE HOMES FOR GOOD
RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2022
EFFECTIVE DATE 10-1-2021 TO 9-30-2022**

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

Chapter 3: Eligibility

Chapter 4: Applications, Waiting List, and Tenant Selection

Chapter 5: Briefings and Voucher Issuance

Chapter 6: Income and Subsidy Determinations

Chapter 7: Verification

Chapter 8: Housing Quality Standards and Rent Reasonableness Determinations

Chapter 11: Reexaminations

Chapter 12: Termination of Assistance and Tenancy

Chapter 13: Owners

Chapter 16: Program Administration

Chapter 17: Project-Based Vouchers

Chapter 18: Project-Based Vouchers (PBV) Under the Rental Assurances Demonstration (RAD) Program

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)
PROPOSED EFFECTIVE DATE 10-1-2021**

Section	Previous Policy	Proposed Policy	Required Change	Impact
1-III.D.	The PHA will review and update the plan at least once a year, and more often if needed , to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.	The PHA will review and update the plan, as needed to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.	No	Allow flexibility
3.I.M	A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family must submit a new, written request-subject to PHA verification-at each annual reexamination	A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family may submit a new, written request-subject to PHA verification-at each annual reexamination	No	Provides clarification
3-III.A.		<p>While the regulations state that the PHA must prohibit admission for certain types of criminal activity and give the PHA the option to deny for other types of previous criminal history, more recent HUD rules and OGC guidance must also be taken into consideration when determining whether a particular individual's criminal history merits denial of admission.</p> <p>When considering any denial of admission, PHAs may not use arrest records as the basis for the denial. Further, HUD does not require the adoption of "One Strike" policies and reminds PHAs of their obligation to safeguard the due process rights of applicants and tenants [Notice PIH 2015-19].</p> <p>HUD's Office of General Counsel issued a memo on April 4, 2016, regarding the application of Fair Housing Act standards to the use of criminal records. This memo states that a PHA violates the Fair</p>	Yes	Now regulates a PHA from a blanket denial

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Housing Act when their policy or practice has an unjustified discriminatory effect, even when the PHA had no intention to discriminate. Where a policy or practice that restricts admission based on criminal history has a disparate impact on a particular race, national origin, or other protected class, that policy or practice is in violation of the Fair Housing Act if it is not necessary to serve a substantial, legitimate, nondiscriminatory interest of the PHA, or if that interest could be served by another practice that has a less discriminatory effect [OGC Memo 4/4/16].</p> <p>PHAs who impose blanket prohibitions on any person with any conviction record, no matter when the conviction occurred, what the underlying conduct entailed, or what the convicted person has done since then will be unable to show that such policy or practice is necessary to achieve a substantial, legitimate, nondiscriminatory interest. Even a PHA with a more tailored policy or practice that excludes individuals with only certain types of convictions must still prove that its policy is necessary. To do this, the PHA must show that its policy accurately distinguishes between criminal conduct that indicates a demonstrable risk to resident safety and property and criminal conduct that does not.</p>		
3-III.B.	<p>Currently engaged in is defined as any use of illegal drugs during the previous six months. 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.</p>	<p>Currently engaged in is defined as any use of illegal drugs during the previous three months. 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.</p>	No	Reduces Barriers

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.B.	In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.	In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. A record or records of arrest will not be used as the sole basis of determining reasonable cause. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.	No	
3-III.C.	The PHA may deny assistance if the PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.	If any household member is currently engaged in or has engaged in any of the following criminal activities, within the past three years, the family will be denied assistance.	No	Criminal activity
3-III.D.	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.	The PHA will perform criminal background checks through a commercial screening company for all household members.	No	Streamlined screening
3-III.D.		While a PHA has regulatory authority to use criminal conviction records for the purpose of applicant screening for admission, there is no corresponding authority to use these records to check for criminal and illegal drug activity by	Yes	

Section	Previous Policy	Proposed Policy	Required Change	Impact
		participants, and therefore, PHAs may not use records for this purpose.		
4-II.F.	<p>The waiting list will be updated annually to ensure that all applicants and applicant information is current and timely.</p> <p>The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 14 business days from the date of the PHA letter.</p> <p>If the family fails to respond within 14 business days, the family will be removed from the waiting list without further notice.</p> <p>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.</p>	<p>The waiting list will be updated as needed to ensure that all applicants and applicant information is current and timely.</p> <p>The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 30 business days from the date of the PHA letter.</p> <p>If the family fails to respond within 30 business days, the family will be removed from the waiting list without further notice.</p> <p>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 30 business days to respond from the date the letter was re-sent.</p>	No	Increase time to return purge
4-III.B		Foster Youth Initiative Vouchers (FYI) under the Family Unification Protection Vouchers (FUP) Program	No	New Targeted funding
5-I.B.	Briefings will be conducted in group meetings	Briefings may be conducted in group meetings or remotely.	No	Remote briefings
5-I.B.		<p>Oral briefings will be either conducted in group meetings or remotely.</p> <p>For remote and group briefings families will be provided access to pre-recorded Oral briefing materials.</p> <p>Following group briefings families will have a group question and answer session as well as the opportunity for a one on one question and answer session with PHA staff.</p>	No	Remote briefings

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Following remote briefings families will have a one on one question and answer session with PHA staff. PHA staff will document in families file completion of the Q&A session when remote briefing is utilized.</p>		
<p>6-I.G.</p>	<p>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.</p>	<p>The PHA will review the passbook rate annually. 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. The effective date of changes to the passbook rate will be determined at the time of the review.</p>	<p>No</p>	<p>Update passbook rate after review of published date.</p>
<p>6-II.F.</p>	<p>When the child care expense being claimed is to enable a family member to work, only one family member's income will be considered for a given period of time. When more than one family member works during a given period, the PHA generally will limit allowable child care expenses to the earned income of the lowest-paid member. The family may provide information that supports a request to designate another family member as the person enabled to work.</p>	<p>Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income</p>	<p>No</p>	<p>Allows flexibility</p>
<p>6-II.F.</p>	<p>Child care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class. To establish the reasonableness of child care costs, the PHA will use the schedule of child care costs from the local welfare agency. Families may present, and the PHA</p>	<p>To establish the reasonableness of childcare costs, the PHA will verify the eligible childcare expenses via third party verification. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.</p>	<p>No</p>	<p>Provides clarity</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	will consider, justification for costs that exceed typical costs in the area.			
6-III.A.	The PHA will make utility reimbursements to the utility provider.	The PHA will make utility reimbursements to the utility provider. In instances where there is no utility provider and only a utility fee being charged by the landlord the utility reimbursement funds will be issued directly to the family.	No	Provides clarity
7-I.D.	As verification of earned income, the PHA will require the family to provide the two most current, consecutive pay stubs.	As verification of earned income, the PHA will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.	No	Better verification
7-III.J.	In addition, the PHA will request written verification of the student's tuition amount .	In addition, the PHA will request written verification of the student's tuition, fees, and other required charges .	Yes	Provide clarity to regulation around student financial assistance
8-II.A.	When a family occupies the unit at the time of inspection an adult family member must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.	When a family occupies the unit at the time of inspection an authorized adult must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.	No	Provides flexibility during inspections
11-I.D.	If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a notice of termination (See Chapter 12).	If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be offered an opportunity to attend a coaching session. Failure to respond or provide the required documents or information will result in the initial ineligibility process. If the family does not provide the required documents or materials during the ineligibility process, then the family will be sent a notice of termination (See Chapter 12).	No	Better customer service

