



ANNUAL PLAN FOR FISCAL YEAR 2023



541-682-3755



www.homesforgood.org



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Homes for Good PHA Annual Plan for Fiscal Year 2023

Homes for Good Housing Agency is updating its PHA Annual Plan. This plan guides the planning and implementation of federal programs under the jurisdiction of the Department of Housing and Urban Development for the period beginning October 1, 2022. The federal programs related to housing and other needs for low-income persons covered by the Agency Plans include, but are not limited to, Capital Fund, Section 8 and Public Housing Admission policies, Self Sufficiency, and Resident participation.

The public examination and comment period begins Friday May 2, 2022 and ends Monday, June 20, 2022. There will be a public hearing on May 25, 2022 at 1:30 p.m. via Zoom.

Topic: May Board Meeting

Time: May 25, 2022 01:30 PM Pacific Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/7427507154?pwd=bkFDWVZjeU9LSjZGR0J0RHF3TUNEUT09>

Meeting ID: 742 750 7154

Passcode: HFGBoard22

One tap mobile

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877 853 5257 US Toll-free

888 475 4499 US Toll-free

833 548 0276 US Toll-free

Comments may be presented in person during this meeting, or in writing as noted below. The draft plans and all supporting documents may be viewed at Homes for Good Service Center 100 West 13th Ave Eugene, OR 97401 and on our website at homesforgood.org

If you have any questions regarding the plans or would like to submit any written comments, please contact Melanie Church, Compliance & Data Analyst; at 100 West 13th Ave Eugene, OR 97401, mchurch@homesforgood.org or 541-682-2588. If you need a reasonable accommodation in regard to this meeting, please call 541-682-2588 at least 24 hours prior to the meeting time.

The Agency is an equal opportunity employer and complies with State and Federal laws and regulations relating to the 1973 Rehabilitation Act, Section 504, and the 1990 Americans with Disabilities Act (ADA) and the 2009 ADA Amendments Act (ADAAA). Homes for Good does not discriminate on the basis of disability status in the admission or access to its federally assisted programs or activities.

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 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

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

Definitions.

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

A.	PHA Information.																										
A.1	<p> PHA Name: _____ Homes for Good Housing Agency _____ PHA Code: ___OR006___ PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/01/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>595</u> Number of Housing Choice Vouchers (HCVs) <u>3199</u> Total Combined <u>3794</u> PHA Plan Submission Type: <input checked="" 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> <i>The Plan and Plan Elements are available the AMP 100 office at Laurelwood Homes, AMP 200 office at McKenzie Village, AMP 300 office at Maplewood Meadows, and AMPs 500 & 600 offices at Riverview Terrace. Home for Good's administrative offices are now located in a new building at 100 W 13th Ave Eugene, OR 97401.</i> </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; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 12.5%;">PH</th> <th style="width: 12.5%;">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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Lead PHA:																											

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>See Attachment B.1 Revision of PHA Plan Elements See Attachment B.1.a Key Modifications ACOP FY23 See Attachment B.1.b Key Modifications Admin Plan FY23</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?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" 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> <p>See Attachment B.3 Progress Report</p>

B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See HUD Form 50075.2 approved by HUD on 08/02/2021</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(a) If yes, please describe: The Agency’s request for an extension of time to deliver the audit report was granted on four occasions. The final extension was granted until February 28, 2022, and the audit report was not filed with the Oregon Secretary of State until March 8, 2022. As a result, the audit report was filed eight days late with the Oregon Secretary of State.</p> <p>This finding was reported based upon the auditor’s work performed in conformity with Oregon minimum audit standards. This is not a Federal audit compliance finding.</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<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>
C.3	<p>Civil Rights Certification/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>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing.

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:
<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>

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

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

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

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

B. Plan Elements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C. Other Document and/or Certification Requirements

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

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

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further

fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

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

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

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

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

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 7.02 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. This was developed with input during the City of Eugene and the City of Springfield Consolidated planning process and consultation with many community partners. Its effectiveness is reviewed and measured 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 incomes. 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'. Most 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 problems 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

5 New Construction projects are recently completed or currently underway totaling 230 units.

The Commons on MLK (\$13 million total budget)	<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>
Sarang (1 of 2 projects part of \$32mm Rental Assistance Demonstration Preservation RAD replacement Project.)	<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 was completed in June of 2021 and provides 49 of the units in Eugene.</p>
Hayden Bridge Landing (2 nd RAD replacement project)	<p>This 70-unit project is the second site in the one financial transaction and was completed in June of 2021. This project provides 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>
The Keystone	<p>This 15-unit Permanent Supportive Housing development in Eugene serves homeless families and includes 15 PBVs. It was completed in fall of 2021.</p>
The Nel	<p>This 45-unit Permanent Supportive Housing development in Eugene will serve homeless individuals and includes 45 PBVs. It began construction in May 2021 and will be complete in July of 2022.</p>

Administrative

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

Future RAD Conversions	Homes for Good is looking at future phases of converting the remaining public housing through the RAD process. 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.
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Development Pipeline

Lazy Days	Homes for Good purchased 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 acquired property in Glenwood that will be used for a future development of 100 to 150 units.
Florence	Homes for Good acquired a 6-acre parcel that will be used for the future development of 100 to 150 units
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 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 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 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:

Accessibility survey of all Homes for Good owned units being conducted.

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. The 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 reasonable accommodation for 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 2021

PROGRAM	BEGINNING RESERVE	FEDERAL REVENUE	RENT	OTHER	TOTAL
Community Services					
Development	12,915,200	-	-	7,422,600	20,337,800
Bus Barn	-	-	62,500	-	62,500
Weatherization	-	1,588,500	-	-	1,588,500
Shelter Plus Care	-	817,000	-	-	817,000
Herran Center	506,700	-	269,000	-	775,700
Signpost House	158,100	-	90,500	-	248,600
Family Self Sufficiency	-	324,900	-	-	324,900
VA Per Diem	-	150,000	-	-	150,000
MS - Barrier Busters	-	-	-	15,600	15,600
The Way Home	-	-	-	39,000	39,000
Family Shelter House	61,000	-	13,500	-	74,500
ROSS	-	80,000	-	-	80,000
Emergency Housing Assistance	-	18,400	-	-	18,400
Homes for Good Foundation	27,900	-	-	3,000	30,900
	13,668,900	2,978,800	435,500	7,480,200	24,563,400
Housing					
Public Housing	845,700	1,588,400	2,019,400	39,900	4,493,400
Firwood	50,100	-	627,800	-	677,900
Norseman	428,200	-	288,600	-	716,800
Jacob's Lane	261,500	-	355,500	-	617,000
Sheldon Village Apartments	82,900	-	620,700	-	703,600
Village Oaks	14,300	100,000	363,600	-	477,900
Fourteen Pines	403,700	284,000	200,000	-	887,700
Laurel Gardens	139,900	-	214,000	-	353,900
Walnut Park	183,800	-	180,000	-	363,800
The Orchards	-	-	201,900	-	201,900
Abbie Lane	235,600	-	360,300	-	595,900
Camas Place	5,275	-	259,500	-	264,775
Capital Fund	-	1,422,000	-	-	1,422,000
	2,650,975	3,394,400	5,691,300	39,900	11,776,575
Rental Assistance	2,021,000	24,540,800	-	-	26,561,800
Central Office Cost Center	1,816,025	-	685,000	3,496,400	5,997,425
TOTALS	\$ 20,156,900	\$ 30,914,000	\$ 6,811,800	\$ 11,016,500	\$ 68,899,200

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

Significant Amendment or Modification

Definitions of Substantial Deviation to the PHA 5 Year Plan and Significant Amendment to the 5 Year and Annual Plan

In accordance with 24 CFR 903.7(r)(2) which requires public housing authorities to identify the basic criteria the agency will use to determine a substantial deviation from its 5 Year Plan and significant amendments or modification to the 5 Year Plan and Annual Plan, the following definitions are offered:

Definition of Substantial Deviation from the 5 Year Plan:

- A substantial change in a goal(s) identified in the 5 Year Plan.

Definition of Significant Amendment or Modification to the Annual and 5 Year Plan:

- Changes of a sufficient nature to the rent, admissions policies, or the organization of the waiting list not required by federal regulatory requirements as to a change in the Section 8 Administration Plan or the Public Housing Admissions and Continued Occupancy Policy. This includes elimination or major changes in any activities proposed, or policies provided in the agency plan that would momentarily affect services or programs provided residents. This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.
- Significant dollar or work item changes to the Capital Fund grant. Significant dollar change to be defined as more than 20% of the total annual grant. Moving a work item from one year to another will not be considered a significant change even if that change produces a dollar change over 20%.
- Changes of a sufficient nature with regard to demolition or disposition, designation, homeownership programs, or conversion activities.

As a result of our participation in the Rental Assistance Demonstration (RAD), Homes for Good is further defining Substantial Deviation and Significant Amendment or Modification to exclude the following RAD-specific items:

- The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance.
- Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds.
- Changes to the construction and rehabilitation plan for each approved RAD conversion.
- Changes to the financing structure for each approved RAD conversion.



