



ANNUAL PLAN FOR FISCAL YEAR 2020

5 YEAR PLAN FOR FISCAL
YEARS 2020-2025

 541-682-3755

 www.homesforgood.org

 177 Day Island Road, Eugene, OR 97401



177 Day Island Rd., Eugene, OR 97401 • PH 541-682-3755 • FAX 541-682-3411
300 West Fairview Dr., Springfield, OR 97477 • PH 541-682-4090 • FAX 541-682-3875



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5 Year Plan for Fiscal Years 2020-2025 Annual Plan for Fiscal Year 2020

Homes for Good Housing Agency

177 Day Island Road
Eugene, OR 97401

Public Hearing

Wednesday, May 22, 2019
1:30 p.m.

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

Written Comments

Due June 18, 2019
Contact: Melanie Church
mchurch@homesforgood.org
(541) 682-2588

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



EXECUTIVE SUMMARY

The Agency is required by Section 511 of the Quality Housing and Work Responsibility Act of 1998 (and ensuing HUD requirements) to submit a 5-Year and Annual Plan to HUD. This year the Agency is required to submit an Annual Plan covering FY 2020, which begins October 1st, 2019 and ends September 30th, 2020, as well as a 5-Year Plan.

As in previous years, the focus of the Plan is to identify the programs and services provided under the Public Housing (PH) and Section 8 Tenant Based Assistance Programs and to allow public access and comment on those programs and services. The Work Responsibility Act requires that housing authorities work with their Public Housing Resident Advisory Boards (RAB) on the planning and development of the Plan. In order to meet this requirement, the Agency began meeting with the RAB in February 2019.

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

Section I 5-Year PHA Plan Form HUD-50075-5Y

Section II 5-Year PHA Plan Form HUD-50075-5Y Attachments

Section III PHA Annual Plan Form HUD-50075-HP

Section IV PHA Annual Plan Form HUD 50075-HP Attachments

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

Public Notice –

May 4th, 2019 begins the 45 day comment period required by the regulations. During this comment period, on May 22nd 2019, the Agency will hold a public hearing to address questions and comments on the Plan. Following the comment period, the Agency will submit the Plan to the Homes for Good Board of Commissioners for approval, followed by electronic submission to HUD no later than July 18th 2019.



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Section I 5-Year PHA Plan

Form HUD-50075-5Y

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

Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.																																
A.1	<p>PHA Name: _____ PHA Code: _____</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____</p> <p>PHA Plan Submission Type: <input type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan 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 on 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 websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">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> <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.	5-Year Plan. Required for all PHAs completing this form.
B.1	Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.
B.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.
B.3	Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.
B.4	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.
B.5	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year 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 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
B.7	<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>

Instructions for Preparation of Form HUD-50075-5Y 5-Year PHA Plan for All PHAs

A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

B.1 Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. ([24 CFR §903.6\(a\)\(1\)](#))

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. ([24 CFR §903.6\(b\)\(1\)](#)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. ([24 CFR §903.6\(b\)\(2\)](#))

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. ([24 CFR §903.6\(a\)\(3\)](#))

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide comments?

(b) If yes, submit 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 §903.17\(a\)](#), [24 CFR §903.19](#))

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 PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 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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Section II 5-Year PHA Plan

Form HUD-50075-5Y Attachments

Attachment 1 – Goals and Objectives

Goal 1 Objective: Increase the number of affordable housing units

Indicators:

- Create 300 new affordable housing units
- Increase number of permanent supporting housing units
(Featured projects: The Commons on MLK, Legion Cottages Tiny Homes)
- Maintain public housing vacancies at 3% or less
- Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons
- Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County

Goal 2 Objective: Continue to receive high performer status

Indicators:

- Homes for Good received high performer status for FY18 SEMAP
- Obligate all capital funds within 24 months of grant award
- Expend all capital funds within 48 months of grant award
- Comply with the financial reporting requirements of asset management
- Comply with the new PHAS requirements (when published) to continue to receive high performer status
- Submit all PHAS reports within required timelines
- Meeting all capital fund, financial reporting, and PHAS reporting requirements

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

Indicators:

- 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
- 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
- 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

- Enhance resident and agency communication through Resident Newsletters, improved website access, email communication and social media
- 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
- 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

Indicators:

- Expand access to the Family Self-Sufficiency (FSS) program to reach enrollment of 200 households or more
- Maintain a minimum representation of 15 community services agencies on the Family Self-Sufficiency Advisory Board
- Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents
- Assist a minimum of two FSS participants a year in purchasing a home
- Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home

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

Indicators:

- Complete the Rent Assistance Demonstration construction and sale of scattered site homes
- Focus preservation efforts communicating with local, state and national funders to help preserve affordable housing opportunities
- 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
- Partnered with NEDCO to provide zero interest loans for security deposits to Section 8 and VASH families

Goal 6 objective: To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families

Indicators

- 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
- Awarded funding to provide monetary incentives to landlords who agree to rent to persons with high housing barriers
- Grown the Landlord Liaison offerings of support for landlords through continuous communication, trainings and sharing resources
- Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program
- Monitor the payment standards and area rents on the private market to keep Section 8 families' portion of rent affordable and allow the Agency to serve the same number of families as in previous years.
- A Homes for Good staff member serves on the board for the local Rental Owners association

Attachment 2 – Progress Report

Goal 1 Objective: Increase the number of affordable housing units.

Indicators:

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

Update for FY 2020 Annual Plan – Homes for Good just completed the rehabilitation of 32 units. Homes for Good expects to start construction on four new developments totaling an additional 218 units in 2019. Construction of these units is expected to be complete in 2020. The Rent Assistance Division was awarded 33 Mainstream Vouchers in FY19 through a competitive grant process. These vouchers serve non-elderly persons with disabilities transitioning out of institutional and other segregated settings. The Rent Assistance Division currently has 3,346 housing subsidies in total, including 3032 Tenant Based Vouchers, 236 VASH Vouchers, 33 Project Based Vouchers, 33 Mainstream Vouchers and 12 RAD Project Based Vouchers. The overall vacancy rate for Public Housing during FY 2018 was 1.3%.