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Coaching Sessions are defined as an opportunity for the family and PHA to meet when the family may not be in compliance with program regulations or policies, to offer additional support to successfully navigate the program. Coaching sessions are not applicable during HUD Mandatory Termination of Assistance (See Chapter 12).</p>		
<p>11-II.C.</p>	<p>Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam).</p>	<p>Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam).</p> <p>Families participating in the Family Self-Sufficiency (FSS) program may request and receive an increase in rent through an interim reexamination.</p>	<p>No</p>	<p>Aligns with FSS program</p>
<p>11-III.C.</p>	<p>The notice to the family will include the annual and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment. The notice also will state the procedures for requesting an informal hearing.</p>	<p>The notice to the family will include the annual and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment.</p> <p>The notice will state the family has the right to request an explanation of how the assistance was calculated and if the family disagrees, they have the right to informal hearing. The notice will include the procedures for requesting an informal hearing.</p>	<p>No</p>	<p>Better customer service</p>
<p>12-I.E.</p>	<p>Currently engaged in is defined as any use of illegal drugs during the previous six months. A record of arrest(s) will not be used as the basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>	<p>Currently engaged in is defined as any use of illegal drugs during the previous three months. A record or records of arrest(s) will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.</p>	<p>No</p>	<p>Flexibility and clarify cannot terminate on just an arrest alone.</p>
<p>12-II.D.</p>	<p>None</p>	<p>Use of Criminal Conviction Records after Admission [24 CFR 5.903] The regulation at 24 CFR 5.903 governs a PHA's access to and use of criminal conviction records obtained from a "law</p>	<p>Yes</p>	<p>Align with HUD regulations</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>enforcement agency” such as the National Crime Information Center (NCIC), police departments, and other law enforcement agencies that hold criminal conviction records. While the regulatory listing of permitted uses for these records includes PHA screening of applicants for admission to the HCV program, it specifically excludes the use of records for lease enforcement and eviction of HCV participants and excludes by omission a PHA’s use of records to terminate assistance for participants. While a PHA has regulatory authority to use criminal conviction records for the purpose of applicant screening for admission, there is no corresponding authority to use these records to check for criminal and illegal drug activity by participants, and therefore, PHAs may not use records for this purpose. The limitations, however, do not apply to criminal conviction information searches from non-federal sources (i.e., sources other than the “law enforcement agencies” defined in 24 CFR 5.902(b)). There is no prohibition that bars a PHA from using non-federal sources to conduct criminal background checks of program participants.</p>		
12-III.B.	None	<p>If a property is subject to foreclosure, during the term of the lease, the new owner of the property does not have good cause to terminate the tenant’s lease, unless the new owner will occupy the unit as their primary residence and has provided the tenant with at least a 90-day notice. In that case, the lease may be terminated effective on the date of sale, although the tenant is still entitled to a 90-day notice to vacate. See Section 13-II.G for a discussion of PHA policies relating to units in foreclosure.</p>	Yes	Protects HCV participant in event of foreclosures

Section	Previous Policy	Proposed Policy	Required Change	Impact
13-I.A.		<p>If the PHA will be conducting outreach events, the PHA must ensure that notices and communications during outreach events are provided in a manner that is effective for persons with hearing, visual, and other communications-related disabilities. PHAs must also take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency.</p>	Yes	
13-II.G.	None	<p>Families receiving HCV assistance are entitled to certain protections set forth under the Protecting Tenants at Foreclosure Act (PTFA). During the term of the lease, the new owner of the property does not have good cause to terminate the tenant's lease, unless the new owner will occupy the unit as their primary residence and has provided the tenant with at least a 90-day notice. In that case, the lease may be terminated effective on the date of sale, although the tenant is still entitled to a 90-day notice to vacate. Further, the new owner assumes interest in the lease between the prior owner and the tenant and to the HAP contract.</p> <p>Any state or local law that provides longer time periods or other additional protections for tenants also applies.</p> <p>PHA Policy</p> <p>If a property is in foreclosure, the PHA will make all reasonable efforts to determine the status of the foreclosure and ownership of the property and will continue to make payments to the original owner until ownership legally transfers in accordance with the HAP contract.</p> <p>The PHA will attempt to obtain a written acknowledgement of the assignment of the HAP contract from the successor in interest. This will include a request for</p>	Yes	Provides clarity in the event of a foreclosure.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>owner information, including a tax identification number and payment instructions from the new owner. Even if the new owner does not acknowledge the assignment of the HAP contract in writing, the assignment is still effective by operation of law.</p> <p>The PHA will inform the tenant that they must continue to pay rent in accordance with the lease, and if the new owner refuses to accept payment or cannot be identified, the tenant should pay rent into escrow. Failure to pay rent may constitute an independent ground for eviction.</p> <p>In the event that the PHA is unable to make HAP payments to the new owner due to an action or inaction by the new owner that prevents such payments (e.g., rejection of payments or failure to maintain the property according to HQS), the PHA will hold the HAP until resolution of said issue.</p> <p>The PHA will also refer the tenant, as needed, to the local legal aid office in order to ensure adequate protection of the tenant's rights and enforcement of the successor in interest's performance under the HAP contract.</p> <p>See Section 12-III.B for a discussion of foreclosure as it pertains to owner termination of tenancy.</p>		
16-II.B.	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.	Changes to payment standard amounts will be effective no later than 3 months following the effective date of the published FMR if a change is necessary to stay within the basic range.	No	Provides clarification
16-II.B.	The PHA must request HUD approval to establish payment standards that are higher than the basic range. At HUD's sole discretion, HUD may approve a payment standard amount that is higher than the basic range for a designated part of the FMR area. HUD may approve an exception payment standard amount (in accordance	A non-SAFMR PHA may establish an exception payment standard for a zip code area of up to and including 110 percent of the SAFMR determined by HUD for that zip code area. Regardless of the level of the exception payment standard	Yes	PHA can do a SAFMR without permission from HUD

Section	Previous Policy	Proposed Policy	Required Change	Impact
	with program requirements) for all units, or for all units of a given size, leased by program families in the exception area. Any PHA with jurisdiction in the exception area may use the HUD-approved exception payment standard amount. The total population of all HUD-approved exception areas in an FMR area may not include more than 50 percent of the population of the FMR area.	compared to the metropolitan area FMRs (MAFMRs), the PHA must send an email to SAFMRs@hud.gov to notify HUD that it has adopted an exception payment standard based on the SAFMR. A PHA that adopts an exception payment standard pursuant to this authority must apply it to the entire ZIP code area, for both its HCV, and if applicable, its PBV program. For the PBV program, this means that the rent to owner may not exceed the new exception payment standard amount, provided the rent is still reasonable. A PHA that adopts an exception payment standard area must revise its briefing materials to make families aware of the exception payment standard and the area that it covers		
16-II.B.	The PHA will not voluntarily adopt the use of SAFMRs.	The PHA may voluntarily adopt the use of SAFMRs.	No	Allows PHA flexibility in setting SAFMR if needed.
16-III.B.	None	Remote Informal Reviews All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements and be in compliance with HUD regulations. PHA Policy The PHA has the sole discretion to require that informal reviews be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. In addition, the PHA will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have child care or transportation that would enable them to attend the informal review, or if the applicant believes an in-	Yes	Adds Remote Informal Reviews

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>person informal review would create an undue health risk. The PHA will consider other reasonable requests for a remote informal review on a case-by-case basis.</p> <p>Conducting Remote Informal Reviews The PHA must ensure that the applicant has the right to hear and be heard.</p> <p>PHA Policy The PHA will conduct remote informal reviews via telephone conferencing call-in or via videoconferencing. If the informal review will be conducted via videoconferencing, the PHA will ensure that all applicants, applicant representatives, PHA representatives and the person conducting the informal review can adequately access the platform (i.e., hear, be heard, see, and be seen). If any applicant, applicant representative, PHA representative, or person conducting the informal review is unable to effectively utilize the videoconferencing platform, the informal review will be conducted by telephone conferencing call-in.</p> <p>Whether the informal review is to be conducted via videoconferencing or telephone call-in, the PHA will provide all parties login information and/or conferencing call-in information before the review.</p>		
16-III.C.	None	<p>Remote Informal Hearings The PHA's essential responsibility is to ensure informal hearings meet the requirements of due process and comply with HUD regulations. Therefore, all PHA policies and processes for remote informal hearings will be conducted in accordance with due process requirements and will be in compliance with HUD regulations.</p> <p>PHA Policy</p>	Yes	Adds Remote Informal Hearings