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Key Modifications to Homes for Good Admissions and Continued Occupancy Policy Fiscal Year 2023 Effective Date 10-01-2022 to 9-30-2023

Section	Previous Policy	Proposed Policy	Required Change?	Impact
2-I.A.	Executive Orders 11063	Executive Orders 11063 and 13988	Yes	None
2-I.B.	The PHA will not discriminate on the basis of marital status, gender identity, or sexual orientation [FR Notice 02/03/12].	The PHA will not discriminate on the basis of marital status, gender identity, or sexual orientation [FR Notice 02/03/12]; Executive Order 13988].	Yes	None
2-III.B.	The PHA will utilize a language line for telephone interpreter services.	The PHA will utilize a language line for telephone interpreter services. When exercising the option to conduct remote hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice-only interpretation.	No	Using video conferencing when possible will provide better Limited English Proficiency customer service.
3-II.E.		<p>3-II.E. EIV SYSTEM SEARCHES [Notice PIH 2018-18; EIV FAQs; EIV System Training 9/30/20] Existing Tenant Search Prior to admission to the program, the PHA must search for all household members using the EIV Existing Tenant Search module. The PHA must review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The PHA must provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance.</p> <p>If the tenant is a new admission to the PHA, and a match is identified at a multifamily property, the PHA must report the program admission date to the multifamily property and document the notification in the tenant file. The family must provide documentation of move-out from the assisted unit, as applicable.</p> <p><u>PHA Policy</u> The PHA will contact the PHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or 50059, as applicable, showing an end of participation. The PHA will only approve assistance contingent upon the move-out from the currently occupied assisted unit.</p> <p>Debts Owed to PHAs and Terminations All adult household members must sign the form HUD-52675, Debts Owed to Public Housing and Terminations. Prior to admission to the program,</p>	Yes	Compliance

		<p>the PHA must search for each adult family member in the Debts Owed to PHAs and Terminations module.</p> <p>If a current or former tenant disputes the information in the module, the tenant should contact the PHA directly in writing to dispute the information and provide any documentation that supports the dispute. If the PHA determines that the disputed information is incorrect, the PHA will update or delete the record from EIV. Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the program.</p> <p><u>PHA Policy</u></p> <p>The PHA will require each adult household member to sign the form HUD-52675 once at the eligibility determination. Any new members added to the household after admission will be required to sign the form HUD-52675 prior to being added to the household.</p> <p>The PHA will search the Debts Owed to PHAs and Terminations module as part of the eligibility determination for new households and as part of the screening process for any household members added after the household is admitted to the program. If any information on debts or terminations is returned by the search, the PHA will determine if this information warrants a denial in accordance with the policies in Part III of this chapter.</p>		
3-III.C.	<p>Has a pattern of unsuitable past performance in meeting financial obligations, including rent within the past three years</p> <p>Has a pattern of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences within the past three years which may adversely affect the health, safety, or welfare of other tenants</p> <p>...</p> <p>In the case of money owing to another PHA, or the owner of a rental or assisted property, the applicant will be notified by the PHA of the amount owed. The applicant will be given 14 days to provide the PHA</p>	<p>Deleted</p> <p>...</p> <p>In the case of money owing to this or another PHA, the applicant will be notified by the PHA of the amount owed. The applicant will be given 14 calendar days to provide the PHA with proof of payment or documentation that a repayment agreement has been reached and that the applicant is considered to be in good standing/up to date on payments.</p>	No	<p>Reducing screening criteria removes housing barriers commonly experienced by low-income renters.</p> <p>In addition, if money is owed to Homes for Good or another Housing Agency, applicants will not be required to have pay off all debts before being housed again. Applicants will be required to</p>

	<p>with proof of payment or documentation that a repayment agreement has been reached and that the applicant is considered to be in good standing/up to date on payments.</p> <p>In the case of money owing to the PHA, the applicant will be notified by the PHA of the total amount owed. The applicant will be given 14 days to provide the PHA with proof of payment in full.</p>			<p>acknowledge the debt through a repayment agreement and be current on payments.</p>
3-III.D.	<p>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.</p> <p>If the adult household member has resided in Oregon for the last 3 years and there is not 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.</p>	<p>The PHA will perform criminal background checks through a commercial screening company for all household members.</p>	No	<p>Homes for Good no longer has access to LEDS and OJIN. We currently use a commercial screening company.</p>
3-III.D.	<p>The PHA will use the Dru Sjodin National Sex Offender database to screen applicants for admission.</p>	<p>The PHA will perform criminal background checks through a commercial screening company for all household members.</p>	No	<p>Homes for Good currently uses a commercial screening company for all background checks.</p>
3-III.D.	<p>Utility company references covering the monthly amount of utilities, late payment, disconnection, return of a utility deposit and whether the applicant can get utilities turned on in his/her name.</p>	<p>Utility company references covering the monthly amount of utilities, late payment, disconnection, return of a utility deposit and whether the applicant can get utilities turned on in their name.</p>	No	<p>Simplified language to make it easier to read.</p>

<p>3-III.D.</p>	<p>If an applicant has no rental payment history the PHA may check court records of eviction actions and other financial judgments, and credit reports.</p> <p>If previous landlords or the utility company do not respond to requests from the PHA, the applicant may provide other documentation that demonstrates their ability to meet financial obligations (e.g. rent receipts, cancelled checks, etc.)</p>		<p>No</p>	<p>Reducing screening criteria removes housing barriers commonly experienced by low-income renters.</p>
<p>3-III.D.</p>	<p>Police and court records within the past three years will be used to check for any evidence of disturbance of neighbors or destruction of property that might have resulted in arrest or conviction. A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying activity.</p> <p>Alternative references will be requested to complete a verification of the applicant's ability to care for the unit and avoid disturbing neighbors if no other documentation is available.</p>	<p>Police and court records within the past three years may be used to check for any evidence of disturbance of neighbors or destruction of property that might have resulted in arrest or conviction. A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying activity.</p>	<p>No</p>	<p>Reducing screening criteria removes housing barriers commonly experienced by low-income renters.</p>
<p>4-I.D.</p>	<p>The PHA will send written notification of the preliminary eligibility determination within 14 calendar days of receiving a completed pre-application. If applicable, the notice will also indicate the waiting list preference(s) for which the family appears to qualify.</p> <p>Applicants will be placed on the waiting list according to PHA preference(s) and a random selection method and ranking method assigned at the time the waiting list closes.</p> <p>Placement on the waiting list does</p>	<p>Upon successful completion of an application the applicant will be provided a computer-generated receipt from the WaitListCheck software waiting list. It is the responsibility of the applicant to retain this receipt as proof of successful application submission.</p> <p>Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. When the family is selected from the waiting list, the PHA will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.</p> <p>Applicants will be placed on the waiting list using a random selection process . Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers and according to any preference(s) for which they qualify.</p> <p>All successful applicant submissions will enter into a random selection</p>	<p>No</p>	<p>Clarifies our waitlist process</p>

	<p>not indicate that the family is, in fact, eligible for admission.</p> <p>When the family is selected from the waiting list, the PHA will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.</p>	<p>process. Those randomly selected will receive a letter assigning them their random selection number. Those who are not selected thru the random selection process will receive a letter stating they were not selected.</p>		
4-II.F.	<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.</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>	No	Change from calendar days to business days to align with the Administrative Plan and provide additional time to participants.
4-II.F.		<p>If the PHA determines that the family is not eligible for admission (see Chapter 3) at any time while the family is on the waiting list the family will be removed from the waiting list.</p> <p>If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the PHA's decision (see Chapter 14) [24 CFR 960.208(a)].</p>	No	Clarifies our waitlist process
4-III.C.		<p>The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following: How to obtain an application packet If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.</p>	No	Clarifies our waitlist process
	<p>Families selected from the waiting list are required to participate in an intake interview. All adult family members must attend the interview. All household members provide</p>	<p>Families selected from the waiting list are required to submit an application. Applications will be reviewed for completeness. Applicants with incomplete applications will be contacted via phone, mail, or email to complete the application. Verification of information pertaining to adult members of the household</p>	No	Removes required intake interview and changes calendar to business days to

<p>appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity). If the family does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.</p> <p>Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 60 days. If not all household members have disclosed their SSNs at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.</p> <p>If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7). If the family is verified as eligible for the preference, the PHA will proceed with the interview. If the PHA determines the family is not eligible for the preference, the interview will not proceed and the family will be placed back on the waiting list according to the date and time of their application.</p> <p>The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.</p>	<p>will not begin until signed release forms are returned to the PHA.</p> <p>Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 60 days. If not all household members have disclosed their SSNs (if applicable) at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.</p> <p>The family must provide the required documentation to the PHA, during regular business hours, within 14 business days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails to provide the required documentation within 14 business days.</p> <p>Any required documents or information that the family is unable to provide must be provided within 14 business days of the family being notified of the missing documentation Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).</p> <p>An advocate, interpreter, or other assistant may assist the family with the application.</p> <p>Applications will be provided in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.</p>	<p>provide more time to participants and align with the Administrative Plan.</p>
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	<p>Any required documents or information that the family is unable to provide at the interview must be provided within 14 calendar days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).</p> <p>An advocate, interpreter, or other assistant may assist the family with the application and the interview process.</p> <p>Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.</p> <p>If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will have their applications made inactive based on the family's</p>			
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	failure to supply information needed to determine eligibility. The second appointment letter will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested and their application will be made inactive. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination, therefore the PHA will not offer an informal hearing.			
4-III.E.	The PHA will notify a family in writing of their eligibility within 14 calendar days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.	The PHA will notify a family in writing of their eligibility within 14 business days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.	No	Provides more time and aligns with the Administrative Plan
4-III.E.	If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 14 calendar days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing (see Chapter 14).	If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 14 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing (see Chapter 14).		Provides more time and aligns with the Administrative Plan
5-I.C.	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.	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 one year from the date of admission, unless they have a subsequent change in family size or composition. Requests need supervisor approval.	No	Reducing the waiting period to one year to align with other transfer processes
5-I.C.	The PHA will notify the family of its decision within 14 calendar days of receiving the family's request.	The PHA will notify the family of its decision within 14 business days of receiving the family's request.	No	Provides more time and aligns with the