Goal 2 Objective: Continue to receive high performer status.

Indicators:

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

Update for FY 2020 Annual Plan – Homes for Good Capital Funds are being obligated and expended in compliance with HUD's deadlines. The agency received High Performer status for Public Housing in FY 2017, with a score of 95.

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

Indicators:

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

Update for FY2020 Annual Plan – The Resident Advisory Board continues to be actively involved in the annual plan process and has 13 representatives from public and assisted housing and two from the Section 8 program. The Resident Newsletter is mailed or passed out door to door for every resident living in Public and Assisted housing every quarter, as well as all participants in the FSS program. Elderly-disabled preferences remain the same as well as deconcentration strategy.

Goal 4 Objective: Promote self-sufficiency and asset development of assisted households.

Indicators:

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

Update for FY2020 Annual Plan – Homes for Good currently has 164 participants in the FSS program and there are 15 agencies on the FSS Advisory Board. A video about FSS is shown at every Section 8 briefing and brochures are mailed with annual review packets to Section 8 and Public Housing tenants. Four FSS families bought a home last year, we have 30 open IDA accounts, and we had six graduates during 2018. Resident Services and FSS team has also been hosting a monthly educational workshop focused on increasing self-sufficiency.

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

Indicators:

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

Update for FY 2020 Annual Plan – In the past year, Homes for Good’s Landlord Liaison provided 5 Housing Quality Standards educational workshops to 46 landlords. Homes for Good’s Landlord Liaison will continue offering Housing Quality Standards educational workshops in FY20.

Goal 6 Objective: To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low income families.

Indicators:

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

Update for FY 2020 Annual Plan – Homes for Good's Landlord Liaison offered 3 Housing Choice Voucher educational workshops to 10 landlords. Homes for Good's Landlord Liaison will continue offering educational workshops to landlords in FY20.

Homes for Good's Landlord Liaison offered 7 educational workshops to 118 support service providers. Homes for Good's Landlord Liaison will continue offering educational workshops to supportive service providers in FY20.

Homes for Good's Landlord Liaison partnered with Lane County Behavioral Health Division to provide one educational workshop to 50 area supportive service providers specific to the Section 8 program, the landlord/tenant relationship and fair housing law. Homes for Good's Landlord Liaison will continue offering educational opportunities to area supportive service providers through collaboration with Lane County Behavioral Health Division in FY20.

Beth Ochs continues to serve on the board of the Rental Owner's Association. Various staff members also attend the general monthly membership meeting.

Goal 7 Objective: Maintain Section 8 Homeownership Program (with subsidy assistance)

Indicators:

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

Update for the FY 2020 Annual Plan – Homes for Good is serving participants through the Section 8 Homeownership program. Two families bought houses in the past year and we continue to work with interested participants to refer them to NEDCO for homeownership education classes and the Family Self-Sufficiency Program to help them prepare for homeownership. Section 8 Housing Specialists are aware of the program and refer participants when appropriate.

Attachment 3 – 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%.
- Any change 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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Section III PHA Annual Plan

Form HUD-50075-HP

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

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

Definitions.

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

A.	PHA Information.																										
A.1	<p>PHA Name: _____ PHA Code: _____</p> <p>PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performer</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>695</u> Number of Housing Choice Vouchers (HCVs) <u>3065</u></p> <p>Total Combined <u>3760</u></p> <p>PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission? Y N</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input type="checkbox"/> Financial Resources. <input type="checkbox"/> <input type="checkbox"/> Rent Determination. <input type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input type="checkbox"/> Pet Policy. <input type="checkbox"/> <input type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p>

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

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

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

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

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

B. Annual Plan.

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

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

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(1\)](#)) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#)) and 24 CFR §903.12(b).

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

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

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

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

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

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

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

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

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

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

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

Hope VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

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

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

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

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

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

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.

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

C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.4 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)

D. Statement of Capital Improvements.

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

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

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

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

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



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Section IV PHA Annual Plan

HUD form 50075-HP Attachments

Attachment 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, submitted by Homes for Good with its Annual PHA Plan for the Fiscal Year beginning October 1, 2015, was developed with input from the City of Eugene and the City of Springfield Consolidated plan 2015.

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

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

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

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

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

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

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

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

Elderly families and families with disabilities

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

The Consolidated Plan also indicates that about 14% of population in the Cities of Eugene and Springfield lives with one or more disabilities (29,125 people). Persons with disabilities face a number of barriers related to mobility, transportation, housing, employment, and access to services. In addition, persons with disabilities report many instances of discrimination.

Households of various races and ethnic groups residing in the jurisdiction

In most income categories, there are racial or ethnic groups which are experiencing a disproportionately greater need than the needs of the income category as a whole. For people with very low-incomes (30-50% MFI), American Indian/Alaskan

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

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

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

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

Our strategies to increase the availability of affordable, accessible housing include aggressively pursuing additions to the housing supply through the use of government subsidies and incentives as well as public/private partnerships.

