



## HOMES FOR GOOD BOARD OF COMMISSIONERS MEETING

Wednesday, January 29<sup>th</sup>, 2025

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# AGENDA

**Homes for Good Housing Agency**

**BOARD OF COMMISSIONERS**

**Location of the meeting:**

Homes for Good Administrative Building  
100 W 13<sup>th</sup> Avenue  
Eugene, OR 97401



Zoom

This meeting will be conducted in person with the option to join via public video call and conference line (see details below).

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## **Wednesday, January 29<sup>th</sup>, 2025, at 1:30pm**

The January 29<sup>th</sup>, 2025, Homes for Good Board of Commissioners meeting will be held at the Homes for Good Administrative Building. It will also be available via a public video call with dial-in capacity. The public has the option to participate in person or by joining via video call or conference line.

### **Teams Meeting:**

Join Meeting: [Link](#)

Meeting ID: 233 949 250 95

Passcode: BHWRbS

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Dial-In: +1 689-206-0388,,817935186#

Phone Conference ID: 817 935 186#

**Guide to Using Teams:** [Link](#)

## **1. PUBLIC COMMENTS**

Maximum time 30 minutes: Speakers will be taken in the order in which they sign up and will be limited to 3-minutes per public comments. If the number wishing to testify exceeds 10 speakers, then additional speakers may be allowed if the chair determines that time permits or may be taken at a later time.

**PLEASE NOTE:** *The Homes for Good Board of Commissioners is a policy advisory body to Homes for Good and is not designated to resolve issues in public meetings. The Board will not discuss or make decisions immediately on any issue presented.*

## **2. COMMISSIONERS' RESPONSE TO PUBLIC COMMENTS AND/OR OTHER ISSUES AND REMONSTRANCE (2 min. limit per commissioner)**

## **3. ADJUSTMENTS TO THE AGENDA**

## **4. COMMISSIONERS' BUSINESS**

### **A. Appointment of Board Chair & Vice Chair**

In accordance with the Homes for Good Bylaws Article II Section 2, "The Chairperson of the Agency shall be elected annually by majority vote of the Agency Board at its first meeting in January." Additionally, in accordance with Article II Section 2 of the Homes for Good Bylaws, "The Vice Chairperson of the Agency shall be elected annually by the majority vote of the Agency Board at its first meeting in January."

### **B. Homes for Good Subcommittee/Ad Hoc Committee Member Assignments**

## **5. EMERGENCY BUSINESS**

## **6. EXECUTIVE SESSION**

*None*

## **7. ADMINISTRATION**

- A. Executive Director Report
- B. Employee of the Year Award

## **8. CONSENT AGENDA**

- A. Approval of 12/18/24 Board Meeting Minutes

## **9. PRESENTATION**

Bioculture Health Indices Research for PSH Residents  
(University of Oregon Global Health Program) (Estimated 30 minutes)

**10. ORDER 25-29-01-01H**

In the Matter of Approving Contract 25-C-0014 Lazy Days Park Model RV Construction Contract with Palm Harbor

(Audrey Banks, Real Estate Development Director) (Estimated 10 minutes)

**11. ORDER 25-29-01-02H**

In the Matter of Updating the Administrative Plan and the Admissions & Continued Occupancy Plan – Distributions from Non-Revocable Trusts

(Beth Ochs, Rent Assistance Director) (Estimated 15 minutes)

**12. PRESENTATION**

Audit Corrective Action Plan Update

(Dan Temmesfeld, Finance Director & Ela Kubok, Deputy Director) (Estimated 20 minutes)

**13. OTHER BUSINESS**

Adjourn.

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**Homes for Good Board of  
Commissioner 2025 Committees**

## **STRATEGIC EQUITY PLAN AD HOC COMMITTEE**

### **Time Commitment**

- One (1) 60-90 minute virtual meeting in May 2025
- 90 minutes to review materials prior to the meeting

**Total: 3 hours / year**

### **Purpose**

Annually review revised drafts of the Strategic Equity Plan (SEP) prepared and presented by the Equity Strategy Team (EST). The EST will need a 60–90 minute meeting with four (4) board members to review and provide feedback on the suggested changes and updates to the SEP for the following year.

### **Need**

- Limit four (4) members

## **BYLAWS REVIEW AD HOC COMMITTEE**

### **Time Commitment**

- Two (2) 90-minute meetings (at minimum)
- 90 minutes to review materials prior to each meeting
- 60 minutes for final draft review

**Total: 5.5 hours / year**

### **Purpose**

Evaluate and recommend updates and revisions to the Homes for Good Board of Commissioners Bylaws on an annual basis.

### **Need**

- Limit two (2) members

## FINANCE COMMITTEE

### Time Commitment

- 11 90-minute meetings
- 60 minutes to review materials prior to each meeting

**Total: 27.5 hours / year**

### Purpose

Monthly review of the financial standing of the Agency. The committee engages in discussions around budgets, financial statements, funding sources and provides suggestions on financial strategies for the short-term and long-term.

### Need

- Limit four (4) members

January started with a lot of community events and activities. We hosted a two-day leadership work session focused on developing our financial sustainability roadmap, which will guide our future fiscal strategies and ensure long-term stability for our organization.

We actively participated in both the State of the County and State of the City of Eugene events, where we witnessed the swearing-in of our new Mayor, Kaarin Knudson. We are excited about the potential for collaboration with Mayor Knudson in addressing our community's housing needs. The State of the City address featured a video highlighting two of our key projects: Ollie Court and Bridges on Broadway. This showcase emphasized our partnership with the City of Eugene in tackling affordable housing challenges.

Kirk Strohman was reappointed for a four-year term during the Lane County Board meeting on January 7, 2025. This reappointment ensures continuity in our board's expertise and oversight.

To further enhance our financial management, we created a financial controller position, with Sean Pearson joining our team in this role on January 6th. Additionally, we commenced our annual audit activities on January 9th. We anticipate the auditors will join our February board meeting to present their audit timeline and planned activities.

In December during our holiday party, we presented the employee of the year award to Will Hartley who just up until recently was part of our maintenance team and was promoted to Project Developer in the Real Estate Development Team.





# EMPLOYEE OF THE YEAR



**Will Hartley**

Project Developer

**HOMES FOR  
GOOD**  
HOUSING AGENCY

# MINUTES

Homes for Good Housing Agency

BOARD OF COMMISSIONERS

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**Wednesday, December 18<sup>th</sup>, 2024, at 1:30 p.m.**

Homes for Good conducted the December 18<sup>th</sup>, 2024, meeting in person at the Homes for Good administrative building and via a public video call with dial-in capacity. The public was able to join the call, give public comments, and listen to the call.

## CALL TO ORDER

Board Members Present:

**Heather Buch**

**Michelle Thurston**

**Justin Sandoval**

**Kirk Strohman**

**Chloe Chapman**

**Larissa Ennis**

**Destinee Thompson**

**Heather Buch**

Board Members Absent:

**Pat Farr**

**Joel Iboa**

**Quorum Met**

## **1. PUBLIC COMMENT**

*None*

## **2. COMMISSIONERS' RESPONSE TO PUBLIC COMMENTS AND/OR OTHER ISSUES AND REMONSTRANCE**

*None*

## **3. ADJUSTMENTS TO THE AGENDA**

- After the Executive Sessions ORDER 24-18-12-01H: In the Matter of the Executive Director Performance Evaluation was the next agenda item discussed.
- Administration – Item C: Committee Member Assignments will be moved to the January 2025 board agenda

## **4. COMMISSIONERS' BUSINESS**

- Commissioner Buch joined at a delayed time due to a conflicting Lane County Board of County Commissioners meeting

## **5. EMERGENCY BUSINESS**

*None*

## **6. EXECUTIVE SESSION**

- A. Homes for Good Board will hold an Executive Session pursuant to ORS 192.660(2)(e), to conduct deliberations with persons designated by the Homes for Good Board of Commissioners to negotiate real estate property transactions.
- B. Homes for Good Board will hold an Executive Session pursuant to ORS 192.660(2)(i) to review and evaluate the job performance of a chief executive officer, other officers, and employees, and staff, if the person whose performance is being reviewed and evaluated does not request an open hearing.

## **7. ADMINISTRATION**

- A. Executive Director Report

**Jacob Fox** provided updates for the ongoing Real Estate Development construction projects of Lazy Days and Ollie Court. Lazy Days is facing a funding deficit as a result of additional costs to hook up utilities and finalize the homes. Homes for Good is working with Oregon Housing & Community Services (OHCS) to secure additional funding. Ollie Court is on schedule and on budget.

Homes for Good staff and board members attended the Eugene Area Chamber of Commerce Economic Summit on November 21<sup>st</sup>. Gregg Coburn, co-author of "Homelessness is a Housing Problem" was in attendance and speaker at the event.

Homes for Good has a new Finance Director, Dan Temmesfeld. Unaudited financials for FY24 have been submitted to HUD for review. The Finance team is continuing to

complete bank account reconciliations. All October 2024 account statements have been reviewed and over 50% reconciled.

Supportive Housing Director, **Wakan Alferes** applied and was awarded \$500,000.00 from the Lane Community Health Council for Bridges on Broadway (BoB) operational funding.

Lazy Days Celebration will be on January 30<sup>th</sup> or 31<sup>st</sup>. Currently Homes for Good is correspondence with a few elected state officials to determine which date will work best for everyone. There will be a Lane Transit District (LTD) bus to talk folks out to the event.

B. Homes for Good in the News

[see document titled: **News Reports**]

## 8. CONSENT AGENDA

- A. Approval of 10/30/2024 Board Meeting Minutes
- B. ORDER 24-18-12-03H: In the Matter of Approving the Homes for Good Commissioner Kirk Strohman Four-Year Term Recommendation

### **Vote Tabulations**

Motion: **Chloe Chapman**

Second: **Destinee Thompson**

Discussion: **Chloe Chapman** expressed appreciation for Kirk's continued work on the Board, his participation on the board finance committee and providing his expertise.

Ayes: **Michelle Thurston, Heather Buch, Justin Sandoval, Kirk Strohman, Chloe Chapman, Larissa Ennis, Destinee Thompson**

Abstain: *None*

Excused: **Pat Farr, Joel Iboa**

**The 12/18/2024 Consent Agenda was approved [7/0/2]**

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## 9. ORDER 24-18-12-01H: In the Matter of the Executive Director Performance Evaluation

*Human Resources Director, Bailey McEuen Presenting*

### **Overview**

The current Executive Director evaluation process started in 2021. A survey this year was sent out internally and to external partners. Additionally, the Executive Director completes a self-assessment.

