	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
(High Performer PHAs)		

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 <u>do not</u> 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 <u>both</u> 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	PHA Name: PHA Code:					
		eginning: (MM nnual Contributi	/YYYY): ons Contract (ACC) units at time of Number of Housing			
	Total Combined		bmission	, , <u> </u>		
	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.					
	PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) Participating PHAs PHA Code Program(s) in the Consortia Program(s) not in the No. of Units in Each Program				in Each Program	
	. 0	T III Coue	r rogram(s) in the Consortia	Consortia	РН	HCV
	Lead PHA:					

B.	Annual Plan Elements
B.1	Revision of PHA Plan Elements.
	 (a) Have the following PHA Plan elements been revised by the PHA since its last Annual <u>PHA Plan</u> submission? Y N
	 Statement of Housing Needs and Strategy for Addressing Housing Needs. Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Financial Resources. Rent Determination. Homeownership Programs. Safety and Crime Prevention. Pet Policy. Substantial Deviation. Significant Amendment/Modification
	(b) The PHA must submit its Deconcentration Policy for Field Office Review.
	(c) If the PHA answered yes for any element, describe the revisions for each element below:
B.2	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y Mixed Finance Modemization or Development. Demolition and/or Disposition. Conversion of Public Housing to Tenant Based Assistance. Conversion of Public Housing to Project-Based Assistance under RAD. Project Based Vouchers. Units with Approved Vacancies for Modernization. Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (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 adv/or disposition approval under section 18 of the 1937 Act under the separate demolition, and proval process. If using Project-Based Vouchers (PB vs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.
D .0	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

B.4 .	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N
	(b) If yes, please describe:
	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
	Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.2	Civil Rights Certification.
	Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) provide comments to the PHA Plan?
	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.
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.
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).
D.1	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.

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 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 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 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 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 sufficient to the housing needs of families in the PHA's s-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 spublic 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. (<u>24 CFR §903.7(c)</u>

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, 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: <u>Notice PIH 1999-51</u>. (<u>24 CFR §903.7(r)(2)(ii)</u>

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
 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. (<u>24 CFR §983.57(b)(1)</u>) 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.

Dther 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.

Attachment B.1 Revision of PHA Plan Elements

Statement of Housing Needs and Strategy for Addressing Housing Needs

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

As a first step in this effort Homes for Good 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 2020 Eugene-Springfield Consolidated Plan. In Eugene-Springfield 44% of households in the plan area have extremely low, very low or low-moderate income. HUD provided numbers in the Consolidated plan indicated that 14.8% of total households were identified as extremely low income (less than 30% AMI) and 12.3% as low income (between 30 and 50% AMI). More households with children under age 6 (55%) and households with people over age 75 (54%) have low-incomes.

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

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

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

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

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

Elderly families and families with disabilities

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

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

Households of various races and ethnic groups residing in the jurisdiction

In most income categories, there are racial or ethnic groups which are experiencing a disproportionately greater need than the needs of the income category as a whole. For people with very low-incomes (30-50% MFI), American Indian/Alaskan Native and Black/African Americans experience a disproportionately greater need than the general population. For people with low-incomes (50-80% MFI), Black/African Americans experience a

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

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

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

Affordability and supply

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

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

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

- New Construction
- Administrative
- Preservation
- Development Pipeline

New Construction

New Construction	
5 New Construction projects	are currently underway totaling 224 units with total budgets over \$62 million
Market District Commons	This 50-unit project is the culmination of 6 years of pre-development planning
(\$17 million total budget)	and is a cornerstone of an unprecedented level of investment in downtown
	revitalization.
	Currently at 50% completion due to open in October 2020.
	15 Project Based Section 8 vouchers awarded to the project.
	To Project based Section o vouchers awarded to the project.
	These units will be prioritized for veterans experiencing homelessness and people
	with disabilities.
The Commons on MLK	This 51-unit project is a powerful partnership with Lane County to implement the
(\$13 million total budget)	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 \$250k each from Kaiser and Pacific Source.
	51 Project Based Section 8 vouchers have been awarded to the project.
	Construction is expected to be complete in December 2020 with doors opening
	in January 2021
Sarang	This 49-unit project is one of two different sites in one financial transaction. for
(1 of 2 projects part of	Good received approval from HUD through the RAD program to sell 100 single
\$32mm Rental Assistance	family homes and duplexes that receive a Public Housing rental/operating subsidy
Demonstration Preservation RAD	and converting these subsidies to a Section 8 subsidy that will be place into 100 newly constructed units. This project will produce 49 of the units in Eugene.
replacement Project.)	newly constructed drifts. This project will produce 49 of the drifts in Eugene.
replacement roject.)	
Hayden Bridge Landing	This 70-unit project is the second site in the one financial transaction. This
(2 nd RAD replacement	project will produce the remaining 53 replacement of the units in Springfield with
project)	attached rental subsidy and an additional 17 units that will provide much needed
	one-bedroom units.
Legion Cottages	This 4-unit tiny home project in Cottage Grove will provide much needed housing
	for homeless veterans.
	1