				Administrative Plan
5-II.C.		Applicants who fail to respond within 3 business days will not be removed from the wait list.	No	Clarifies our waitlist process
5-II.D.	The PHA will require documentation of good cause for unit refusals.	The PHA may require documentation of good cause for unit refusals.	No	Provides flexibility to only request documentation if it is necessary
5-II.D.	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 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).	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).	No	Clarifies that removal from a waitlist for rejection would only result in removal from the one waiting list
6-I.D.	Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.	Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a landscaper would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.	No	Change to gender neutral language
6-II.F.	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 will consider, justification for costs that exceed	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.	No	Simplifies childcare expense calculations

	typical costs in the area.			
7-I.D.	As verification of earned income, the PHA will require the family to provide payroll documents or paystubs for at least the most current month.	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	Clarification of income verification process
7-II.F.	For family members claiming disability who receive disability payments from the SSA, the PHA will attempt to obtain information about disability benefits through HUD's Enterprise Income Verification (EIV) system. If documentation is not available through HUD's EIV system, the PHA will utilize available UIV systems. If the documentation is not available through EIV or UIV, or if the PHA questions the accuracy of UIV, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, the PHA will ask the family to obtain and provide a benefit verification letter to the PHA.	For family members claiming disability who receive disability payments from the SSA, the PHA will attempt to obtain information about disability benefits through HUD's Enterprise Income Verification (EIV) system. If documentation is not available through HUD's EIV system, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, the PHA will ask the family to obtain a benefit verification letter either by calling SSA at 1-800-772-1213 or by requesting one from www.ssa.gov. Once the family receives the benefit verification letter, it will be required to provide the letter to the PHA.	No	Provides additional information on how participants can access required documentation
8-I.C.	The head of household, spouse or cohead, and all other adult members of the household will be required to sign the public housing lease prior to admission. An appointment will be scheduled for the parties to execute the lease. The head of household will be provided a copy of the executed lease and the PHA will retain a copy in the resident's file.	The head of household, spouse or cohead, and all other adult members of the household will be required to sign the public housing lease prior to admission. An appointment may be scheduled for the parties to execute the lease. The head of household will be provided a copy of the executed lease and all addenda and the PHA will retain a copy in the resident's file.	No	Clarifies the leasing process
8-I.F.	If the family fails to pay their rent by the seventh day of the month, and the PHA has not agreed to accept payment at a later date, a 14 day Notice to Vacate (72 Hour Notice with 14 days to pay) will be issued to the resident for failure to pay rent, demanding payment in full or the	If the family fails to pay their rent by the seventh day of the month, and the PHA has not agreed to accept payment at a later date, a 30-Day Notice of Termination for Nonpayment of Rent will be issued to the resident for failure to pay rent, demanding payment in full or the surrender of the premises.	Yes	HUD regulatory change due to the COVID-19 pandemic

	surrender of the premises.			
8-II.B.	Supervisory quality control inspections will be conducted in accordance with the PHA's Quality Control Plan.	Supervisory quality control inspections will be conducted in accordance with the PHA's Maintenance Plan.	No	Reflects that the Quality Control Plan is an integral part of the Maintenance Plan.
8-II.C.	<p>Except at move-in inspections, the resident is not required to be present for the inspection. The resident may attend the inspection if he or she wish.</p> <p>If no one is at home, the inspector will enter the unit, conduct the inspection and leave a copy of the inspection report in the unit. For other entries when a resident is not home, the PHA will leave a notice of the date, time, and purpose of entry.</p>	<p>Except at move-in inspections, the resident is not required to be present for the inspection. The resident may attend the inspection if they wish.</p> <p>If no one is at home, the inspector will enter the unit, conduct the inspection and provide a copy of the inspection report upon request. For other entries when a resident is not home, the PHA will leave a notice of the date, time, and purpose of entry.</p>	No	<p>Update to gender neutral language.</p> <p>Reduces administrative burden of providing copies when not all residents wish to receive a copy.</p>
8-II.D.	Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke detector. Only one warning will be given. A second incidence will result in lease termination.	Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke detector. Only one warning will be given. A second incidence will result in a lease termination notice .	No	Reflects the progressive lease enforcement procedure. No lease is terminated without opportunities for remedy except in extreme circumstances that qualify for a 24-HR Notice of Termination.
9-I.C.	Families generally are required to participate in an annual reexamination process, and adult family members may be required to attend an interview. If participation in an in- person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a	<p>The PHA's procedure for conducting annual reexaminations will be through mail, unless the family requests an in-person interview.</p> <p>If a family fails to comply with the PHA's annual reexamination process, the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p> <p>An advocate, interpreter, or other assistant may assist the family in the interview process.</p>	No	Updates the annual reexamination interview process to reflect participant preference

	<p>reasonable accommodation.</p> <p>If a family fails to comply with the PHA's annual reexamination process, the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p> <p>An advocate, interpreter, or other assistant may assist the family in the interview process.</p>			
9-II.B.	<p>For families paying flat rents, the PHA will conduct a full reexamination of family income and composition once every 3 years.</p>	<p>For families paying flat rents, the PHA may conduct a full reexamination of family income and composition annually.</p>	No	<p>Updated to reflect actual process, annual review needed to provide annual option of flat rent</p>
9-III.B.	<p>Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 14 calendar days per year during any 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.</p>	<p>Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 14 consecutive days or 30 cumulative days per year during any 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.</p>	No	<p>Updated to reflect guest policy in community rules</p>
9-III.C.	<p>For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start, to adjust the exclusion with any changes in income, and at the conclusion of the 24-month eligibility period.</p> <p>If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income.</p>	<p>For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start, to adjust the exclusion with any changes in income, and at the conclusion of the 24-month eligibility period.</p> <p>If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income.</p> <p>The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.</p>	No	<p>Simplify language</p>

	<p>If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.</p> <p>If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.</p> <p>The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.</p>			
<p>9-III.C.</p>	<p>Families are required to report all increases in income, including in earned income, including new employment at the next Annual Recertification.</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>Families are not required to report any other changes in income or expenses.</p>	<p>Families are required to report all increases in income, including in earned income, including new employment at the next Annual Recertification (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam).</p> <p>The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.</p>	<p>No</p>	<p>Simplify language and align with Administrative Plan</p>
<p>9-III.D.</p>	<p>The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA will require the family to submit the changes on a PHA form.</p>	<p>The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.</p> <p>Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview</p>	<p>No</p>	<p>Clarifies the notification requirement</p>

	<p>Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview is warranted, the family will be required to attend.</p> <p>Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 calendar days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, electronically or in person.</p>	<p>is warranted, the family will be required to attend.</p> <p>Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 calendar days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, electronically or in person.</p>		
<p>12-III.C</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</p>	<p>Except where reasonable accommodation or an emergency transfer under VAWA 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>No</p>	<p>Simplifies transfer language</p>

	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. 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.			
12-III.E.	The resident will bear all of the costs of transfer s/he requests. However, the PHA will bear the transfer costs when the transfer is done as a reasonable accommodation.	The resident will bear all of the costs of transfer they requests. However, the PHA will bear the transfer costs when the transfer is done as a reasonable accommodation.	No	Change to gender neutral language
12.IV.D.	When the transfer has been requested by the resident, the refusal of that offer without good cause will result in the removal of the family from the transfer list. In such cases, the family must wait six months to reapply for another transfer.	When the transfer has been requested by the resident, the refusal of that offer without good cause will result in the removal of the family from the transfer list and all bedroom-size wait lists the family was placed on as a result of the transfer request. In such cases, the family must wait one year to reapply for another transfer.	No	Clarifies and simplifies transfer language
12.IV.F.	The reexamination date will not be changed when a transfer takes place.	The reexamination date will be changed when a transfer takes place, except for emergency transfers and temporary transfers related to Demolition, Disposition, Revitalizations, or Rehabilitation.	No	Clarifies when a reexamination will take place
13-III.C.	Failure to permit access to the unit by the PHA after proper advance notification for the purpose of performing routine inspections and maintenance, for making improvements or repairs, or to show the dwelling unit for re-leasing , or without advance notice if there is reasonable cause to believe	Failure to permit access to the unit by the PHA after proper advance notification for the purpose of performing routine inspections and maintenance, for making improvements or repairs, or without advance notice if there is reasonable cause to believe that an emergency exists	No	Clarification of unit entry process