[see document titled: **Board Memo – In the Matter of Documenting the Executive Director’s Annual Performance Evaluation & Instructing Human Resources Regarding Revision of the Employment Agreement**]

### **Discussion Themes**

- **Chloe Chapman** and **Larissa Ennis** expressed appreciation for Jacob’s work and how he shows up as not only an Agency leader, but community leader.

### **Vote Tabulations**

Motion: **Kirk Strohman**

Second: **Chloe Chapman**

Discussion: **Jacob Fox** expressed gratitude for the Homes for Good Board of Commissioners and the time they dedicate to the Agency.

Ayes: **Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Chapman, Larissa Ennis, Destinee Thompson**

Abstain: *None*

Excused: **Heather Buch, Pat Farr, Joel Iboa**

**ORDER 24-18-12-01H was approved [6/0/3]**

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## **10. PRESENTATION: Hate & Bias 6 Month Report**

*Human Resources Director, Bailey McEuen Presenting*

### **Overview**

The Hate & Bias Response Procedure was created to address and resolve complaints related to discrimination, harassment and other forms of hate and bias experienced in Homes for Good's communities and workplace.

Reports are reviewed as they come in and the procedures outline appropriate follow-up and action to take. An overview of incidents is provided to the Board on a six (6) month basis.

[see document titled: **Hate & Bias Incidents 2024 Board Report**]

### **Discussion Themes**

None

**No action needed.**

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## **11. ORDER 24-18-12-02H: In the Matter of a Procurement Process for the Replacement of the Heeran Center Heating System**

*Asset Manager, Victoria Smithweiland Presenting*

### **Overview**

The Heeran Center is a combined residential and commercial building that provides 24/7 to residents with severe and persistent mental illness. The commercial space is occupied by Lane County.

Building heating and cooling is provided by a heat pump system that is dependent on two (2) water source boilers. The system has failed. An urgent replacement is needed, and this will entail a procurement process to be initiated for the work and supplies.

There will be further discussion to determine if Homes for Good will continue to own this property in the future.

### **Discussion Themes**

None

### **Vote Tabulations**

Motion: **Kirk Strohman**

Second: **Destinee Thompson**

Discussion: *None*

Ayes: **Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Chapman, Larissa Ennis, Destinee Thompson**

Abstain: *None*

Absent: **Pat Farr, Joel Iboa**

**ORDER 24-18-12-02H was approved [7/0/2]**

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## **12. OTHER BUSINESS**

*None*

**Meeting adjourned at 3:30 p.m.**  
*Minutes Taken By: Jasmine Leary Mixon*



# BOARD OF COMMISSIONERS AGENDA ITEM

**BOARD MEETING DATE:** 01/29/2025

**AGENDA TITLE:** Bioculture Health Indices Research for PSH Residents

**DEPARTMENT:** Supportive Housing Division

**CONTACT :** Jacob Fox

**EXT:** 2527

**PRESENTER:** University of Oregon Global Health Program

**EXT:** --

**ESTIMATED TIME :** 30 minutes

- ORDER/RESOLUTION
- PUBLIC HEARING/ORDINANCE
- DISCUSSION OR PRESENTATION (NO ACTION)
- APPOINTMENTS
- REPORT
- PUBLIC COMMENT ANTICIPATED

**Approval Signature**

**EXECUTIVE DIRECTOR:**

A handwritten signature in black ink, appearing to be "J. Fox", is written over a horizontal line.

**DATE:** 01.22.2025

**LEGAL STAFF :**

**DATE:**

**MANAGEMENT STAFF:**

**DATE:**



# BOARD OF COMMISSIONERS AGENDA ITEM

**BOARD MEETING DATE:** 01/29/2025

**AGENDA TITLE:** In the Matter of Approving Contracts 25-C-0014 Lazy Days Park Model RV Construction Contract with Palm Harbor

**DEPARTMENT:** Real Estate Development Division

**CONTACT :** Audrey Banks

**EXT:** 6814

**PRESENTER:** Audrey Banks

**EXT:** 6814

**ESTIMATED TIME :** 10 minutes

- ORDER/RESOLUTION**
- PUBLIC HEARING/ORDINANCE**
- DISCUSSION OR PRESENTATION (NO ACTION)**
- APPOINTMENTS**
- REPORT**
- PUBLIC COMMENT ANTICIPATED**

**Approval Signature**

**EXECUTIVE DIRECTOR:**

**DATE:** 01.22.2025

**LEGAL STAFF :**

**DATE:**

**MANAGEMENT STAFF:**

**DATE:**



## **HOMES FOR GOOD MEMORANDUM REFERENCE DOCUMENT**

**TO:** Homes for Good Board of Commissioners  
**FROM:** Audrey Banks, Real Estate Development Director  
**TITLE:** In the Matter of Authorizing the Executive Director to approve Contract 25-C-0014 for the Manufacturing, Delivery, and Installation of Park Model RV's at Lazy Days Mobile Home Park  
**DATE:** January 29<sup>th</sup>, 2025

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### **MOTION:**

It is moved that the Homes for Good Board of Commissioners authorize the Executive Director or Authorized Designee to approve Contract 25-C-0014 with Palm Harbor for the Manufacturing, Delivery, and Installation of Modular Homes at Lazy Days Mobile Home Park with a purchase price up to \$62,001 per unit.

### **DISCUSSION:**

#### **A. Issue**

Homes for Good has entered into an Intergovernmental Agreement (IGA) with Oregon Housing and Community Services (OHCS) to rebuild the Lazy Days Mobile Home and RV Park located approximately 2 miles east of Blue River Oregon. As part of this rebuilding effort Homes for Good is securing funds from OCHS and HUD to pay for 10 Park Model RV's to complete phase 2 of the project. This order will authorize the Executive Director or Authorized Designee to execute Contract 25-C-0014 with Palm Harbor for the Manufacturing, Delivery, and Installation of these Park Model RV's at Lazy Days Mobile Home Park.

#### **B. Background**

Lazy Days Mobile Home and RV Park is an 8-acre site located on the north side of McKenzie River Hwy at 52511 McKenzie River Hwy about 2 miles east of the unincorporated town of Blue River. The park was completely burned in the Holiday Farm fire that started just to the east of the park in September of 2020. Prior to being destroyed the park provided 21 Manufactured Home spaces and 15 RV spaces. At the time of the fire there were 20 occupied manufactured homes including the managers home and 5 occupied RV spaces that were being rented on a long-term basis.



Homes for Good is nearing completion of phase one which includes the manufacturing and installation of 20 modular homes placed on permanent foundations, extensive site work to provide a community well, septic system, community building and a playground. The community building includes a community area, offices, and a laundry facility. The site work has been completed to prepare for the delivery of 10 Park Model RVs to complete phase 2 of the project and continue to provide replacement homes for people displaced by the fire. Homes for Good staff is preparing for occupancy of Phase 1.

### **C. Analysis**

In September 2024, Homes for Good put out a Request for Proposals (RFP) for the Manufacturing, Delivery, and Installation of Park Model RV's at Lazy Days Mobile Home Park. The RFP specified the overall dimension maximum of the units, fire hardening requirements and other specifications but left the overall design to each respondent. A committee of Homes for Good staff and two consultants reviewed and scored all proposals. Three (3) proposals were received. Of the 3 applicants, Palm Harbor was selected from this pool based on such factors as cost, quality and design, schedule of delivery, completeness of RFP, experience/qualifications, and references. Palm Harbor is located in Albany, Oregon, and builds manufactured homes as well as Park Model RV's.

Factors that contributed to Palm Harbor's proposal to being selected included their price, experience with Park Model RV's, the quality of construction and thorough proposal along with references. The scoring breakout is included as Attachment A.

Homes for Good is in final negotiations to match the roofs, decks and exterior paint of the units with the modular homes. The unit prices with Palm Harbor are currently quoted at \$62,001 each. For all 10, the total is \$620,010. In order to allow for a small contingency as numbers are finalized with the roofs, decks and paint, the contract with Palm Harbor should not exceed \$650,000.

The Park Model RV units only include baseboard heat. They are built plumbed for ductless heat pumps, which are not provided by Palm Harbor. Homes for Good is working with the General Contractor for the site, Meili construction to budget and plan within the existing sitework contract for the electrical and plumbing hookups after delivery, along with the installation of ductless heat pumps, which will also provide air conditioning. This will be comparable to the heat/ac provided in the modular homes.

### **D. Furtherance of the Strategic Equity Plan**

The rebuild of Lazy helps implement the Homes for Good strategic equity plan in the following ways:



- Providing additional opportunities for contracting with MWESB contractors and Section 3 (Low-income) workers.
- Provide self-sufficiency and homeownership opportunities for low-income Lane County residents that lost homes.

Approval of the attached order will allow Homes for Good to execute necessary documents and achieve these outcomes.

#### **E. Alternatives & Other Options**

The alternative is to not approve the contract and ask staff to engage with a different firm for the Manufacturing, Delivery, and Installation of the Park Model RV's for Lazy Days. The RFP process would need to be repeated in order to find a company that could provide the same quality product in a similar price point.

#### **F. Timing & Implementation**

Upon approval of the Order, Homes for Good will confirm funding availability with Oregon Housing and Community Services and finalize and execute approve Contract 25-C-0014 with Palm Harbor for the Manufacturing, Delivery, and Installation of Park Model RVs at Lazy Days Mobile Home Park in the subsequent weeks. With orders being placed at the beginning of February, the estimated timeline for delivery of the units is April/May 2025.

#### **G. Recommendation**

It is recommended that the Board of Commissioners approve the attached board order to allow Homes for Good Housing Agency to execute contracts for the Manufacturing, Delivery, and Installation of Park Model RV's at Lazy Days Mobile Home Park.

#### **H. Follow Up**

Homes for Good does not expect to need further board approval to complete the construction and lease-up of the Lazy Days Mobile Home Park Rebuild and will bring the board regular updates on progress.