Administrative

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

Preservation

Sheldon Village	 \$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 completed in late 2019
RAD	Future RAD Conversions – Homes for Good is looking at future phases of converting the remaining public housing through the RAD process Preservation of Federal Subsidies in Lane County – Homes for Good is looking at several developments that may need preservation work to preserve ongoing federal subsidies

Development Pipeline

The Keystone	This 15-unit Permanent Supportive Housing development in Eugene will serve homeless families. It received funding in April through OHCS and will begin construction in fall of 2020.
1100 Charnelton	This 45-unit Permanent Supportive Housing development in Downtown Eugene will serve homeless individuals and couples. Staff will apply for 9 percent tax credit funding in May of 2020.
Glenwood	Homes for Good acquired property in Glenwood that will be used for a future development of 100 to 150 units.
Springfield	Homes for Good is looking to acquire property in Springfield to facilitate permanent supportive housing units for homeless families
Rural Lane County	Homes for Good is working with organizations

Impediments to Fair Housing

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

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

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

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

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

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

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

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

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

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

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

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

Homes for Good staff participate annually in the University of Oregon Internship Fair. This is an opportunity to inform students about Homes for Good's work in the community to promote Fair Housing.

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

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

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

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

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

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

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

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

Quarterly meetings at VA to expedite referrals for homeless vets. Waiver requests to HUD to allow CARES Act funds to be utilized for deposits and fees.

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

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

Provide sufficient ADA units in public housing and LIHTC housing.

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

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

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

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

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

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

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

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

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

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

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

Applicants or residents with questions about Fair Housing issues are referred, or directed via website link, to the Fair Housing Council of Oregon, Legal Aid Services of Oregon (LSAO) or Lane County Law & Advocacy Center (LCLAC), the Oregon Advocacy Center (OAC), the Lane Independent Living Alliance (LILA), the Oregon Bureau of Labor and Industries (BOLI), and/or to the US Department of Housing & Urban Development (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 administrative office and in public areas of its various housing complexes. It is available to any applicant or resident and is included in the Admin Plan and Admissions and Continued Occupancy Policies. It is also posted on Homes for Good's website at www.HomesforGood.org

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

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

Homes for Good has completed outreach presentations to agencies representing youth, seniors/elderly, persons with physical and/or mental disabilities, and minorities, to help assure that a broad base of the community has access to information about the availability of housing. This outreach effort continues on an ongoing basis and representatives from a number of those social service/advocacy agencies serve on Homes for Good's family self-sufficiency advisory board.

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

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

Financial Resources

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

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





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SUPPORTIVE HOUSING PET POLICY

The purpose of a pet policy is to establish clear guidelines for ownership of pets and to ensure that no applicant or resident is discriminated against regarding admission or continued occupancy because of ownership of pets.

Registration of Pets	Refusal to Register Pets	
Pets must be registered with the PHA before they are	The PHA will refuse to register a pet if:	
brought onto the property. Conditional approval (not to exceed one month) may	The pet is not <i>a common household pet</i> as defined below	
be granted to allow registration steps. Registration includes documentation signed by a	Keeping the pet would violate any pet restrictions listed in this policy	
licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration must be	The pet owner fails to provide complete pet registration information, or fails to update the registration annually	
renewed annually and will be coordinated with the annual reexamination date.	The applicant or tenant has previously been charged with animal cruelty under state or local law; or has	
Pets will not be approved to reside in a unit until completion of the registration requirements.	been evicted, had to relinquish a pet or been prohibited from future pet ownership due to pet rule violations or a court order	
Pet Agreement	The PHA reasonably determines that the pet owner is	
Residents who have been approved to have a pet must enter into a pet agreement with the PHA, or the approval of the pet will be withdrawn.	unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a	
The pet agreement is the resident's certification that he or she has received a copy of the PHA's pet policy and applicable house rules, that he or she has read the policies and/or rules, understands them, and agrees to comply with them.	If the PHA refuses to register a pet, a written notification will be sent to the pet owner within 14 calendar days of the PHA's decision. The notice will state the reason for refusing to register the pet and will inform the family of their right to appeal the decision in accordance with the PHA's grievance procedures	
The resident further certifies by signing the pet agreement that he or she understands that noncompliance with the PHA's pet policy and applicable house rules may result in the withdrawal of		
PHA approval of the pet or termination of tenancy.	Pet Removal	
Responsible Parties	If the death or incapacity of the pet owner threatens	
The pet owner will be required to designate a responsible party for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that	the health or safety of the pet, or other factors occur that render the owner unable to care for the pet, the situation will be reported to the responsible party designated by the pet owner.	
render the pet owner unable to care for the pet.	If the responsible party is unwilling or unable to care	
A resident who cares for another resident's pet must notify the PHA and sign a statement that they agree to abide by all of the pet rules.	for the pet, or if the PHA after reasonable efforts cannot contact the responsible party, the PHA may contact the appropriate state or local agency and request the removal of the pet.	