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>The PHA has the sole discretion to require that informal hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. In addition, the PHA will conduct an informal hearing remotely upon request as a reasonable accommodation for a person with a disability, if a participant does not have child care or transportation that would enable them to attend the informal hearing, or if the participant believes an in-person hearing would create an undue health risk. The PHA will consider other reasonable requests for a remote informal hearing on a case-by-case basis.</p> <p>Conducting Informal Hearings Remotely In conducting any informal hearing remotely, the PHA shall ensure due process and that all parties are able to have full access to the hearing.</p> <p>PHA Policy The PHA will conduct remote informal hearings via telephone conferencing call-in or via videoconferencing. If the informal hearing will be conducted via videoconferencing, the PHA will ensure that all participants, participant representatives, advocates, witnesses, PHA representatives, and the hearing officer can adequately access the platform (i.e., hear, be heard, see, and be seen). If any participant, representative, advocate, witness, PHA representative, or hearing officer is unable to effectively utilize the videoconferencing platform, the informal hearing will be conducted by telephone conferencing call-in. Whether the informal hearing is to be conducted via videoconferencing or</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>telephone call-in, the PHA will provide all parties login information and/or telephone call-in information before the hearing.</p>		
<p>16-III.C.</p>	<p>None</p>	<p>That the family may request a remote informal hearing If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the family informing them of the right to request an informal hearing, the family will be notified that the informal hearing will be conducted remotely. The family will be informed of the processes involved in a remote informal hearing and that the PHA will provide technical assistance, if needed, before the informal hearing</p>	<p>No</p>	<p>Allows persons access to hearing due to barriers (i.e. Social distancing, childcare, etc.)</p>
<p>16-III.C.</p>	<p>Participants and the PHA are permitted pre-hearing discovery rights. The family must be given the opportunity to examine before the hearing any PHA documents that are directly relevant to the hearing. The family must be allowed to copy any such documents at their own expense. If the PHA does not make the document available for examination on request of the family, the PHA may not rely on the document at the hearing.</p> <p>The PHA hearing procedures may provide that the PHA must be given the opportunity to examine at the PHA offices before the hearing, any family documents that are directly relevant to the hearing. The PHA must be allowed to copy any such document at the PHA's expense. If the family does not make the document available for examination on request of the PHA, the family may not rely on the document at the hearing.</p> <p>For the purpose of informal hearings, documents include records and regulations. PHA Policy</p> <p>The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA</p>	<p>Participants and the PHA are permitted pre-hearing discovery rights. The family must be given the opportunity to examine before the hearing any PHA documents that are directly relevant to the hearing. The family must be allowed to copy any such documents at their own expense. If the PHA does not make the document available for examination on request of the family, the PHA may not rely on the document at the hearing.</p> <p>For the purpose of informal hearings, documents include records and regulations.</p> <p>The hearing will be conducted remotely or in-person. The PHA will compile a hearing packet, consisting of all documents the PHA intends to produce at the informal hearing. The PHA will mail copies of the hearing packet to the family, the family's representatives, if any, and the hearing officer at least three days before the scheduled informal hearing. The original hearing packet will be in the possession of the PHA representative and retained by the PHA.</p>	<p>Yes</p>	<p>Clarity around documents reviewed prior to and during hearings</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date.	<p>Documents will be shared electronically whenever possible.</p> <p>The family will be allowed to copy any additional documents not provided in the hearing packet at a cost of \$.25 per page. The family must request any additional documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date.</p> <p>The PHA hearing procedures may provide that the PHA must be given the opportunity to examine at the PHA offices before the hearing any family documents that are directly relevant to the hearing. The PHA must be allowed to copy any such document at the PHA's expense. If the family does not make the document available for examination on request of the PHA, the family may not rely on the document at the hearing.</p> <p>PHA Policy</p> <p>For in-person or remote hearings, the PHA will not require pre-hearing discovery by the PHA of family documents directly relevant to the hearing.</p> <p>Copies of family documents will be presented at the time of the hearing. Immediately following the hearing, family documents will be copied and dispersed to relevant PHA staff at the PHA's expense. Documents will be shared electronically whenever possible.</p>		
17-II.B.	For certain public housing projects where the PHA has an ownership interest or control and will spend a minimum amount per unit on rehabilitation or construction , the PHA may select a project without following one of the two processes above.	<p>For certain public housing projects where the PHA has an ownership interest or control, the PHA may attach PBV assistance non-competitively without following one of the two processes above.</p> <p>This exception applies when the PHA is engaged in an initiative to improve, develop, or replace a public housing property or site. The public housing units may either currently be in the public</p>	Yes	Allows a PHA to implement PBV noncompetitively

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>housing inventory or may have been removed from the public housing inventory within five years of the date on which the PHA entered into the AHAP or HAP.</p> <p>If the PHA is planning rehabilitation or new construction on the project, a minimum threshold of \$25,000 per unit in hard costs must be expended.</p> <p>If the PHA plans to replace public housing by attaching PBV assistance to existing housing in which the PHA has an ownership interest or control, then the \$25,000 per unit minimum threshold does not apply as long as the existing housing substantially complies with HQS.</p> <p>The PHA must include in the administrative plan what work it plans to do on the property or site and how many PBV units will be added to the site.</p>		
17-II.B.	<p>The PHA may submit a proposal for project-based housing that is owned or controlled by the PHA. If the proposal for PHA-owned housing is selected, the PHA will use an entity that is not Homes for Good governed and/or has Homes for Good employees, to review the PHA selection and to administer the PBV program. The PHA will obtain HUD approval of this entity prior to selecting the proposal for PHA-owned housing.</p>	<p>The PHA may submit a proposal for project-based housing that is owned or controlled by the PHA. If the proposal for PHA-owned housing is selected, the PHA will use an entity that is not Homes for Good governed and/or has Homes for Good employees, to review the PHA selection process. The PHA will obtain HUD approval of this entity prior to selecting the proposal for PHA-owned housing.</p>	Yes	Expands responsibilities of independent entity.
17-II.E.	<p>The PHA may provide PBV assistance only in accordance with HUD subsidy layering regulations [24 CFR 4.13] and other requirements.</p> <p>The subsidy layering review is intended to prevent excessive public assistance by combining (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits. Subsidy layering requirements do not apply to existing housing. A further subsidy layering review is not required for new construction or rehabilitation if HUD's</p>	<p>The subsidy layering review is intended to prevent excessive public assistance by combining (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits.</p> <p>HUD requires new construction and rehabilitation housing that will include forms of governmental assistance other than PBVs to undergo a subsidy layering review (SLR) prior to entering into an</p>	Yes	Provides clarity to ensure that there is the appropriate amount of funding for the project, and in turn results in long term fiscally healthy project.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>designee has conducted a review that included a review of PBV assistance in accordance with the PBV subsidy layering guidelines.</p> <p>The PHA must submit the necessary documentation to HUD for a subsidy layering review. Except in cases noted above, the PHA may not enter into an agreement to enter into a HAP contract or a HAP contract until HUD, or a HUD-approved housing credit agency (HCA), has conducted any required subsidy layering review and determined that the PBV assistance is in accordance with HUD subsidy layering requirements. However, in order to satisfy applicable requirements, HCAs must conduct subsidy layering reviews in compliance with the guidelines set forth in the Federal Register notice published July 9, 2010.</p> <p>The HAP contract must contain the owner's certification that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than assistance disclosed in the subsidy layering review in accordance with HUD requirements.</p>	<p>Agreement to Enter into Housing Assistance Payments Contract (AHAP). Subsidy layering requirements do not apply to existing housing, when PBV is the only governmental assistance, or for projects already subject to a PBV HAP contract, even if the project is recapitalized with outside sources of funding.</p> <p>When a PHA selects a new construction or rehabilitation project, the PHA must require information regarding all HUD and/or other federal, state, or local governmental assistance to be disclosed by the project owner using Form HUD-2880. Appendix A of FR Notice 2/28/20 contains a list of all required documentation.</p> <p>Either HUD or a HUD-approved housing credit agency (HCA) in the PHA's jurisdiction performs the subsidy layering review. The PHA must request an SLR through their local HUD Field Office or, if eligible, through a participating HCA. If the SLR request is submitted to an approved HCA, and the proposed project-based voucher assistance meets HUD subsidy layering requirements, the HCA must submit a certification to HUD and notify the PHA. The PHA may proceed to execute an AHAP at that time if the environmental approval is received.</p> <p>The HAP contract must contain the owner's certification that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than assistance disclosed in the subsidy layering review in accordance with HUD requirements.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
17-III.D.	<p>Pre-HAP Contract Inspections [24 CFR 983.103(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.</p> <p>Turnover Inspections [24 CFR 983.103(c), FR Notice 1/18/17, and Notice PIH 2017-20] 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, 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. PHA Policy The PHA will not provide assistance in turnover units until the unit fully complies with HQS.</p>	<p>Pre-HAP Contract Inspections [24 CFR 983.103(b)), FR Notice 1/18/17, and Notice PIH 2017-20] The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS, 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. PHA Policy The PHA will not provide assistance on behalf of the family until the unit fully complies with HQS.</p> <p>Turnover Inspections [24 CFR 983.103(c), FR Notice 1/18/17, and Notice PIH 2017-20] 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.</p>	Yes	Provides clarity on what options a PHA has to execute a HAP contract when unit does not meet HQS
17-III.D.	The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.	The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Or The PHA will inspect on an biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program.	No	Provides PHA options on how to conduct HQS inspections while stay maintaining HUD compliance.
Exhibit 17-1	None	New Exhibit 17-1: PBV Development Information sheet/chart	No	Provides clarity on expanding PBV portfolio.