<p>14-I.B.</p>	<p>that an emergency exists</p> <p>A request for an informal hearing must be made by phone or in writing by the close of the business day, no later than 14 calendar days from the date of the PHA's notification of denial of admission.</p> <p>The PHA will schedule and send written notice of the informal hearing within 14 calendar days of the family's request.</p>	<p>A request for an informal hearing must be made by phone or in writing by the close of the business day, no later than 14 calendar days from the date of the PHA's notification of denial of admission.</p> <p>The PHA will schedule and send written notice of the informal hearing within 14 calendar days of the family's request.</p> <p>If the PHA informal hearing will be conducted remotely, at the time the notice is sent to the family, the family will be informed: Regarding the processes involved in a remote informal hearing;</p> <p>That the PHA will provide technical assistance prior to and during the informal hearing, if needed; and</p> <p>That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal hearing, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to participate in an in-person informal hearing, as appropriate.</p>	<p>Yes</p>	<p>New language added regarding remote hearings and the technical assistance available to participants</p>
<p>14-I.B.</p>		<p>Remote Informal Hearings [Notice PIH 2020-32]</p> <p>There is no requirement that informal hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their informal hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal hearings, applicants may still request an in-person informal hearing, as applicable.</p> <p>PHA Policy</p> <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.</p> <p>In addition, the PHA will conduct an informal hearing 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 hearing, or if the applicant believes an in-person informal 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>Ensuring Accessibility for Persons with Disabilities and LEP Individuals</p> <p>As with in-person informal hearings, the platform for conducting remote informal hearings must be accessible to persons with disabilities and the informal hearing must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are</p>	<p>Yes</p>	<p>Adds information regarding ability to request remote informal hearing</p>

		<p>accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.</p> <p>If no method of conducting a remote informal hearing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote informal review, and the PHA should consider whether postponing the remote informal hearing to a later date is appropriate or whether there is a suitable alternative.</p> <p>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances and requirements.</p> <p>As with in-person hearings, Limited English Proficiency (LEP) requirements also apply to remote informal hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal hearings.</p> <p>Conducting Remote Informal Hearings [Notice PIH 2020-32]</p> <p>The PHA must ensure that the lack of technology or inability to use technology for remote informal hearings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote informal hearing and, if the family does not have the proper technology to fully participate, either postpone the informal hearing or provide an alternative means of access.</p> <p>As with in-person informal hearings, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal hearing. The family must also be provided with an accessible means by which to transmit their own evidence.</p> <p>The PHA must ensure that the applicant has the right to hear and be heard. 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 at 24 CFR 966.56 and the guidance for conducting remote hearings specified in Notice PIH 2020-32.</p> <p>PHA Policy</p> <p>The PHA will conduct remote informal hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers,</p>		
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		<p>applicants are unable to adequately access the video conferencing platform at any point, or upon applicant request, the informal hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</p> <p>At least five business days prior to scheduling the remote hearing, the PHA will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</p> <p>If the informal hearing is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal hearing at least 24 hours before the scheduled hearing through the mail, via email, or text. The PHA will scan and email copies of these documents to the PHA representative and to the person conducting the informal hearing the same day.</p> <p>Documents will be shared electronically whenever possible.</p> <p>The PHA will follow up the email with a phone call and/or email to the applicant at least one business day prior to the remote informal hearing to ensure that the applicant received all information and is comfortable accessing the video conferencing or call-in platform.</p> <p>The PHA will ensure that all electronic information stored or transmitted with respect to the informal hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</p>		
14-III.C	The PHA is located in a HUD-declared due process state. Therefore, the PHA will not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA, for violent or drug-related criminal activity on or off the premises, or for any criminal activity that resulted in felony conviction of a household member.	The PHA is located in a HUD-declared due process state. Therefore, the PHA may not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA, for violent or drug-related criminal activity on or off the premises, or for any criminal activity that resulted in felony conviction of a household member.	No	Allows flexibility in assessing the need for a requested grievance hearing
14-III.D.	The PHA will accept requests for an informal settlement of a grievance	The PHA will accept requests for an informal settlement of a grievance either orally or in writing, to the PHA office within 14 calendar days. Within	Yes	New language regarding the

	<p>either orally or in writing, to the PHA office within 5 business days of non-payment of rent notice or 14 calendar days for any other grievance. Within 14 calendar days of receipt of the request the PHA will arrange a meeting with the tenant at a mutually agreeable time and confirm such meeting in writing to the tenant.</p> <p>If a tenant fails to attend the scheduled meeting without prior notice, the PHA will reschedule the appointment only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.</p> <p>Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family.</p>	<p>14 calendar days of receipt of the request the PHA will arrange a meeting with the tenant at a mutually agreeable time and confirm such meeting in writing to the tenant.</p> <p>The informal settlement may be conducted remotely as required by the PHA or may be conducted remotely upon consideration of the request of the tenant. See 14-III.G for information on how and under what circumstances remote informal settlements may be conducted.</p> <p>If a tenant fails to attend the scheduled meeting without prior notice, the PHA will reschedule the appointment only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.</p> <p>Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family.</p>		ability to conduct remote hearings
14-III.E.	The resident must submit a request, either orally or in writing, for a grievance hearing to the PHA within five business days of the tenant's receipt of the summary of the informal settlement.	The resident must submit written request (including emailed requests), for a grievance hearing to the PHA within five business days of the tenant's receipt of the summary of the informal settlement.	No	Change to require grievance requests to be submitted in writing to ensure appropriate tracking and response
14-III.G.		<p>14-III.G. REMOTE HEARINGS [Notice PIH 2020-32]</p> <p>There is no requirement that grievance hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their grievance hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote grievance hearings, applicants may still request an in-person hearing, as applicable.</p> <p>PHA Policy</p> <p>The PHA has the sole discretion to require that hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.</p> <p>In addition, the PHA will conduct a hearing remotely upon request as a</p>	Yes	New language regarding remote hearings

		<p>reasonable accommodation for a person with a disability, if a tenant does not have child care or transportation that would enable them to attend the hearing, or if the tenant believes an in-person hearing would create an undue health risk. The PHA will consider other reasonable requests for a remote hearing on a case-by-case basis.</p> <p>Discovery of Documents Before the Remote Hearing PHA Policy</p> <p>If the hearing will be conducted remotely, the PHA will compile a hearing packet, consisting of all documents the PHA intends to produce at the hearing. The PHA will mail copies of the hearing packet to the tenant, the tenant's representatives, if any, and the hearing officer at least three days before the scheduled remote hearing. The original hearing packet will be in the possession of the PHA representative and retained by the PHA.</p> <p>If the hearing is to be conducted remotely, the PHA will require the resident to provide any documents directly relevant to the hearing at least 24 hours before the scheduled hearing through the mail, via email, or text. The PHA will scan and email copies of these documents to the hearing officer and the PHA representative the same day they are received. Documents will be shared electronically whenever possible.</p> <p>Ensuring Accessibility for Persons with Disabilities and LEP Individuals</p> <p>As with in-person grievance hearings, the platform for conducting remote grievance hearings must be accessible to persons with disabilities and the grievance hearings must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote grievance hearings.</p> <p>If no method of conducting a remote grievance hearing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote grievance hearing, and the PHA should consider whether postponing the remote hearing to a later date is appropriate or whether there is a suitable alternative.</p> <p>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation will depend on the</p>		
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		<p>specific circumstances and requirements.</p> <p>As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote grievance hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote grievance hearings.</p> <p>Conducting Hearings Remotely</p> <p>The PHA must ensure that the lack of technology or inability to use technology for remote grievance hearings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote grievance hearing and, if the family does not have the proper technology to fully participate, either postpone the hearing or provide an alternative means of access.</p> <p>As with in-person grievance hearings, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote grievance hearing. The family must also be provided with an accessible means by which to transmit their own evidence.</p> <p>The PHA's essential responsibility is to ensure grievance hearings meet the requirements of due process and comply with HUD regulations. Therefore, all PHA policies and processes for remote grievance hearings will be conducted in accordance with due process requirements and will be in compliance with HUD regulations at 24 CFR 966.56 and the guidance for conducting remote hearings specified in Notice PIH 2020-32.</p> <p>PHA Policy</p> <p>The PHA will conduct remote grievance hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers, participants are unable to adequately access the video conferencing platform at any point, or upon request, the grievance hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote grievance hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</p> <p>At least five business days prior to scheduling the remote hearing, the PHA will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</p> <p>The PHA will follow up with a phone call and/or email to the family at least</p>		
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		<p>one business day prior to the remote grievance hearing to ensure that the family received all information and is comfortable accessing the video conferencing or call-in platform.</p> <p>The PHA will ensure that all electronic information stored or transmitted with respect to the grievance hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</p>		
14-III.G – 14-III.H.	<p>The tenant 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 documents no later than 12:00 p.m. on the business day prior to the hearing.</p>	<p>The tenant will be allowed to copy any documents related to the hearing at no cost to the family. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the hearing.</p>	No	<p>The administrative burden of collecting this fee is larger than the amount charged. This will provide residents free access to their own informal settlement discussion and/or hearing materials for review in advance.</p>



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KEY MODIFICATIONS TO THE HOMES FOR GOOD RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2023 EFFECTIVE DATE 10-1-2022 TO 9-30-2023