Definition of "Common Household Pet"	Pet Restrictions
Common household pet means a domesticated	The following animals are not permitted:
animal, such as a dog, cat, bird, or fish that is traditionally recognized as a companion animal and is kept in the home for pleasure rather than commercial	Any animal whose adult weight will exceed 30 pounds and whose shoulder height will exceed 15 inches.
purposes.	Ferrets or other animals whose natural protective
The following animals are not considered common household pets:	mechanisms pose a risk to small children of serious bites or lacerations
Reptiles	Any animal not permitted under state or local law or code
Rodents	Number of Pets
Insects	Residents may own a maximum of 2 pets, only 1 of
Arachnids	which may be a dog.
Wild animals or feral animals	In the case of fish, residents may keep no more than
Pot-bellied pigs	can be maintained in a safe and healthy manner in a tank holding up to 10 gallons. Such a tank or
Animals used for commercial breeding	aquarium will be counted as 1 pet.

Other Requirements

Dogs and cats must be spayed or neutered at the time of registration or, in the case of underage animals, within 30 days of the pet reaching 6 months of age. Exceptions may be made upon veterinary certification that subjecting this particular pet to the procedure would be temporarily or permanently medically unsafe or unnecessary.

Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration and annually, in conjunction with the resident's annual reexamination.

Pet Area Restrictions	Noise
Pets must be maintained within the resident's unit.	Pet owners must agree to control the noise of pets so
When outside of the unit (within the building or on	that their noise is not a nuisance to other residents or
the grounds) dogs and cats must be kept on a leash	interrupt their peaceful enjoyment of their housing unit
or carried. They must be under the control of the	or property. This includes, but is not limited to loud or
resident or other responsible individual at all times.	continuous barking, howling, whining, biting, scratching,
Pets other than dogs or cats must be kept in a cage	chirping, or other such activities.
or carrier when outside of the unit.	Pets Temporarily on the Premises
Pets are not permitted in common areas including	Pets that are not owned by a tenant are not allowed on
lobbies, community rooms and laundry areas	the premises. Residents are prohibited from feeding or
except for those common areas which are	harboring stray animals. Residents may however have
entrances to and exits from the building.	bird feeders.
Pet owners are not permitted to exercise pets or	This rule does not apply to visiting pet programs
permit pets to deposit waste on the property	sponsored by a humane society or other non-profit
outside of the areas designated for such purposes.	organizations, and approved by the PHA.

Cleanliness	Pet Care		
The pet owner shall be responsible for the removal of waste from the exercise area by placing it in a	Each pet owner shall be responsible for adequate care, nutrition, exercise and medical attention for his/her pet.		
sealed plastic bag and disposing of it in an appropriate receptacle.	Each pet owner shall be responsible for appropriately training and caring for his/her pet to ensure that the pet		
The pet owner shall take adequate precautions to eliminate any pet odors within or around the unit	is not a nuisance or danger to other residents and does not damage PHA property.		
and to maintain the unit in a sanitary condition at all times.	No dog may be allowed unleashed outside unless the pet owner has a fully fenced private yard and maintains the		
Litter box requirements: Pet owners must promptly dispose of waste from	dog within that space. No animals may be tethered or chained inside or outside the dwelling unit at any time.		
litter boxes and must maintain litter boxes in a sanitary manner.	Alterations to Unit		
Litter shall not be disposed of by being flushed through a toilet.	Pet owners shall not alter their unit, patio, premises or common areas to create an enclosure for any animal.		
Litter boxes shall be kept inside the resident's	Installation of pet doors is not allowed.		
dwelling unit.			
Pet Rule Violations	Notice for Pet Removal		
All complaints of cruelty and all dog bites will be referred to animal control or an applicable agency for investigation and enforcement.	If the pet owner and the PHA are unable to resolve the violation at the meeting or the pet owner fails to correct the violation in the time period allotted by the PHA, the		
If a determination is made on objective facts supported by written statements, that a	PHA may serve notice to remove the pet. The notice will contain:		
resident/pet owner has violated the pet rules, written notice will be served.	A brief statement of the factual basis for the PHA's determination of the pet rule that has been violated		
The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated. The notice will also	The requirement that the resident /pet owner must remove the pet within 30 calendar days of the notice		
state: That the pet owner has 14 calendar days from the	A statement that failure to remove the pet may result in the initiation of termination of tenancy procedures		
effective date of the service of notice to correct the	Termination of Tenancy		
violation or make written request for a meeting to discuss the violation	The PHA may initiate procedures for termination of tenancy based on a pet rule violation if:		
That the pet owner is entitled to be accompanied by another person of his or her choice at the	The pet owner has failed to remove the pet or correct a pet rule violation within the time period specified		
meeting That the pet owner's failure to correct the violation, request a meeting, or appear at a requested meeting may result in initiation of procedures to remove the pet, or to terminate the pet owner's tenancy	The pet rule violation is sufficient to begin procedures to terminate tenancy under terms of the lease		

Emergencies

The PHA will take all necessary steps to ensure that pets that become vicious, display symptoms of severe illness, or demonstrate behavior that constitutes an immediate threat to the health or safety of others, are immediately removed from the premises by referring the situation to the appropriate state or local entity authorized to remove such animals.