Section	Previous Policy	Proposed Policy	Required Change	Impact
18-I.B.	<p>Requirements specific to the RAD program may be found in the following:</p> <ul style="list-style-type: none"> • Generally, public housing projects converting assistance under RAD are bound by the terms of the notice in effect at the time of closing. Notice PIH 2012-32, REV-3 is applicable to projects converting assistance through RAD, including those where a CHAP has already been issued, upon the expiration of the 30-day comment period after publication of the notice. Notice PIH 2012-32, REV-3 was published January 12, 2017. • Notice PIH 2012-32, REV-2, RAD – Final Implementation, REV-2 is applicable to projects converting assistance through RAD upon the expiration of the 30-day comment period after publication of the Notice. PIH Notice 2012-32, REV-2 was published June 15, 2015. 	<p>Requirements specific to the RAD program may be found in the following:</p> <ul style="list-style-type: none"> • Generally, public housing projects converting assistance under RAD are bound by the terms of the notice in effect at the time of closing. <ul style="list-style-type: none"> - Notice PIH 2019-23 was immediately applicable at the time of closing to all projects converting assistance (notwithstanding execution of a commitment for conversion). Notice PIH 2019-23 was published on September 5, 2019. <ul style="list-style-type: none"> <input type="checkbox"/> Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which are effective after a 30-day comment period. - Notice PIH 2012-32, REV-3 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published January 12, 2017. <ul style="list-style-type: none"> <input type="checkbox"/> Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which were effective after a 30-day comment period. - Notice PIH 2012-32, REV-2 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published June 15, 2015. <ul style="list-style-type: none"> • Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which are effective after a 30-day comment period. 	Yes	Align RAD PBV with std PBV as much as possible.
18-I.D.	Expanded language	<p>However, for projects that applied for conversion prior to November 10, 2016, the following applies [Notice PIH 2014-17]:</p> <ul style="list-style-type: none"> • In some developments, in-place residents may need to be relocated as a result of properties undergoing repairs, being demolished and rebuilt, or when 	Yes	Clarifies what has already be enacted as of 2014.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>assistance is transferred from one site to another. RAD program rules prohibit the permanent, involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed.</p> <ul style="list-style-type: none"> • Relocation assistance provided to residents will vary depending on the length of time relocation is required. Residents must be properly notified in advance of relocation requirements in accordance with RAD program rules and Uniform Relocation Act (URA) requirements. Sample informing notices are provided in Appendices 2–5 of Notice PIH 2014-17. While the PHA is not required to have a written relocation plan, HUD strongly encourages PHAs to prepare one. Appendix I of Notice PIH 2014-17 contains recommended contents for a relocation plan. • In addition, PHAs must undertake a planning process that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), although not all relocations under RAD will trigger requirements under URA. URA statute and implementing regulations may be found at 49 CFR Part 24. • Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved, residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or 		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or owner’s offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.</p>		
<p>18-II.B.</p>	<p>Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or non-profit entity. The requirement for a public or non-profit entity is satisfied if a public or non-profit entity (or entities), directly or through a wholly-owned affiliate (1) holds a fee simple interest in the property; (2) is the lessor under a ground lease with the property owner; (3) has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units, (4) owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable; (5) owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD; (6) owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or (7) other ownership and control arrangements approved by HUD.</p> <p>If low-income housing tax credits will be used, HUD may allow ownership of the property to be transferred to a tax credit entity controlled by a for-profit entity if HUD determines that the PHA preserves its interest in the property. Preservation of PHA interest in the property includes but is not limited to the following:</p> <ul style="list-style-type: none"> • The PHA, or an affiliate under its sole control, is the general partner or managing member; • The PHA retains fee ownership and leases the real estate to the tax credit entity pursuant to a long-term ground lease; 	<p>For projects governed by Notice PIH 2019-23, the following language applies:</p> <ul style="list-style-type: none"> • Under the PBV program, the contract administrator and the owner listed on the contract cannot be the same legal entity (i.e., the PHA cannot execute a contract with itself). To avoid this situation, the PHA may either: 1) Transfer the ownership of the project to a nonprofit affiliate or instrumentality of the PHA (including to a “single-purpose entity” that owns nothing other than the property, which will typically be a requirement of a lender or investor), or 2) The PHA can form a related entity that is responsible for management and leasing and can serve as the owner for purposes of the Section 8 HAP contract; in this scenario, the HAP is then executed between the PHA (as the contract administrator) and the PHA’s related entity (as the owner for HAP contract purposes). Note that in the second scenario, both the PHA and the entity serving as the owner for HAP contract purposes will be required to sign the RAD Use Agreement [RAD Resource Desk FAQ 01/24/19]. • Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or non-profit entity. HUD may also allow ownership of the project to be transferred 	<p>Yes</p>	<p>Clarity on what PIH to abide by depending on when RAD conversion took place.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<ul style="list-style-type: none"> • The PHA retains control over leasing the property and determining program eligibility; • The PHA enters into a control agreement by which the PHA retains consent rights over certain acts of the project owner and retains certain rights over the project; • Other means that HUD finds acceptable 	<p>to a tax credit entity controlled by a for-profit entity to facilitate the use of tax credits for the project, but only if HUD determines that the PHA or a nonprofit entity preserves an interest in the profit.</p> <p>The requirement for a public or non-profit entity, or preservation of an interest by a PHA or non-profit in a property owned by a tax credit entity controlled by a for-profit entity, is satisfied if a public or non-profit entity (or entities), directly or through a wholly-owned affiliate (1) holds a fee simple interest in the property; (2) is the lessor under a ground lease with the property owner; (3) has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units, (4) owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable; (5) owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD; (6) owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or (7) demonstrates other ownership and control arrangements approved by HUD.</p> <ul style="list-style-type: none"> • Control may be established through the terms of the project owner's governing documents or through a Control Agreement, provided that in either case amendment of the terms of control requires consent from HUD. <p>For projects subject to the requirements of Notice PIH 2012-32, REV-3, the following language applies:</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<ul style="list-style-type: none"> • Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or nonprofit entity. The requirement for a public or nonprofit entity is satisfied if a public or nonprofit entity (or entities), directly or through a wholly owned affiliate (1) holds a fee simple interest in the property; (2) is the lessor under a ground lease with the property owner; (3) has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units, (4) owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable; (5) owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD; (6) owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or (7) other ownership and control arrangements approved by HUD. • If low-income housing tax credits will be used, HUD may allow ownership of the property to be transferred to a tax credit entity controlled by a for-profit entity if HUD determines that the PHA preserves its interest in the property. Preservation of PHA interest in the property includes but is not limited to the following: <ul style="list-style-type: none"> •- The PHA, or an affiliate under its sole control, is the general partner or managing member; 		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<ul style="list-style-type: none"> •- The PHA retains fee ownership and leases the real estate to the tax credit entity pursuant to a long-term ground lease; •- The PHA retains control over leasing the property and determining program eligibility; •- The PHA enters into a control agreement by which the PHA retains consent rights over certain acts of the project owner and retains certain rights over the project; - Other means that HUD finds acceptable <p>For projects that converted assistance prior to the implementation of Notice PIH 2012-32, REV 3, the following language applies:</p> <ul style="list-style-type: none"> • During both the initial term and renewal terms of the HAP contract, ownership must be either of the following: <ul style="list-style-type: none"> - A public or nonprofit entity that has legal title to the property. The entity must have the legal authority to direct the financial, legal, beneficial, and other interests of the property; or •- A private entity, if the property has low-income tax credits. The PHA must maintain control via a ground lease. 		
18-II.C.	None	If units converted to PBV under RAD are PHA-owned housing, the PHA will use an entity that is not Homes for Good governed as the HUD-approved independent entity.	No	Aligns with HUD regulation and std PBV
18-II.D.	<p>In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project at closing; the PHA may convey all program funds to the covered projects. In order to cover the cost of administrative activities required to terminate the ACC, once it no longer has units under the ACC and has no plans to develop additional public housing, the PHA may:</p> <ul style="list-style-type: none"> • Designate that a reserve associated with the project be available to fund any public 	<p>For projects governed by Notice PIH 2019-23, the following language applies:</p> <ul style="list-style-type: none"> • In the case of a PHA that will no longer have ACC units as a result of the pending or simultaneous closing, or have less than 50 units remaining and have initiated procedures to dispose of their final ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project or projects though the conversion. However, the PHA 	Yes	Clarity on what PIH to abide by depending on when RAD conversion took place.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>housing closeout costs (such as an operating deficit reserve or a specific PHA close-out reserve). Any funds not needed for public housing close-out costs would remain in such reserve or may be transferred to another reserve associated with the project (such as the replacement reserve). Thereafter, these funds may be used at the project pursuant to the authorized use of the applicable reserve; or</p> <ul style="list-style-type: none"> Retain funds under the public housing program for this purpose. However, HUD will recapture any public housing funds that a PHA does not expend for closeout costs. <p>In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory.</p> <p>In addition, following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project unless such funding has been identified in the approved financing plan and included in the approved "sources and uses" attached to the RCC.</p>	<p>must estimate and plan for outstanding liabilities and costs and must follow Notice PIH 2016-23 or successor notice regarding the administrative activities required to terminate the ACC if it has no plans to develop additional public housing.</p> <ul style="list-style-type: none"> In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory. Following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project unless been identified in the RCC and converted at closing for Section 8 RAD purposes. <p>For projects governed by Notice PIH 2012-32, REV-3, the following language applies:</p> <ul style="list-style-type: none"> In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to 		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>the covered project at closing; the PHA may convey all program funds to the covered projects. In order to cover the cost of administrative activities required to terminate the ACC, once it no longer has units under the ACC and has no plans to develop additional public housing, the PHA may:</p> <ul style="list-style-type: none"> - Designate that a reserve associated with the project be available to fund any public housing closeout costs (such as an operating deficit reserve or a specific PHA closeout reserve). Any funds not needed for public housing closeout costs would remain in such reserve or may be transferred to another reserve associated with the project (such as the replacement reserve). Thereafter, these funds may be used at the project pursuant to the authorized use of the applicable reserve; or - Retain funds under the public housing program for this purpose. However, HUD will recapture any public housing funds that a PHA does not expend for closeout costs. • In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves 		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory.</p> <ul style="list-style-type: none"> In addition, following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project unless such funding has been identified in the approved financing plan and included in the approved "sources and uses" attached to the RCC. <p>For projects governed by the requirements of Notice PIH 2012-32, REV-2, the following language applies:</p> <ul style="list-style-type: none"> In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project at closing; the PHA may convey all program funds to the covered project. HUD will recapture any public housing funds that a PHA has not expended once it no longer has units under ACC. In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), 		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory.</p>		
<p>18-II.E.</p>	<p>Covered projects do not count against the maximum amount of assistance a PHA may utilize for the PBV program, which under the standard PBV program is set at 20 percent of the authorized units allocated to a PHA under the HCV program. To implement this provision, HUD is waiving section 8(o)(13)(B) of the 1937 Act as well as 24 CFR 983.6.</p> <p>There is no cap on the number of units that may receive PBV assistance in a project.</p>	<p>PBV Percentage Limitation Covered projects do not count against the maximum amount of assistance a PHA may utilize for the PBV program, which under the standard PBV program is set at 20 percent of the authorized units allocated to a PHA under the HCV program. To implement this provision, HUD is waiving section 8(o)(13)(B) of the 1937 Act as well as 24 CFR 983.6.</p> <p>Unit Cap Limitation When HUD published REV-3 of Notice PIH 2012-32, the cap on the number of assisted units in each project was eliminated. Under the standard PBV program the cap is set at the greater of 25 units or 25 percent of the units in the project. HUD is waiving this requirement, and projects governed by Notice PIH 2019-23 and Notice PIH 2012-32, REV-3 have no cap on the number of units that may receive PBV assistance in a project. However, for projects that are governed by REV-2 of Notice PIH 2012-32, the cap on the number of PBV units in the project is increased to 50 percent. In these projects, however, provided units met certain exception criteria, the PHA may have converted a larger number of units to RAD PBV. For projects governed by the requirements of Notice PIH 2012-32, REV-2 only, the following language applies:</p> <ul style="list-style-type: none"> In general, the PHA may not provide PBV assistance for units in a project if the total number of dwelling 	<p>Yes</p>	<p>Clarity on what PIH to abide by depending on when RAD conversion took place.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>units in the project that will receive PBV assistance during the term of the PBV HAP contract is more than 50 percent of the number of dwelling units (assisted or unassisted) in the project. However, PHAs may exceed the 50 percent limitation when units in the project are occupied by elderly and/or disabled families or families that will receive supportive services. These units are known as "excepted units" and do not count toward the project cap.</p> <ul style="list-style-type: none"> For projects governed by the requirements of Notice PIH 2012-32, REV-2 choosing to include excepted units, additional policy decisions may be required. <p>PHA Policy For projects governed by Notice PIH 2012-32, REV-2, the PHA may provide RAD PBV assistance for any excepted units.</p>		
18-III.D.	Under RAD, all units must meet HQS no later than the date of completion of the work as indicated in the RCC.	Under standard PBV regulations at 24 CFR 983.103(b), a PHA may not enter into a HAP contract until the PHA has determined all units comply with HQS. It is the responsibility of the contract administrator to perform this initial inspection (unless units are PHA-owned). In order to accommodate projects in which repairs are conducted, however, HUD has waived this requirement when units are undergoing rehabilitation. In this case, units must meet HQS by the date indicated in the RAD Conversion Commitment (RCC).	Yes	Provides PHA options on how to conduct HQS inspections while stay maintaining HUD compliance.
18-III.D.	Turnover Inspections [24 CFR 983.103(c), FR Notice 1/18/17, and Notice PIH 2017-20] 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	Turnover Inspections [24 CFR 983.103(c), FR Notice 1/18/17, and Notice PIH 2017-20] 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	Yes	Provides PHA options on how to conduct HQS inspections while stay maintaining HUD compliance.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>fully complies with HQS, 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.</p> <p>PHA Policy The PHA will not provide assistance in turnover units until the unit fully complies with HQS.</p> <p>Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14] At least once every 24 months during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building, to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement.</p> <p>PHA Policy The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.</p> <p>If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, the PHA must reinspect 100 percent of the contract units in the building.</p>	<p>of the family until the unit fully complies with HQS.</p> <p>Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14] At least once every 24 months during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building, to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement.</p> <p>PHA Policy The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.</p> <p>Or The PHA will inspect on an biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program. If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, the PHA must reinspect 100 percent of the contract units in the building.</p> <p>Alternative Inspections [24 CFR 983.103(g); Notice PIH 2016-05] In the case of mixed-finance properties that are subject to alternative inspections, the PHA may rely upon an alternative inspection conducted at least triennially to demonstrate compliance with inspection requirements.</p> <p>PHA Policy The PHA will not rely on alternative inspection standards.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
18-IV. B.	<p>The initial term of the HAP contract may not be for less than 15 years, and may be for a term of up to 20 years upon request of the owner and with approval of the administering voucher agency. Upon expiration of the initial term of the contract, and upon each renewal term of the contract, the owner must accept each offer to renew the contract, subject to the terms and conditions applicable at the time of each offer, and further subject to the availability of appropriations for each year of each such renewal. To implement this provision, HUD is waiving section 8(o)(13)(F) of The United States Housing Act of 1937, which established a maximum term of 15 years, as well as 24 CFR 983.205(a), which governs the contract term.</p>	<p>The initial term of the HAP contract may not be for less than 15 years and may be for a term of up to 20 years upon request of the owner and with approval of the administering voucher agency. Upon expiration of the initial term of the contract, and upon each renewal term of the contract, the owner must accept each offer to renew the contract, for the prescribed number and mix of units, either on the site of the project subject to the expiring contract or, upon request of the project owner and subject to PHA and HUD approval, at another site through a future transfer of assistance. Contracts are subject to the terms and conditions applicable at the time of each offer, and further subject to the availability of appropriations for each year of each such renewal. To implement this provision, HUD is waiving section 8(o)(13)(F) of The United States Housing Act of 1937, which permits a minimum term of one year, as well as 24 CFR 983.205(a), which governs the contract term.</p>	<p>Yes</p>	
18-V. D.	<p>Expanded language</p>	<p>The PHA will assess any changes in racial, ethnic or disability-related tenant composition at each PHA site that may have occurred during the implementation of the site-based waiting list, based on confirmed and accurate PIC occupancy data. At least every three years, the PHA will use independent testers to assure that the site-based system is not being implemented in a discriminatory manner. The PHA will give priority to participants moving under a VAWA emergency transfer from one PBV development to another in accordance with Section 18-VI.E.</p>	<p>No</p>	<p>Ensuring that PHA is using DEI lens when creating RAD PBV projects.</p>
18-V. D.	<p>The PHA may offer preferences for the RAD PBV program or for particular PBV projects or units.</p>	<p>The PHA may offer preferences for the RAD PBV program or for particular PBV projects or units. The PHA will give priority to participants moving under a VAWA emergency transfer from one</p>	<p>No</p>	<p>Aligns with HCV & Std PBV</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		PBV development to another in accordance with Section 18-VI.E.		
18-VI. B.	<p>Following conversion, 24 CFR 983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program. Further, for any new families admitted after the conversion, assistance will be terminated 180 days after the last housing assistance payment on their behalf. The cessation of housing assistance payments does not affect the family's other rights under its lease, nor does it preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within the 180 day window. If a family's assistance is terminated as a result of their zero HAP status, the PHA must remove the unit from the HAP contract. If the project is fully assisted, the PHA must reinstate the unit after the family has vacated the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.</p> <p>PHA Policy If a participating family who was admitted after the RAD conversion receive zero assistance and subsequently experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the PHA of the change and request an interim reexamination before the expiration of the 180-day period.</p>	<p>Unless a waiver is requested and approved following conversion, 24 CFR 983.53(d) applies, and any new admission referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program. The PHA may request a waiver from HUD in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not paid HAP for the family in 180 days.</p> <p>Further, for any new families admitted after the conversion, assistance will be terminated 180 days after the last housing assistance payment on their behalf. The cessation of housing assistance payments does not affect the family's other rights under its lease, nor does it preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within the 180-day window. If a family's assistance is terminated as a result of their zero HAP status, the PHA must remove the unit from the HAP contract. If the project is fully assisted, the PHA must reinstate the unit after the family has vacated the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.</p> <p>PHA Policy The PHA will not request a waiver from HUD to allow families whose TTP initially exceeds gross rent to occupy units. If a participating family who was admitted after the RAD conversion receive zero assistance and</p>	Yes	Ensure new applicants moving into RAD PBV require PHA financial assistance under regulations.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		subsequently experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the PHA of the change and request an interim reexamination before the expiration of the 180-day period.		
18- VI.E.	The PHA will notify the family and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 14 business days of the PHA's determination. The PHA will offer the family the following types of continued assistance in the following order, based on the availability of assistance: PBV assistance in the same building or project PBV assistance in another project Tenant-based voucher assistance	The PHA will notify the family and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 14 business days of the PHA's determination. The PHA will offer the family the following types of continued assistance in the following order, based on the availability of assistance: PBV assistance in the same building or project PBV assistance in another project Tenant-based voucher assistance Families who need to move will declare at least three eligible options to which they are willing to move (specific PBV properties or a combination of PBV properties and tenant-based voucher assistance). For waitlists in which declaration is declared the family will be assigned the appropriate weighted point which will designate appropriate ranking on the waitlists. When the family reaches the top of the waitlist for which willingness to move has been declared the PHA will offer the family the opportunity to receive continued housing assistance. The PHA will issue the housing option for which top of the list status is gained first. If issued housing assistance is accepted, once processed the family will be removed from any other waitlists, they were on in which they were assigned weighted preference for continued housing assistance in another unit.	No	Aligns with std. PBV and streamlines moves

