



# ANNUAL PLAN FOR FISCAL YEAR 2026

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541-682-3755



[www.homesforgood.org](http://www.homesforgood.org)



100 West 13th Avenue, Eugene, OR 97401

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## 1. ANNUAL PLAN 45 DAY NOTICE



100 West 13th Avenue, Eugene, OR 97401 • PH 541-682-3755 • FAX 541-682-3411

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### **Homes for Good PHA Annual Plan Notice of 45-Day Comment Period and Public Hearing**

Homes for Good Housing Agency is updating its PHA Annual Plan. This plan guides the planning and implementation of federal programs under the jurisdiction of the Department of Housing and Urban Development for the period beginning October 1, 2025. The federal programs related to housing and other needs for low-income persons covered by the Agency Plans include, but are not limited to, Capital Fund, Section 8 and Public Housing Admission policies, Self Sufficiency, and Resident participation.

The public examination and comment period begins April 28, 2025, and ends June 16, 2025. There will be a public hearing on June 13, 2025, at 9:45 a.m. at the Homes for Good Service Center first floor at 100 West 13<sup>th</sup> Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good PHA Annual Plan Public Hearing  
Time: June 13, 2025, at 09:45 AM Pacific Time (US and Canada)

#### **Online:**

<https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting>

Meeting ID: 296 789 220 546

Passcode: iZ9fg2VW

#### **Dial-in by phone:**

[+1 689-206-0388, 652475122#](tel:+16892060388652475122) United States, Orlando

Phone conference ID: 652 475 122#

Comments may be presented in person during this meeting, or in writing as noted below. The draft plans and all supporting documents may be viewed at Homes for Good Service Center 100 West 13<sup>th</sup> Ave Eugene, OR 97401 and on our website at [www.homesforgood.org](http://www.homesforgood.org)

If you have any questions regarding the plans or would like to submit any written comments, please contact Noël Oostdijk, Compliance & Data Analyst; at 100 West 13<sup>th</sup> Ave Eugene, OR 97401, [noostdijk@homesforgood.org](mailto:noostdijk@homesforgood.org) or 541-682-2588. To request a reasonable accommodation for this meeting, please call 541-682-2588 at least 24 hours prior to the meeting time.

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

## 2. MTW SUPPLEMENT 45 DAY NOTICE



100 West 13th Avenue, Eugene, OR 97401 • PH 541-682-3755 • FAX 541-682-3411

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### **Homes for Good Moving to Work (MTW) Supplement to the Annual Plan Notice of 45-Day Comment Period and Public Hearing**

Homes for Good Housing Agency is updating its Moving to Work (MTW) Supplement to the Public Housing Authority (PHA) Annual Plan (the "Supplement") for submission to HUD. The MTW program gives Homes for Good specific funding and programmatic flexibilities. The Supplement describes the ways in which Homes for Good plans to use its MTW flexibilities in the Fiscal Year starting October 1, 2025. Homes for Good also prepared a "reader-friendly" narrative that describes the waivers included in its plan. This narrative can be found on the MTW page on the Homes for Good website.

A separate public hearing is required for the Supplement because it includes a request to waive one or more of HUD's safe harbor waivers and an agency-specific waiver. The public examination and comment period of the Supplement begins April 28, 2025, and ends June 16, 2025. There will be a public hearing on June 13, 2025, at 10:30 a.m. at the Homes for Good Service Center first floor at 100 West 13<sup>th</sup> Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good MTW Supplement to the Annual Plan Public Hearing  
Time: June 13, 2025, at 10:30 AM Pacific Time (US and Canada)

#### **Online:**

<https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting>

Meeting ID: 265 633 189 890 2

Passcode: C2p2dX6u

#### **Dial-in by phone:**

[+1 689-206-0388](tel:+16892060388), 55080623# United States, Orlando

Phone conference ID: 550 806 23#

Comments may be presented in person during this meeting, or in writing as noted below. The draft MTW Supplement and all supporting documents may be viewed at Homes for Good Service Center 100 West 13<sup>th</sup> Ave Eugene, OR 97401 and on our website at [www.homesforgood.org](http://www.homesforgood.org)

If you have any questions regarding the plans or would like to submit any written comments, please contact Noël Oostdijk, Compliance & Data Analyst; at 100 West 13<sup>th</sup> Ave Eugene, OR 97401, [noostdijk@homesforgood.org](mailto:noostdijk@homesforgood.org) or 541-682-2588. To request a reasonable accommodation for this meeting, please call 541-682-2588 at least 24 hours prior to the meeting time.

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

### 3. STREAMLINED ANNUAL PHA PLAN FOR FY2026

<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

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

**Definitions.**

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

A.	PHA Information																										
A.1	<p><b>PHA Name:</b> <u>Homes for Good Housing Agency</u> <b>PHA Code:</b> <u>OR006</u></p> <p><b>PHA Type:</b> <input checked="" type="checkbox"/> High Performer</p> <p><b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>10/2025</u></p> <p><b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p><b>Number of Public Housing (PH) Units</b> <u>595</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>3,306</u></p> <p><b>Total Combined</b> <u>3,901</u></p> <p><b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV																		
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		PH	HCV																								
B.	Plan Elements																										
B.1	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual PHA Plan</b> submission?</p> <p>Y N: No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p>																										