If it is necessary for the PHA to place the pet in a shelter facility, the cost will be the responsibility of the pet owner.

If the pet is removed as a result of any aggressive act on the part of the pet, the pet will not be allowed back on the property.

Payment of Deposit	Pet-Related Damages During Occupancy		
Pet owners are required to pay a pet deposit of \$200 in addition to any other required deposits. The deposit may be paid in full or with a signed payment plan of \$50 down and \$10 per month before the pet	All reasonable expenses incurred by the PHA as a result of damages directly attributable to the presence of the pet on the property will be the responsibility of the resident, including:		
is brought on the premises. The pet deposit is not part of rent payable by the	Cost of repairs and replacements to the resident's dwelling unit		
resident.	Fumigation of the dwelling unit		
Refund of Deposit	Repairs to common areas of the property		
The PHA will refund the pet deposit to the resident, less the costs of any damages caused by the pet to	Cost of flea elimination		
the dwelling unit, within 30 days of move-out or removal of the pet from the unit.	If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance		
The resident will be billed for any amount that exceeds the pet deposit.	with the policies for Maintenance and Damage Charges. Pet deposits will not be applied to the costs of pet-related damages during occupancy.		
The PHA will provide the resident with a written list of any charges against the pet deposit within 30 calendar days of the move-out inspection. If the resident disagrees with the amount charged to the pet deposit, the PHA will provide a meeting to discuss the charges.	Charges for pet-related damage are not part of rent payable by the resident.		

My signature below indicates that I have read, understood, and agree to this policy:

Signature:	Date:
Signature:	Date:
Signature:	Date:
Signature:	Date:
Homes for Good Signature:	Date:

Key modifications to The Homes for Good Admissions and Continued Occupancy Policies (ACOP) Fiscal Year 2021 Effective date 10-1-20 to 9-30-21

Section	Previous Policy	Proposed Policy	Required Change	Impact
1-I.C. PHA MISSION	Making a difference in the quality of affordable housing and related community services.	Our mission is Homes. People. Partnerships. Good. Homes for Good is Lane County's housing agency and our primary work is to help low-income residents with the logistics of affordable housing. At a higher level, we are neighbors united to get every Lane County resident who needs help, into a home.	No	Updated mission statement
Throughout	Homes for Good	The PHA	No	Aligns style with Section 8 Administrative Plan and the model language for efficient updates.
3-I.J. GUESTS	A family is allowed a total of 14 overnight guest visits in any 12 month period; this limit applies, whether used by one or several guests.	A resident family must notify the PHA when overnight guests will be staying in the unit for more than 3 days. A guest can remain in the unit no longer than 14 consecutive days or a total of 30 cumulative calendar days during any 12 month period.	No	More effectively tracks overnight guests and prevents individuals from becoming unauthorized occupants.

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-I.L. ABSENT FAMILY MEMBERS	Generally an individual who is or is expected to be absent from the public housing unit for 90 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the public housing unit for more than 90 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.	Generally an individual who is or is expected to be absent from the public housing unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the public housing unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.	No	Provides more flexibility for residents receiving medical care.
3-I.L. ABSENT FAMILY MEMBERS	An employed head, spouse, or cohead absent from the unit more than 90 consecutive days due to employment will continue to be considered a family member.	An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.	No	Provides more flexibility for working residents.
3-III.D. SCREENING	Home visits may be used to determine the applicant's ability to care for the unit.		No	Was discontinued many years ago.

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING	Homes for Good will request in writing that an applicant wishing to claim this protection must notify Homes for Good within 14 business days.	The PHA will request in writing that an applicant wishing to claim this protection notify the PHA within 14 calendar days.	No	Makes response periods more consistent throughout.
4-III.B. SELECTION METHOD	To meet deconcentration goals, effective 10/1/17, admissions to Pengra Court Apartments will be limited to families whose gross income falls between the Very Low Income (VLI) limit and the Low Income (LI) limit.	Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.	No	Removes no longer applicable goals

Section	Previous Policy	Proposed Policy	Required Change	Impact
5-I.B. DETERMINING UNIT SIZE	Homes for Good will assign one bedroom for each two persons within the household, except in the following circumstances: Persons of the opposite sex (other than spouses, and children under age 5) will not be required to share a bedroom. Persons of different generations will not be required to share a bedroom. Different generation is defined as a difference of 8 years or more. Minors age 16 or more will be assigned their own bedroom.	The head of household, including the spouse or co- head, will be allocated one bedroom. All other household members will be based on two (2) persons per bedroom, without regard to gender or age. Live-in aides will be allocated a separate bedroom. Family members of a live-in aide will not be considered when determining family unit size.	No	Align with Section 8 HCV occupancy standards and appropriately house families.