Strategies currently underway to increase the availability and accessibility include:

- Enhanced Resident Services at The Oaks at 14th
 - This 54 unit project was brought online in the Spring of 2017 but significant time continued to be invested in this project as part of the Pay for Success/The Way Home Project to further increase the impact of the project.
- \$6.1mm preservation project for Richardson Bridge through comprehensive rehabilitation
 - This 32 unit project that was built in 1992 as one of the State of Oregon's first Low Income Housing Tax Credit (LIHTC) projects. Capital needs assessment completed in 2015 indicated significant envelope and water intrusion issues.
 - Comprehensive rehabilitation completed in 2018 by securing competitive 9% LIHTC in 2016.
 - 12 Public Housing to Project Based Housing Choice Voucher (PBV) Rental Assistance Demonstration (RAD) subsidy conversion as part of this rehabilitation.
- \$2.1mm received in sales proceeds from 12 Scattered Site Public Housing Single Family Homes and Duplexes due to subsidy conversion described in previous bullet. These funds to be reinvested in new affordable housing or preserving existing affordable housing.
- Purchased Glenwood Place a future affordable housing site
- \$3.75mm acquisition of new administrative headquarters on 100 W 13th
- \$4.3mm preservation project for Sheldon Village through comprehensive rehabilitation
 - This 78 unit project that was built in 2 phases in 2004 and 2005. Capital needs assessment completed in 2015 indicated significant envelope and water intrusion issues.

- Comprehensive rehabilitation underway and currently at 50% completion.
- \$17mm new construction project the Market District Commons
 - This 50 unit project is the culmination of 6 years of pre-development planning and is a cornerstone of an unprecedented level of investment in downtown revitalization.
 - Project to break ground in March of 2019.
 - 15 Project Based Section 8 vouchers awarded to the project. These units will be prioritized for veterans experiencing homelessness and people with disabilities.
- \$32mm Rental Assistance Demonstration Preservation through New Construction Project
 - This 122 unit project will be two different sites in one financial transactions. In summary we are building the new project and in parallel Homes for Good is selling 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. The overall project will produce 122 units 49 of which will be in Eugene (Taney Place) and the balance of 73 will be in Springfield (Hayden Bridge Meadows).
- \$13mm new construction project The Commons on MLK
 - This 51 unit project is a powerful partnership with Lane County to implement the priorities/goals of the Poverty and Homelessness Board.
 - 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.
 - The project has received the following supportive services commitments - \$180k from Pacific Source and we have two outstanding requests of \$250k each from Kaiser and Pacific Source.
 - 51 Project Based Section 8 vouchers are tentatively awarded to the project.
- The Legion Cottages in Cottage Grove
 - 4 tiny homes to be built on property being sold to Homes for Good by The American Legion Post 32.
 - Partnership with U of O School of Architecture (OregonBILDs) to design and build the homes.

Impediments to Fair Housing - While some of the identified impediments are not directly related to the federal Fair Housing Act, as a Public Housing Authority that sponsors the Fair Housing Council of Oregon, Homes for Good continues to believe that the lack of availability of affordable, accessible housing is a problem in our community and therefore, had maintained its efforts to promote affordable, accessible housing in addition to our efforts to overcome the more specific impediments which are directly related to the federal Fair Housing Act. Three major impediments to providing equal housing to populations were identified in development of the annual plan as follows:

Limited Awareness of Fair Housing Policies in the Broader Community;

Cultural differences and language barriers which inhibit access to fair housing, and;

People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes.

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

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

Joining various relevant boards, including the Rental Owners Association (ROA), Human Rights Commission, Housing Policy Board, United Way Equity Coalition and 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 has joined the board of the Eugene/Springfield Rental Owners Association (ROA). In that role, Beth makes regular presentations to the ROA on topics related to Fair Housing.

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

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

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

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

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

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

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

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

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

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

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

Conduct targeted recruitments for bilingual employees. At the present time there are 10 bilingual employees (English/Spanish). Homes for Good also has staff members proficient in German, Dutch, Czech, Polish, Hindi and French.

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

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

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

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

Quarterly meetings at VA to expedite referrals for homeless vets

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

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

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

Provide sufficient ADA units in public housing and LIHTC housing

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

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

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

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

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

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

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

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

The Agency’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed on the website: www.HomesforGood.org

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

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

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

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

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

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

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

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

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

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

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

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

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

See Attachment 4 - Admin Plan Modifications and Attachment 5 - ACOP Modifications

Deconcentration Update for Public Housing

Homes for Good has analyzed each of the Public Housing developments for concentrations of poverty, based on current records in February 2019. AMP 100 (Laurelwood Homes) and Pengra Court (part of AMP 200) were the only Public Housing complexes where the average resident incomes were below the Homes for Good Established Income Range (EIR) for Public Housing without an explanation that was acceptable to HUD staff.

At Pengra Court (part of AMP 200) and Laurelwood Homes (AMP 100), Homes for Good will market the Family Self Sufficiency Program to current residents.

Feb 2019 Public Housing Deconcentration Analysis	Average Income	% of EIR	Median Income	% of EIR	# of HHS	0- 30% AMI	% HHS	30- 50% AMI	% HHS	50- 80% AMI	% HHS	80%+ AMI	% HHS	Notes/Explanation	2019-2020 Income Mixing Measures
200(A) McKenzie Village -002	\$ 16,354.19	88.7%	\$ 13,668.00	89.5%	167	109	65.3%	38	22.8%	15	9.0%	5	3.0%		Promote Family Self Sufficiency Program.
200(D) Pengra Court - 016	\$ 14,405.86	78.1%	\$ 10,318.00	67.6%	22	15	68.2%	5	22.7%	1	4.5%	1	4.5%		
200(E) Scattered Sites, Spfld - 017	\$ 27,640.00	149.9%	\$ 21,136.50	138.5%	16	7	43.8%	3	18.8%	4	25.0%	2	12.5%	Scattered Site: Deconcentrated by design	
300(E) Scattered Sites - 023	\$ 22,148.59	120.1%	\$ 19,991.50	131.0%	80	46	57.5%	14	17.5%	16	20.0%	4	5.0%	Scattered Site: Deconcentrated by design	
300(F) Maplewood Meadows - 024	\$ 20,932.56	113.5%	\$ 19,484.50	127.6%	34	23	67.6%	3	8.8%	6	17.6%	2	5.9%	A few above-low-income families are skewing the results. % of VLI households is otherwise normal. HUD considers this explanation to be reasonable per email from Dan Esterling on 2/9/2018	
500(C) 010 Veneta Villa Scattered Sites	\$ 18,332.30	99.4%	\$ 17,724.00	116.1%	20	13	65.0%	5	25.0%	2	10.0%	0	0.0%	Scattered Site: Deconcentrated by design	
AMP 100 - Laurelwood Homes - 001	\$ 15,403.41	83.5%	\$ 15,913.00	104.2%	29	18	62.1%	8	27.6%	3	10.3%	0	0.0%		Promote Family Self Sufficiency Program.
Established Income Range (EIR) Upper	\$ 21,210.18	115.0%	\$ 17,554.18	115.0%											
Overall Totals	\$ 18,443.64	100.0%	\$ 15,264.50	100.0%	368	231	62.8%	76	20.7%	47	12.8%	14	3.8%		
Established Income Range (EIR) Lower	\$ 15,677.09	85.0%	\$ 12,974.83	85.0%											