Section	Previous Policy	Proposed Policy	Required Change	Impact
18-VII.A.	<p>PHAs may adjust subsidy (and contract rents) across multiple projects as long as the PHA does not exceed the aggregate subsidy for all of the projects the PHA has submitted for conversion under RAD. This use, which HUD refers to as “bundled” rents, is permissible when a PHA submits applications for two or more projects. There is no limit to the number of projects that a PHA may bundle.</p> <p>Notwithstanding the current funding level, the initial rents are set at the lower of:</p> <ul style="list-style-type: none"> • 110 percent of the fair market rent (FMR) or the PHA's exception payment standard approved by HUD, or the alternate rent cap in a PHA's MTW agreement • Reasonable rent in comparison to the unassisted housing market • An amount determined by current funding - Adjusted through rent bundling or reconfiguration of units 	<p>PHAs may adjust subsidy (and contract rents) across multiple projects as long as the PHA does not exceed the aggregate subsidy for all of the projects the PHA has submitted for conversion under RAD.</p> <p>Notwithstanding HUD’s calculation of the initial contract rent based on the project’s subsidy under the public housing program and any modifications made to the initial contract rent, the initial rents are set at the lower of:</p> <ul style="list-style-type: none"> • An amount determined by the PHA, not to exceed 110 percent of the fair market rent (FMR) or the PHA's exception payment standard approved by HUD, or the alternate rent cap in a PHA's MTW agreement minus any utility allowance • The reasonable rent • The rent requested by the owner. 	Yes	Provide clarification
18-VIII.D.	<p>For in-place tenants, if a tenant’s monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over three years. To implement this provision, HUD is waiving section 3(a)(1) of the 1937 Act, as well as 24 CFR 983.3 (definition of total tenant payment (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. For families who were on EID at the time of conversion to RAD PBV, upon the expiration of the EID, the rent adjustment is not subject to rent phase-in.</p> <p>PHA Policy The PHA will implement a three-year phase-in for in-place families whose rent increases by more than the greater of 10 percent or \$25 as a result of the conversion as follows: Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion: 33 percent of the difference between the most recently paid TTP and the calculated PBV TTP Year 2: Year 2 annual recertification (AR) and any interim recertification (IR): 50 percent of the difference</p>	<p>For in-place tenants, if the amount the tenant would pay for rent and utilities (TTP) would increase by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over three years. To implement this provision, HUD is waiving section 3(a)(1) of the 1937 Act, as well as 24 CFR 983.3 (definition of total tenant payment (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. For families who were on EID at the time of conversion to RAD PBV, upon the expiration of the EID, the rent adjustment is not subject to rent phase-in.</p> <p>The PHA must communicate this policy in writing to affected residents.</p> <p>PHA Policy The PHA will use the family’s public housing tenant rent (reflected on line 10f of the family’s most recent 50058) at the date of conversion to calculate the family’s tenant rent in PBV. The PHA will</p>	Yes	Addresses phase-in rent process & communication