Section	Previous Policy	Proposed Policy	Required Change	Impact
6-I.B. HOUSEHOLD COMPOSITION AND INCOME	Absences in excess of 30 days require Homes for Good's approval. Generally an individual who is or is expected to be absent from the unit for 90 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.	Absences in excess of 30 days require Homes for Good's approval. Generally an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.	No	Aligns with changes in absence policy.
10-II.B. MANAGEMENT APPROVAL OF PETS		Conditional approval (not to exceed one month) may be granted to facilitate registration steps.	No	Added additional language to existing policy, in order to allow residents to complete pet adoptions.

Section	Previous Policy	Proposed Policy	Required Change	Impact
10-II.C. STANDARDS FOR PETS	Residents may own a maximum of 2 pets, only 1 of which may be a dog or cat. Residents may have 1 guinea pig, hamster, rabbit or gerbil. In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 20 gallons. Such a tank or aquarium will be counted as 1 pet.	Residents may own a maximum of 2 pets, only 1 of which may be a dog. In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 10 gallons. Such a tank or aquarium will be counted as 1 pet.	No	Simplified pet rules are easier to understand and enforce
10-II.D. PET RULES	Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash, carried and/or under the immediate control of the resident or other responsible individual at all times.	Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash or carried. They must be under the control of the resident or other responsible individual at all times.	No	Clarifies that pets outside of the unit must be on a leash.

Section	Previous Policy	Proposed Policy	Required Change	Impact
10-II.D. PET RULES	Homes for Good has not designated any buildings, floors of buildings, or sections of buildings as no-pet areas. In addition, Homes for Good has not designated any buildings, floors of buildings, or sections of buildings for residency of pet- owning tenants.	With the exception of common areas as described in the previous policy, the PHA has not designated any buildings, floors of buildings, or sections of buildings as no-pet areas. In addition, the PHA has not designated any buildings, floors of buildings, or sections of buildings for residency of pet-owning tenants.	No	Clarifies that pets are not allowed in building common areas that are not entrances and exits.
10-II.D. PET RULES	Residents must promptly dispose of waste from litter boxes and must maintain litter boxes in a sanitary manner. Litter must be cleaned daily and changed at least weekly. Litter shall not be disposed of by being flushed through a toilet. Litter boxes shall be kept inside the resident's dwelling unit.	Litter box requirements: Pet owners must promptly dispose of waste from litter boxes and must maintain litter boxes in a sanitary manner. Litter shall not be disposed of by being flushed through a toilet. Litter boxes shall be kept inside the resident's dwelling unit.	No	Simplifies pet rules.

Section	Previous Policy	Proposed Policy	Required Change	Impact
12-I.B. EMERGENCY TRANSFERS	Maintenance conditions in the resident's unit, building or at the site that pose an immediate, verifiable threat to the life, health or safety of the resident or family members that cannot be immediately repaired or abated.	Maintenance conditions in the resident's unit, building or at the site that pose an immediate, verifiable threat to the life, health, or safety of the resident or family members that cannot be repaired or abated within 24 hours.	No	Defines immediately.
12-III.C. ELIGIBILITY FOR TRANSFER	Except where transfers for serious medical reasons or reasonable accommodation are being requested, Homes for Good will only consider transfer requests from residents that meet the following requirements:	Except where reasonable accommodation is being requested, the PHA will only consider transfer requests from residents that meet the following requirements:	No	Requires verification from a qualified professional through a reasonable accommodation.

Section	Previous Policy	Proposed Policy	Required Change	Impact
12-IV.B. TRANSFER LIST	Emergency transfers will not automatically go on the transfer list. Instead emergency transfers will be handled immediately, on a case by case basis. If the emergency cannot be resolved by a temporary accommodation, and the resident requires a permanent transfer, the family will be placed at the top of the transfer list.	With the approval of the division director, the PHA may, on a case-by-case basis, transfer a family without regard to its placement on the transfer list in order to address the immediate need of a family in crisis.	No	Requires division director approval to bypass normal transfer procedures.
16-II.B. FLAT RENTS	Homes for Good will publicly post the schedule of flat rents in a conspicuous manner in the Homes for Good, 300 W Fairview Drive Office.	The PHA will publicly post the schedule of flat rents in a conspicuous manner in the applicable PHA or project office.	Yes	Reflect changed administrative building.

Key modifications to The Homes for Good Rent Assistance Administrative Plan Fiscal Year 2021 Effective date 10-1-2020 to 9-30-2021

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

- Chapter 4: Applications, Waiting List, and Tenant Selection
- Chapter 6: Income and Subsidy Determinations
- Chapter 7: Verification
- Chapter 9: General Leasing Policies
- Chapter 10: Moving with Continued Assistance and Portability
- Chapter 11: Reexaminations
- Chapter 14: Program Integrity
- Chapter 16: Program Administration

Key modifications to The Homes for Good Administrative Plan for the Housing Choice Voucher Program (Admin Plan) Proposed Effective date 10-1-2020