Financial Resources

HOMES FOR GOOD HOUSING AGENCY BUDGET - SUMMARY OF RESOURCES - FY 2019

PROGRAM	BEGINNING RESERVE	FEDERAL REVENUE	RENT	OTHER	TOTAL
Community Services					
Fleet	\$ -	\$ -	\$ -	\$ 75,000	\$ 75,000
W. 13th	22,000	-	400,000	6,000	428,000
Madrone	-	300,000	-	-	300,000
Emergency Housing Assistance	-	30,000	-	-	30,000
Pay for Success	-	-	-	50,000	50,000
Weatherization	4,000	1,800,000	-	-	1,804,000
Development	2,800,000	-	-	6,000,000	8,800,000
Asset Management	-	-	-	400,000	400,000
Corporate	-	-	-	34,000	34,000
ROSS	-	80,000	-	-	80,000
Family Self Sufficiency	-	290,000	-	-	290,000
Family Shelter House	4,000	-	12,000	-	16,000
Herran Center	300,000	-	275,000	-	575,000
Signpost House	100,000	-	95,000	-	195,000
Shelter Plus Care	-	500,000	-	-	500,000
Housing Plus	-	-	-	2,000	2,000
	3,230,000	3,000,000	782,000	6,567,000	13,579,000
Housing					
Public Housing	2,400,000	2,800,000	2,100,000	105,000	7,405,000
Capital Fund	-	1,400,000	-	-	1,400,000
Abbie Lane	150,000	200,000	100,000	1,000	451,000
Fourteen Pines	350,000	300,000	200,000	5,000	855,000
Village Oaks	230,000	80,000	400,000	10,000	720,000
Firwood	400,000	-	600,000	14,000	1,014,000
Camas Place	25,000	-	200,000	-	225,000
Norseman	240,000	-	300,000	-	540,000
Jacob's Lane	225,000	-	400,000	6,000	631,000
Laurel Gardens	160,000	-	200,000	6,000	366,000
Walnut Park	25,000	-	250,000	4,000	279,000
The Orchards	240,000	-	250,000	4,000	494,000
Sheldon Village Apartments	600,000	-	600,000	-	1,200,000
	5,045,000	4,780,000	5,600,000	155,000	15,580,000
Rental Assistance	1,800,000	19,600,000	-	-	21,400,000
Central Office Cost Center	2,900,000	-	-	2,500,000	5,400,000
TOTALS	\$ 12,975,000	\$ 27,380,000	\$ 6,382,000	\$ 9,222,000	\$ 55,959,000

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

Rent Determination

See Attachment 4 – Admin Plan Modifications and Attachment 5 – ACOP Modifications

Attachment 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 or the remainder of its public housing portfolio but there is not yet a timeline for when such an application would occur.

Conversion of Public Housing to 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) and transfer assistance to new sites under the guidelines of PIH Notice 2012-32, REV-2 and any successor notices. 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.

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 as described below.

AMP 200 Springfield Sites (Partial Conversion): 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). Homes for Good disposed of the 3 former PH units for affordable housing purposes. The next phase will transfer the remaining 17 units to two new housing developments. Construction of the replacement housing will begin in the fall of 2019 and disposal of the units will begin at that time. The remaining units in AMP 200 will remain unchanged.

AMP 300, Eugene Scattered Sites (Partial Conversion): AMP 300 OR000600300 includes 92 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converted 9 units of public housing and transferred the assistance to Richardson Bridge (an existing Homes for Good development). Homes for Good disposed of the 9 former PH units for affordable housing purposes in 2018. The next phase will transfer the remaining 83 units to two new housing developments. Construction of the replacement housing will begin in the fall of 2019 and disposal of the units will begin at that time. The remaining units in AMP 300 will remain unchanged.

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

Project Based Vouchers

It is Homes for Good's intention to publish Request for Proposal(s) in 2019 in order to award Project Based Vouchers. Since 2017 Homes for Good has awarded 120 Project Based Vouchers through this competitive process. Homes for Good intends to utilize Project Based Vouchers to increase the availability of affordable housing stock in our community along with potentially increasing access to supportive services for families that we serve. In implementing the use of Project Based Vouchers Homes for Good will adhere to the Administrative Plan for; owner proposals, Housing Quality Standards, development and completion of Rehabilitated and Newly Constructed units, Housing Assistance Payment Contracts, selection of Project Based Program participants, occupancy of Project Based units, determining rents to owners and distributing payments to owners.

Other Capital Grant Programs

Homes for Good expects to apply for Emergency Safety and Security Grants Capital Fund Grants and/or Emergency and Non-Presidentially Declared Disaster Grants in 2019. The agency does not plan to apply for any other Capital Grants.

Attachment 3 – Progress Report

Goal 1 Objective: Increase the number of affordable housing units.