#### **I. Attachments**

Attachment A: Park Model RV RFP Scoring Sheet

Attachment B: Quotation Summary



## Attachment A

### LAZY DAYS PARK MODEL RV – Overall Scores – RFP Scoring Sheet

#### Average Scores

Firm	Cost, Quality, and Design (50 pts)	Experience/Qualifications (25 pts)	Schedule of Delivery of Units (10 pts)	References (10 pts)	Completeness of RFP (5 pts)	Firm Total (100 pts)
Idea Box	32.5	23.5	8	9.5	4.75	<b>80.75</b>
Future Homes	27.25	15.25	5.25	8.25	2	<b>57</b>
Palm Harbor	45.25	22.75	9.75	9.25	5	<b>92</b>

#### Audrey Banks [Homes for Good, Real Estate Division Director]

Firm	Cost, Quality, and Design (50 pts)	Experience/Qualifications (25 pts)	Schedule of Delivery of Units (10 pts)	References (10 pts)	Completeness of RFP (5 pts)	Firm Total (100 pts)
Idea Box	20	25	7	10	5	<b>77</b>
Future Homes	42	20	0	8	3	<b>73</b>
Palm Harbor	46	23	10	8	5	<b>92</b>

#### Jeffrey Champ [Homes for Good, Maintenance Supervisor FFS]

Firm	Cost, Quality, and Design (50 pts)	Experience/Qualifications (25 pts)	Schedule of Delivery of Units (10 pts)	References (10 pts)	Completeness of RFP (5 pts)	Firm Total (100 pts)
Idea Box	40	20	9	8	4	<b>81</b>
Future Homes	30	12	8	8	4	<b>62</b>
Palm Harbor	42	24	9	9	5	<b>89</b>

## Attachment A

### LAZY DAYS PARK MODEL RV – Overall Scores – RFP Scoring Sheet

**Johanna Jimenez** [Homes for Good, Project Developer]

Firm	Cost, Quality, and Design (50 pts)	Experience/Qualifications (25 pts)	Schedule of Delivery of Units (10 pts)	References (10 pts)	Completeness of RFP (5 pts)	Firm Total (100 pts)
<b>Idea Box</b>	35	25	7	10	5	<b>82</b>
<b>Future Homes</b>	17	10	7	7	0	<b>41</b>
<b>Palm Harbor</b>	47	20	10	10	5	<b>92</b>

**Steve Ochs** [OHCS Consulting]

Firm	Cost, Quality, and Design (50 pts)	Experience/Qualifications (25 pts)	Schedule of Delivery of Units (10 pts)	References (10 pts)	Completeness of RFP (5 pts)	Firm Total (100 pts)
<b>Idea Box</b>	35	24	9	10	5	<b>83</b>
<b>Future Homes</b>	20	15	6	10	1	<b>52</b>
<b>Palm Harbor</b>	46	24	10	10	5	<b>95</b>

**Michael Morter** [Diamond M Consulting]

Firm	Cost, Quality, and Design (50 pts)	Experience/Qualifications (25 pts)	Schedule of Delivery of Units (10 pts)	References (10 pts)	Completeness of RFP (5 pts)	Firm Total (100 pts)
<b>Idea Box</b>	33	25	7	10	5	<b>80</b>
<b>Future Homes</b>	15	7	10	5	0	<b>37</b>
<b>Palm Harbor</b>	42	25	10	5	5	<b>87</b>

3737 Palm Harbor Drive  
Millersburg, OR  
9/27/2024

1/21/2025

Matt Salazar, Project Development Manager  
Audry Banks, Real Estate Development Director



Homes for Good  
100 West 13<sup>th</sup> Avenue  
Eugene, OR 97401

Matt & Audry,

Thank you for choosing Palm Harbor Homes to fulfill this critical part of your project.

On behalf of Cavco & Palm Harbor Homes, I want to express our heartfelt thanks for being selected as the producer of Park Model RVs for Homes for Good's Lazy Days RV Park project.

We are deeply honored to collaborate with you on this initiative and take great pride in the trust placed in us to meet the expectations of the project developers. Together, we are not only addressing the specific needs of this development but also making a meaningful contribution toward alleviating housing challenges in Lane County, Oregon.

The total bid is included as presented for the 10 Park Model RV's delivered and installed for a contracted total cost of **\$620,010**

The next steps would be to sign off the confirmation as presented to lock in the pricing, and we can discuss the necessary deposit requirements. 50/50 COD terms is recommended to allow us to schedule the units. Upon receipt of a 50% down deposit of \$310,005 we would commence ordering all materials that can have up to a 6-week lead time. This would permit a delivery rate of approximately 3 units per week over 3-4 week period. Thus, a deposit no later than February 17<sup>th</sup> would allow us to start delivering units 1<sup>st</sup> week in April having all units on site by May 2<sup>nd</sup>.

I will be working continuously through the build process to ensure that we meet or exceed your expectations, so that we together can create a lasting impact on the individuals and families Homes for Good will serve.

Thank you again for your collaboration as we worked to navigate the design and specifications adjustments. We are excited to move forward with this project and be small part of Oregon's housing supply needs.

Warm regards,

Ben Roche  
District Sales Manager  
Palm Harbor Homes



# Attachment B

## Quotation Summary

RETAILER: CRC (CAVCO RETAIL GROUP) SALES PERSON: BEN ROCHE / PALM HARBOR  
 MODEL #: COTTAGE PARK MODEL RV CUSTOMER: HOMES FOR GOOD HOUSING  
 DESTINATION CITY: BLUE RIVER, OR 1/21/2025

SERIES	COTTAGE PARK MODELS
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BOX WIDTH: 14'8"

BOX LENGTH: 32' 8" INC PORCH

REQUESTED CHANGE(S):	PRICE
BASE PRICE MODEL 310AF15331P 391 SQ. FT. PARK MODEL RV	\$37,000
TOTAL OPTIONS REFERENCE QUOTE# 2024-8980460-00	\$14,250
MATERIAL SURCHARGE (Q1 INFLATION ADJUSTMENT)	\$370
DELIVERY TO SITE - FREIGHT FEES	\$2,446
HOME INSTALLATION, BLOCKING, LEVELING, DRYWALL & INTERIOR FINISH	\$4,200
FINAL WALK THROUGH, PUNCH LIST TOUCH-UPS	INCLUDED
EXTERIOR VINYL SKIRTING	\$3,500
RVIA Certification & Label	\$85
ANSI Certification Fee	\$150
PER UNIT SUBTOTAL	\$62,001
<b>10 UNITS TOTAL</b>	<b>\$620,010</b>
ENGINEERING FEES	WAIVED
<b>Total</b>	<b>\$620,010</b>

OPTIONS MAY BE ADDED AND WOULD BE IN ADDITION TO PRICE QUOTED - DIMENSIONS MAY VARY

BUYER \_\_\_\_\_  
*Signature*

DATE: \_\_\_\_\_

SELLER \_\_\_\_\_  
*Signature*

DATE: \_\_\_\_\_

\* WATER & SEWER UTILITY HOOK UPS NOT INCLUDED, ELEC 100AMP CONNECTION HARD WIRED

**PRICE IS SUBJECT TO INFLATION ADJUSTMENT AFTER 30 DAYS**

ONCE ORDER CONFIRMATION IS SIGNED, AND DEPOSIT RECEIVED, PRICE WILL BE HONORED

**PHH USE ONLY!**

\*BLACK LINE DRAWING REQUIRED YES NO

\*COSTING REQUIRED YES NO



# Quote

**Quote No:** 2024-898046-00

**Quote Date:** 09/27/2024

**Financed By:** Net 10

**Approval No:**

**Approved By:**

**Approval Date:**

**Ordered By:**

**Written By:** Ben

**Sales Mgr:** Unassigned ASM

**Transporter:** To Be Determined

**Purch. Order No:**

**Series:** American Freedom

**Model No:** 310AF15331P

**Serial No:**

**Customer Name:**

**Customer Address:**

3737 Palm Harbor Drive  
Millersburg, OR 97321  
Phone: 800-928-2083  
Fax: 541-730-4247

**Notes:**

**Remarks:**

Ordered As Stock Unit

**SOLD TO:** CRG Holdings, LLC.-Litch Specialty  
dba: CRG LITCHFIELD  
1366 S. Litchfield Road  
Bldg 6  
Goodyear, AZ 85338

**SHIP TO:** CRG Holdings, LLC.-Litch Specialty  
1366 S. Litchfield Road  
Bldg 6  
Goodyear, AZ 85338

**EXTERIOR:**

**Base:** Paint - Tricorn Black

**Trim:** Paint - Tricorn Black

**Accent:** Paint - See General Notes

**Shutter:**

**Floor Covering:** DF 9665 Vinyl

**Interior Paint T/O:** Paint - Prism White

**Roof Color:** Sterling Grey

**Decor Choice:**

**Cab Color:**Knotty Alder Raised Panel

**Cab Hardware:** Knobs - Silver

	Interior Wall Color/Accent	Countertop	Counter Edge	Backsplash	Floor Covering
<b>Kitchen</b>	See Int Pt T/O	Drama Marble		Renzo Jade	DF 9665 Vinyl
<b>M Bath</b>		Drama Marble		Renzo Jade	DF 9665 Vinyl
<b>M Bed</b>	See Int Pt T/O				DF 9665 Vinyl
<b>2 Bed</b>	See Int Pt T/O				
<b>3 Bed</b>	See Int Pt T/O				
<b>Liv Rm</b>	See Int Pt T/O				DF 9665 Vinyl
<b>Dining</b>	See Int Pt T/O				DF 9665 Vinyl
<b>Entry</b>					DF 9665 Vinyl
<b>Office</b>					



3737 Palm Harbor Drive  
 Millersburg, OR 97321  
 Phone: 800-928-2083

Fax: 541-730-4247

# Quote

Quote No: 2024-898046-00

Quote Date: 09/27/2024

Purch. Order No:

Model No: 310AF15331P

Serial No:

Part Number/Description	Qty.	Price	Extension
Standard Options Include: Cottage Park Model			
<b>310AF-American Freedom-15331P</b>	<b>1</b>	<b>\$37000.00</b>	<b>\$37000.00</b>
<b>PACKAGES</b>			
<b>SPECS</b>			
Note - Home Size 14'8" x 32'8" INCLUDING COVERED PORCH SITE: BLUE RIVER, OR RV PARK MODEL	1.00	STD	\$0.00
Plt310 - Singlewide Width Limitation Overall Width Not to Exceed 16 Ft	1.00	STD	\$0.00
Spec -310 RVIA Approved	1.00	STD	\$0.00
Spec -310 ANSI 119.5 **THIS UNIT IS CONSTRUCTED TO ANSI 119.5 STANDARDS**	1.00	STD	\$0.00
<b>APPLIANCE PACKAGE</b>			
<b>ENERGY PACKAGES</b>			
Package - Energy Star w/Neem Plus - SW	27.00	\$59.00	\$1,593.00
Plt310 - Package - Energy Star w/Neem Plus Note R-44 Ceiling Insulation, 2x6 Exterior Walls w/R21 Insulation, Insulated Headers & 2 Stud Exterior Wall Corners, 2x8 Floor Joists w/R38 Blanket Insulation, Windows w/U 0.28 or Better Thermal Performance, Panasonic FV-08VQ5 Whole House Ventilation Fan, Smart Thermostat, Conduit Drop from Electrical panel, Air Sealing with Enerfoam Sealants, Sill Seal Construction, Receptacle & Switch Gaskets Installed, Electrical Boxes Caulked to Drywall, Windows & Doors Sealed to Rough Openings from Inside	1.00	PKG	\$0.00
<b>STRUCTURAL PACKAGES</b>			
<b>MISC - PACKAGES</b>			
Package - WUI SW	1.00	\$1,100.00	\$1,100.00
Plt310 - Package WUI Note **INCLUDES: CLASS 'A' SHINGLES OR BETTER SEE SUB METAL ROOF, TEMPERED	1.00	PKG	\$0.00