Section	Previous Policy	Proposed Policy	Required Change	Impact
4-11.F.	(Regarding removal from the waitlist) The family's response must be in writing and may be delivered in person, by mail or by fax.	(Regarding removal from the waitlist) The family's response must be in writing and may be delivered in person, by mail, email or by fax.	No	Allows for an additional method for communicating with Homes for Good.
4-111.C.	None	An Approved Entity with higher preference points will be indicated in the MOU and on Homes for Good's website. Unless otherwise noted all Local Preferences will be weighted the same.	No	Allows Homes for Good to meet the housing needs of various hard to house populations.
4-111.C.	Non-Elderly Persons with Disabilities Preference (limited to 33 families utilizing a Mainstream Voucher).	Non-Elderly Persons with Disabilities Preference	Yes	Allows an applicant on the waitlist who meets the qualifications of a Mainstream voucher to access one in order of placement on the waitlist.
6-1.M.	None	Distributions from an ABLE account, and actual or imputed interest on the ABLE Account balance	Yes	A source of income that is excluded. Allows disabled persons to save money in dedicated ABLE Account and not affect Federal Benefits, such as SSI, SSDI, Medicaid, and Housing Assistance. If a program participant provides proof, they have an ABLE Account, the funds in the account will not be counted as income and the interest earned will not be counted as income from an asset.
7-I. B	Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.	Documents must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.	No	Provides clarification as to what can be used for verification.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	 Print-outs from Web pages are considered original documents. The PHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed and sign the copy. Any family self-certifications must be made in a format acceptable to the PHA and may be signed in the presence of a PHA representative or notary public. 	If the PHA staff member views the original document makes a photocopy, staff must annotate the copy with the name of the person who provided the document and the date the original was viewed and sign the copy. Any family self-certifications must be made in a format acceptable to the PHA and may be signed in the presence of a PHA representative or notary public.		
7-1.C.	The PHA will obtain income reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process. Income reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C and in this chapter. Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources. Income reports will be retained in participant files with the applicable annual or interim reexamination documents. When the PHA determines through income reports and third-party verification that a family has concealed or under reported income, corrective action will be taken	The PHA will obtain income and IVT reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process. Income and IVT reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C and in this chapter. Income and IVT reports will be used in interim reexaminations triggered by income or family composition changes to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.	Yes	Provides PHA with a notification of discrepancy regarding families' reported sources of income.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	pursuant to the policies in Chapter 14, Program Integrity.	Income and IVT reports will be retained in participant files with the applicable annual or interim reexamination documents.		
		When the PHA determines through EIV reports and third-party verification that a family has concealed or under reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.		
9-I.A.	The PHA will not screen applicants for family behavior or suitability for tenancy.	The PHA will not screen applicants for family behavior or suitability for tenancy.	No	Allows PHA to provide information to OHCS regarding claims of
	The PHA will not provide additional screening information to the owner.	The PHA will not provide additional screening information to the owner.		damage at subsidized unit.
		The PHA will provide requested documentation regarding the subsidized unit address, length of subsidy at said address, and type of voucher to Oregon Housing and Community Services (OHCS) when OHCS is requesting such information in regard to utilization of the Landlord Guarantee Program within the state of Oregon.		
10-I.C.	None	If a zero HAP family requests to move to a new unit, the family may request a voucher to move. However, if no subsidy will be paid at the unit to which the family requests to move, the PHA may enter into a HAP contract on behalf of the family for the new unit.	Yes	Clarifies that a PHA must issue a voucher to a zero HAP family.
11- II.C.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the Next Annual Recertification.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the Next Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam).	No	Clarifies when a tenant needs to report changes in income.

Section	Previous Policy	Proposed Policy	Required Change	Impact
11- II.C.	If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income.	Remove Policy	No	Reduces administrative burden by collecting income information annually as opposed to every quarter.
14- II.C.	None	Committing sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2. Retaliating against any applicant or participant reporting/alleging sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2.	No	Adheres to best practice policies defined by Nan McKay, an industry expert in PHA regulations and policy. Clarifies evidence of program owner abuse.
16- VII.C.	The public health department(s) has stated they do not wish to receive a report of an updated list of the addresses of units receiving assistance under the HCV program, on a quarterly basis. Therefore, the PHA is not providing such a report.	The Oregon Health Authority has stated they do wish to receive a report of an updated list of the addresses of units receiving assistance under the HCV program, on a quarterly basis. Therefore, the PHA is providing such a report.	Yes	PHA is able to detect children who may be impacted by elevated blood lead levels and take appropriate action with the property owner.

Attachment B.2 New Activities

✓ Demolition and/or Disposition

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

✓ Conversion of Public Housing to Project Based Assistance under RAD

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing access to private sources of capital to repair and preserve its affordable housing assets. Homes for Good submitted applications for participation in the RAD program in November of 2013 to convert 112 of its scattered sites to Project Based Vouchers (PBV). Homes for Good submitted a revised multi-phase application in May of 2016 which allowed conversion of 12 units into Richardson Bridge Apartments as part of a major rehabilitation and sold 12 units of scattered site housing and will transfer assistance to new sites which include 49 units at Sarang in Eugene and 51 units at Hayden Bridge Landing in Springfield. Homes for Good received a Commitment to enter into a Housing Assistance Payment (CHAP) for the remaining 100 units in August of 2018 for AMP 200 and 300.