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

Chapter 2: Fair Housing and Equal Opportunity

Chapter 3: Eligibility

Chapter 4: Applications, Waiting List, and Tenant Selection

Chapter 5: Briefings and Voucher Issuance

Chapter 7: Verification

Chapter 8: Housing Quality Standards and Rent Reasonableness Determinations

Chapter 11: Reexaminations

Chapter 15: Special Housing Types

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 10-1-2022**

Section	Previous Policy	Proposed Policy	Required Change	Impact
2-I.A.	Executive Orders 11063	Executive Orders 11063 and 13988	Yes	Prevent discrimination on gender identity or sexual orientation
2-II.E.	<p>After a request for an accommodation is presented, the PHA will respond, in writing, within 14 business days. If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.</p> <p>If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, in writing, of its determination within 14 business days from the date of the most recent discussion or communication with the family.</p>	<p>After a request for an accommodation is presented, the PHA will respond, in writing, within 14 business days.</p> <p>If the PHA denies a request for an accommodation because there is no relationship, or nexus, found between the disability and the requested accommodation, the notice will inform the family of the right to appeal the PHA's decision through an informal review (if applicable) or informal hearing (see Chapter 16).</p> <p>If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.</p> <p>If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, in writing, of its determination within 14 business days from the date of the most recent discussion or communication with the family.</p>	No	Provides clear guidance of steps

Section	Previous Policy	Proposed Policy	Required Change	Impact
2-III.B.	<p>The PHA will utilize a language line for telephone interpreter services.</p> <p>Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The interpreter may be a family member or friend.</p>	<p>The PHA will utilize a language line for telephone interpreter services.</p> <p>When exercising the option to conduct remote briefings, informal reviews, or hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice-only interpretation.</p> <p>Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing. The interpreter may be a family member or friend. If the interpreter chosen by the family is a minor, the PHA will not rely on the minor to serve as the interpreter.</p>	No	Allows additional access points to engage with Homes for Good
3-I.L.	<p>The PHA will request verification of the family member's permanent absence from a responsible medical professional. If the responsible medical professional cannot provide a determination, the person will be considered temporarily absent. If the family certifies that the family member is confined on a permanent basis, they may present, and the PHA will consider, any additional documentation or evidence.</p>	<p>An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.</p> <p>The PHA will request verification of the family member's permanent absence from a responsible medical professional. If the responsible medical professional cannot provide a determination, the person will be considered temporarily absent. If the family certifies that the family member is confined on a permanent basis, they may present, and the PHA will consider, any additional documentation or evidence.</p>	No	Provides clarity on who is a family member
3-I.M.	<p>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-</p>	<p>A family's request for a live-in aide may be made either orally or 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</p>	No	Provides flexibility on how families can communicate their request for a live in aide.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	subject to PHA verification-at each annual reexamination.	member. For continued approval, the family may submit a new, written request-subject to PHA verification-at each annual reexamination.		
3-II.B.	The PHA will not provide assistance to a family before the verification of at least one family member.	The PHA will not provide assistance to a family before the verification of at least one family member as a citizen, national, or eligible non-citizen.	No	Provides clarification for eligibility
3-II.F.	None	<p>Existing Tenant Search Prior to admission to the program, the PHA must search for all household members using the EIV Existing Tenant Search module. The PHA must review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The PHA must provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance. If the tenant is a new admission to the PHA, and a match is identified at a multifamily property, the PHA must report the program admission date to the multifamily property and document the notification in the tenant file. The family must provide documentation of move-out from the assisted unit, as applicable.</p> <p>PHA Policy The PHA will contact the PHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or 50059, as applicable, showing an end of participation. The PHA will only approve assistance contingent upon the move-out from the currently occupied assisted unit.</p> <p>Debts Owed to PHAs and Terminations All adult household members must sign the form HUD-52675 Debts Owed to Public Housing</p>	Yes	Ensure recipients are not receiving subsidy elsewhere or owe debts to other Public Housing Agencies.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>and Terminations. Prior to admission to the program, the PHA must search for each adult family member in the Debts Owed to PHAs and Terminations module.</p> <p>If a current or former tenant disputes the information in the module, the tenant should contact the PHA directly in writing to dispute the information and provide any documentation that supports the dispute. If the PHA determines that the disputed information is incorrect, the PHA will update or delete the record from EIV. Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the program.</p> <p>PHA Policy</p> <p>The PHA will require each adult household member to sign the form HUD-52675 once at the eligibility determination. Any new members added to the household after admission will be required to sign the form HUD-52675 prior to being added to the household.</p> <p>The PHA will search the Debts Owed to PHAs and Terminations module as part of the eligibility determination for new households and as part of the screening process for any household members added after the household is admitted to the program. If any information on debts or terminations is returned by the search, the PHA will determine if this information warrants a denial in accordance with the policies in Part III of this chapter.</p> <p>Income and IVT Reports</p> <p>For each new admission, the PHA is required to review the EIV Income and IVT Reports to confirm and validate family reported income within 120 days of the IMS/PIC submission date of the new admission. The PHA must print and</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		maintain copies of the EIV Income and IVT reports in the tenant file and resolve any discrepancies with the family within 60 days of the EIV Income or IVT report dates.		
3-III.C.	<p>The family owes rent or other amounts to any PHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family repays the full amount of the debt prior to being selected from the waiting list.</p> <p>If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.</p> <p>The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.</p>	<p>The family owes rent or other amounts to any PHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family repays the full amount of the debt or enters into a repayment agreement when selected from the waiting list.</p> <p>If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt or enters into a repayment agreement when selected from the waiting list.</p> <p>The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement or enters into a repayment agreement when selected from the waiting list.</p>	No	Provides access to housing even while debts may be owed
4-II.F.	<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 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. 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>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 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 business days from the date of the PHA letter.</p>	No	Provides clarity on how removal from the waitlist happens

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<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 30 business days to respond from the date the letter was re-sent.</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 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 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frames, the family will be removed from the waiting list without further notice.</p>		
<p>4-III.D.</p>	<p>The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:</p> <p>How to obtain an application packet</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family’s address of record, as well as to any known alternate address.</p>	<p>The PHA will notify the family by first class mail when it is selected from the waiting list. The notification will contain the full application packet.</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list, without further notice.</p>	<p>No</p>	<p>Provides clarity on how the process functions.</p>
<p>5-I.B.</p>	<p>The PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed individually or in groups. At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973), and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.</p> <p>PHA Policy</p> <p>Briefings may be conducted in group meetings or remotely.</p> <p>Generally, all adult family members are required to attend the briefing. If any adult member is unable to attend, the PHA may waive this requirement as long as the</p>	<p>Prior to issuance of a voucher, the PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed in individual face-to-face meetings, through group briefing sessions, or via remote briefing sessions.</p> <p>PHA Policy</p> <p>Families will be notified of their eligibility for assistance at the time they are invited to a briefing. The notice will be sent by first class mail and may also be sent by email if the family has provided a valid email address to the PHA.</p> <p>The notice will advise the family of the type of briefing, who is</p>	<p>Yes</p>	<p>Allows for remote briefings</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>head, spouse, or co-head attends the briefing. Families that attend group or remote briefings and still need individual assistance will be referred to an appropriate PHA staff person. Briefings will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan (See Chapter 2).</p> <p>Notification and Attendance PHA Policy Families will be notified of their eligibility for assistance at the time they are invited to attend a briefing. The notice will identify who is required to attend the briefing, as well as the date and time of the scheduled briefing, and if briefing held remotely how to access the briefing. If the notice is returned by the post office with no forwarding address, the applicant will be denied and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. Applicants who fail to attend a scheduled briefing will be scheduled for another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).</p>	<p>required to be present at the briefing, and the date and time of the briefing. The notice will also inform the family of any additional requirements for in-person or remote briefings as addressed in relevant policy elsewhere in this section. If the notice is returned by the post office with no forwarding address, the applicant will be denied and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be resent to the address indicated.</p> <p>In-Person Briefings At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973) and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2. PHA Policy In-person briefings will generally be conducted in group meetings. At the family's written or oral request, the PHA may provide an individual briefing. Generally, the head of household is required to attend the briefing. If the head of household is unable to attend, the PHA may approve another adult family member to attend the briefing. Families that attend group briefings and still need individual</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>assistance will be referred to an appropriate PHA staff person. Briefings will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide interpretation services in accordance with the PHA's LEP plan (See Chapter 2).</p> <p>Attendance PHA Policy Applicants who fail to attend a scheduled in-person briefing will be scheduled for another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).</p> <p>Remote Briefings [Notice PIH 2020-32] Remote briefings may be conducted over the phone, via video conferencing, or through other virtual platforms. PHA Policy The PHA has the sole discretion to require that briefings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. If the PHA schedules a remote briefing, the PHA will conduct a face-to-face briefing upon request of the applicant as a reasonable accommodation for a person with a disability if safety and health concerns can be reasonably addressed.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>In addition, the PHA will conduct a briefing 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 briefing, or if the applicant believes an in-person briefing would create an undue health risk. The PHA will consider other reasonable requests for a remote briefing on a case-by-case basis.</p> <p>Accessibility Requirements for Persons with Disabilities and LEP Individuals As with in-person briefings, the platform for conducting remote briefings must be accessible and the briefing conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. If no method of conducting a remote briefing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>in the remote briefing, and the PHA should consider whether postponing the remote briefing to a later date is appropriate or whether there is a suitable alternative.</p> <p>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances.</p> <p>Limited English Proficiency (LEP) requirements also apply to remote briefings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote briefings.</p> <p>Conducting Remote Briefings The PHA must ensure that the lack of technology or inability to use technology for remote briefings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA must ensure that the family has appropriate technological access in order to fully participate in the remote briefing.</p> <p>PHA Policy At least 10 business days prior to scheduling the remote briefing, the PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate.</p> <p>The PHA will conduct remote briefings via a video conferencing platform when available. If applicants are unable to adequately access the video conferencing platform, the briefing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in, the remote briefing will be postponed, and an in-person alternative or one-on-one briefing over the phone will be provided.</p> <p>The PHA will provide login information and/or conferencing call-in information and a copy of the briefing packet via email at least five business days before the briefing.</p> <p>The PHA will ensure that all electronic information stored or transmitted as part of the briefing meets the requirements for accessibility for persons with disabilities and persons with LEP, and is secure, including ensuring personally identifiable information (PII) is protected.</p> <p>The PHA will ensure that families who participate in remote briefings have the opportunity to ask questions as part of the briefing. If families lose connectivity during any remote briefing or otherwise feel they were unable to access information presented during the briefing, the family may request a</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		one-on-one briefing over the phone or in person with the PHA.		
7-III.I.	The PHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, and earnings are not being received by families claiming to have zero annual income.	The PHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, and earnings are not being received by families claiming to have zero annual income. Households that claim zero income may be required to fill out and submit the PHA's Zero Income Questionnaire.	No	Provides clarity to the process
7-IV.D.	<p>Information to be Gathered</p> <p>The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.</p> <p>Seeking Work</p> <p>Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the PHA any reports provided to the other agency.</p> <p>In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at each subsequent reexamination for which this deduction is claimed.</p> <p>Furthering Education</p> <p>The PHA will request third-party documentation to verify that the person permitted to further his or her education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.</p>	<p>Information to be Gathered</p> <p>The PHA may verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.</p> <p>Seeking Work</p> <p>Whenever possible the PHA may use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the PHA any reports provided to the other agency.</p> <p>In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA may review this information at each subsequent reexamination for which this deduction is claimed.</p> <p>Furthering Education</p>	No	Provides flexibility on how child-care is verified