	<div data-bbox="232 191 1045 388"> <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.  <input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.  <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.  <input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.  <input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.  <input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.  <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.  <input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification </div> <div data-bbox="232 436 1421 661"> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:  <b>These are included in the sections that follow. Homes for Good's PHA Plan Elements are also restated in this document for clarity:</b></p> <ul style="list-style-type: none"> <li>• See Attachment B.1 Revision of PHA Plan Elements</li> <li>• See Attachment 1. Key Modifications ACOP FY26 <ul style="list-style-type: none"> <li>○ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions Revision - page 22</li> <li>○ Rent Determination Revision – page 15</li> </ul> </li> <li>• See Attachment 2. Key Modifications Admin Plan FY26 <ul style="list-style-type: none"> <li>○ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions Revision – page 33</li> <li>○ Rent Determination Revision – page 25</li> </ul> </li> </ul> </div> <div data-bbox="232 684 902 709"> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p> </div>
<p><b>B.2</b></p>	<div data-bbox="232 779 367 804"> <p><b>New Activities.</b></p> </div> <div data-bbox="232 829 1206 854"> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> </div> <div data-bbox="232 877 1336 1098"> <p>Y   N   Yes – Project Based Vouchers</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> </div> <div data-bbox="232 1123 1455 1241"> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> </div> <div data-bbox="232 1262 1450 1333"> <p>Homes for Good was awarded a City of Eugene landbank site on 13th Avenue in Eugene that will be used for the development of 80 affordable units and includes 80 PBVs. An Early Learning Center is being developed onsite on the ground floor. Construction started in August 2024 and will be completed in December 2025.</p> </div> <div data-bbox="232 1352 1440 1423"> <p>Lane County acquired a 50-unit hotel that it is used to house people displaced by wildfires. This 57-unit Permanent Supportive Housing development in Eugene will serve homeless individuals and includes 56 PBVs. It began construction in August 2024 and will be completed in August of 2025.</p> </div> <div data-bbox="232 1442 1471 1514"> <p>Homes for Good was awarded CDBG funds for roof replacements at McKenzie Village in Springfield, OR. This grant will fund a replacement roofing project for twenty-six (26) duplexes in McKenzie Village. These twenty-six (26) duplexes represent the remaining duplexes that have yet to receive new roofs. There have been sixty (60) units done previously. The projected completion date is September 2025.</p> </div>
<p><b>B.3</b></p>	<div data-bbox="232 1585 386 1610"> <p><b>Progress Report.</b></p> </div> <div data-bbox="232 1633 1185 1659"> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> </div> <div data-bbox="232 1675 565 1701"> <p><b>See Attachment B.3 Progress Report</b></p> </div>
<p><b>B.4.</b></p>	<div data-bbox="232 1732 1386 1780"> <p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> </div> <div data-bbox="232 1797 948 1822"> <p><b>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/26/2022.</b></p> </div>

B.5	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit? Y</p> <p>Y N: Yes  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>Homes for Good received a finding related to a Significant Deficiency in Internal Controls in its FY2023 audit. A corrective action plan was established in 2024 and completed in Feb 2025.</p>	
<p><b>C. Other Document and/or Certification Requirements.</b></p>		
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>	
C.2	<p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
C.3	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><u>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</u> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> <p>Homes for Good will identify and add challenged elements that come up through public process, if any.</p>	
<p><b>D. Affirmatively Furthering Fair Housing (AFFH).</b></p>		
D.1	<p><b>Affirmatively Furthering Fair Housing.</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="233 1814 1477 1845"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> </table>	<b>Fair Housing Goal:</b>
<b>Fair Housing Goal:</b>		

*Describe fair housing strategies and actions to achieve the goal*

**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*

**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*



# Instructions for Preparation of Form HUD-50075-HP

## Annual Plan for High Performing PHAs

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

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

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

### B. Plan Elements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

☐ **HOPE VI.** 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). (Notice PIH 2011-47)

☐ **Mixed Finance Modernization or Development.** 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

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

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

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

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

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

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

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

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement

section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

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

**C. Other Document and/or Certification Requirements**

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

- C.2 Certification by State 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](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

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

**D. Affirmatively Furthering Fair Housing.**

**D.1 Affirmatively Furthering Fair Housing.**

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

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

locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

## 4. ANNUAL PLAN FY2026 ATTACHMENTS

### 4.1. ATTACHMENT 1 REVISIONS TO HOMES FOR GOOD'S ADMISSIONS AND CONTINUED OCCUPANCY POLICY

Color codes: **Chapters**

**added language**

**removed language**

revised 4/15/2025

#### Overview of Changes in the FY2026 – ACOP

**Below is a summary of the changes organized by chapter.**

##### **Introduction**

##### **HOTMA 102/104**

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, and reexams (among others) to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD has delayed the compliance date for HOTMA 102/104. Initially, HUD published a delayed compliance date of January 1, 2025, but HUD again delayed the compliance date for HOTMA 102/104 and no new date has been provided.

**In the ACOP, we have provided a matrix that will show which HOTMA related policies are effective, and the date they became effective.**

**The policies in the following overview may reflect language that will not become effective until additional guidance is received from HUD.**

##### **Chapter 1 - OVERVIEW OF THE PROGRAM AND PLAN**

- This chapter contains only minor corrections to bring the content current.

##### **Chapter 2 - FAIR HOUSING AND EQUAL OPPORTUNITY**

- This chapter contains only minor corrections to bring the content current.

##### **Chapter 3 – ELIGIBILITY**

- 3-I.M. LIVE-IN AIDE

##### **PHA Policy**

A family's request for a live-in aide may be made either orally or in writing. The PHA will verify the need for a live-in aide, if necessary, with a reliable, knowledgeable professional as provided by the family, such as a doctor, social worker, or case worker, **unless the disability-related need is apparent or known to the PHA.** For continued approval, the family may be required to submit a new, written request— subject to PHA verification—at each annual reexamination.

In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.

The PHA has the discretion not to approve a particular person as a live-in aide, and may withdraw such approval, if [24 CFR 966.4(d)(3)(i)]:

The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

The person has a history of drug-related criminal activity or violent criminal activity; or

The person currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

Within 14 business days of receiving a request for a live-in aide, including all required documentation related to the request, the PHA will notify the family of its decision in writing.

- 3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION

**PHA Policy**

The PHA has established a policy that the family's revocation of consent to allow the PHA to access records from financial institutions will result in denial of admission or termination of assistance.

- minor change in VAWA request notification requirement changing from 14 calendar days to 14 business days to align with Administrative Plan.
- minor change in option for waiting list closure from 12 months to 24 months for expected future move-in, to align with Administrative Plan.

## **Chapter 4 - APPLICATIONS, WAITING LIST AND TENANT SELECTION**

- 4-III.B SELECTION METHOD

**PHA Policy**

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 weighed the same. The PHA will offer the following preferences:

Permanent Housed Family Preference

This preference applies to families that are currently served in other permanent housing assistance programs administered by the PHA, when the other program is unable to serve the family and when such assistance is necessary for the PHA to appropriately house the family. This preference requires approval of Directors of both programs.

Transitional Homeless Family Preference

This preference applies to transitional housing persons who are homeless and who are referred from a PHA approved entity (an entity with an active MOU/MOA with the PHA). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity.

Continuum of Care Preference

Participants in Lane County's Continuum of Care programs, who have completed an assessment for move on readiness with a system screening tool and are referred through Lane County Coordinated Entry based on prioritized readiness.