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>between the most recently paid TTP and the calculated PBV TTP Year 3: Year 3 AR and all subsequent recertifications: Full calculated TTP Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.</p>	<p>implement a three-year phase-in for in-place families whose TTP increases by more than the greater of 10 percent or \$25 purely as a result of the conversion as follows: Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion: 33 percent of the difference between the most recently paid TTP and the calculated PBV TTP (If the family was paying flat rent immediately prior to conversion, the PHA will use the flat rent amount to calculate the phase-in for Year 1.) Year 2: Year 2 annual recertification (AR) and any interim recertification (IR): 50 percent of the difference between the most recently paid TTP and the calculated PBV TTP Year 3: Year 3 AR and all subsequent recertifications: Full calculated TTP Once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward. The PHA will communicate the PHA's phase-in policy in writing to the family at the time the PHA first determines that the family qualifies for a rent phase-in. Any non-RAD PBV units located in the same project are also subject to rent phase-in requirements.</p>		
Exhibit 18-1	None	New Exhibit 18-1: PBV Development Information	No	Provides clarity on expanding PBV portfolio.

Attachment B.2 New Activities

✓ **Demolition and/or Disposition**

Homes for Good is evaluating the remaining public housing portfolio to determine if Demo/Disposition or a RAD conversion is appropriate. Homes for Good has submitted a letter of interest (LOI) to HUD regarding the conversion of the remaining Public Housing Portfolio. If it is determined to be appropriate, Homes for Good may submit a Demo/Dispo application for a portion of its public housing portfolio.

✓ **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 to convert 112 of its scattered sites to Project Based Vouchers (PBV). Homes for Good submitted a revised multi-phase application in May of 2016 which allowed conversion of 12 units into Richardson Bridge Apartments as part of a major rehabilitation and sold 12 units of scattered site housing and will transfer assistance to new sites which include 49 units at Sarang in Eugene and 51 units at Hayden Bridge Landing in Springfield. Homes for Good received a Commitment to enter into a Housing Assistance Payment (CHAP) for the remaining 100 units in August of 2018 for AMP 200 and 300.

AMP 200 Springfield Sites: AMP 200 OR000600200 included 20 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converted 3 units of public housing and transferred the assistance to Richardson Bridge (an existing Homes for Good development). The next phase will be the remaining 17 units to two new housing developments. Construction of the replacement housing began in the spring of 2020. Disposal of some units began at that time and will continue until the replacement housing is up and running in the late spring of 2021.

AMP 300, Eugene Scattered Sites: AMP 300 OR000600300 includes 92 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converted 9 units of public housing and transferred the assistance to Richardson Bridge (an existing Homes for Good development). Homes for Good disposed of the 9 former PH units for affordable housing purposes in 2018. The next phase will transfer the remaining 83 units to two new housing developments. Construction of the replacement housing began in the spring of 2020. Disposal of some units began at that time and will continue until the replacement housing is up and running in the late spring of 2021.

Homes for Good is evaluating the remaining public housing portfolio to determine if Demo/Disposition or a RAD conversion is appropriate. Homes for Good submitted a letter of interest (LOI) to HUD regarding the conversion of the remaining Public Housing Portfolio in the fall of 2018.

✓ **Project Based Vouchers**

It is Homes for Good's intention to enter into Housing Assistance Payment Contracts for Project Based Vouchers with prior year(s) PBV awardees. We anticipate entering into PBV Contracts for The Nel (a Homes for Good endeavor) which will contain 45 PBV units and a project in partnership with Cornerstone in Eugene, OR which will contain 8 Project Based Voucher units. Homes for Good is also exploring the possibility of converting tenant based VASH Vouchers to Project Based Vouchers. Homes for Good may issue Request for Proposals for additional Project Based Vouchers. As of March 2021 Homes for Good has 99 units of Project Based Vouchers under HAP Contract and another 99 Project Based Vouchers under award.