Indicators:

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

Update for FY 2020 Annual Plan – Homes for Good just completed the rehabilitation of 32 units. Homes for Good expects to start construction on four new developments totaling an additional 218 units in 2019. Construction of these units is expected to be complete in 2020. The Rent Assistance Division was awarded 33 Mainstream Vouchers in FY19 through a competitive grant process. These vouchers serve non-elderly persons with disabilities transitioning out of institutional and other segregated settings. The Rent Assistance Division currently has 3,346 housing subsidies in total, including 3032 Tenant Based Vouchers, 236 VASH Vouchers, 33 Project Based Vouchers, 33 Mainstream Vouchers and 12 RAD Project Based Vouchers. The overall vacancy rate for Public Housing during FY 2018 was 1.3%.

Goal 2 Objective: Continue to receive high performer status.

Indicators:

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

Update for FY 2020 Annual Plan – Homes for Good Capital Funds are being obligated and expended in compliance with HUD's deadlines. The agency received High Performer status for Public Housing in FY 2017, with a score of 95.

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

Indicators:

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

Update for FY2020 Annual Plan – The Resident Advisory Board continues to be actively involved in the annual plan process and has 13 representatives from public and assisted housing and two from the Section 8 program. The Resident Newsletter is mailed or passed out door to door for every resident living in Public and Assisted housing every quarter, as well as all participants in the FSS program. Elderly-disabled preferences remain the same as well as deconcentration strategy.

Goal 4 Objective: Promote self-sufficiency and asset development of assisted households.

Indicators:

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

Update for FY2020 Annual Plan – Homes for Good currently has 164 participants in the FSS program and there are 15 agencies on the FSS Advisory Board. A video about FSS is shown at every Section 8 briefing and brochures are mailed with annual review packets to Section 8 and Public Housing tenants. Four FSS families bought a home last year, we have 30 open IDA accounts, and we had six graduates during 2018. Resident Services and FSS team has also been hosting a monthly educational workshop focused on increasing self-sufficiency.

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

Indicators:

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

Update for FY 2020 Annual Plan – In the past year, Homes for Good’s Landlord Liaison provided 5 Housing Quality Standards educational workshops to 46 landlords. Homes for Good’s Landlord Liaison will continue offering Housing Quality Standards educational workshops in FY20.

Goal 6 Objective: To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low income families.

Indicators:

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

Update for FY 2020 Annual Plan – Homes for Good's Landlord Liaison offered 3 Housing Choice Voucher educational workshops to 10 landlords. Homes for Good's Landlord Liaison will continue offering educational workshops to landlords in FY20.

Homes for Good's Landlord Liaison offered 7 educational workshops to 118 support service providers. Homes for Good's Landlord Liaison will continue offering educational workshops to supportive service providers in FY20.

Homes for Good's Landlord Liaison partnered with Lane County Behavioral Health Division to provide one educational workshop to 50 area supportive service providers specific to the Section 8 program, the landlord/tenant relationship and fair housing law. Homes for Good's Landlord Liaison will continue offering educational opportunities to area supportive service providers through collaboration with Lane County Behavioral Health Division in FY20.

Beth Ochs continues to serve on the board of the Rental Owner's Association. Various staff members also attend the general monthly membership meeting.

Goal 7 Objective: Maintain Section 8 Homeownership Program (with subsidy assistance)

Indicators:

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

Update for the FY 2020 Annual Plan – Homes for Good is serving participants through the Section 8 Homeownership program. Two families bought houses in the past year and we continue to work with interested participants to refer them to NEDCO for homeownership education classes and the Family Self-Sufficiency Program to help them prepare for homeownership. Section 8 Housing Specialists are aware of the program and refer participants when appropriate.

Attachment 4

KEY MODIFICATIONS TO THE HOMES FOR GOOD RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2020 EFFECTIVE DATE 10-1-19 TO 9-30-20

HIGHLIGHTS:

Chapter 4: Applications, Waiting List, and Tenant Selection

Modifications to Local Preferences to expand housing opportunities

Chapter 6: Income and Subsidy Determinations

Language added to the IRS 502 to provide clarity regarding expenses for assistance animals

Chapter 9: General Leasing Policies

Updated language from rent increases to rent changes to align with regulations

Chapter 11: Reexaminations

Adjustments of reporting timelines to align with other reporting requirements

Chapter 12: Termination of Assistance and Tenancy

Adjusting policies from will terminate to may terminate to expand housing opportunities and allows for housing stability for high risk participants

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)
PROPOSED EFFECTIVE DATE 10-1-19**

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-I.L.	If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.	If a child has been placed in foster care, the PHA will verify with the appropriate agency whether or not the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.	No	Clarity aligns with DHS policy
3-III.C.	If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past three years, the family will be denied assistance.	The PHA may deny assistance if the PHA determines that any household member is currently engaged in, or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.	No	Provides flexibility to allow more housing opportunities
3-III.C.	The PHA will deny assistance to an applicant family if	The PHA may deny assistance to an applicant family if	No	Provides flexibility to allow more housing opportunities
4-III.C.	This preference applies to transitional housing persons who are homeless and entering Lane County from Jail or prison 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.	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.	No	Expands opportunities for referrals for Transitional Homeless
4-III.C.	This preference applies to families who are displaced as a result of a fire. Persons who claim they are being or have been displaced due to fire must be a resident of Lane County, and have written verification from a Homes for Good approved entity, such as the Red Cross, local Fire Department, etc., of displacement. Referrals must be received within 45 days of the displacement.	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, such as First Place Family Center , the Red Cross, local Fire Department, etc., of displacement. Referrals must be received within 45 days of the displacement.	No	Provides opportunities for referrals for Natural Disaster