Domestic Violence Preference

This preference applies to persons who are victims of domestic violence, dating violence, sexual assault, or stalking (as defined under VAWA; see Chapter 16) who have been

referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).

#### **HCV Abatement-Affected Family Preference**

The PHA will provide a preference for an HCV family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.

Under this policy selected is defined as the date on which the unit was offered to an approved family. Permanent Housed Family Preference will be given priority above other local preferences. First Priority - Permanent Housed Family Preference referrals. Referrals received under this preference will be prioritized by date and time of referral. All other local preference referrals will be prioritized by date and time of referral.

- This chapter contains a minor change in adding email as an optional form of communication.

### **Chapter 5 – OCCUPANCY STANDARDS AND UNIT OFFERS**

- This chapter contains minor changes in adding email as an optional form of communication.

### **Chapter 6 – INCOME AND RENT DETERMINATIONS**

- 6-I.B. HOUSEHOLD COMPOSITION AND INCOME – Caretakers of a child

#### **PHA Policy**

The approval of a caretaker is at the PHA's discretion and subject to the PHA's screening criteria. If neither a parent nor a designated guardian remains in a household receiving assistance, the PHA will take the following actions.

If a responsible agency has determined that another adult is to be brought into the unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.

If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After the 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary. In such cases the PHA will extend the caretaker's status as an eligible visitor.

At any time that custody or guardianship legally has been awarded to a caretaker, the lease will be transferred to the caretaker, as head of household. During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

- 6-I.H. PERIODIC PAYMENTS – Social Security Benefits

#### **PHA Policy**



Annual income includes “all amounts received,” not the amount that a family may be legally entitled to receive but which they do not receive. When the SSA overpays an individual, resulting in a withholding or deduction from their benefit amount until the overpayment is paid in full., the PHA must use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount. Further, if a family’s social security income is garnished for any reason, the PHA will use the net amount after the garnishment in order to calculate the family’s income.

- 6-I.H. PERIODIC PAYMENTS – Alimony and Child Support

**PHA Policy**

The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement. The PHA will count court awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made.

In order to verify that payments are not being made, the PHA will review child support payments over the last three months. If no payments have been made in the past three months and there are no lump sums, the PHA will not include alimony or child support in annual income.

- 6-II.C. ASSET INCLUSIONS AND EXCLUSIONS

**PHA Policy**

In determining the value of non-necessary, non-financial personal property, the PHA will use the family’s estimate of the value. The PHA may obtain an appraisal if there is reason to believe that the family’s estimated value is off by \$50 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.

- 6-II.F. CHILD CARE EXPENSE DEDUCTION – Necessary and Reasonable Costs

**PHA Policy**

Childcare expenses will be considered for the time required for the eligible activity and may include reasonable transportation time. For childcare that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of childcare costs, the PHA will verify the eligible childcare expenses via third party verification. Families may present, and the PHA will consider justification for costs that exceed typical costs in the area.

## **Chapter 7 – VERIFICATION**

- 7-I.C. STREAMLINED INCOME DETERMINATIONS

**PHA Policy**

When the PHA does not use a Safe Harbor income determination from a federal assistance program to determine the family’s annual income as outlined above, the PHA will use streamlined income determinations where applicable.



Regardless of the percent of a family's unadjusted income from fixed income sources:

The PHA will streamline the annual reexamination process by applying the verified COLA/inflationary adjustment factor to fixed-income sources.

The family will be required to sign a self-certification stating that their sources of fixed income have not changed from the previous year.

The PHA will document in the file how the determination that a source of income was fixed was made.

All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.

In the following circumstances, regardless of the percentage of income received from fixed sources, the PHA will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

Of all assets when net family assets exceed the HUD-published threshold (\$50,000 for 2024, and \$51,600 for 2025);

Of all deductions and allowances from annual income;

If a family member with a fixed source of income is added;

If verification of the COLA or rate of interest is not available;

During the intake process and at least once every three years thereafter.

- 7-I.F. LEVEL 4 VERIFICATION – EIV + Self-Certification

**PHA Policy**

At annual reexamination, if the PHA is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, the PHA will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

The PHA will use an average of the last two quarters of income listed in EIV to determine income from employment. The PHA will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with using only the last two quarters of income listed in EIV, because of the seasonal or otherwise fluctuating nature of a particular family member's employment, the PHA will permit the family to sign a self-certification stating that the average of all four quarters of income listed in EIV is accurate and representative of current annual income and use that amount for calculating annual income. If the family disagrees and contends that the amount listed in EIV is not reflective of current income, or if less than two quarters are available in EIV, the PHA will use written third-party verification from the source as outlined below.

The PHA will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

- 7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM

### **PHA Policy**

~~PHA may substitute Level 2 (Oral third-party verification) for written, third-party verification form, before moving to self-certification.~~ Typically, the PHA will attempt to send written third-party verification forms to the verification source whenever higher forms of verification are unavailable. However, on a case-by-case basis, the PHA may choose to obtain oral third-party verification without first attempting, and in lieu of, a written-third party verification form.

- 7-II.F. DOCUMENTATION OF DISABILITY

### **PHA Policy**

For family members claiming disability who receive disability payments from the SSA, the PHA will attempt to obtain information about disability benefits through HUD's Enterprise Income Verification (EIV) system. If documentation is not available through HUD's EIV system, the PHA will request a current (dated within ~~the appropriate benefit year last 60 days~~) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, the PHA will ask the family to obtain a benefit verification letter either by calling SSA at 1-800-772-1213 or by requesting one from [www.ssa.gov](http://www.ssa.gov). Once the family receives the benefit verification letter, they will be required to provide the letter to the PHA.

- 7-III.F. ASSETS AND INCOME FROM ASSETS

### **PHA Policy**

For families with net assets ~~less than or equal to the HUD-published threshold listed in the current year's Inflation-Adjusted Values tables totaling \$50,000 or less~~, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income. ~~The family's declaration must show the total amount of income expected from all assets. The family's declaration must show each asset and the amount of income expected from that asset.~~ All family members 18 years of age and older must sign the family's declaration. The PHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual income. The family will be required to provide third-party verification of net family assets every three years.

When verification is required, in determining the value of checking or savings accounts, the PHA will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, the PHA will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

- This chapter contains a minor change to include victims of human trafficking in complying with VAWA confidentiality requirements.
- This chapter contains a minor change in adding email as an optional form of communication.