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>Gainful Employment</p> <p>The PHA will seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.</p>	<p>The PHA may request third-party documentation to verify that the person permitted to further their education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.</p> <p>Gainful Employment</p> <p>The PHA may seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.</p>		
8-I.C.	<p>The following are considered life-threatening conditions:</p> <ul style="list-style-type: none"> Any condition that jeopardizes the security of the unit Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling Natural or LP gas or fuel oil leaks Any electrical problem or condition that could result in shock or fire Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit. Utilities not in service, including no running hot water Conditions that present the imminent possibility of injury Obstacles that prevent safe entrance or exit from the unit Absence of a functioning toilet in the unit Inoperable or missing smoke detectors Inoperable or missing Carbon Monoxide detectors in homes that contain a CO source If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the HQS in accordance with HUD requirements. See 8-II-G. If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H. The owner will be required to repair an inoperable smoke detector and/or Carbon Monoxide detector in a home with a CO source unless the PHA determines that the family has intentionally disconnected it (by removing 	<p>The following are considered life-threatening conditions:</p> <ul style="list-style-type: none"> Any condition that jeopardizes the security of the unit Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling Natural or LP gas or fuel oil leaks A fuel storage vessel, fluid line, valve, or connection that supplies fuel to a HVAC unit is leaking or a strong odor is detected with potential for explosion or fire or that results in a health risk if inhaled Any electrical problem or condition that could result in shock or fire A light fixture is readily accessible, is not securely mounted to the ceiling or wall, and electrical connections or wires are exposed A light fixture has a missing or broken bulb, and the open socket is readily accessible to the tenant during the day-to-day use of the unit Any nicks, abrasions, or fraying of the insulation that exposes conducting wire Exposed bare wires or electrical connections 	No	Provides clarity on life threatening conditions under Housing Quality Standards.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>batteries or other means). In this case, the family will be required to repair the smoke detector and/or Carbon Monoxide detector within 24 hours.</p>	<p>Water leaking or ponding near any electrical device Any condition that poses a serious risk of electrocution or fire and poses an immediate life-threatening condition Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit. Utilities not in service, including no running hot water Conditions that present the imminent possibility of injury Obstacles that prevent safe entrance or exit from the unit Absence of a functioning toilet in the unit Inoperable or missing smoke detectors as it pertains to HQS guidelines on placement in unit based on configurations of the unit. Inoperable or missing Carbon Monoxide detectors in homes that contain a CO source Gas/oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting The chimney or venting system on a fuel-fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting or gases A gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside A fuel-fired space heater is not properly vented or lacks available combustion air A non-vented space heater is present Safety devices on a fuel-fired space heater are missing or damaged The chimney or venting system on a fuel-fired heating, ventilation, or cooling system is misaligned, negatively pitched,</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>or damaged, which may cause improper or dangerous venting of gas</p> <p>If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the HQS in accordance with HUD requirements. See 8-II-G.</p> <p>If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H.</p> <p>The owner will be required to repair an inoperable smoke detector and/or Carbon Monoxide detector in a home with a CO source unless the PHA determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector and/or Carbon Monoxide detector within 24 hours.</p>		
8-II.A.	None	<p>Remote Video Inspections (RVIs) [Notice PIH 2020-31]</p> <p>As an alternative to some or all on-site inspections, the PHA may, but is not required to, perform HQS inspections from a remote location using video streaming technology and a proxy at the inspection site. Since there may be some circumstances in which the application of technology provides insufficient information or evidence to allow the PHA to make appropriate determinations about whether a condition violates HQS, Notice PIH 2020-31 requires that if a PHA chooses to implement RVIs, the PHA should have policies and procedures in place to address such limitations.</p> <p>PHA Policy The PHA may conduct HQS inspection using RVI.</p>	Yes	Allows for remote inspections