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

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

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

✓ Project Based Vouchers

It is Homes for Good's intention to publish Request for Proposal(s) in 2021 in order to award Project Based Vouchers. As of March 2020, Homes for Good has awarded 128 Project Based Vouchers. Homes for Good intends to utilize Project Based Vouchers to increase the availability of affordable housing stock in our jurisdiction and well as increase supportive services within the PBV projects. Oregon Housing Community Services' Permanent Supportive Housing Cohort is eager to bring forth permanent supportive housing projects to the state of Oregon. Homes for Good is a member of the cohort and it is anticipated that projects from that cohort would be seeking project-based vouchers.

Attachment B.3 Progress Report

Goal 1 Objective: Increase the number of affordable housing units

Indicator	FY20 Progress
Create 300 new affordable housing units	Homes for Good has various projects currently under construction including Market District Commons (50 units), The Commons on MLK (51 units), Sarang (49 units), Hayden Bridge Landing (70 units), Legion Cottages (4 units).
Increase number of permanent supporting housing units (Featured projects: The Commons on MLK, Legion Cottages Tiny Homes, 13 th & Tyler, 1100 Charnelton)	70 of the units under construction are Permanent Supportive Housing, as well as a few projects in the development pipeline including The Keystone (15 units PSH), as well as 1100 Charnelton (45 units PSH).
Maintain public housing vacancies at 3% or less	Public Housing continues to maintain an occupancy rate of 97% across the portfolio, with higher vacancies associated with the RAD resident relocations.
Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons	33 Mainstream vouchers are being utilized. Received an additional 25 Mainstream Vouchers through a competitive process, and most recently was awarded an additional 18 Mainstream Vouchers in conjunction with the CARES Act on June 1, 2020. Currently, utilizing 38 Mainstream Vouchers. We continue to work with partner agencies to ensure full utilization.
Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County	Currently, 207 VASH vouchers are under lease. 26 VASH recipients have been issued vouchers and are searching for housing. Homes for Good has applied for a waiver request from HUD to utilize CARES Act funds to provide deposits and arrears assistance to VASH voucher holders who are seeking housing. Homes for Good continues to meet with local agencies on a quarterly basis to collaborate on the use of all VASH vouchers.

Goal 2 Objective: Continue to receive high performer status

Indicator	FY20 Progress
Homes for Good received high performer status for FY18 SEMAP	Homes for Good received high performer status for FY19 SEMAP
Obligate all capital funds within 24 months of grant award	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.
Expend all capital funds within 48 months of grant award	
Comply with the financial reporting requirements of asset management	Homes for Good continues to receive high performer status
Comply with the new PHAS requirements (when published) to continue to receive high performer status Submit all PHAS reports within required timelines	
Meeting all capital fund, financial reporting, and PHAS reporting requirements	

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

Indicator	FY20 Progress
Creation of a Housing Liaison position that will provide education and advocacy to persons searching for housing. Once housed, the Housing Liaison's continued education and advocacy supports will increase housing stability	Homes for Good Housing Liaison has assisted over 100 participants in challenges related to lease up with their Housing Choice Voucher program and has implemented participant and partner education related to housing navigation.
Continue to encourage and promote resident involvement in the Resident Advisory Board by maintaining and expanding the number of representatives from public and assisted housing, as well as the Section 8 program	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.
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	All communities continue to receive a monthly or quarterly residential newsletter.
Annually monitor income levels by development and provide targeted support to deconcentrate poverty. Bring higher income PH households into lower income developments and vice versa, if necessary	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.
Continue giving preferences to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units)	

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

Indicator	FY20 Progress
Expand access to the Family Self-Sufficiency (FSS) program	Homes for Good Family Self-Sufficiency program currently
to reach enrollment of 200 households or more	has 149 households enrolled
Maintain a minimum representation of 15 community services agencies on the Family Self-Sufficiency Advisory Board	and has increased participation on the FSS Advisory Board to over 18 community partners.
Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet.
Assist a minimum of two FSS participants a year in purchasing a home	FSS has assisted 3 participants to purchase homes this year
Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home	FSS has assisted 11 residents to open IDA's.

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

Indicator	FY20 Progress
Complete the Rent Assistance Demonstration construction	Homes for Good has broken ground on the RAD new
and sale of scattered site homes	construction and has begun the sale of the 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	The Landlord Liaison continues to engage community
engagement, providing routine educational seminars for	partners and landlords in ongoing education and support.
landlords and supportive service organizations. Expansion	Publication of a quarterly landlord newsletter in in place.
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	In partnership with DevAWA (providevaly NEDCO) Homes for
Partnered with NEDCO to provide zero interest loans for security deposits to Section 8 and VASH families	In partnership with DevNW (previously NEDCO), Homes for
security deposits to section o and vasin families	Good was awarded \$50,000 from Meyer Memorial Trust to expand access to zero interest loans for security deposits
	for Section 8 and VASH families. These funds will become
	available to participants this year and will continue to be
	accessible through a revolving fund.