## Chapter 8 - LEASING AND INSPECTIONS

- 8-I.E. SECURITY DEPOSITS

### **PHA Policy**

Residents must pay a security deposit to the PHA at the time of admission. The amount of the security deposit will be based on bedroom size. If requested prior to occupancy, a payment arrangement can be made that allows residents to pay 50% of the deposit at lease signing and the remainder in monthly payments until the balance is paid off. The monthly payment amount will be set at a minimum of \$25. If no payment arrangement is requested, the security deposit must be paid in full prior to occupancy.

The PHA will hold the security deposit for the period the family occupies the unit. The PHA will not use the security deposit for rent or other charges while the resident is living in the unit.

Within 30 days of move-out, the PHA will refund to the resident the amount of the security deposit (including interest earned on the security deposit), less any amount needed to pay the cost of unpaid rent, damages listed on the move-out inspection report that exceed normal wear and tear, and other charges due under the lease. If the resident disagrees with the amount charged, the PHA will provide a meeting to discuss the charges.

If the resident transfers to another unit, the PHA will transfer the security deposit to the new unit, including transfers due to RAD. If the security deposit in the new unit is higher, the tenant will be required to pay the difference between the "old" and "new" unit. The tenant will be billed for any maintenance or other charges due for the "old" unit.

- 8-I.F. PAYMENTS UNDER THE LEASE

### **PHA Policy**

If the family fails to pay their rent by the seventh day of the month, and the PHA has not agreed to accept payment at a later date, a 30-day Notice to Vacate will be issued to the resident for failure to pay rent, demanding payment in full or the surrender of the premises. The PHA will not proceed with filing an eviction if the tenant pays the alleged amount of rent owed within the 30-day notification period.

In addition, if the resident fails to make payment by the end of office hours on the seventh day of the month, a late fee of \$50.00 will be charged. Notices of late fees will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, the PHA may not take action for nonpayment of the fee until the conclusion of the grievance process.

When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a returned check fee of ~~\$25~~ \$30 will be charged to the family. The fee will be due and payable 14 days after billing.

## Chapter 9 – REEXAMINATIONS

- This chapter contains a minor change in adding email as an optional form of communication.

#### **Chapter 10 – PETS**

- This chapter contains only typographical corrections.

#### **Chapter 11 - COMMUNITY SERVICE**

- This chapter contains only minor corrections to bring the content current.

#### **Chapter 12 - TRANSFER POLICY**

- This chapter contains only minor corrections to bring the content current.

#### **Chapter 13 - LEASE TERMINATIONS**

- 13-II.J. OVER-INCOME FAMILIES

##### **PHA Policy**

For families whose income exceeds the over-income limit for 24 consecutive months, the PHA will terminate the tenancy of the family six months after the final notification of the family's over-income status in accordance with the continued occupancy policies below.

##### **PHA Policy**

For families whose income exceeds the over-income limit for 24 consecutive months, the PHA will terminate the tenancy of the family six months after the final notification of the family's over-income status.

During the period before termination, the over-income family will continue to be a public housing program participant until their tenancy is terminated. The PHA will continue to charge the family rent in accordance with public housing regulations, will offer the family the choice between income-based and flat rent as required by the regulations, and will prorate rent for mixed families.

When an over income family is facing termination after exceeding the grace period of six months, the family may request an interim reexamination, but a decrease in income and the family's rent will not reset the period before termination or enable the family to avoid termination.

The PHA will give appropriate notice of lease tenancy termination (notice to vacate) in accordance with state and local laws.

Family Size	1	2	3	4	5	6	7	8
Over-Income Limit	\$77,040	\$88,080	\$99,120	\$110,040	\$118,920	\$127,680	\$136,560	\$145,320

- 13-III.B. MANDATORY LEASE PROVISIONS

##### **PHA Policy**

The PHA may terminate the lease for the following violations of tenant obligations under the lease:

Failure to make payments due under the lease, including nonpayment of rent (see Chapter 8 for details pertaining to lease requirements for payments due);

Repeated late payment of charges **due under the lease, with the exception of nonpayment of rent**. Three late payments within a 12-month period shall constitute a repeated late payment.

Failure to fulfill the following household obligations:

Not to assign the lease or to sublease the dwelling unit. Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

Not to provide accommodations for boarders or lodgers

To use the dwelling unit solely as a private dwelling for the tenant and the tenant's household as identified in the lease, and not to use or permit its use for any other purpose

To abide by necessary and reasonable regulations promulgated by the PHA for the benefit and well-being of the housing project and the tenants which shall be posted in the project office and incorporated by reference in the lease

To comply with all obligations imposed upon tenants by applicable provisions of building and housing codes materially affecting health and safety

To keep the dwelling unit and such other areas as may be assigned to the tenant for the tenant's exclusive use in a clean and safe condition

To dispose of all ashes, garbage, rubbish, and other waste from the dwelling unit in a sanitary and safe manner

To use only in a reasonable manner all electrical, plumbing, sanitary, heating, ventilating, air-conditioning and other facilities and appurtenances including elevators

To refrain from, and to cause the household and guests to refrain from destroying, defacing, damaging, or removing any part of the dwelling unit or project

To pay reasonable charges (other than for normal wear and tear) for the repair of damages to the dwelling unit, or to the project (including damages to project buildings, facilities or common areas) caused by the tenant, a member of the household or a guest

To act, and cause household members or guests to act, in a manner which will not disturb other residents' peaceful enjoyment of their accommodations and will be conducive to maintaining the project in a decent, safe and sanitary condition

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors as described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

- 13-III.C. OTHER AUTHORIZED REASONS FOR TERMINATION [24 CFR 966.4(l)(2) and (5)(ii)(B)]

#### **PHA Policy**

The PHA will enforce the asset limitation for all program participants, except:

1. Elderly and/or disabled households (head, co-head or spouse is elderly or disabled)
2. Families whose assets exceed the limit due to real property that is not suitable for occupancy by the family (see chapter 3 for guidance on what is considered not suitable for occupancy)

Families who are out of compliance with the asset limitation at any annual or interim reexamination and do not fall into one of the exception categories listed above will be provided up to but no longer than six months from the effective date of that reexamination to cure their noncompliance.

Within 14 business days of completing the family's reexamination, the PHA will provide a written notice stating the family is out of compliance with the asset limitation. The notice will include the date assistance will be terminated if the family does not cure their noncompliance and provide the opportunity for an ISD in accordance with PHA policies in chapter 14.