Section	Previous Policy	Proposed Policy	Required Change	Impact
8-II.E.	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS. The unit sample must include only units that have been inspected within the preceding 3 months. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.</p>	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS. The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.</p>	Yes	Streamlines the monitor inspection process
11-II.C.	<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>The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.</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>The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.</p>	No	Provides clarity, provides options for participants to increase escrow savings.
11-II.C.	<p>If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination. An example would be an FSS participant whose increases in rent are deposited into his or her FSS escrow account.</p>	<p>If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination unless the family requests an interim to increase rent. An example would be an FSS participant whose increases in rent are deposited into his or her FSS escrow account.</p>	No	Provides clarity, provides options for participants in the FSS program to increase escrow savings.
11-II.D.	<p>The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until</p>	<p>The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be processed until after the</p>	No	Provides clarity on when a decrease will be processed when a change in income has occurred.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>after the date the change would have become effective, the change will be made retroactively.</p> <p>For example, an interim decrease is reported and all required documentation is provided to the PHA on April 30th, but the PHA was not able to verify the changes until May 15th, the interim change will be made retroactive to May 1st.</p>	<p>date the change would have become effective, the change will be made retroactively.</p> <p>A decrease that lasts less than 30 calendar days will not be processed.</p> <p>For example, an interim decrease is reported and all required documentation is provided to the PHA on April 30th, but the PHA was not able to verify the changes until May 15th, the interim change will be made retroactive to May 1st.</p>		
<p>15-VII.B.</p>	<p>The PHA will impose additional eligibility requirements. To be eligible to participate in the homeownership option, families must meet the following criteria:</p> <ul style="list-style-type: none"> • The family must participate and meet the graduation requirements for the Family Self-Sufficiency (FSS) Program. • The family does not owe money to the PHA. • The family has not committed any serious or repeated violations of a PHA-assisted lease within the past year. 	<p>The PHA will impose additional eligibility requirements. To be eligible to participate in the homeownership option, families must meet the following criteria:</p> <ul style="list-style-type: none"> • The family does not owe money to the PHA. • The family has not committed any serious or repeated violations of a PHA-assisted lease within the past year. 	<p>No</p>	
<p>15-VII.I.</p>	<p>Effective with new homeownership clients starting the program January 1, 2017 or later, homeownership clients may request to meet with their designated Housing Specialist in an in-person interview annually, either at the Homes for Good office or in the client's home. At this meeting the family must provide documentation of money spent on home repairs or provide documentation showing that they are saving at least the amount of their monthly maintenance/repair allowance.</p>	<p>Effective with new homeownership clients starting the program January 1, 2017 or later, homeownership clients may request to meet with their designated Housing Specialist in an in-person interview annually, either at the Homes for Good office or in the client's home. At this meeting the family may provide documentation of money spent on home repairs or provide documentation showing that they are saving at least the amount of their monthly maintenance/repair allowance.</p>	<p>No^[AS1]</p>	
<p>16-III.B.</p>	<p>A request for an informal review must be made in writing or verbally, and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA's denial of assistance.</p> <p>The PHA must schedule and send written notice of the informal review within 14 business days of the family's request.</p>	<p>A request for an informal review must be made in writing or verbally, and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA's denial of assistance.</p> <p>The PHA must schedule and send written notice of the informal review within 14 business days of the family's request.</p> <p>If the informal review will be conducted remotely, at the time the PHA notifies the</p>	<p>No</p>	<p>Allows for Informal Reviews to be conducted remotely</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>family of the informal review, the family will be informed: Regarding the processes to conduct a remote informal review; That, if needed, the PHA will provide technical assistance prior to and during the informal review; and That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal review, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to participate in an in-person informal review, as appropriate.</p>		
<p>16-III.B.</p>	<p>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-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</p>	<p>Remote Informal Reviews [Notice PIH 2020-32] There is no requirement that informal reviews be conducted in-person and, as such, HUD allows PHAs to conduct all or a portion of their informal review remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal reviews, applicants may still request an in-person informal review, as applicable. 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 may provide a remote option to conduct an informal review. The PHA may also provide an in-person informal review upon the applicant’s request. The PHA will consider other reasonable requests for</p>	<p>Yes</p>	<p>Provides parameters on how Informal Reviews are to be conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>The PHA must ensure that the applicant has the right to hear and be heard.</p> <p>PHA Policy</p> <p>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. 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>	<p>a remote informal review on a case-by-case basis.</p> <p>Ensuring Accessibility for Persons with Disabilities and LEP Individuals</p> <p>As with in-person informal reviews, the platform for conducting remote informal reviews must be accessible to persons with disabilities and the informal review must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.</p> <p>PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal review process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>If no method of conducting a remote informal review is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote informal review, and the PHA should consider whether postponing the remote informal review to a later date is appropriate or whether there is a suitable alternative.</p> <p>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances and requirements. As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal reviews, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal reviews.</p> <p>Conducting Remote Informal Reviews</p> <p>The PHA must ensure that the lack of technology or inability to use technology for remote informal reviews does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote informal review and, if the family does not have the proper technology to fully participate, either postpone the informal review or provide an alternative means of access.</p> <p>As with in-person informal reviews, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal review. The</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>family must also be provided with an accessible means by which to transmit their own evidence.</p> <p>The PHA must ensure that the applicant has the right to hear and be heard. 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 at 24 CFR 982.554 and guidance specified in Notice PIH 2020-32.</p> <p>PHA Policy</p> <p>The PHA will conduct remote informal reviews via a video conferencing platform, when available. If, after attempting to resolve any barriers, applicants are unable to adequately access the video conferencing platform at any point, or upon applicant request, the informal review will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal review will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</p> <p>Prior to scheduling the remote review, the PHA will provide the family with login information and/or conferencing call-in information and an electronic and/or physical copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</p> <p>If the informal review is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal review at least 24 hours before the scheduled review through the mail, via email, or text. The PHA will scan and email copies of these documents to the PHA representative the same day. Documents will be shared electronically whenever possible. The PHA will ensure that all electronic information stored or transmitted with respect to the informal review is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</p>		
<p>16-III.C.</p>	<p>Remote Informal Hearings</p> <p>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> <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.</p>	<p>Remote Informal Hearings [Notice PIH 2020-32]</p> <p>There is no requirement that informal hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their informal hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal hearings, applicants may still request an in-person informal hearing, as applicable.</p> <p>PHA Policy</p> <p>The PHA has the sole discretion to require that informal hearings be conducted remotely in case of local,</p>	<p>Yes</p>	<p>Provides parameters on how Informal Hearings are to be conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>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 telephone call-in, the PHA will provide all parties login information and/or telephone call-in information before the hearing.</p>	<p>state, or national physical distancing orders, and in cases of inclement weather or natural disaster.</p> <p>In addition, the PHA may provide a remote option to conduct an informal hearing. The PHA may also provide an in-person informal hearing upon the participant’s request. The PHA will consider other reasonable requests for a remote informal hearing on a case-by-case basis.</p> <p>Ensuring Accessibility for Persons with Disabilities and LEP Individuals As with in-person informal hearings, the platform for conducting remote informal hearings must be accessible to persons with disabilities and the informal hearings must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal hearing process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.</p> <p>If no method of conducting a remote informal hearing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote informal hearing, and the PHA should consider whether postponing the remote hearing to a later date is appropriate or whether there is a suitable alternative. Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation will depend on the specific circumstances and requirements. As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal hearings.</p> <p>Conducting Informal Hearings Remotely The PHA must ensure that the lack of technology or inability to use technology for remote informal hearings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>conducting the remote informal hearing and, if the family does not have the proper technology to fully participate, either postpone the informal hearing or provide an alternative means of access.</p> <p>As with in-person informal hearings, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal hearing. The family must also be provided with an accessible means by which to transmit their own evidence.</p> <p>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 at 24 CFR 982.555 and the guidance for conducting remote hearings specified in Notice PIH 2020-32.</p> <p>PHA Policy</p> <p>The PHA will conduct remote informal hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers, participants are unable to adequately access the video conferencing platform at any point, or upon request, the informal hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Prior to scheduling the remote hearing, the PHA will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</p> <p>The PHA will ensure that all electronic information stored or transmitted with respect to the informal hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</p>		
<p>16-III.C.</p>	<p>In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following: The proposed action or decision of the PHA. A brief statement of the reasons for the decision, including the regulatory reference. The date the proposed action will take place. A statement of the family’s right to an explanation of the basis for the PHA’s decision. A statement that if the family does not agree with the decision the family may request an informal hearing of the decision. A deadline for the family to request the informal hearing. To whom the hearing request should be addressed. A copy of the PHA’s hearing procedures.</p>	<p>In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following: The proposed action or decision of the PHA. A brief statement of the reasons for the decision, including the regulatory reference. The date the proposed action will take place. A statement of the family’s right to an explanation of the basis for the PHA’s decision. A statement that if the family does not agree with the decision the family may request an informal hearing of the decision. A deadline for the family to request the informal hearing.</p>	<p>Yes</p>	<p>Provides clarity on how Informal remote Hearings are conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<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>To whom the hearing request should be addressed. A copy of the PHA’s hearing procedures. That the family may request a remote informal hearing</p>		
<p>16-III.C.</p>	<p>A request for an informal hearing must be made orally or in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA’s decision or notice to terminate assistance. The PHA must schedule and send written notice of the informal hearing to the family within 14 business days of the family’s request. The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the PHA may request documentation of the “good cause” prior to rescheduling the hearing. If the family does not appear within 20 minutes of the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, the PHA’s decision will stand.</p>	<p>A request for an informal hearing must be made orally or in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA’s decision or notice to terminate assistance. The PHA must schedule and send written notice of the informal hearing to the family within 14 business days of the family’s request. If the PHA hearing will be conducted remotely, at the time the notice is sent to the family, the family will be notified: Regarding the processes involved in a remote informal hearing; That the PHA will provide technical assistance prior to and during the informal hearing, if needed; and That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform the PHA and the PHA will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its</p>	<p>Yes</p>	<p>Provides clarity on how Informal remote Hearings are conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>discretion, the PHA may request documentation of the "good cause" prior to rescheduling the hearing.</p> <p>If the family does not appear within 20 minutes of the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, the PHA's decision will stand.</p>		
16-III.C.	<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>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 14 business 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>	No	Provides additional time for documentation to be provided to the family
16-III.C.	<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.</p> <p>Documents will be shared electronically whenever possible.</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>If the informal hearing is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal hearing at least 24 hours before the scheduled hearing . through the mail, via email, or fax. The PHA will scan and email copies of these documents to the hearing officer and the PHA representative the same day.</p>	No	Provides clarity on how remote Informal Hearings are to be conducted

Section	Previous Policy	Proposed Policy	Required Change	Impact
		Documents will be shared electronically whenever possible.		
16-III.C.	<p>Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.</p> <p>If either the PHA or the family fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence. Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.</p>	<p>Hearsay Evidence is evidence based not on a witness' personal knowledge. In and of itself, hearsay evidence carries no weight when making a finding of fact. The hearing officer may include hearsay evidence when considering their decision if it is corroborated by other evidence. Even though hearsay evidence is generally admissible in a hearing, the hearing officer will not base a hearing decision on hearsay alone unless there is clear probative value and credibility of the evidence, and the party seeking the change has met the burden of proof.</p> <p>If either the PHA (or the family, if required in a remote hearing) fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence. Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.</p>	No	Provides clarity on the definition of Hearsay Evidence
16-VI.C.	<p>All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.</p> <p>PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.</p>	<p>All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.</p> <p>PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.</p> <p>The family will be allowed to request any documents at a cost of \$.25 per page.</p>	No	Allows families access to information within their applicant and/or participant files

Section	Previous Policy	Proposed Policy	Required Change	Impact
17-I.A.	The PHA may project-base any units not subject to the 20 percent cap.	The PHA may project-base units not subject to the 20 percent cap in accordance with HUD regulations and requirements.	No	Provides clarity on how to exceed the 20% cap
17-II.A.	The PHA will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing in the following newspapers and trade journals. Register Guard In addition, the PHA will post the RFP and proposal submission and rating and ranking procedures on its electronic web site.	The PHA will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing in the following newspapers and trade journals. Register Guard The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements. In addition, the PHA will post the RFP and proposal submission and rating and ranking procedures on its web site.	No	Provides clarity on what will be advertised on the Request for Proposals for PBV
17-II.G.	It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less. However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in: A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community;	It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less. However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in: A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic	No	Provides clarity on which census tracts can exceed the 20% PBV cap