Attachment B.3 Progress Report

Goal 1 Objective:

Increase the number of affordable housing units

Indicator	FY20 Progress	FY21 Progress
Create 300 new affordable housing units.	Homes for Good has various projects currently under construction including Market District Commons (50 units), The Commons on MLK (51 units), Sarang (49 units), Hayden Bridge Landing (70 units), Legion Cottages (4 units).	The Keystone (15 units) began construction in January 2021 and will be complete in fall of 2021. The Nel (45 units) will begin construction in May of 2021 and be complete in early 2022.
Increase number of permanent supporting housing units. (Featured projects: The Commons on MLK, Legion Cottages Tiny Homes, The Keystone, The Nel)	70 of the units under construction are Permanent Supportive Housing, as well as a few projects in the development pipeline including The Keystone (15 units PSH), as well as 1100 Charnelton (45 units PSH).	70 of the units just completed or under construction are Permanent Supportive Housing, and The Nel (45 units PSH) will begin construction in May 2021.
Maintain public housing vacancies at 3% or less.	Public Housing continues to maintain an occupancy rate of 97% across the portfolio, with higher vacancies associated with the RAD resident relocations.	Public Housing continues to maintain an average occupancy of above 97% (98.5% for FY21 YTD).
Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons.	33 Mainstream vouchers are being utilized. Received an additional 25 Mainstream Vouchers through a competitive process, and most recently was awarded an additional 18 Mainstream Vouchers in conjunction with the CARES Act on June 1, 2020. Currently, utilizing 38 Mainstream Vouchers. We continue to work with partner agencies to ensure full utilization.	We received an additional allocation of 75 Mainstream Vouchers on April 1, 2021, bringing our total allocation of Mainstream Vouchers to 151. Effective March 2021 we expanded access to Mainstream vouchers to all non-elderly disabled persons on our waiting list, while also still continuing our work with partner agencies to distribute the vouchers.
Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County.	Currently, 207 VASH vouchers are under lease. 26 VASH recipients have been issued vouchers and are searching for housing. Homes for Good has applied for a waiver request from HUD to utilize CARES Act funds to provide deposits and arrears assistance to VASH voucher holders who are seeking housing. Homes for Good continues to meet with local agencies on a quarterly basis to collaborate on the use of all VASH vouchers.	As of March 2021, 222 VASH vouchers are under lease. 46 VASH recipients have been issued vouchers and are searching for housing. CARES Act funds were obtained to provide deposit assistance for VASH voucher holders. Homes for Good is now meeting with local agencies on a monthly basis to collaborate on the use of all VASH vouchers.

Goal 2 Objective: Continue to receive high performer status

Indicator	FY20 Progress	FY21 Progress
Homes for Good received high performer status for FY18 SEMAP.	Homes for Good received high performer status for FY19 SEMAP.	Homes for Good will not be submitting a FY20 SEMAP assessment. In accordance with the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136), HUD will not issue a new SEMAP score. HUD will instead carry forward the most recent SEMAP score on record. The most recent SEMAP score for Homes for Good is high performer status.
Obligate all capital funds within 24 months of grant award.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.
Expend all capital funds within 48 months of grant award.		
Comply with the financial reporting requirements of asset management.	Homes for Good continues to receive high performer status.	Homes for Good continues to receive high performer status.
Comply with the new PHAS requirements (when published) to continue to receive high performer status.		
Submit all PHAS reports within required timelines.		
Meeting all capital fund, financial reporting, and PHAS reporting requirements.		

Goal 3 Objective: Improve community quality of life and economic vitality

Indicator	FY20 Progress	FY21 Progress
<p>Creation of a Housing Liaison position that will provide education and advocacy to persons searching for housing. Once housed, the Housing Liaison's continued education and advocacy supports will increase housing stability.</p>	<p>Homes for Good Housing Liaison has assisted over 100 participants in challenges related to lease up with their Housing Choice Voucher program and has implemented participant and partner education related to housing navigation.</p>	<p>Homes for Good Housing Liaison has continued to participants in challenges related to lease up with their Housing Choice Voucher program and has worked to adapt provided participant and partner education related to housing navigation.</p>
<p>Continue to encourage and promote resident involvement in the Resident Advisory Board by maintaining and expanding the number of representatives from public and assisted housing, as well as the Section 8 program.</p>	<p>The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.</p>	<p>The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.</p>
<p>Enhance the customer service experience across agency programs by simplifying and aligning processes, providing access to services staff and by connecting participants to needed resources in the community.</p>		<p>Homes for Good continues to work to streamline and simplify agency processes and increasing availability of Resident Services and other support staff.</p>
<p>Enhance resident and agency communication through Resident Newsletters, improved website access, email communication and social media.</p>	<p>All communities continue to receive a monthly or quarterly residential newsletter.</p>	<p>All communities continue to receive a monthly or quarterly residential newsletter as well as more frequent resident updates related to COVID-19 and Agency operations which are posted and emailed to all residents.</p>
<p>Annually monitor income levels by development and provide targeted support to deconcentrate poverty. Bring higher income PH households into lower income developments and vice versa, if necessary.</p>	<p>Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.</p>	<p>Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.</p>
<p>Continue giving preferences 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).</p>		

Goal 4 Objective: Promote self-sufficiency and asset development of households served through public and assisted housing as well as the Section 8 homeownership program

Indicator	FY20 Progress	FY21 Progress
Expand access to the Family Self-Sufficiency (FSS) program to reach enrollment of 200 households or more.	Homes for Good Family Self-Sufficiency program currently has 149 households enrolled	Homes for Good Family Self-Sufficiency program currently has 128 households enrolled and have worked to adapt recruitment and intake to meet COVID-19 precautions.
Maintain a minimum representation of 15 community services agencies on the Family Self-Sufficiency Advisory Board.	and has increased participation on the FSS Advisory Board to over 18 community partners.	The FSS Advisory Board continues to grow with new organizations joining each year. Currently there are over 20 community partners engaged with this board.
Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet. Info Sessions have moved from monthly to every other week to increase availability and attendance.
Assist a minimum of two FSS participants a year in purchasing a home.	FSS has assisted 3 participants to purchase homes this year.	FSS has assisted 2 participants in purchasing homes this year and are working with several more to hopefully complete purchases by the end of the fiscal year.
Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.	FSS has assisted 11 residents to open IDA's.	FSS has assisted 6 households in opening IDA's this year. Funding for this opportunity has decreased this year but we are hopeful that it will return to pre-pandemic levels by the start of the fiscal year.

Goal 5 objective: To provide decent, safe and sanitary housing for very low-income families while maintaining their rent payments at an affordable level.

Indicator	FY20 Progress	FY21 Progress
Complete the Rent Assistance Demonstration construction and sale of scattered site homes.	Homes for Good has broken ground on the RAD new construction and has begun the sale of the scattered site homes.	Homes for Good is wrapping up construction of the replacement housing and will finalize construction and all relocations by July 2021.
Focus preservation efforts communicating with local, state and national funders to help preserve affordable housing opportunities.		RAD Replacement Housing at Sarang and Hayden Bridge Landing will be complete in June 2021. Sale of the scattered site homes is ongoing and will be complete in late 2021.
The Landlord Liaison continues with community engagement, providing routine educational seminars for landlords and supportive service organizations. Expansion of classes include courses specifically focused on housing quality standard guidelines, thus giving landlords the education and tools needed to prepare for successful housing inspections under HUD requirements.	The Landlord Liaison continues to engage community partners and landlords in ongoing education and support. Publication of a quarterly landlord newsletter in in place.	The Landlord Liaison provides routine education on accessing housing through Homes for Good to both landlord and community partners. The Landlord Liaison is engaged in a pilot Remote Video Inspection (RVI) program in partnership with our local VA office. The RVI process allows for remote video inspections with VA staff serving as proxy inspectors.
Partnered with NEDCO to provide zero interest loans for security deposits to Section 8 and VASH families.	In partnership with DevNW (previously NEDCO), Homes for Good was awarded \$50,000 from Meyer Memorial Trust to expand access to zero interest loans for security deposits for Section 8 and VASH families. These funds will become available to participants this year and will continue to be accessible through a revolving fund.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher recipients. Over the course of FY20 14 loans were issued.