- 13-IV.D. LEASE TERMINATION NOTICE

#### **PHA Policy**

The PHA will give written notice of 30 calendar days from the date the tenant receives the notice for nonpayment of rent which will not be provided to tenants until the day after the day rent is due.. For all other lease terminations, the PHA will give 30 days written notice or, if state or local law allows less than 30 days, such shorter notice will be given.

Oregon state law allows 24-hour termination notice for certain circumstances, and the PHA will serve 24-hour lease termination notices per Oregon state law.

### **Chapter 14 - GRIEVANCES AND APPEALS**

- This chapter contains only minor corrections to bring the content current.

### **Chapter 15 – PROGRAM INTEGRITY**

- This chapter contains only typographical corrections.

### **Chapter 16 – PROGRAM ADMINISTRATION**

- Updated references regarding HUD-9886 to HUD-9886-A.

### **Glossary**

Called out various definitions for HOTMA. Definitions effective prior to and upon specific effective dates are explicitly called out.

### **Appendix**

Added a new appendix per recent HUD guidance to explicitly call out HOTMA 102/104 policies that are on hold until implementation.

## 4.2. ATTACHMENT 2 REVISIONS TO HOMES FOR GOOD'S ADMINISTRATIVE PLAN

Color codes: **Chapters**

**added language**

**removed language**

revised 4/15/2025

### Overview of Changes in the FY2026 – Administrative Plan

**Below is a summary of the changes organized by chapter.**

#### **Introduction**

##### **HOTMA 102/104**

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, and reexams (among others) to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD has delayed the compliance date for HOTMA 102/104. Initially, HUD published a delayed compliance date of January 1, 2025, but HUD again delayed the compliance date for HOTMA 102/104 and no new date has been provided.

**In the Admin Plan, we have provided a matrix that will show which HOTMA related policies are effective, and the date they became effective.**

**The policies in the following overview may reflect language that will not become effective until additional guidance is received from HUD.**

#### **Chapter 1 – OVERVIEW**

- This chapter contains only minor corrections to bring the content current.

#### **Chapter 2 – FAIR HOUSING**

- This chapter contains only minor corrections to bring the content current.

#### **Chapter 3 – ELIGIBILITY**

- 3-I.M Live-in Aide - Policy change

##### **PHA Policy**

A family's request for a live-in aide may be made either orally or in writing. The PHA will verify the need for a live-in aide with ~~written verification will be required from~~ a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, unless the disability-related need is apparent or known to the PHA ~~that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member~~. For continued approval, the family may be required to submit a new, written request-subject to PHA verification at each annual reexamination.

In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.



The PHA will not approve a particular person as a live-in aide, and may withdraw such approval if [24 CFR 982.316(b)]:

The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

The person is convicted of criminal activity in violation of the PHA's criminal screening policies; or

The person currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

The PHA will notify the family of its decision in writing within 14 business days of receiving a request for a live-in aide, including all required documentation related to the request.

#### **Chapter 4 – APPLICATIONS**

- This chapter contains minor change in adding email as an optional form of communication upon roll-out of client portals.

#### **Chapter 5 – BRIEFINGS**

- This chapter contains only minor corrections to bring the content current.

#### **Chapter 6 – INCOME**

- 6-I.G Student Financial Assistance

##### **PHA Policy**

If the student does not live with their parents and is the head of household, cohead, or spouse, and is 23 or younger or does not have dependent children, then Title IV HEA assistance will be considered when determining the student's total financial assistance to be included in annual income. The PHA will use Notice PIH 2015-21 as a guide to determine the total amount of the student's tuition plus required fees and charges. The PHA will subtract the total tuition plus required fees and charges from the total student financial assistance. If the result is zero or exceeds the amount of total financial assistance from all sources, then no student financial assistance will be included in annual income. Any amount of student financial assistance that exceeds the total tuition plus required fees and charges will be included in annual income.

##### **Example 1**

Tuition and required fees and charges: \$20,000

Title IV HEA assistance: \$10,000

Other student financial assistance: \$15,000

Total student financial assistance:  $\$10,000 + \$15,000 = \$25,000$

Included income:  $\$25,000$  in financial assistance -  $\$20,000$  tuition and required fees =  $\$5,000$

If a student is head, spouse, or cohead, and is over 23 with dependent children or lives with their parents, the following applies:

- 6-I.H Periodic Payments

**PHA Policy**

The PHA will include in annual income the full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts. Payments in lieu of earnings, such as unemployment and disability compensation, and severance pay are also counted as income if they are received in the form of periodic payments.

- 6-II.C Asset Inclusions and Exclusions

**PHA Policy**

In determining the value of non-necessary, non-financial personal property, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal if there is reason to believe that the family's estimated value is off by \$50 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.

- 6-III.F. Child Care Expense Deduction

**PHA Policy**

Childcare expenses will be considered for the time required for the eligible activity and may include reasonable transportation time. For childcare that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of childcare costs, the PHA will verify the eligible childcare expenses via third party verification. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.

- 6-IV.C. Applying Payment Standards

**PHA Policy**

If a PHA changes its payment standard schedule resulting in a lower payment standard amount, during the term of a HAP contract, the PHA will not reduce the payment standard used to calculate subsidy for families under HAP contract as long as the HAP contract remains in effect.

The PHA will not establish different policies for decreases in the payment standard for designated areas within their jurisdiction.

**PHA Policy**

The PHA will not adopt payment standard increases earlier than the date required by the regulations.

**PHA Policy**

If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard at the family's first regular reexamination following the change in family unit size.

- 6-IV.D. Applying Utility Allowances

**PHA Policy**

The PHA will not base utility allowance payments on flat fees charged by the owner.

**Chapter 7 – VERIFICATION**

- 7-I.C. Streamlined Income Determinations

**PHA Policy**

The PHA chooses not to streamline the annual reexamination process for fixed-income sources. The PHA will obtain third-party verification, where applicable, of all sources of income **annually** in accordance with PHA policies in the chapter and HUD regulations.

- 7-I.F. Level 4 Verification

**PHA Policy**

In general, the PHA will use third-party verification from the source in the following circumstances:

At annual reexamination when **EIV + self-certification is not used** ~~verification is not obtained under Level 6 or Level 5 (see 7 I.E. UP FRONT INCOME VERIFICATION (UIV))~~;

For all new admissions; and

For all interim reexaminations.