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

Indicator	FY20 Progress
Increase success of Section 8 participants, particularly those coming out of homelessness or transitioning from permanent supportive or transitional housing through engagement with the Housing Liaison	The Housing Liaison and Landlord Liaison have increased support for participants and landlords with the goal of increasing the success rate of HCV participants.
Grown the Landlord Liaison offerings of support for landlords through continuous communication, trainings and sharing resources	
Awarded funding to provide monetary incentives to landlords who agree to rent to persons with high housing barriers	
Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program	The Housing Liaison has initiated a quarterly Housing Navigator meetup to support local Housing Navigators in increasing the success of their participants who are seeking to lease up with their Section 8 voucher and is in the process of initiating a lease up support group to help participants in building their housing portfolio, searching for housing and leasing up in available units.
Monitor the payment standards and area rents on the private market to keep Section 8 families' portion of rent affordable and allow the Agency to serve the same number of families as in previous years.	A rent study was completed for the 2020 Fair Market Rents. Homes for Good received a 12% increase to the FMRs, which directly impact the Payment Standards utilized by those receiving tenant-based subsidies. This increase will expand housing stock (will now be able to qualify for units they once could not afford) and the dollar amount (more funds to each household) of assistance Homes for Good provides.
A Homes for Good staff member serves on the board for the local Rental Owners association	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association. Various staff members also attend the general monthly membership meeting.

Attachment C.3 Resident Advisory Board (RAB) Comments

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING	Homes for Good will request in writing that an applicant wishing to claim this protection must notify Homes for Good within 14 business days.	The PHA will request in writing that an applicant wishing to claim this protection notify the PHA within 14 calendar days.	No	Makes response periods more consistent throughout.

14 calendar days is not very much time and I don't think that it should be shortened from what it is now.

Homes for Good Response:

14 calendar days are used elsewhere in this section and throughout the ACOP as a standard response period. For consistency that benefits both residents and staff, we will change it to 14 calendar days.

This time period is how long applicants have to claim this protection, not to provide all documentation.

Section	Previous Policy	Proposed Policy	Required Change	Impact
5-I.B. DETERMINING UNIT SIZE	Homes for Good will assign one bedroom for each two persons within the household, except in the following circumstances: Persons of the opposite sex (other than spouses, and children under age 5) will not be required to share a bedroom. Persons of different generations will not be required to share a bedroom. Different generation is defined as a difference of 8 years or more. Minors age 16 or more will be assigned their own bedroom.	The head of household, including the spouse or co- head, will be allocated one bedroom. All other household members will be based on two (2) persons per bedroom, without regard to gender or age. Live-in aides will be allocated a separate bedroom. Family members of a live-in aide will not be considered when determining family unit size.	No	Align with Section 8 HCV occupancy standards and appropriately house families.

RAB Comments:

The new standards are too basic and don't consider opposite genders.

Homes for Good Response:

Homes for Good wants to appropriately house families in a consistent way across programs. The Fair Housing Council of Oregon recommends simple occupancy limit of 2 persons per bedroom with 1 additional allowed. It is illegal to say that boys and girls cannot share a bedroom or to indicate where occupants should sleep in a unit. While our current policy does not require sex, generational, and age differences to be in different bedrooms, it does say that we are assigning bedrooms, which is not consistent with the recommended best practice.

Section	Previous Policy	Proposed Policy	Required Change	Impact
10-II.C. STANDARDS FOR PETS	Residents may own a maximum of 2 pets, only 1 of which may be a dog or cat. Residents may have 1 guinea pig, hamster, rabbit or gerbil. In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 20 gallons. Such a tank or aquarium will be counted as 1 pet.	Residents may own a maximum of 2 pets, only 1 of which may be a dog. In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 10 gallons. Such a tank or aquarium will be counted as 1 pet.	No	Simplified pet rules are easier to understand and enforce

RAB Comments:

It's weird that a fish tank counts as a pet.

Homes for Good Response:

The idea behind a fish tank being a "pet" is that multiple small fish are allowed as long as they can be kept safely and in a healthy manner in the allowed tank size, rather than dictating a maximum number of fish. We do want to consider a fish tank a pet so that the pet rules will apply concerning keeping the pet in a sanitary manner and being responsible for any damage caused (a leaking tank that causes water damage, for example).

Section	Previous Policy	Proposed Policy	Required Change	Impact
10-II.D. PET RULES	Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash, carried and/or under the immediate control of the resident or other responsible individual at all times.	Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash or carried. They must be under the control of the resident or other responsible individual at all times.	No	Clarifies that pets outside of the unit must be on a leash.

RAB Comments:

This is really making the leash rules more clear for pets, but it'd be helpful to clear up confusion around pets and assistance animals on leashes.

Homes for Good Response:

We are publishing a new pet policy, assistance animal policy, and registration forms for both. They are shorter and more plain language than past documents. We will also include resident education in upcoming newsletters.