Section	Previous Policy	Proposed Policy	Required Change	Impact
4-III.C.	<p>Title XIX Preference (limited to 25 families selected under this preference per PHA Fiscal Year)</p> <p>This preference applies to persons qualify for Title XIX services and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).</p>	<p>Elderly or Disabled Preference</p> <p>This preference applies to persons who are elderly or disabled and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).</p>	No	Expands housing opportunities for elderly/disabled families
4-III.C.	<p><i>Domestic Violence Preference (limited to 25 families selected under this preference per PHA Fiscal year)</i></p>	<p><i>Domestic Violence Preference</i></p>	No	Provides opportunities for additional service providers.
4-III.C.	<p>Shelter Plus Care Preference (limited to 25 families selected under this preference per PHA Fiscal Year)</p> <p>This preference applies to participants in Homes for Good's Shelter Plus Care Program. To qualify, participants must have participated in the program for a minimum of two years, be in compliance with case management requirements, and not have violated their Family Obligations within 12 months of referral from the Case Manager.</p>	<p>Continuum of Care Preference</p> <p>Participants in Lane County's Continuum of Care programs, who have completed an assessment for move on readiness with a system screening tool and are referred through Lane County Coordinated Entry based on prioritized readiness.</p>	No	Expands housing opportunities
4-III.C.	<p>This preference applies to disabled homeless persons who reside in cities where an established overnight homeless shelter is not within the city limits. Persons must be referred by a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'disabled homeless' for this purpose will be included in the MOU/MOA with the qualified entity.</p>	<p>This preference applies to disabled homeless families. Families must be referred by a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'disabled homeless' for this purpose will be included in the MOU/MOA with the qualified entity.</p>	No	Expands housing opportunities for disabled homeless families
4-III.C.	<p>Over/Under Housed Homes for Good Project-Based Preference</p> <p>This preference applies to families who are currently receiving project-based housing assistance from Homes for Good and are over/under housed according to occupancy guideline for their current housing program, and there is no available unit to rectify the under/over housed issue in the family's current housing program.</p>	<p>Permanent Housed Family Preference</p> <p>This preference applies to families that are currently served in other permanent housing assistance programs administered by Homes for Good, when the other program is unable to serve the family and when such assistance is necessary for Homes for Good to appropriately house the family. This preference requires approval of Directors of both programs</p>	No	Allows tenants to move between programs to be appropriately housed.

Section	Previous Policy	Proposed Policy	Required Change	Impact
6-I.B.	If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.	If a child has been placed in foster care, the PHA will verify with the appropriate agency whether the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.	No	Provides clarity
6-II.D.	The most current IRS Publication 502, <i>Medical and Dental Expenses</i> , will be used as a reference to determine the costs that qualify as medical expenses.	The most current IRS Publication 502, <i>Medical and Dental Expenses</i> , will be used as a reference to determine the costs that qualify as medical expenses. In addition to costs allowed by the IRS Homes for Good will allow all necessary costs incurred for service and assistance animals. Such costs include food, grooming, and veterinary care, incurred in maintaining the health and vitality of the service or assistance animal so that it may perform its duties.	No	Adds clarity regarding expenses for assistance animals
7-III.K.	If the PHA is required to determine the income eligibility of a student's parents, the PHA will request an income declaration and certification of income from the appropriate parent(s) (as determined in section 3-II.E). The PHA will send the request directly to the parents, who will be required to certify to their income under penalty of perjury. The parents will be required to submit the information directly to the PHA. The required information must be submitted (postmarked) within 14 business days of the date of the PHA's request or within any extended timeframe approved by the PHA.	If the PHA is required to determine the income eligibility of a student's parents, the PHA will request an income declaration and certification of income from the appropriate parent(s) (as determined in section 3-II.E). The PHA will send the request directly to the parents, who will be required to certify to their income under penalty of perjury. The parents will be required to submit the information directly to the PHA. The required information must be submitted or postmarked within 14 business days of the date of the PHA's request or within any extended timeframe approved by the PHA.	No	Provides clarity regarding options for acceptable deadline.
8-III.D.	The PHA will collect and maintain data on market rents in the PHA's jurisdiction. Information sources include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent	The PHA has contracted The Nelrod Company for EZ-RRD rent reasonableness compliant methodology. EZ-RRD will use its comprehensive and copyrighted methods to collect up to the target of 755 (subject to availability) unassisted rental market comparables, arrange data, and identify rental market values of neighborhoods/areas within Lane County, OR.	No	Expands the database of comparable rental units.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	information that is more than 12 months old will be eliminated from the database.			
EXHIBIT 8-1	Stabilize deteriorated painted surfaces and conduct hazard reduction activities when identified by the PHA	Stabilize deteriorated painted surfaces and conduct hazard reduction activities within 30 days when identified by the PHA	Yes	HUD update
9-I.H.	Rent increases will go into effect on the first of the month following the 60-day period after the owner notifies the PHA of the rent change or on the date specified by the owner, whichever is later.	Rent changes will go into effect on the first of the month following the 60-day period after the owner notifies the PHA of the rent change or on the date specified by the owner, whichever is later.	Yes	Aligns with regulations
11-I.B.	Third-party verification of fixed sources of income will be obtained during the intake process and at least once every three years thereafter.	Third-party verification of fixed sources of income will be obtained during the intake process and annually. Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.	No	Provides clarity on verifying income annually
11-I.D.	At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. The PHA will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.	At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state.	No	Aligns with other reporting requirements of annual reexams
11-II.A.	However, if the new member is under the age of 6 , an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.	However, if the new member qualifies for a dependent deduction , an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.	No	Provides clarity
11-II.C.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, within 14 business days of the date the change takes effect.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification.	No	Remove reporting requirements to align with no interim ups