Retailer Initials: \_\_\_\_\_



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# Quote

Quote No: 2024-898046-00

Quote Date: 09/27/2024

Purch. Order No:

Model No: 310AF15331P

Serial No:

Part Number/Description	Qty.	Price	Extension
WINDOWS, EMBER RESISTENT VENTED SOFFITS, METAL DRIP EDGE, WUI CONFORMANCE LABEL FOR CALIFORNIA WUI COMPLIANCE, FIRE RESISTANT COMPOSITE DECKING**			
<b>EXTERIOR</b>			
<b>SIDING TYPE - EXT</b>			
Siding - Board & Batt - Add (per Perimeter Ft)	80.00	\$8.00	\$640.00
Plt310 - Siding - Board & Batt - Add (per Perimeter Ft)	1.00	PKG	\$0.00
Includes:			
Use Flat Stock Siding			
>DO NOT BATT HEADERS ABOVE PORCH SIDES & ENDS			
<b>ROOF TYPE</b>			
Roof - Metal - Standing Seam SW (per LF)	35.00	\$85.00	\$2,975.00
Plt310 - Metal Roof - Standing Seam Note	1.00	PKG	\$0.00
**26 GAUGE HIDDEN FASTENER W/16" COVERAGE**			
** NOT COMPATABLE WITH WUI "WILDLAND URBAN INTERFACE" – EAVE & RIDGE VENTING REQUIRED **			
<b>EXTERIOR WINDOWS</b>			
Miscellaneous Notes	1.00	STD	\$0.00
WINDOWS WHITE VINLY FRAMED / .25U VALUE			
WUI/TEMPERED W/ARGON			
Window - 30 x 80 ILO Standard	3.00	\$165.00	\$495.00
Window - 36 x 17 Horizon (each)	2.00	\$185.00	\$370.00
Window - 46 x 40	1.00	\$305.00	\$305.00
MASTER BEDROOM END			
<b>FRONT DOOR</b>			
Door - Exterior - Ari 3 Lite ILO STD	1.00	\$1,595.00	\$1,595.00
Door - Exterior - Painted	1.00	PKG	\$0.00
Plt310 - Door - Exterior Painted Note	1.00	PKG	\$0.00
**REPLACES STANDARD. COLOR WILL MATCH TRIM UNLESS SPECIFIED ON ORDER**			
<b>REAR DOOR</b>			
<b>MISC - DOOR</b>			
Door - Sliding Glass - Omit	1.00	\$-200.00	\$-200.00
<b>MISC - EXT</b>			
Hose Bibb - Frost Free	2.00	\$60.00	\$120.00
Plt310 - Location Note	1.00	PKG	\$0.00
**INDICATE LOCATION ON PRINT**			

Retailer Initials: \_\_\_\_\_



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## Quote

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Quote Date: 09/27/2024

Purch. Order No:

Model No: 310AF15331P

Serial No:

Part Number/Description	Qty.	Price	Extension
<b>DORMER</b>			
<b>STRUCTURAL</b>			
<b>FLOOR FRAME &amp; AXLE</b>			
Axle - Brake - New (ea)	1.00	\$420.00	\$420.00
Chassis - Recessed (per Floor)	1.00	\$270.00	\$270.00
<b>FLOOR JOISTS</b>			
Floor Joist - 2x8	1.00	PKG	\$0.00
<b>FLOOR DECKING</b>			
<b>PORCHES &amp; DECKS</b>			
Floor Decking - Porch - Composite (per Sq Ft) COTTAGE(GREY)	87.00	\$3.70	\$321.90
Fee - Exterior Change	750.00	\$1.00	\$750.00
HOG FENCE RAILING ILO OF STD RAILS 20' @ \$37.50 - INCLUDES NAT STAINED 2X6 TOP HAND RAIL			
Miscellaneous Notes	1.00	STD	\$0.00
RAILING OPENING TO BE ON SIDE ENTRY TO PORCH PER PRINT HOG WIRE RAILING WITH NATURAL WOOD FRAMING (OMIT CORNER CORBEL ACCENTS, SIMPLE PICTURE FRAME RETENTION)			
<b>MISC - FLRS</b>			
<b>EXTERIOR WALLS</b>			
<b>INTERIOR WALLS</b>			
<b>ROOF LOAD</b>			
<b>ROOF PITCH</b>			
Roof Pitch - 2:12 - Shed Roof SGL 15 Wide (per LF)	33.00	\$32.00	\$1,056.00
Plt310 - Shed Roof Option Note "includes 2x6 exterior walls with R/21"	1.00	PKG	\$0.00
<b>EAVES &amp; OVERHANGS</b>			
Exterior - Vented Eaves - WUI	6.00	\$100.00	\$600.00
<b>INSULATION</b>			
Insulation - Ceiling R44	1.00	PKG	\$0.00
Insulation - Floor R38 ILO Standard (per SF)	1.00	PKG	\$0.00
Insulation - R9 - Header Rigid Foam	1.00	PKG	\$0.00
<b>FURNACE</b>			
<b>STRUCTURAL CHANGES</b>			
Kitchen - Alternate	1.00	\$350.00	\$350.00
<b>STRUCTURAL - MISC</b>			





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Purch. Order No:

Model No: 310AF15331P

Serial No:

Part Number/Description	Qty.	Price	Extension
<b>INTERIOR</b>			
<b>INTERIOR DECOR</b>			
<b>INTERIOR FINISH</b>			
<b>INTERIOR DOORS</b>			
Miscellaneous Notes 32" INTERIOR DOORS, BEDROOM & BATH	1.00	STD	\$0.00
<b>FIREPLACE</b>			
<b>CLOSETS</b>			
<b>MEDIA &amp; OFFICE CENTERS</b>			
<b>CABINERY</b>			
<b>CABINET &amp; DOOR TYPE</b>			
Cab Doors - Alder ILO Standard	1.00	\$395.00	\$395.00
<b>KNOBS &amp; PULLS</b>			
<b>CAB KIT</b>			
<b>CAB M/BATH</b>			
<b>CAB G/BATH</b>			
<b>CAB 3RD BATH</b>			
<b>CAB HALF BATH</b>			
<b>CAB UTILITY</b>			
<b>MISC - CAB</b>			
<b>KITCHEN</b>			
<b>COUNTERTOP - KIT</b>			
<b>COUNTER EDGE - KIT</b>			
<b>BACKSPLASH - KIT</b>			
<b>APPLIANCES</b>			
Icemaker - Plumbed Only	1.00	STD	\$0.00
Miscellaneous Notes ELECTRIC RANGE ILO GAS	1.00	STD	\$0.00
Refrigerator - 18 CF - Energy Star ILO Std 18 CF	1.00	\$200.00	\$200.00
<b>MISC - KITCHEN OPTIONS</b>			
<b>UTILITY ROOM</b>			
<b>COUNTERTOP - UTILITY</b>			
<b>COUNTER EDGE - UTILITY</b>			
<b>BACKSPLASH - UTILITY</b>			
<b>WATER HEATER</b>			

Retailer Initials: \_\_\_\_\_



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Purch. Order No:

Model No: 310AF15331P

Serial No:

Part Number/Description	Qty.	Price	Extension
<b>WASHER &amp; DRYER</b>			
<b>PLUMBING</b>			
<b>ELECTRICAL</b>			
<b>ELECTRICAL SERVICE</b>			
Electric Service - Exterior 100 AMP	1.00	STD	\$0.00
<b>LIGHTING</b>			
Light - Can - Additional	6.00	\$75.00	\$450.00
ADDITIONAL CEILING CAN LIGHT IN PORCH			
ADD 4 TO LIVING / DINING AREA IN ADDTION TO STD 5 KITCHEN AREA LED CAN LIGHTS			
ADD 1 OVER BATH SHOWER			
<b>MISC - ELEC</b>			
Exterior - 20 AMP DHP Disconnect	1.00	\$125.00	\$125.00
Recept - Exterior - GFI - Add	1.00	\$60.00	\$60.00
<b>BATHS</b>			
<b>MASTER BATHROOM</b>			
<b>COUNTERTOP - M/BATH</b>			
<b>COUNTER EDGE - M/BATH</b>			
<b>BACKSPLASH - M/BATH</b>			
<b>MASTER BATH TUB/SHOWER</b>			
<b>MASTER BATH TUB</b>			
<b>MASTER BATH TOILET</b>			
Toilet - Handicap	1.00	\$110.00	\$110.00
<b>MASTER BATH LAVY</b>			
<b>MASTER BATH FAUCET</b>			
<b>MISC - MASTER BATH</b>			
Grab Bar - 36"	2.00	\$75.00	\$150.00
<b>GUEST BATHROOM</b>			
<b>COUNTERTOP - G/BATH</b>			
<b>COUNTER EDGE - G/BATH</b>			
<b>BACKSPLASH - G/BATH</b>			
<b>GUEST BATH TUB/SHOWER</b>			
<b>GUEST BATH TOILET</b>			
<b>GUEST BATH LAVY</b>			
<b>GUEST BATH FAUCET</b>			

Retailer Initials: \_\_\_\_\_



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## Quote

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Purch. Order No:

Model No: 310AF15331P

Serial No:

Part Number/Description	Qty.	Price	Extension
MISC - GUEST BATH			
3RD BATHROOM			
COUNTERTOP - 3RD BATH			
COUNTER EDGE - 3RD BATH			
BACKSPLASH - 3RD BATH			
3RD BATH TUB/SHOWER			
3RD BATH TOILET			
3RD BATH LAVY			
3RD BATH FAUCET			
MISC - 3RD BATH			
HALF BATH			
COUNTERTOP - HALF BATH			
COUNTER EDGE - HALF BATH			
BACKSPLASH - HALF BATH			
HALF BATH TOILET			
HALF BATH LAVY			
HALF BATH FAUCET			
MISC - HALF BATH			
MISCELLANEOUS			
SPECIALTY OPTIONS			
SHIP LOOSE			
MISC - ITEMS			
<b>Freight</b>	<b>1</b>	<b>\$2446.00</b>	<b>\$2446.00</b>
FREIGHT ON INVOICE FROM MILLERSBURG TO BLUE RIVER VIA BENNETT QUOTE 9.27.24			
<b>Other Fees and Charges - Single Section</b>	<b>1</b>	<b>\$4200.00</b>	<b>\$4200.00</b>
SITE SET-UP AND INTERIOR TRIM OUT CONTRACTED SERVICES (ASSUMES TIRES ARE RETURNED TO INSTALLER FOR RECYCLING)			
<b>RVIA Labels</b>	<b>1</b>	<b>\$85.00</b>	<b>\$85.00</b>
<b>ANSI Certification Fee</b>	<b>1</b>	<b>\$150.00</b>	<b>\$150.00</b>
<b>Other Fees and Charges - Single Section</b>	<b>1</b>	<b>\$3500.00</b>	<b>\$3500.00</b>
VINYL SKIRTING INSTALLATION BY CONTRACTOR ON SITE			