Section	Previous Policy	Proposed Policy	Required Change	Impact
		Community, Choice Neighborhood , or Renewal Community;		
17-V.C.	<p>The PHA will consider adding contract units to the HAP contract when the PHA determines that additional housing is needed to serve eligible low-income families. Circumstances may include, but are not limited to:</p> <p>The local housing inventory is reduced due to a disaster (either due to loss of housing units, or an influx of displaced families); and</p> <p>Voucher holders are having difficulty finding units that meet program requirements.</p>	<p>The PHA will add units to the contract on a case-by-case basis to ensure the availability of affordable housing as long as the addition of units does not exceed allowable project caps.</p>	No	Provides clarity on how to add additional units to PBV contracts
18-V.D.	<p>The PHA will maintain the project-specific waiting list in accordance with all applicable civil rights and fair housing regulations found at 24 CFR 903.7(b)(2)(ii)-(iv). The PHA will provide applicants full information about each development, including an estimate of the wait time, location, occupancy, number and size of accessible units, and amenities like day care, security, transportation, and training programs at each development with a site-based waiting list. The system for selection will be consistent with all applicable civil rights and fair housing laws and regulations and may not be in conflict with any imposed or pending court order, settlement agreement, or complaint brought by HUD.</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.</p> <p>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>The PHA will maintain the project-specific waiting list in accordance with all applicable civil rights and fair housing regulations found at 24 CFR 903.7(b)(2)(ii)-(iv). The PHA will provide applicants full information about each development, including an estimate of the wait time, location, occupancy, number and size of accessible units, and amenities like day care, security, transportation, and training programs at each development with a site-based waiting list. The system for selection will be consistent with all applicable civil rights and fair housing laws and regulations and may not be in conflict with any imposed or pending court order, settlement agreement, or complaint brought by HUD.</p> <p>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>	No	The change is in alignment with National best practices per Nan McKay. The assessment note in the previous policy are requirements of a Public Housing program but are not requirements of a Project Based Voucher program. The prior policy was never implemented as RAD is a recent addition to Homes for Good. Therefore, the impact is moot. This data is currently and will continue to be assessed on the Public Housing portfolio.

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>18-V.E.</p>	<p>Hayden Bridge Referrals received under this preference will be prioritized by date and time of referral. Preference will be given to: Displaced Family Preference (Fire or Natural Disaster) This preference applies to families who are displaced as a result of a fire or Natural Disaster. Persons who claim they are being or have been displaced due to fire or Natural Disaster must be a resident of Lane County and have written verification from a Homes for Good approved entity. The definition of "displaced" for this purpose will be included in the MOU/MOA with the qualified entity.</p>	<p>Hayden Bridge Referrals received under this preference will be prioritized by date and time of referral. Preference will be given to: Displaced Family Preference (Fire or Natural Disaster) This preference applies to families who are displaced as a result of a fire or Natural Disaster. Persons who claim they are being or have been displaced due to fire or Natural Disaster must be a resident of Lane County and have written verification from a Homes for Good approved entity. The definition of "displaced" for this purpose will be included in the MOU/MOA with the qualified entity. Transitional Homeless Family Preference This preference applies to transitional housing persons who are homeless and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity.</p>	<p>No</p>	<p>Expands local preferences for Hayden Bridge</p>

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 converted the remaining 17 units to two new housing developments. Construction of the replacement housing began in the spring of 2020 and was completed in June of 2021. Approximately three-quarters of the scattered sites have been sold and is expected to be completed by summer of 2022.

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 was to transfer the remaining 83 units to two new housing developments. Construction of the replacement housing began in the spring of 2020 and was completed in June of 2021. Approximately three-quarters of the scattered sites have been sold and is expected to be completed by summer of 2022.

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**

Homes for Good has 159 units of Project Based Voucher (PBV) across five Projects and 112 units of Rental Assistance Demonstration (RAD) PBV across three Projects and 5 units of VASH PBV in 1 project. These are all owned by Homes for Good. Homes for Good is intending to enter into contracts for Project Based Vouchers for The Coleman which will contain 18 PBV vouchers. This project is also owned by Homes for Good. In addition, Homes for Good also intends to enter into PBV Contracts for two projects owned by entities outside of Homes for Good. 11th and Lincoln, is a 59 unit complex in Eugene that will contain 13 PBV units and Shore Pines at Munsel Park is a 68 unit complex in Florence that will contain 31 PBV units.

For Attachment B.3 Progress Report

Goal 1 Objective:

Increase the number of affordable housing units

Indicator	FY21 Progress	FY22 Progress
Create 300 new affordable housing units.	Homes for Good recently completed Market District Commons (50 units), The Commons on MLK (51 units), Sarang (49 units), Hayden Bridge Landing (70 units), Legion Cottages (4 units) and the Keystone (15 units.)	The Nel (45 units) began construction in May of 2021 and be complete in summer of 2022. Funding application for The Coleman (52 units) being submitted in Spring of 2022.
Increase number of permanent supporting housing units. (Featured projects: The Commons on MLK, Legion Cottages Tiny Homes, The Keystone, The Nel)	66 of the units recently completed are Permanent Supportive Housing, including The Keystone (15 units PSH) and the Commons on MLK (51 units PSH).	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.	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	As of March 2022, we have 139 Mainstream vouchers in use. In May 2022 we will apply for an additional 200 Mainstream Vouchers. We will also apply for extraordinary Administrative Fees. If awarded, the \$500.00 per voucher fee will aid with move in costs, such as security deposits.
Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County.	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.	As of March 2022, 232 VASH vouchers are under lease. We continue to meet monthly with the VA Team to collaborate on the utilization of the vouchers. We have also piloted a Remote Video Inspection (RVI) project with the VA. RVI, an initiative deployed by HUD in response to COVID-19 provides a process for in field proxy inspectors to connect via video platform within office Housing Quality Standard Inspection staff to complete required HUD inspections.

Goal 2 Objective: Continue to receive high performer status

Indicator	FY21 Progress	FY22 Progress
Homes for Good received high performer status for FY18 SEMAP.	. Homes for Good will not be submitting a FY21 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.	Homes for Good will not be submitting a FY22 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
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.	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.	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.
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.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.
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.		Homes for Good continues to work to streamline and simplify agency processes and increasing availability of Resident Services and other support staff.
Enhance resident and agency communication through Resident Newsletters, improved website access, email communication and social media.	All communities continue to receive a monthly or quarterly residential newsletter.	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.
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.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.
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).		

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	FY21 Progress	FY22Progress
Complete the Rent Assistance Demonstration construction and sale of scattered site homes.	Homes for Good has completed the RAD new construction.	Homes for Good has completed construction of the replacement housing and has completed the majority of the scattered site sales.
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 was complete in June 2021.	Sale of the scattered site homes is ongoing and will be complete in mid-2022.
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 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.	The Landlord Liaison continues to provide routine education on accessing housing through Homes for Good to both landlord and community partners. The Landlord Liaison continues its engagement 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.	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.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher recipients. For FY21 and as of April FY22, 17 loans have been requested. 10 were approved. 3 families have paid the loans back, 2 families defaulted and 5 are actively paying the loan back.

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	FY21 Progress	FY212Progress
<p>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</p> <p>Grown the Landlord Liaison offerings of support for landlords through continuous communication, trainings and sharing resources</p> <p>Awarded funding to provide monetary incentives to landlords who agree to rent to persons with high housing barriers</p>	<p>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 aid with deposits and other move in related costs. As of February 2021, success rate for utilization of a tenant based voucher was 78%.</p>	<p>The Landlord Liaison continues to provide education to local preference partners. Homes for Good has expanded partnerships and now has 22 local preference partners. Homes for Good received 184 Emergency Housing Vouchers (EHV). These vouchers are to serve homeless person, persons fleeing domestic violence and persons fleeing human trafficking. As of March 2022, we have 91 vouchers in use. 18 PHAs across Oregon were awarded EHV. Homes for Good has issued and utilized more EHV vouchers than any other PHA in the state. These funds also provide a \$2K per household assistance option for items such as move in costs and essential household items. As of April 1, 2022 \$102,891.00 has been utilized to assist 78 families.</p>
<p>Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program</p>	<p>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.</p>	<p>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.</p>
<p>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.</p>	<p>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</p>	<p>At time of setting the Payment Standards for CY22, 3.2% of 4-bedroom families were paying more than 41% of their income towards rent. A 1.6% decrease since FMR study implementation. As of 03/2022 success rate for tenant-based voucher utilization was 62%. In 02/2022 utilization was at 70%. Some of this fluctuation can be attributed to lack of housing stock and the impacts COVID-19 has had on the community as a whole.</p>

	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 (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.	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 over 1200 members representing over 18,000 rental units. The Landlord Liaison also provides routine educational seminars for ROA members on aspects of the housing subsidy process. We have also obtained the credentials to issue Continuing Education Credits (CEUs) to participating Landlords.