Section	Previous Policy	Proposed Policy	Required Change	Impact
12-I.E.	<p>The PHA will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p>The PHA will terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.</p>	<p>The PHA may terminate a family's assistance if any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p>The PHA may terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.</p>	No	Expands housing opportunities and allows for housing stability
12-I.E.	<p>The PHA will terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug-related or violent criminal activity during participation in the HCV program.</p>	<p>The PHA may terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug-related or violent criminal activity during participation in the HCV program.</p>	No	Expands housing opportunities and allows for housing stability
12-I.E.	<p>The PHA will terminate a family's assistance if</p>	<p>The PHA may terminate a family's assistance if</p>	No	Expands housing opportunities and allows for stability
12-II.E.	<p>The PHA will terminate assistance to a family member if the PHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the assistance of the remaining, nonculpable family members.</p>	<p>The PHA may terminate assistance to a family member if the PHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the assistance of the remaining, nonculpable family members.</p>	No	Expands housing opportunities and allows for housing stability
13-I.A.		<p>PHA will delineate concentration of poverty or minority within its jurisdiction by providing materials identify areas of concentration (ie. Maps & Open rental listing).</p>	Yes	Provides clarity adding delineating areas of poverty to publications.
18-VII.C.	<p>The PHA will use the HCV utility allowance schedule for the RAD developments.</p>	<p>The PHA may use the HCV utility allowance schedule for the RAD developments. If the HCV utility allowance is not utilized, then the HAP contract will specify if site specific utility allowances are used.</p>	No	Provides clarity – May use HUD utility model or HCVUA. Provides flexibility to ensure most effective use of program funds.

Attachment 5

KEY MODIFICATIONS TO THE HOMES FOR GOOD ADMISSIONS AND CONTINUED OCCUPANCY POLICIES (ACOP) FISCAL YEAR 2020 EFFECTIVE DATE 10-1-19 TO 9-30-20

HIGHLIGHTS:

Chapter 3: Other Permitted Reasons for Denial of Admission

Criminal activity screening reduced from 5 years to 3 years to increase access to affordable housing

Chapter 4: Applications, Waiting List, and Tenant Selection

Modifications to Local Preferences to expand housing opportunities and clarify current agency policies

Chapter 6: Income and Subsidy Determinations

Language added to the IRS 502 to provide clarity regarding expenses for assistance animals

Modification to utility allowance implementation date to ensure no interim increases

Chapter 9: Reexaminations

Updated language to clarify how often third-party verification of non-fixed income will be obtained

Modification to transfer language to allow for reexamination at transfer and to change reexamination date

Adjustments of reporting timelines to align with other reporting requirements

Section	Previous Policy	Proposed Policy	Required Change	Impact
1-II.E.	List of Homes for Good PUBLIC HOUSING DEVELOPMENTS	Pages removed	No	Accurate information is located on the website, removes duplicate maintenance
3-I.M.	Homes for Good will typically provide the family a form to request a live in aide. The family's request for a live-in aide may be made either orally or in writing. Homes for Good will verify the need for a live-in aide with a qualified professional as provided by the family, such as a doctor, social worker, or case worker. For continued approval, the family may be required to submit a new, written request—subject to Homes for Good verification—at the time of the annual reexamination.	Homes for Good will typically provide the family a form to request a live in aide. The family's request for a live-in aide may be made either orally or in writing. Homes for Good will verify the need for a live-in aide, if necessary , with a qualified professional as provided by the family, such as a doctor, social worker, or case worker. For continued approval, the family may be required to submit a new, written request—subject to Homes for Good verification—at the time of the annual reexamination.	No	Allows flexibility in determining the need for a live-in aide

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.	Homes for Good will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if HASCA is able to verify that the household member who engaged in the criminal activity has successfully completed a supervised drug rehabilitation program approved by HASCA , or the person who committed the crime is no longer living in the household.	Homes for Good will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has successfully completed a supervised drug rehabilitation program approved by the PHA , or the person who committed the crime is no longer living in the household.	No	Corrected a typo and removed reference to the agency's former name
3-III.C.	Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 5 years.	Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 3 years.	No	Increases access to affordable housing

<p>4-III.B.</p>	<p>The PHA will use the following local preference system:</p> <p>The following preferences are both worth 10 points. An applicant who qualifies for one of the preferences below, will need to complete a new application and will receive the 10 preference points. If the applicant qualifies for both preferences they will receive only 10 points.</p> <p>Victims of domestic violence, dating violence, sexual assault or stalking living in Section 8 properties managed by Homes for Good, (currently Abbie Lane, Fourteen Pines, and Village Oaks) or holding a Housing Choice Voucher issued by Homes for Good, whose situation requires moving out of the current unit.</p> <p>Persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by Homes for Good, or holding a Housing Choice Voucher</p>	<p>The PHA will use the following local preference system:</p> <p>Permanent Housed Family Preference</p> <p>This preference applies to families that are currently served in other permanent housing assistance programs administered by Homes for Good, when the other program is unable to serve the family and when such assistance is necessary for Homes for Good to appropriately house the family. This preference requires approval of Directors of both programs. This preference is worth 10 points.</p> <p>Transitional Homeless Family Preference</p> <p>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. This preference is worth 5 points. A list of partner agencies can be</p>	<p>No</p>	<p>Allows tenants to move between programs to be appropriately housed</p>
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Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>issued by Homes for Good, who cannot be reasonably accommodated in those properties.</p> <p>Homes for Good will apply a waiting list preference worth 5 points for applicants referred by an agency with whom the Homes for Good Property Management Division has a signed Memorandum of Understanding (MOU) outlining such a preference. The preference will be specific to the properties and agencies covered by the MOU. A list of partner agencies can be found on the Homes for Good website at homesforgood.org.</p>	<p>found on the Homes for Good website at homesforgood.org</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
6-II.D.	<p>The most current IRS Publication 502, Medical and Dental Expenses, will be used as a reference to determine the costs that qualify as medical expenses. In addition to costs allowed by the IRS, Homes for Good will allow all necessary costs incurred for service and assistance animals. Homes for Good will also allow non-prescription medicines when recommended by a medical practitioner, as treatment for a specific condition diagnosed by a physician, as an allowable medical expense.</p>	<p>The most current IRS Publication 502, Medical and Dental Expenses, will be used as a reference to determine the costs that qualify as medical expenses. In addition to costs allowed by the IRS Homes for Good will allow all necessary costs incurred for service and assistance animals. Such costs include food, grooming, and veterinary care, incurred in maintaining the health and vitality of the service or assistance animal so that it may perform its duties.</p>	No	Clarifies agency policy
6-II.E.	<p>The cost of animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.</p>	<p>The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.</p>	No	Clarifies agency policy