Retailer Initials: \_\_\_\_\_



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# Quote

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Quote Date: 09/27/2024

Purch. Order No:

Model No: 310AF15331P

Serial No:

Page 8 of 8

Printed on: 1/20/2025

Part Number/Description	Qty.	Price	Extension
<b>Material Surcharge</b>	1	\$370.00	\$370.00

\_\_\_\_\_  
 Retailer's Signature

\_\_\_\_\_  
 Date

*All prices and specifications are subject to change without notice. Sales tax, if applicable, will be added at invoicing. Confirmation to be sent to manufacturing center by return mail or fax. Retailer to report any corrections required to the manufacturing center immediately. Applicable materials used in this structure comply with EPA TSCA Title VI.*

<b>BASE PRICE</b>	<b>\$ 37,000.00</b>
<b>TOTAL OPTIONS</b>	<b>\$ 14,250.90</b>
<b>MATERIAL SURCHARGE</b>	<b>\$ 370.00</b>
<b>MISC FEES / DUES / DISCOUNTS</b>	<b>\$ 7,935.00</b>
<b>SUBTOTAL</b>	<b>\$ 59,555.90</b>
<b>FREIGHT</b>	<b>\$ 2,446.00</b>
<b>SALES TAX</b>	<b>\$ 0.00</b>
<b>TOTAL HOME COST</b>	<b>\$ 62,001.90</b>

VEP 0 --- This house does not contain any Volume Incentive payment nor does its purchase qualify toward the achievement of any volume incentive plateau.



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Plant Location: **Millersburg**

Customer Name:

Drawn By: **GJA**

Date: **6/28/23**

**Cottage**

Model Number: **4H1CB1**

**HUD Unit**

Designation: **Shed Roof**

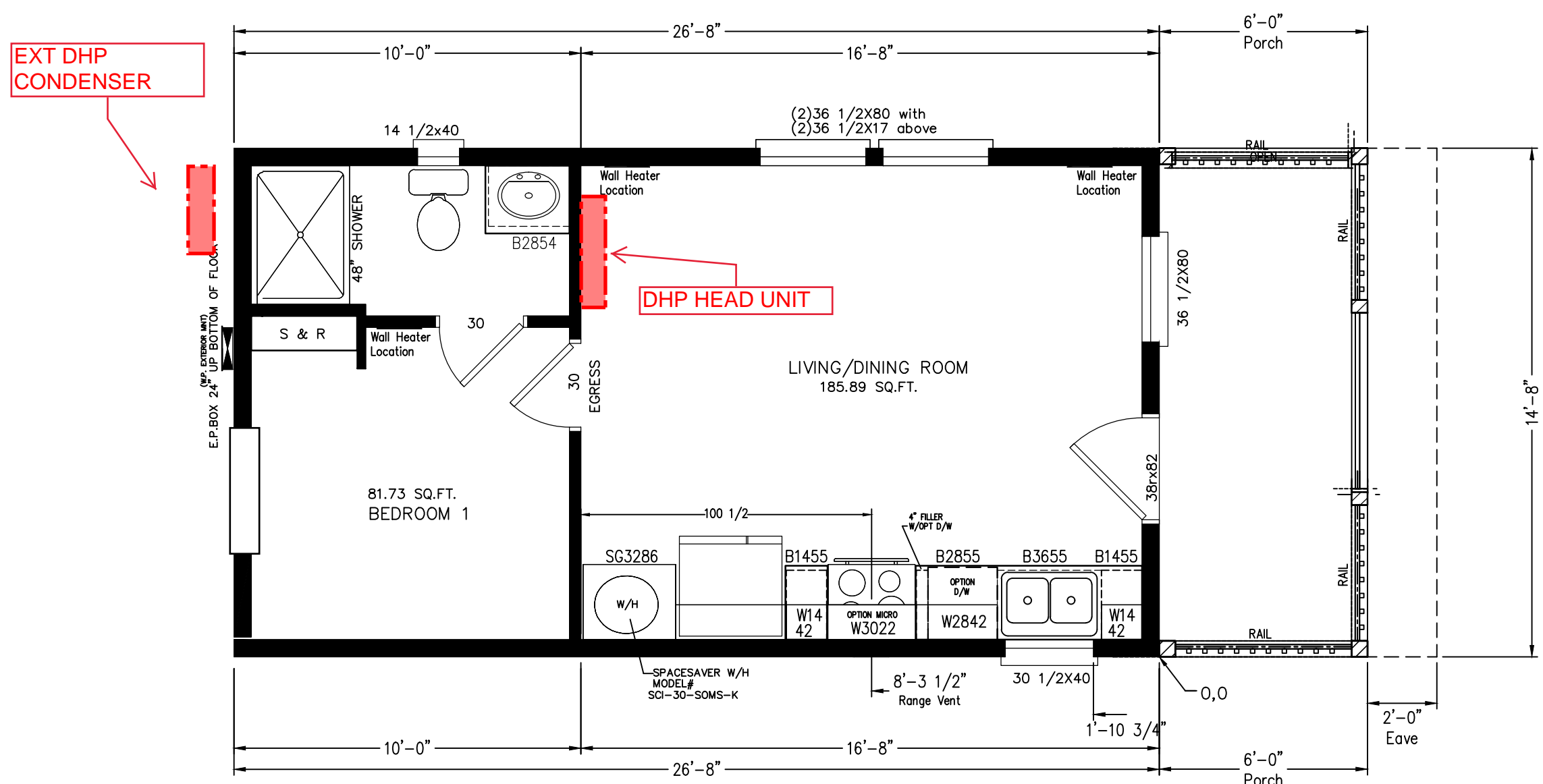
Rev. By: --  
Revision: --

### Approvals

P.E.

3rd Party:

State:



Note:  
1) Unit requires min. R-30 floor, R-21 walls and R-33 Roof in order to be in compliance with HUD standards.



**Cottage Park Model Standard Features**

Exterior		Kitchen/Appliance/Utility	
Item	Description	Item	Description
Siding	Allura Panel Fibercement Traditional Cedar 30YR	Kitchen Sink	7" Deep Stainless Steel Double Bowl
Siding Underlayment	House Wrap	Kitchen Faucet	Nickel Single Lever
Trim	3.5" Allura Fibercement	Kitchen Sink Front	Fixed Drawer Front
Fascia	7.5" Allura Fibercement	Shut Off Valves	All Fixtures & Whole Home
Soffit	HardiSoffit Cedarmill	Range	Black Freestanding Gas
Roofing	Architectural Shingles	Range Ventilation	Black Broan Vertical Range Hood
Roofing Underlayment	Sythetic	Refrigerator	Black 18cf Top & Bottom Frost Free
Windows	Vinyl Frame Low-E Dual Glazed	Over Refrigerator	Shelf
Front Door	36" Six-Panel	Water Heater	20 Gal Electric
Rear Door	Sliding Glass Door in Bedroom	Water Heater Access	Interior
Exterior Floor Decking	Stained Wood- per print	Utility Plumbing	Optional
Hose Bib	Optional	Plumbing	Plumb for Icemaker
Dormer	Optional	Gas Lines	Optional

**SUB WINDOW**

**SUB ELEC RANGE**

Energy/Structural		Electrical	
Item	Description	Item	Description
Frame	I-Beam Chassis	Mainpanel	50 Amp Electrical Service w/Pigtail
Axles & tires	Recycled Brakes	Switches	Rocker Type
Floor Joist	2x8 16"OC	Light Bulbs	LED Bulbs Installed
Floor Decking	19/32 OSB Tongue & Groove	Entry Lights	White Wall Mount Jelly Jar
Exterior Walls	2x6 16" OC /102" Height	Closet Lights (Walk-in Size)	N/A
Interior Walls	24" OC	Wall Light	Optional
Roof Trusses	24" OC	Dining Room Lights	Recessed LED Can Lights
Roof Pitch & Load	4/12, 30# , Ridgevent	Morning Room Lights	N/A
Eaves & Overhangs	5" Eaves, 12" End Overhangs	Kitchen Area Lights	Recessed LED Can Lights
Ceiling	Flat 102"	Kitchen Sink Light	Recessed LED Can Light
Insulation	R40-R21-R38 (Ceiling - Walls - Floor)	Island or Bar Lighting	N/A
Heating	Cadet Heaters and Bath Fan/Light/Heater combo	Utility & Hall Lights	N/A
Duct System	N/A	Bathroom Light	Bathroom Strip Lights w/Heat/Light/Fan combo
Heat Registers	N/A	Bedrooms Lights	Optional
Air Return	Over Door	Fan (Wire)	Optional
Cross Overs	N/A	TV Jack (Plate & Conduit)	Optional
Ventilation	Baths & Whole Home	Phone Jack (Plate & Conduit)	Optional
Air & Vapor Barrier	Sill Seal with Spray Vapor Barrier	Freezer (Wire)	N/A
Crawl Space	N/A	Dryer Hookup	Optional
Attic Access	N/A	GFCI Recept	(1) Exterior per plan
		Safety	Smoke/CO Detectors

**OPT 100 AMP**

Décor		Master Bath	
Item	Description	Item	Description
Window Coverings	White Window Cornices	Tub / Shower	48" 1 pc Shower
Blinds	Metal Miniblinds Throughout	Tub / Shower Faucet	Single Control Anti-Scald Diverter
Carpet	N/A	Tub	N/A
Pad	N/A	Lavy	China Sink With Overflow
Vinyl Flooring	Living/Dining, Bedroom, Bath	Lavy Faucet	Single Handle Lavy Faucet
Tile Flooring	Optional	Toilet	Elongated Bowl
Laminate Flooring	Optional	Mirror	Trimmed Above Sink
Accent Paint	Optional	Hardware	Brushed Nickel Towel Hook & Tissue Holder

Interior		Optional Items	
Item	Description	Item	Description
Drywall Finish	Textured & Painted Prism White	Alternate Kitchen	
Drywall Corners	Square Including Windows w/Wood Sill	Closet Module	
Marriage Line Close-Up	N/A	Bath w/Plumb & Wire for stack washer/dryer	
Cabinets	Durabuilt with Adjustable Shelves	Upgrade Exterior	
Cabinet Doors	Picture Frame	Plumb for Gas Range	
Cabinet Pulls	Satin Silver Knobs	Plumb for Gas Dryer	
Countertops	Wilsonart Laminate		
Counter Edge	Wilsonart Laminate		
Backsplash	Stacked Ceramic Tile		
Interior Doors	White Raised Panel		
Interior Door Hardware	Satin Silver Lever Handles		
Door Trim	2 1/4" White Square Door Casing		
Baseboards	2 1/4" Square Baseboard Vinyl Areas Only		
Ceiling Cove	N/A		
Closet Shelving	Wood With Dowel Rod		

**OPTIONS ON ORDER SUPERCEDED THESE STANDARD SPECIFICATIONS**

**Build To**

ANSI 119.5  
RVIA Approved

IN THE BOARD OF COMMISSIONERS OF THE  
HOMES FOR GOOD HOUSING AGENCY, OF LANE COUNTY OREGON

ORDER 25-29-01-01H

In the Matter of Authorizing the Executive Director to approve Contract 25-C-0014 for the Manufacturing, Delivery, and Installation of Modular Homes at Lazy Days Mobile Home Park.