**The PHA will not use this method if the PHA is able to use an income determination from a means-tested federal assistance program or if the PHA uses EIV + self-certification as outlined above.**

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by the PHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

The PHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, the PHA will obtain one statement that reflects the current balance of the account.

When pay stubs are used, the PHA will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.

### **PHA Policy**

At annual reexamination, if the PHA is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, the PHA may use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

The PHA will use an average of the last two quarters of income listed in EIV to determine income from employment. The PHA will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with using only the last two quarters of income listed in EIV, because of the seasonal or otherwise fluctuating nature of a particular family member's employment, the PHA will permit the family to sign a self-certification stating that the average of all four quarters of income listed in EIV is accurate and representative of current annual income and use that amount for calculating annual income. If the family disagrees and contends that the amount listed in EIV is not reflective of current income, or if less than two quarters are available in EIV, the PHA will use written third-party verification from the source as outlined below

~~The PHA will use an average of the last two quarters of income listed in EIV to determine income from employment. The PHA will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, the PHA will use written third-party verification from the source as outlined below.~~

The PHA will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

- 7-I.G. Level 3 Verification: Written, Third-Party Form

### **PHA Policy**

~~PHA may substitute Level 2 (Oral third-party verification) for written, third-party verification form, before moving to self-certification.~~ Typically, the PHA will attempt to send written third-party verification forms to the verification source whenever higher forms of verification are unavailable.

However, on a case-by-case basis, the PHA may choose to obtain oral third-party verification without first attempting, and in lieu of, a written-third party verification form.

- 7-II.F. Documentation of Disability

### **PHA Policy**

For family members claiming disability who receive disability benefits from the SSA, the PHA will attempt to obtain information about disability benefits through the HUD Enterprise Income Verification (EIV) system. If documentation from HUD's EIV System is not available, the PHA will request a current (dated within the appropriate benefit year

~~last 60 days~~) SSA benefit verification letter from each family member claiming disability status. If the family is unable to provide the document(s), the PHA will ask the family to request a benefit verification letter by either calling SSA at 1-800-772-1213, or by requesting it from [www.ssa.gov](http://www.ssa.gov). Once the applicant or participant receives the benefit verification letter they will be required to provide it to the PHA.

- 7-III.F. Assets and Income from Assets

#### **PHA Policy**

The PHA will accept self-certification from the family stating that the family does not have any present ownership in any real property. The certification must be signed by all family members 18 years of age and older. ~~Both at admission and reexam, the PHA will accept self-certification from the family that the family does not have any present ownership in any real property. The certification will state that the family does not have any present ownership interest in any real property and must be signed by all family members 18 years of age and older.~~ The PHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question.

If the family declares they have a present ownership in real property, the PHA will obtain third-party verification of the following factors: whether the family has the legal right to reside in the property; whether the family has effective legal authority to sell the property; and whether the property is suitable for occupancy by the family as a residence. However, in cases where a family member is a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the PHA will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

- 7-III.G. Assets Disposed of for Less than Fair Market Value

#### **PHA Policy**

~~The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.~~

~~The PHA will verify the value of assets disposed of only if:~~

~~The PHA does not already have a reasonable estimation of its value from previously collected information, or~~

~~The amount reported by the family in the certification appears obviously in error.~~

### **Chapter 8 – HQS**

- 8-I.B. Additional Local Requirements

#### **PHA Policy**

##### **Smoke Alarms**

There must be a working smoke alarm in each sleeping room and on each level of the unit, including the basement, as well as one smoke alarm within 21 ft located in a hallway adjacent to each area of the unit which contains a bedroom(s). ~~There must be a working smoke alarm located in a hallway adjacent to each area of the unit which contains a bedroom(s), as well as one smoke alarm on each level of the unit, including the basement.~~

- 8-I.C. Life-Threatening Conditions

**PHA Policy**

Deteriorating paint as defined at 24 CFR 35.110 in a unit built before 1978 that is to be occupied by a family with a child under six years of age if it would prevent the family from moving into the unit.

- 8-I.D. Owner and Family Responsibilities

**PHA Policy:** (The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier)

The owner is responsible for all housing quality violations not listed as a family responsibility above, even if the violation is caused by the family's living habits (e.g., vermin infestation). However, if the family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family.

The owner will be required to repair an inoperable smoke detector unless the PHA determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector within 24 hours.

If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the housing quality standards in accordance with HUD requirements. See 8-II.G.

**PHA Policy:** (The following is applicable to HAP contracts executed or renewed June 6, 2024, or later)

The PHA may waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease.

**PHA Policy**

Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

- 8-II.B. Initial HSQ Inspection

**PHA Policy**

The PHA will not use the NLT option. All units must pass the initial inspection on or before the effective date of the HAP contract.

**PHA Policy**

The unit must pass the initial inspection on or before the effective date of the HAP contract.

The PHA will not rely on alternative inspections and will conduct an initial inspection for each unit prior to executing a HAP contract with the owner.

- 8-II.F. Inspection Results and Reinspections for Units Under HAP Contract

**PHA Policy**

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing quality standards failures, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

The PHA may withhold assistance payments upon notification of the deficiencies to the owner.

When life-threatening conditions are identified, the PHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are not life-threatening are identified, the PHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction.

If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated in accordance with PHA policy (see 8-II.G.).

Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).

- 8-II.G. Enforcing Owner Compliance

**PHA Policy**

The PHA may withhold assistance payments upon notification to the owner of the deficiencies.

**PHA Policy**

The PHA will make all HAP abatements effective the day after the PHA specified correction period (including any extension).

The PHA will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

**PHA Policy**

The maximum length of time that HAP may be abated is 90 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the PHA is 30 days. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

## **Chapter 9 – LEASING**

- This chapter contains only a minor citation update.

## **Chapter 10 – MOVING**

- 10-I.B. Family Moves Due to Unit Deficiencies

### **PHA Policy**

Upon receipt of a family's written notification that it wishes to move, the PHA will issue a voucher within 14 business days of the PHA's written approval to move. No briefing is required for these families. The PHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration.

### **PHA Policy**

The PHA will issue a family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 120 calendar days.

To continue under the tenant-based HCV program, the family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension. The PHA will follow the policies set forth in Chapter 5 on voucher extension and expiration.