Section	Previous Policy	Proposed Policy	Required Change	Impact
6-III.C.	Unless Homes for Good is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first interim or annual reexamination after the allowance is adopted.	Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination that is effective after the allowance is adopted.	No	Ensures no interim increases in rent, if a new utility allowance is lower than the previous year's
7-I.D.	Homes for Good will send third-party verification forms directly to the third party.	Homes for Good may send third-party verification forms directly to the third party.	No	Allows tenants to collect third party verification in situations where third parties will not communicate with Homes for Good

<p>7-II.H.</p>	<p>Homes for Good offers a preference for victims of domestic violence, dating violence, sexual assault or stalking living in Section 8 properties managed by Homes for Good, (currently Abbie Lane, Fourteen Pines, and Village Oaks) or holding a Housing Choice Voucher issued by Homes for Good, whose situation requires moving out of the current unit – as described in Section 4-III.B. To verify that applicants qualify for the preference, the PHA will follow documentation requirements outlined in Section 16-VII.D.</p> <p>Homes for Good also offers a preference for persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by Homes for Good, or holding a Housing Choice Voucher issued by Homes for Good, who cannot be reasonably accommodated in those properties. To verify that applicants qualify for the preference, Homes for Good will follow</p>	<p>Permanent Housed Family Preference</p> <p>This preference applies to families that are currently served in other permanent housing assistance programs administered by Homes for Good, when the other program is unable to serve the family and when such assistance is necessary for Homes for Good to appropriately house the family. This preference requires approval of Directors of both programs. This preference is worth 10 points.</p> <p>Transitional Homeless Family Preference</p> <p>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. This preference is worth 5 points. A list of partner agencies can be found on the Homes for Good website at homesforgood.org</p>	<p>No</p>	<p>Allows tenants to move between programs to be appropriately housed</p>
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Section	Previous Policy	Proposed Policy	Required Change	Impact
	documentation requirements outlined in Homes for Good's reasonable accommodation policy.	Third-party verification of fixed sources of income will be obtained during the intake process and annually.	No	Provides clarity on verifying income annually
9-I.B	Third-party verification of fixed sources of income will be obtained during the intake process and at least once every three years thereafter.	Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.	No	Ensures accurate income and family composition information when a family transfers
9-I.C.	If the family transfers to a new unit, Homes for Good will process the transfer as an "Other Change of Unit", but a full reexamination will not be conducted, and the anniversary date will be changed. If the family experiences a change in income or expenses that are applicable to Homes for Good's interim policy, Homes for Good will process an interim reexamination.	If the family transfers to a new unit, Homes for Good will process the transfer as an "Other Change of Unit," a full reexamination will be conducted, and the anniversary date will be changed.	No	Ensures accurate income and family composition information when a family transfers

Section		Previous Policy	Proposed Policy	Required Change	Impact
9-III.C.		Families are required to report all increases in income, including new employment, within 30 calendar days of the date the change takes effect.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification.	No	Remove reporting requirements to align with no interim ups

<p>16-V.B.</p> <p>During the term of each public housing tenancy, and for at least three years thereafter, the PHA will keep all documents related to a family's eligibility, tenancy, and termination.</p> <p>In addition, the PHA will keep the following records for at least three years:</p> <p>An application from each ineligible family and notice that the applicant is not eligible</p> <p>Lead-based paint records as required by 24 CFR 35, Subpart B</p> <p>Documentation supporting the establishment of flat rents and the public housing maximum rent</p> <p>Documentation supporting the establishment of utility allowances and surcharges</p> <p>Documentation related to PHAS</p> <p>Accounts and other records supporting PHA budget and financial statements for the program</p>	<p>During the term of each assisted lease, and for at least three years thereafter, the PHA must keep:</p> <ul style="list-style-type: none"> • A copy of the executed lease • The application from the family • All documents related to termination of tenancy and/or subsidy <p>In addition, the PHA must keep the following records for at least three years:</p> <ul style="list-style-type: none"> • Records that provide income, racial, ethnic, gender, and disability status data on program applicants and participants • An application from each ineligible family and notice that the applicant is not eligible • HUD-required reports • Lead-based paint records as required by 24 CFR 35, Subpart B • Documentation supporting the establishment of flat rents and the public housing maximum rent 	<p>No</p>	<p>Clarifies agency policy</p>
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Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule</p> <p>Other records as determined by the PHA or as required by HUD</p>	<ul style="list-style-type: none"> • Documentation supporting the establishment of utility allowances and surcharges • Documentation related to PHAS • Accounts and other records supporting PHA budget and financial statements for the program • Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule • Other records specified by HUD 		

Section	Previous Policy	Proposed Policy	Required Change	Impact
14-III.C.	Homes for Good is located in a HUD-declared due process state. Therefore, Homes for Good 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, or for violent or drug-related criminal activity on or off the premises.	Homes for Good is located in a HUD-declared due process state. Therefore, Homes for Good 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 any criminal activity that resulted in felony conviction of a household member.	No	Increase property safety and allows more flexibility on a case-by-case basis
15-I.C.	For each investigation the PHomes for Good will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed the PHA, and (3) what corrective measures or penalties will be assessed.	For each investigation the Homes for Good will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed the PHA, and (3) what corrective measures or penalties will be assessed.	No	Fixed typo