WHEREAS, Housing and Community Services Agency of Lane County doing business as Homes for Good Housing Agency (the "Authority") is a public body corporate and politic, exercising public and essential governmental functions, and having all the powers necessary or convenient to carry out and effectuate the purposes of the ORS 456.055 to 456.235 (the "Housing Authorities Law"); and

WHEREAS, Homes for Good Housing Agency is assisting in recovery efforts for the McKenzie River community that was impacted by the 2020 Holiday Farm Fire;

WHEREAS, Homes for Good Housing Agency has purchased the Lazy Days Mobile Home Park that was destroyed in the Holiday Farm Fire;

WHEREAS, Homes for Good Housing Agency is working to rebuild the Park and provide affordable homeownership and rental opportunities;

WHEREAS, Homes for Good Housing Agency conducted a Request For Proposals process to select a firm to Manufacture, Delivery, and install Park Model RV units at Lazy Days Mobile Home Park;

WHEREAS, Homes for Good Housing Agency determined that the Palm Harbor proposal for Manufacturing, Delivery, and installation of Park Model RV units scored the highest during the Request for Proposal process.

NOW IT IS THEREFORE ORDERED THAT:

The Executive Director or Designee is authorized to enter into a Contract not to exceed \$650,000 for the manufacturing, delivery, and installation of Park Model RV's at Lazy Days Mobile Home Park.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025

\_\_\_\_\_  
Chair, Homes for Good Board of Commissioners

\_\_\_\_\_  
Secretary, Homes for Good Board of Commissioners





# BOARD OF COMMISSIONERS AGENDA ITEM

**BOARD MEETING DATE:** 01/29/2025

**AGENDA TITLE:** In the Matter of Updating the Administrative Plan and the Admissions and Continued Occupancy Plan - Distributions from Non-Revocable Trusts

**DEPARTMENT:** Rent Assistance Division

**CONTACT :** Beth Ochs

**EXT:** 2547

**PRESENTER:** Beth Ochs

**EXT:** 2547

**ESTIMATED TIME :** 15 minutes

- ORDER/RESOLUTION**
- PUBLIC HEARING/ORDINANCE**
- DISCUSSION OR PRESENTATION (NO ACTION)**
- APPOINTMENTS**
- REPORT**
- PUBLIC COMMENT ANTICIPATED**

**Approval Signature**

**EXECUTIVE DIRECTOR:**

A handwritten signature in black ink, appearing to be "JAF", is written over a horizontal line.

**DATE:** 01.22.2025

**LEGAL STAFF :**

**DATE:**

**MANAGEMENT STAFF:**

**DATE:**



## **HOMES FOR GOOD MEMORANDUM**

**TO:** Homes for Good Board of Commissioners

**FROM:** Beth Ochs, Rent Assistance Division Director

**TITLE:** In the Matter of updating the FY25 Administrative Plan and the Admissions and Continued Occupancy (ACOP) – Distribution from Trusts

**DATE:** January 29, 2025

---

### **MOTION:**

Seeking Board Approval to implement HOTMA language that has been approved by HUD regarding distribution of funds from irrevocable trusts or revocable trusts outside the control of the family.

### **DISCUSSION:**

#### **A. Issue**

HOTMA regulations change how a Public Housing Agency (PHA) views money that is removed from a trust. Since publishing its HOTMA regulations, two tenants have put forth requests to Homes for Good to follow the HOTMA regulations as they pertain to the trusts.

#### **B. Background**

Pre HOTMA regulations required the (PHA) to count distributions from the trust as income. HOTMA regulations require a PHA to count only the interest earned as income (unless the distribution of interest is to pay for medical expenses of a minor).

#### **Pre HOTMA regulation:**

In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate [24 CFR5.603(b)].

#### **HOTMA regulation:**

The value of the trust is not included in net family assets, so long as the fund continues to be held in a trust that is not revocable by, or under the control of, any member of the family or household. All distributions from the trust's principal are excluded from income. Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust's principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor. [24 CFR5.603(b)].

Unless otherwise stated HUD defines income as, all amounts, monetary or not, which go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

**C. Analysis**

Two families being served by Homes for Good (1 applicant and 1 tenant) asserted via the Hearing process and the Reasonable Accommodation process that HOTMA should be followed as it pertains to revocable trusts outside the control of the family. For these two families, the pre HOTMA regulations would result in one family being over income to qualify for subsidy and the other contesting the out of pocket rent cost would encompass principal distributions from the trust which HOTMA does not allow.

To address their concerns, a waiver to HUD to implement the HOTMA regulations prior to HUD's approval to do so was requested.

Amid gaining approval to the waiver HUD published PIH Notice 2024-38 on December 17, 2024. This notice provides details on what aspects of HOTMA PHAs need to implement by July 1, 2025. Included in this notice is the HOTMA regulation for trusts.

The HUD field office then advised Homes for Good to withdraw its waiver request and to implement the trust regulations via implementation of the PIH notice.

**D. Furtherance of the Strategic Equity Plan**

This implementation of HOTMA regulations for trust disbursements reflects our commitment to the pillar of "Listen to our Communities". By first seeking the waiver and then pivoting to the PIH notice, we have actively responded to the needs and concerns of those we serve.

**E. Alternatives & Other Options**

The implementation may be delayed until July 2025. If this option is selected, one family would lose their assistance from Homes for Good, while the other would need to use trust principal to cover rent expenses.

**F. Timing & Implementation**

Upon approval of the board order we will update both the Administrative and ACOP plans.

**G. Recommendation**

Homes for Good recommends the board approve this board order.

**H. Follow Up**

Other aspects of HOTMA from the PIH Notice will be addressed in future board orders prior to July 2025.

**I. Attachments**

PIH Notice 2024-38



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

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**SPECIAL ATTENTION OF:**

Office Directors of Public Housing;  
Regional Directors; Public Housing  
Agencies

**NOTICE PIH 2024-38**

**Issued:** December 17, 2024

**Expires:** This notice remains in effect until  
amended, superseded or rescinded.

Cross References: Notice PIH 2023-27, Notice H  
2024-09

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**Subject: Housing Opportunity Through Modernization Act (HOTMA) Sections 102 and 104: Updated Guidance to Public Housing Agencies (PHAs) on Compliance**

**I. Purpose**

The purpose of this Notice is to identify which income and assets provisions from Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) that Public Housing Agencies (PHAs) must comply with no later than July 1, 2025.<sup>1</sup>

Section 6.1 of Notice PIH 2023-27 previously established a compliance deadline of January 1, 2025, by which PHAs had to fully comply with the HOTMA final rule.<sup>2</sup> This Notice supersedes, in part, Section 6.1 of Notice PIH 2023-27. This Notice indicates that for the specific HOTMA provisions identified below, the new deadline for PHA compliance is July 1, 2025. For all other provisions that are not identified in this Notice, HUD will not enforce PHA compliance by January 1, 2025.

**II. Background**

HOTMA was signed into law on July 29, 2016 (Pub. L. 114-201). The final rule implementing Sections 102 and 104 of HOTMA (88 FR 9600) became effective January 1, 2024. HUD initially provided, in the HOTMA Section 102 and 104 Implementation

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<sup>1</sup> References to form HUD-50058 in this notice take on the meaning of form HUD-50058 MTW for MTW PHAs and form HUD-50058 MTW Expansion for MTW Expansion PHAs.

<sup>2</sup> [Housing Opportunity Through Modernization Act of 2016; Implementation of Sections 102, 103, and 104](#). 88 Fed. Reg., 9,600. February 14, 2023.

Guidance (Notice PIH 2023-27),<sup>3</sup> that PHAs could set a compliance date between January 1, 2024, and January 1, 2025, based on when the PHA’s software could submit to HIP.

Due to further IT system development delays, HUD will not enforce compliance with all Section 102 and 104 income and assets provisions by January 1, 2025.<sup>4</sup> PHAs will not have software capable of submitting HOTMA-compliant forms to HIP by January 1, 2025, because HIP development has not been completed. The IMS/PIC legacy system reflects pre-HOTMA requirements in many places. When the timeline for completion of HIP development and PHA migration is known, HUD will issue further guidance on the deadline to comply with any outstanding provisions of Sections 102 and 104. HUD will provide regular updates on the progress of systems development.

### **III. Applicability**

This notice applies to PHAs administering Office of Public and Indian Housing (PIH) programs (HCV [including Project-Based Vouchers], Moderate Rehabilitation, Moderate Rehabilitation SRO, Public Housing), including PHAs that participate in the Moving to Work (MTW) Demonstration.<sup>5</sup>

### **IV. PHA Compliance with HOTMA Sections 102 and 104**

#### **A. HUD Enforcement Prior to July 1, 2025**

##### **1. Earned Income Disregard**

**Regulation:** 24 CFR 5.611

PHAs must have ceased enrolling families into the Earned Income Disregard (EID) as of December 31, 2023. EID will not apply to any family that was not eligible for and already participating in the disregard as of December 31, 2023. Please refer to Notice PIH 2023-27, Attachment G, Section G.20, for guidance on the end of EID.<sup>6</sup>

##### **2. Form HUD-9886-A**

**Regulation:** 24 CFR 5.230, 5.232

PIH communicated by letter on February 23, 2024, that PHAs may begin having families sign the new Form HUD-9886-A (Authorization for the Release of Information/Privacy Act Notice) on January 1, 2024. The Form HUD-9886-A instructs readers to use the HUD-9886-A for reexaminations effective on or after January 1, 2024, and to use Form HUD-9886 for reexaminations effective prior to January 1,

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<sup>3</sup> Notice PIH 2023-27, [Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 \(HOTMA\)](#). Re-issued February 2, 2024.