### **PHA Policy**

The PHA does operate a public housing program and will provide a preference for HCV families whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.

Thirty days prior to the expiration date of the voucher, the PHA will provide written notice to the family stating that the PHA does provide such a preference and providing an estimation of availability for the appropriate-sized public housing unit.

### **PHA Policy**

The PHA will assist families with disabilities with locating available accessible units in accordance with program requirements.

The PHA may use up to two months of withheld and abated payment to assist with any required security deposit at the new unit. Funds will not be used for any other relocation assistance.



If the family receives a refund of a security deposit for the new unit, the PHA will not require any amount to be remitted to the PHA.

- 10-I.D. Moving Process

**PHA Policy**

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will issue a new voucher within 14 business days of the PHA's written approval (completion of the transfer packet) to move. No briefing is required for these families. The PHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration. If a family does not locate a new unit within the term of the voucher and any extensions, the family may remain in its current unit with continued voucher assistance if the owner agrees and the PHA approves. Otherwise, the family will lose its assistance.

For families moving into or families approved to move out of the PHA's jurisdiction under portability, the PHA will follow the policies set forth in Part II of this chapter.

For families moving due an owner failing to make required repairs timely, resulting in the PHA terminating the HAP contract, the PHA will follow the policies set forth earlier in this section and in Chapter 8, Part II.

**PHA Policy**

For participating families approved to move under portability, the PHA will issue a new voucher within 14 business days of the PHA's written approval to move.

The initial voucher term will be 60 calendar days.

However, if the move is due to the HAP contract being terminated due to an owner failing to make required repairs within the required time frame, the PHA will issue the family a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 120 calendar days.

## **Chapter 11 – REEXAMINATIONS**

- 11-II.B. Changes in Family and Household Composition

**PHA Policy**

If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard at the family's first regular reexamination following the change in family unit size.

## **Chapter 12 – TERMINATIONS**

- 12-I.E. MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS

**PHA Policy**

The PHA will enforce the asset limitation for all program participants, except:

1. Elderly and/or disabled households (head, co-head or spouse is elderly or disabled)

2. Families whose assets exceed the limit due to real property that is not suitable for occupancy by the family (see chapter 3 for guidance on what is considered not suitable for occupancy)

Families who are out of compliance with the asset limitation at any annual or interim reexamination and do not fall into one of the exception categories listed above will be provided up to but no longer than six months from the effective date of that reexamination to cure their noncompliance.

Within 14 business days of completing the family's reexamination, the PHA will provide a written notice stating the family is out of compliance with the asset limitation. The notice will include the date assistance will be terminated if the family does not cure their noncompliance and provides the opportunity for an informal hearing in accordance with PHA policy in this chapter.

- 12-I.D. Mandatory Termination of Assistance

**PHA Policy**

The PHA will also terminate assistance if the family revokes consent for the PHA to collect information from financial institutions.

**Chapter 13 – OWNERS**

- This chapter contains only minor corrections to bring the content current.

**Chapter 14 – PROGRAM INTEGRITY**

- This chapter contains only minor corrections to bring the content current.

**Chapter 15 – SPECIAL HOUSING**

- 15-VI.B. Special Requirements for Manufactured Home Owners who Lease a Space

**PHA Policy**

If the housing assistance payment exceeds the portion of the monthly rent due to the owner, the PHA will pay the balance to the family.

**PHA Policy**

The PHA will not exercise the option to pay a single HAP and will pay HAP directly to the owner.

**Chapter 16 – PROGRAM ADMINISTRATION**

- 16-II.B. Payment Standards

**PHA Policy**

The PHA is not a mandatory SAFMR PHA.

The PHA will not voluntarily adopt the use of SAFMRs except to establish exception payment standards in certain ZIP code areas.

**PHA Policy**

The PHA has not established any designated payment standard areas.

- 16-II.C. Utility Allowances

**PHA Policy**

The PHA will not maintain an energy efficient utility allowance schedule.

- 16-III.C. Informal Hearings for Participants

**PHA Policy**

The PHA will also give participant families an opportunity for an informal hearing for:

Any denial of a request for a reasonable accommodation for a person with disabilities (see Chapter 2).

Families participating in the Family Self-Sufficiency (FSS) program, when the PHA withholds the coordination of supportive services or terminates a family's participation in the FSS program because the PHA determines the FSS family has failed to comply without good cause with the requirements of the FSS Contract of Participation in accordance with the FSS Action Plan [24 CFR 984.303(i)].

- 16-IV.B. Repayment Policy

**PHA Policy**

The PHA will consult with the HUD Field Office and regional OIG Special Agent in Charge (SAC) to determine whether it will refer the matter to the state or local district attorney to pursue criminal fraud charges.

**PHA Policy**

The PHA generally will not enter into a repayment agreement with a family if there is already a repayment agreement in place with the family or if the PHA, in consultation with HUD and local law enforcement, determine to pursue criminal charges in connection with the conduct and the amounts owed. ~~The amount owed by the family exceeds the federal or state threshold for criminal prosecution.~~

## **Chapter 17 – PROJECT BASED VOUCHER (PBV)**

- 17-I.B. PBV Definitions

**PHA Policy**

The PHA will not define circumstances that limit the definition of the term project.

- 17-I.C. Maximum Number of PBV Units

**PHA Policy**

The PHA may project-base up to an additional 10 percent of its authorized units, up to 30 percent, in accordance with HUD regulations and requirements.

- 17-I.C. Maximum Number of PBV Units

**PHA Policy**

The PHA may project-base units not subject to the 20 percent cap in accordance with HUD regulations and requirements.

- 17-II.H. Site Selection Standards

**PHA Policy**

It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.

However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:

A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, Choice Neighborhood, or Renewal Community;

A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;

A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;

A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;

A census tract where there has been an overall decline in the poverty rate within the past five years; or

A census tract where there are meaningful opportunities for educational and economic advancement.

The PHA will also consider whether the site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d(4)) and HUD's implementing regulations at 24 CFR Part 1; Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601-3629) and HUD's implementing regulations at 24 CFR Parts 100 through 199; Executive Order 11063 (27 FR 11527; 3 CFR, 1959-1963 Comp., p. 652), and HUD's implementing regulations at 24 CFR Part 107.

The site must also be suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of the Americans with Disabilities Act (42 U.S.C. 12131-12134) and implementing regulations (28 CFR Part 35), and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and HUD's implementing regulations at 24 CFR Part 8, including meeting the Section 504 site selection requirements described in 24 CFR 8.4(b)(5).