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

Indicator	FY20 Progress	FY21 Progress
Increase success of Section 8 participants, particularly those coming out of homelessness or transitioning from permanent supportive or transitional housing through engagement with the Housing Liaison	The Housing Liaison and Landlord Liaison have increased support for participants and landlords with the goal of increasing the success rate of HCV participants.	Homes for Good has expanded local preference provider partnerships to thirteen community agencies. These agencies work with high barrier populations to access housing. The Landlord Liaison provides education to local preference partners on accessing housing through Homes for Good. Several community partners also have access to EHA funds which provide assistance with deposits and other move in related costs. As of February 2021 success rate for utilization of a tenant based voucher was 78%.
Grown the Landlord Liaison offerings of support for landlords through continuous communication, trainings and sharing resources		
Awarded funding to provide monetary incentives to landlords who agree to rent to persons with high housing barriers		
Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program	The Housing Liaison has initiated a quarterly Housing Navigator meetup to support local Housing Navigators in increasing the success of their participants who are seeking to lease up with their Section 8 voucher and is in the process of initiating a lease up support group to help participants in building their housing portfolio, searching for housing and leasing up in available units.	The Housing Liaison continues to facilitate a quarterly Housing Navigator meetup to support local Housing Navigators in increasing the success of their participants who are seeking to lease up with their Section 8 voucher and is in the process of initiating a lease up support group to help participants in building their housing portfolio, searching for housing and leasing up in available units.
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.	A rent study was completed for the 2020 Fair Market Rents. Homes for Good received a 12% increase to the FMRs, which directly impact the Payment Standards utilized by those receiving tenant-based subsidies. This increase will expand housing stock (will now be able to qualify for units they once could not afford) and the dollar amount (more funds to each household) of assistance Homes for Good provides.	Success rate for utilization of vouchers for 02/2019 was 69%. It grew to a success rate of 78% by 02/2021. Some of this growth in success rate can be contributed to the increase in Payment Standards. In addition, rent burden for families has decreased. Prior to the FMR study 16.7% of 4-bedroom families were paying 41% or more of their income towards rent. Post FMR study 4.8% of 4-bedroom families are paying 41% or more of their income towards rent.
A Homes for Good staff member serves on the board for the local Rental Owners association	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association. Various staff members also attend the general monthly membership meeting.	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association (ROA). The Landlord Liaison attends general membership meetings and contributes articles to the ROA's monthly newsletter which is distributed to 1180 members representing 18,617 rental units.

Attachment C.3 Resident Advisory Board (RAB) Comments

RAB Meeting

04/08/2021

Beth Ochs, Rent Assistance Director: Presented the Key modifications Matrix ACOP

RAB member #1: Question- can you explain that more? – the part about currently engaged in any use of illegal drugs during the previous six months.

RAB member #2: does this only cover drugs or any other federal crimes?

Beth Ochs, Rent Assistance Director: Public housing agency is looking for convictions

RAB member #1: Are they looking any other convictions like pedophiles?

Beth Ochs, Rent Assistance Director: The Public housing agency has specific rules around convictions that are outlined in the Administrative Plan/ ACOP

Beth Ochs, Rent Assistance Director: (read more key modifications Sections 8-16)

RAB member #2: are we going to get an electronic version of this?

Beth Ochs, Rent Assistance Director: Will send the document to Emily to distribute to the group

RAB member #1: what is the timeline moving to project based? Moving all of them to project based?

Wakan Alferes, Supportive Housing Director: No confirmed timeline, would happen in stages, will come back to this group once a timeline has been determined, possibly the next two years to kick off the next phase.

RAB member #3: Was given 6 days or 9 days, to move to Springfield. What's going on with that?

Beth Ochs, Rent Assistance Director: ACOP now states 14 days' notice to transfer to new unit.

Melanie Church, Supportive Housing Division Analyst: Most new changes are based on waitlist and application challenges, drug use: Previous policy states – must have *“completed recovery program”*, now states *“participating in recovery program”* going from currently engaged in drug use to within the last 3 months. Example: Not currently engaged but seeking treatment. In the past we have denied based, now *may* deny – in order to reduce barriers for housing stability. Decisions to deny housing could be a panel process.

RAB member #1: could someone say they are participating in a 12-step recovery program? Considering the cost in-patient treatment?

Melanie Church, Supportive Housing Division Analyst: It is possible to submit a claim saying 12-steps has remained sober.

Melanie Church, Supportive Housing Division Analyst: Rental history has also become a barrier, denial based on housing history goes against our housing mission.

RAB member #3: we can't have other people living in our unit

Melanie Church, Supportive Housing Division Analyst: Doing our best to keep people housed, ability to add people to lease.

Melanie Church, Supportive Housing Division Analyst: no longer doing paper applications, removed from ACOP

Melanie Church, Supportive Housing Division Analyst: First come first served to Random selection method to allow for a more equitable process for all who apply. We are working with community partners; preference would put them at the top of the list

RAB member #2: random selection was done a long time ago, the last person doing the random selection was arrested and fired. How can we be sure that won't happen again?

Melanie Church, Supportive Housing Division Analyst: The process is computerized, technology has advanced, not aware of the incident previously mentioned.

RAB member #3: what if you don't have a computer,

Melanie Church, Supportive Housing Division Analyst: When we open a waitlist – we have staff specifically assigned to answer waitlist questions. Staff members will type in the application and submit it for them.

Melanie Church, Supportive Housing Division Analyst: in the past PHA assigns the bedroom size, applicants tell us how many bedrooms they want.

Melanie Church, Supportive Housing Division Analyst: using random selection, SSN is not required to apply for housing.

Melanie Church, Supportive Housing Division Analyst: will now have 30 days to respond to waitlist.

Melanie Church, Supportive Housing Division Analyst: requests for exceptions to occupancy standards will need supervisor approval.

Melanie Church, Supportive Housing Division Analyst: if an applicant receives an offer for a 3-bedroom, applicant can choose to remain on the waitlist.

RAB member #3: neighbor had a high school teen, was told to move once they graduated high school.

Melanie Church, Supportive Housing Division Analyst: low inventory of vacant units, may ask the person who is overhoused to move to a smaller unit. Reasonable accommodation requests can be made to ask to stay in the unit for a medically required reasons.

RAB member #3: there are people who are in 2- or 3-bedroom units with only one person living in the unit.

Melanie Church, Supportive Housing Division Analyst: Many different reasons that they have not moved yet

RAB member #1: it was a common practice 20 or so years ago, also because we didn't have the tools to determine wage. But the system has changed since then.

Melanie Church, Supportive Housing Division Analyst: if a person has questions or would like to challenge the decision of the PHA they can reach out a supervisor to review the decision.

RAB member #1: does the advertising for waitlist clearly state instructions for those who need help app

Melanie Church, Supportive Housing Division Analyst: Staff is available to provide live help.

Melanie Church, Supportive Housing Division Analyst: will not review income when adding a new person to the household, except when adding a minor in that case the household would benefit from the addition.

Melanie Church, Supportive Housing Division Analyst: Transfer requests, can now be for reasons of education and including work.

RAB member #3: really misses the coast.

Melanie Church, Supportive Housing Division Analyst: Anyone in the household can get the utilities turned on, no longer required to be head of household

Melanie Church, Supportive Housing Division Analyst: lease termination- changing from will to may terminate based on previous ACOP matrix, drug / alcohol related actives

RAB member #3: let's talk about pedophiles

Melanie Church, Supportive Housing Division Analyst: lifetime registered sex offenders are not allowed in public housing.

Beth Ochs, Rent Assistance Director: will have a meeting with HUD to discuss registered sex offenders. Tiers 1-3 in Oregon all Registered sex offenders are registered for a lifetime.

RAB member #2: an incentive to not commit the crime.

RAB member #1: was hoping to get draft prior to RAB meeting so we can gather questions prior to meeting

Comment Analysis

RAB members were supportive of reduced and/or more flexible screening criteria. Beth Ochs, the Rent Assistance Director who oversees Public Housing intake, is meeting with HUD to discuss the blanket ban on all registered sex offenders when as RAB points out, the predatory nature and severity of crimes committed by these individuals varies a great deal.

They preferred the move to a lottery based Public Housing wait list system as long as sufficient accommodations are made for individuals without access to technology or the skills necessary to fill out an electronic pre-application. RAB members were also concerned about fairness or an individual staff member's ability to manipulate the lottery. Homes for Good is confident that computer assigned lottery numbers with a robust audit trail would make it extremely difficult to show favoritism that could not be detected.

RAB members expressed concerns about the fairness and communication that happens within the transfer policy. Historically, individuals have not had the policy explained clearly and have not always received reasonable notice of required moves. Homes for Good has centralized intake functions, composed new transfer notification letters, and is working on revised, more clear transfer procedures that can be shared with any resident who has questions beyond the language in the Public Housing Lease Agreement.

Future phases of converting Public Housing to a Section 8 platform are of concern to RAB members. Wakan Alferes, the Supportive Housing Director, will keep RAB informed as a timeline develops but it will possibly be within the next two years.

RAB asked for advance copies of any materials being presented at a meeting. Homes for Good will make every effort to meet this request.