<sup>4</sup> PIH Message to Public Housing Agencies. “[HOTMA 102/104 Income and Assets Rule Compliance](#).” September 18, 2024.

<sup>5</sup> The contents of this notice apply to PHAs participating in the MTW program except where an approved MTW waiver is in place. For example, MTW PHAs that have previously developed a different method of measuring prior-year income as part of the Rent Reform Demonstration or Stepped and Tiered Rent Demonstration may continue to use those methods after this notice takes effect.

<sup>6</sup> PIH Message to Public Housing Agencies. “[Updates on HIP and HOTMA Implementation](#).” February 23, 2024.

2024. Please refer to Notice PIH 2023-27, Attachment J, Section J.1 for guidance on the authorization for release of information form. Form HUD-9886 expires on January 31, 2025, at which point the Form HUD-9886-A will be the only approved version of the authorization for release of information form. PHAs must transition to using the Form HUD-9886-A by February 1, 2025.

PHAs that have begun use of the Form HUD-9886-A must also start implementing policies related to the revocation of consent. Please refer to Notice PIH 2023-27, Attachment J for guidance on the new authorization for the release of information form (HUD-9886-A) and the family's ability to revoke consent. Section J.1 provides guidance on the use of the Form HUD-9886-A. Notice PIH 2023-27, Attachment J, Section J.2 provides guidance on revocation of consent.

## **B. HUD Enforcement Beginning July 1, 2025**

This Notice identifies additional provisions in Sections 102 and 104 of HOTMA that PHAs must comply with no later than July 1, 2025. HUD has determined that PHAs can comply with these specific provisions while they remain in IMS/PIC, prior to the availability of HOTMA-compliant HUD-50058 forms in HIP. All transactions with an effective date on or after July 1, 2025, must be processed using these HOTMA policies. Since the reexamination process typically starts 90-120 days prior to the effective date of the transaction, this means that PHAs may need to utilize such policies in reexaminations as soon as March 3, 2025.

This compliance deadline does not apply to other provisions, which require systems development. For provisions not on this list, HUD either identified technical obstacles in IMS/PIC that PHAs would encounter when trying to report HUD-50058 transactions that used such provisions, or the provision is closely linked to other HOTMA provisions that have similar obstacles. For example, HOTMA raised the Elderly/Disabled Family deduction to \$525 effective January 1, 2024, but PHAs in IMS/PIC are unable to comply with this change, because they are unable to submit transactions at the higher amount.

PHAs may immediately begin complying with HOTMA provisions identified below, once they have made any necessary updates to their materials and processes. HUD encourages PHAs to consult with their software vendors prior to beginning to implement these provisions, to ensure HUD-50058 transactions are submitted successfully.

### **1. Income Exclusions**

**Regulation:** 24 CFR 5.609(b)

PHAs may immediately begin to implement income exclusions in 24 CFR 5.609(b), on all income examinations including at new admissions, annual, or interim reexaminations. For all income examinations with an effective date on or after July 1, 2025, PHAs must utilize the list of income exclusions. Please note that Notice PIH 2023-27 does not reference all income exclusions, but rather provides guidance on

new or revised income exclusions. For the full list of income exclusions, please refer to the regulations at 24 CFR 5.609(b).

Please refer to Notice PIH 2023-27, Attachment G, for guidance on the following new and revised exclusions:

- Nonrecurring Income (24 CFR 5.609(b)(24))
- Lump-Sum Additions to Net Family Assets (24 CFR 5.609(b)(24)(vii))
- Income Earned on Amounts Placed in a Family's Family Self Sufficiency (FSS) Account (24 CFR 5.609(b)(27))
- Income of Live-in Aides, Foster Children, and Foster Adults (24 CFR 5.609(b)(8))
- Payments Received for the Care of Foster Children or Foster Adults or State or Tribal Kinship or Guardianship Care Payments (24 CFR 5.609(b)(4))
- Insurance Payments or Settlements (24 CFR 5.609(b)(5))
- Civil Action Recoveries or Settlements (24 CFR 5.609(b)(7))
- Earned Income of Dependent Full-Time Students (24 CFR 5.609(b)(14))
- Adoption Assistance Payments (24 CFR 5.609(b)(15))
- Veterans Regular Aid and Attendance (24 CFR 5.609(b)(17))
- Home-Based Care Payments for a Family Member(s) with one or more Disabilities (24 CFR 5.609(b)(19))
- Loan Proceeds (24 CFR 5.609(b)(20))
- Certain Payments Received by Tribal Members (24 CFR 5.609(b)(21))
- Exclusions from Other Federal Statutes (24 CFR 5.609(b)(22))
- Replacement Housing Gap Payments (24 CFR 5.609(b)(23))
- Student Financial Assistance (24 CFR 5.609(b)(9))
- Achieving a Better Life Experience (ABLE) Accounts (24 CFR 5.609(b)(22))
- Income and Distributions from Coverdell Education Savings Accounts, 529 Accounts, and "Baby Bond" Accounts (24 CFR 5.609(b)(10))
- Gross Income from Self-Employment or Operation of a Business (24 CFR 5.609(b)(24) and 5.609(b)(28))
- Civil Rights Settlements or Judgments (24 CFR 5.609(b)(25))

Please refer to Notice PIH 2023-27, Attachment F, Section F.4.d.iii for guidance on the income exclusion at 24 CFR 5.609(b)(2):

- Certain distributions of irrevocable trusts or revocable trusts outside the control of the family or household (including most Special Needs Trusts) (24 CFR 5.609(b)(2))

Note that adoption of some new or revised definitions below may affect the calculation for certain income exclusions. For example, the revised definition of the term "health and medical care expenses" may affect the income exclusion at 24 CFR 5.609(b)(6):

- Amounts for or in reimbursement of the cost of health and medical care expenses (24 CFR 5.609(b)(6))

## 2. Definitions

**Regulation:** 24 CFR 5.100, 5.403, 5.603

PHAs may immediately begin to use the following definitions. For all transactions with an effective date on or after July 1, 2025, PHAs must use these definitions.

- “Earned income” and “unearned income” (24 CFR 5.100). Please refer to Notice PIH 2023-27, Attachment F, Sections F.2 and F.3 for guidance on these definitions.
- “Family” (24 CFR 5.403). Please refer to Notice PIH 2023-27, Attachment E, Section E.1 for guidance on the definition of family.
- “Day laborer,” “independent contractor,” and “seasonal worker” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment F, Sections F.2.a, F.2.b, and F.2.c for guidance on these definitions.
- “Dependent” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment E, Section E.2 for guidance on the revision to this definition.
- “Foster child” and “foster adult” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment E, Section E.2 for guidance on these definitions. **Note:** The definitions of “foster child” and “foster adult” were added to 24 CFR 982.4 as part of a final rule published on May 7, 2024 (“Housing Opportunity Through Modernization Act of 2016-Housing Choice Voucher (HCV) and Project-Based Voucher Implementation; Additional Streamlining Changes,” 89 FR 38224), and this rule did not have a delayed compliance date.<sup>7</sup> For the Housing Choice Voucher program [including Project-Based Vouchers], PHAs must already be implementing the definition of “foster child” and “foster adult”.
- “Health and medical care expenses” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment C, Section C.3.b for guidance on this definition.
- “Minor” (24 CFR 5.603).

## 3. De Minimis Errors

**Regulation:** 24 CFR 5.609(c)(4); 882.515(f); 882.808(i)(5); 960.257(f); and 982.516(f)

Please refer to Notice PIH 2023-27, Attachment B, Section B.4 for guidance on de minimis errors, which includes guidance on when PHAs must take corrective action to credit or repay a family.

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<sup>7</sup> [Housing Opportunity Through Modernization Act of 2016 – Housing Choice Voucher \(HCV\) and Project-Based Voucher Implementation; Additional Streamlining Changes](#). 89 Fed. Reg., 38,224. May 7, 2024.



### C. Summary of Compliance Requirements

The table below summarizes the provisions of Sections 102 and 104 of HOTMA identified in this Notice and their respective compliance deadlines.

Provisions	Required Compliance Date
Ceasing Enrollment into Earned Income Disregard (EID)	January 1, 2024
Use of HUD-9886-A	No later than February 1, 2025
Income Exclusions	No later than July 1, 2025
Definitions	No later than July 1, 2025
De Minimis Errors	No later than July 1, 2025

HUD will not be enforcing compliance with any other provision by January 1, 2025.<sup>8</sup> HUD will issue further guidance on the compliance deadline for all other provisions, when there is more information about when PHAs will be able to submit HOTMA-compliant HUD-50058 forms in HIP.

### V. Further Information

Questions concerning this notice should be submitted by email to the following Office of Public Housing and Voucher Programs mailbox: [HOTMAQuestions@hud.gov](mailto:HOTMAQuestions@hud.gov).



Richard J. Monocchio  
Principal Deputy Assistant Secretary  
Public and Indian Housing

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<sup>8</sup> HUD has also determined that PHAs can implement two discretionary provisions of Sections 102 and 104 of HOTMA while they remain in IMS/PIC, prior to the HOTMA-compliant HUD-50058 forms becoming available in HIP. As previously noted, PHAs may start implementing the “Safe Harbor” income verification option of the HOTMA final rule. Please refer to Notice PIH 2023-27, Attachment J, Section J.4 for guidance on Safe Harbor income verification. If a PHA chooses to adopt this policy while in IMS/PIC, they must list the annual income from the other program’s determination in Section 7 of the HUD-50058 for the Head of Household using the “Other Non-Wage Sources” income code. Additionally, PHAs may choose not to use the Enterprise Income Verification (EIV) system to verify tenant employment and income information during an interim reexamination of family composition and income. Please refer to Notice PIH 2023-27, Attachment J, Section J.3, for guidance on mandated and discretionary use of the EIV system. PHAs may choose to continue to use EIV to verify tenant employment and income information at interim reexaminations of family composition and income.

IN THE BOARD OF COMMISSIONERS OF THE  
HOMES FOR GOOD HOUSING AGENCY, OF LANE COUNTY OREGON

ORDER 25-29-01-02H

In the Matter of Updating the Housing Choice Voucher Administrative Plan and Admissions & Continued Occupancy (ACOP), Distributions from Trusts

WHEREAS, Homes for Good is required by HUD under the Housing Opportunity Through Modernization Act (HOMTA) to implement income exclusions noted in 24 CFR 5,609(b)

WHEREAS, PIH Notice 2024-38 identifies which aspects of HOTMA PHAs can implement as of December 17, 2024.

WHEREAS, Homes for Good is implementing the required HOTMA changes for certain distributions of irrevocable trusts or revocable trusts outside the control of the family or household (24 CFR 5.609(b)(2)).

NOW IT IS THEREFORE ORDERED THAT:

The Housing Choice Voucher Administrative Plan for Fiscal Year 2025 and the Admissions and Continued Occupancy Plan for Fiscal Year 2025 shall be revised as follows:

The Pre and Post HOTMA Regulatory Citation Matrix will be updated by completing the "Date Implemented" field for "Distributions from Trusts" as of the board order approval date. This update will trigger the following regulatory implementation:

***Trusts [24 CFR 5.609(b)(2) and 5.603(b)(4)]***

A *trust* is a legal arrangement generally regulated by state law in which one party (the creator or grantor) transfers property to a second party (the trustee) who holds the property for the benefit of one or more third parties (the beneficiaries).

The following types of trust distributions are excluded from annual income:

- Distributions of the principal or corpus of the trust; and
- Distributions of income from the trust when the distributions are used to pay the costs of health and medical care expenses for a minor.

The basis for determining how to treat trusts relies on information about who has access to either the principal in the account or the income from the account. There are two types of trusts, *revocable* and *irrevocable*.

When the creator sets up an *irrevocable trust*, the creator has no access to the funds in the account. Irrevocable trusts not under the control of any member of the family or household are not assets. Typically, special needs trusts are considered irrevocable. The value of the trust is

not included in net family assets, so long as the fund continues to be held in a trust that is not revocable by, or under the control of, any member of the family or household [24 CFR 5.603(b)(4)]. Where an irrevocable trust is excluded from net family assets, the PHA must not consider actual income earned by the trust (e.g., interest earned, rental income if property is held in the trust) for so long as the income from the trust is not distributed. If the value of the trust is not considered part of the family's net assets, then distributions from the trust are treated as follows:

- All distributions from the trust's principal are excluded from income.
- Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust's principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor.

A *revocable trust* is a trust that the creator of the trust may amend or end (revoke). When there is a revocable trust, the creator has access to the funds in the trust account.

The value of revocable trusts that are not under the control of the family are excluded from net family assets. This happens when a member of the assisted family is the beneficiary of a revocable trust, but the grantor is not a member of the assisted family. In this case the beneficiary does not "own" the revocable trust, and the value of the trust is excluded from net family assets. For the revocable trust to be considered excluded from net family assets, no family or household member may be the account's trustee. If this is the case, then distributions from the trust are treated as follows:

- All distributions from the trust's principal are excluded from income.
- Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust's principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor.

Revocable trusts under the control of the family or household (e.g., the grantor is a member of the assisted family or household) are considered assets and must be included in net family assets.

If the value of the trust is considered part of the family's net assets, then distributions from the trust are not considered income to the family. The PHA must count all actual returns (e.g., interest earned) from the trust as income or, if the trust has no actual returns (e.g., if the trust is comprised of farmland that is not in use) and the total value of the combined net family assets exceeds \$50,000 (as that amount is updated for inflation), as imputed returns, as applicable.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025

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Chair, Homes for Good Board of Commissioners

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Secretary, Homes for Good Board of Commissioners



# BOARD OF COMMISSIONERS AGENDA ITEM

**BOARD MEETING DATE:** 01/29/2025

**AGENDA TITLE:** Audit Corrective Action Plan Update

**DEPARTMENT:** Finance

**CONTACT :** Ela Kubok

**EXT:** 2506

**PRESENTER:** Dan Temmesfeld & Ela Kubok

**EXT:**

**ESTIMATED TIME :** 20 minutes

- ORDER/RESOLUTION
- PUBLIC HEARING/ORDINANCE
- DISCUSSION OR PRESENTATION (NO ACTION)
- APPOINTMENTS
- REPORT
- PUBLIC COMMENT ANTICIPATED

**Approval Signature**

**EXECUTIVE DIRECTOR:**

A handwritten signature in black ink, appearing to be "JAF", is written over a horizontal line.

**DATE:** 01.22.2025

**LEGAL STAFF :**

**DATE:**

**MANAGEMENT STAFF:**

**DATE:**



July 24, 2024

Oregon Secretary of State  
Audits Division  
255 Capitol St. NE, Ste 500  
Salem OR 97310

**Plan of Action for Sample Municipality**

Homes for Good Housing Agency respectfully submits the following corrective action plan in response to the deficiency/finding reported in our audit for fiscal year ending September 30, 2023. The audit was completed by the independent auditing firm Berman Hopkins CPAs and Associates, LLP and reported the deficiencies listed below. The plan of action was adopted by the governing body at their meeting on July 24, 2024, as indicated by the signature below.

Findings are listed below, including the adopted plan of action and timeframe for each.

- 1. Finding #1 (2023-01)
  - a. Type of Finding: Financial Reporting, Significant Deficiency in Internal Control  
During our audit of the Agency’s financial statements, adjustments were needed to properly report the financial statements in accordance with generally accepted accounting principles. Certain accounts had not been properly reconciled and corrective entries were not readily available. Significant adjustments were necessary for several audit areas. The general ledger and the unaudited data submitted to REAC required numerous and material audit adjustments that delayed the audit, and therefore REAC could not provide proper timely financial oversight. The Agency should continue to develop and implement internal controls over both internal and external reporting, and the year-end close process to ensure reporting remains accurate and timely, with any unexpected financial data being investigated and corrected before it is reported. The Agency should consider additional staff training on development activities and its financial software.
  - b. Plan of Action and Timeframe for Implementation

Action	Timeframe	Responsible Person	Notes
Enter GL Opening Balances into new software, Yardi	July 31, 2024	Brandy, Stacy and CLA Staff Eileen left in August	9/26 All opening balances have been completed. CAP Adjustments in process 11/6 – Complete
Utilize Clifton Larson Allen, CPA, and any available HUD training regarding FDS classifications & GL Account Crosswalk	July 31, 2024	Cori and Brandy Assist from CLA as needed	9/26 HAB to Yardi Crosswalk is complete but needs to be communicated to organization. 11/6 - Complete



Complete Year-to-Date period close, October 2023 thru June 2024	August 15, 2024	Brandy, Stacy and CLA Staff Eileen left in August	9/26 Please note that reconciliations from October 2023 through July 2024 are being completed together. <b>12/16 - Complete</b>
Complete Month-end close for July 2024	August 30, 2024	Brandy, Stacy and CLA Staff Eileen left in August	9/26 Please note that reconciliations from October 2023 through July 2024 are being completed together. <b>12/16 - Complete</b>
Complete Month-end close for August 2024 and thereafter by last business day of the following month	September 30, 2024	Brandy, Stacy and CLA Staff Eileen left in August	9/26 Monthly reconciliation checklist has been drafted and all months will be reconciled monthly as of FY2025. <b>12/16 - Complete</b>
Complete FY24 Year-end Close	November 15, 2024	Finance Department as a whole	9/26 Internal due date is 11/8/2024 12/16 -
Utilize Clifton Larson Allen, CPA to ensure compliance with relevant and new FASB and GASB rules	November 15, 2024	CLA Staff	9/26 In process in terms of review. <b>11/6 - Complete</b>

2. Finding #2 (2023-02)

a. Type of Finding: Eligibility, Moving to Work Demonstration Program AL No.14.881, Other matter required to be reported in accordance with 2 CFR 200.516(a). Out of an approximate population of approximately 3,900 tenants, 86 tenant files were tested and the following deficiencies were noted:

- One file did not complete the income calculation correctly
- One file did not have a 214 declaration form for all members of the household
- One file did not have the required form of identification documented
- Two files did not have the unit inspection for the prior 3 years
- Two files did not have the required support to prove dependency


The Agency is not in compliance with HUD requirements regarding eligibility which could result in the incorrect amount of rental assistance provided. The Agency should reevaluate their established procedures and controls in place to ensure full compliance in regards to eligibility. The Agency needs to correct the deficiencies noted in the tested files and consider the impact to the rest of the population to tenant files that were not selected as part of the auditor’s sample.

Action	Time Frame	Responsible Person	Notes
7 files flagged for audit corrected	August 31, 2024	Program Manager, Christi Champ	9/26 Has been corrected as of 8/20/24 <b>Complete</b>
Overdue Inspections completed	September 30, 2024	Program Manager, Nat Dybens	Should meet deadline (Per Beth) <b>11/6 - Complete</b>
Quality Control review of files resumes. Paused since software conversion	July 31, 2024	Program Manager, Christi Champ	Have been started again per Beth <b>11/6 - Complete</b>



Disposal of documentation approved by supervisory staff	August 1, 2024	Program Manager, Nat Dybens	New Procedure to have supervisory sign and approve per Beth 11/6 - Complete
Checklists for eligibility functions enhanced with focus on the addition of family members to established families	July 31, 2024	Division Director, Beth Ochs	2 New Checklists established – one to address the add a family issue and the other is intake eligibility essential 11/6 - Complete
Additional 50 files randomly selected for audit compliance	July 31, 2024	Program Manager, Christi Champ	Those were pulled and 10 had errors. 3 missing form HUD form 214, 5 were missing DOB, 1 had calc error, and one had no inspection (80% compliance) Those will be completed by 10/4/2024 11/6 - Complete

Sincerely,

Michelle Thurston   
 Governing Board Chair, Homes for Good Housing Agency

Jacob Fox   
 Executive Director and Governance Board Secretary, Homes for Good Housing










# Corrective Action Plan FY23 Audit

Final Audit Report

2024-07-25

Created:	2024-07-25
By:	Jasmine Leary Mixon (jlearymixon@homesforgood.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAw-Ni03JAHkHXw__Jk4yA4Mlg732sDL7U

## "Corrective Action Plan FY23 Audit" History

-  Document created by Jasmine Leary Mixon (jlearymixon@homesforgood.org)  
2024-07-25 - 5:34:52 PM GMT
-  Document emailed to mthurston@homesforgood.org for signature  
2024-07-25 - 5:34:56 PM GMT
-  Email viewed by mthurston@homesforgood.org  
2024-07-25 - 9:28:51 PM GMT
-  Signer mthurston@homesforgood.org entered name at signing as Michelle Thurston  
2024-07-25 - 9:29:16 PM GMT
-  Document e-signed by Michelle Thurston (mthurston@homesforgood.org)  
Signature Date: 2024-07-25 - 9:29:18 PM GMT - Time Source: server
-  Document emailed to Jacob Fox (jfox@homesforgood.org) for signature  
2024-07-25 - 9:29:20 PM GMT
-  Email viewed by Jacob Fox (jfox@homesforgood.org)  
2024-07-25 - 10:12:14 PM GMT
-  Document e-signed by Jacob Fox (jfox@homesforgood.org)  
Signature Date: 2024-07-25 - 10:12:34 PM GMT - Time Source: server
-  Agreement completed.  
2024-07-25 - 10:12:34 PM GMT