The PHA will also consider whether the site and neighborhood are reasonably free from disturbing noises and reverberations and other dangers to the health, safety, and general welfare of the occupants. The site and neighborhood may not be subject to serious adverse environmental conditions, natural or manmade, that could affect the health or safety of the project occupants, such as dangerous walks or steps; contamination; instability; flooding, poor drainage, septic tank back-ups or sewage hazards; mudslides; abnormal air pollution, smoke or dust; excessive noise, vibration or vehicular traffic; excessive accumulations of trash; vermin or rodent infestation; or fire hazards.

- 17-III.B. Housing Quality Standards

**PHA Policy**

The PHA will identify the need for any special features on a case-by-case basis depending on the intended occupancy of the PBV project. The PHA will specify any special design standards or additional requirements in the invitation for PBV proposals (if applicable), the AHAP, and the HAP contract.

- 17-III.D. Inspecting Units

**PHA Policy**

During an interim inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional deficiencies that are observed and will require the responsible party to make the necessary repairs. If the periodic inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full inspection.

- 17-IV.B. Agreement to enter into HAP Contract (AHAP)

**PHA Policy**

The PHA will not exercise its discretion to not use an AHAP or to execute an AHAP after construction or rehabilitation.

- 17-V.C. Termination of the HAP Contract

**PHA Policy**

The PHA will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease.

**PHA Policy**

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing quality standards failures, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

The PHA may withhold assistance payments upon notification to the owner of the deficiencies.

When life-threatening conditions are identified, the PHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are not life-threatening are identified, the PHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction.

If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated.

Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).

#### **PHA Policy**

The PHA may withhold assistance payments upon notification to the owner of the deficiencies.

#### **PHA Policy**

The PHA will make all HAP abatements effective the day after the PHA specified correction period (including any extension).

The PHA will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

#### **PHA Policy**

The PHA will issue a family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 120 calendar days. No briefing is required for these families.

In order to receive tenant-based assistance under the HCV program, the family must submit a Request for Tenancy Approval and proposed lease within the 120-day period, unless the PHA grants an extension. The PHA will follow the policies set forth in Chapter 5 on voucher extension and expiration.

#### **PHA Policy**

The PHA does operate a public housing program and will provide a preference for PBV families whose units are being removed from the HAP contract or whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.

Thirty days prior to the expiration date of the voucher, the PHA will provide written notice to the family stating that the PHA does provide such a preference and providing an estimation of availability for the appropriately-size public housing unit.

**PHA Policy**

The PHA will assist families with disabilities with locating available accessible units in accordance with program requirements.

The PHA will use up to two months of withheld and abated payment to assist with any required security deposit at the new unit. Funds will not be used for any other relocation assistance.

If the family receives a refund of a security deposit for the new unit, the PHA will not require any amount to be remitted to the PHA.

- 17-VI.D. Owner-Maintained Waiting Lists

**PHA Policy**

The PHA will not establish owner-maintained waiting lists

**PHA Policy**

The PHA will not allow the owner to make preliminary eligibility determinations for purposes of placing the family on the waiting list.

- 17-VI.F. Offer of PBV Assistance or Owner's Rejection

**PHA Policy**

The PHA will define good cause for rejection of a unit offer as any of the factors listed above.

- 17-VIII.C. Redetermination of Rent to Owner

**PHA Policy**

The PHA will not allow for rent increases via OCAF. All rent increases must be requested by the owner as outlined below.

- 17-VIII.D. Reasonable Rent

**PHA Policy**

The PHA will elect not to establish a rent floor in the HAP contract.

- 17-IX.B. Vacancy Payments

**PHA Policy**

If the PHA determines that the owner is responsible for a vacancy and as a result is not entitled to keep the housing assistance payment, the PHA will notify the landlord of the amount of housing assistance payment that the owner must repay. The PHA will require the owner to repay the amount owed. Payment to owner will end on the date indicated on the rental agreement termination notice received by the PHA. Any payment released beyond the aforementioned date must be returned to the PHA by the owner in accordance with the policies in Section 16-IV.B.

#### **PHA Policy**

If an owner the HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified the PHA of the vacancy in accordance with the policy in Section 18-V.G. regarding filling vacancies.

In order for a vacancy payment request to be considered, it must be made in writing (including via email) within 10 business days of the end of the period for which the owner is requesting the vacancy payment. The request must include the required owner certifications and the PHA may require the owner to provide documentation to support the request. If the owner does not provide the information requested by the PHA within 10 business days of the PHA's request, no vacancy payments will be made.

If vacancy payments are made, the PHA will make vacancy payments for the period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will not exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit). Any vacancy payment will cover only the period the unit remains vacant.

### **Chapter 18 – RAD PBV**

- 18-III.D. Inspecting Units

#### **PHA Policy**

During an interim inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional deficiencies that are observed and will require the responsible party to make the necessary repairs.

If the periodic inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full inspection.

- 18-IV.B. HAP Contract Requirements

#### **PHA Policy**

The PHA will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease.



**PHA Policy**

Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

**PHA Policy**

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing quality standards failures, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

The PHA may withhold assistance payments upon notification to the owner of the deficiencies.

When life-threatening conditions are identified, the PHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are not life-threatening are identified, the PHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction.

If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated.

Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).

**PHA Policy**

The PHA may withhold assistance payments upon notification to the owner of the deficiencies.

**PHA Policy**

The PHA will make all HAP abatements effective the day after the PHA specified correction period (including any extension).

The PHA will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

**PHA Policy**

The PHA will issue a family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame a voucher no later than

30 days prior to the termination of the HAP contract. The initial term of the voucher will be 120 calendar days.

In order to receive tenant-based assistance under the HCV program, the family must submit a Request for Tenancy Approval and proposed lease within the 120-day period, unless the PHA grants an extension. The PHA will follow the policies set forth in Chapter 5 on voucher extension and expiration.

#### **PHA Policy**

The PHA does operate a public housing program and will provide a preference for PBV families whose units is being removed from the HAP contract or whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.

Thirty days prior to the expiration date of the voucher, the PHA will provide written notice to the family stating that the PHA does provide such a preference and providing an estimation of availability for the appropriately sized public housing unit.

#### **PHA Policy**

The PHA will assist families with disabilities with locating available accessible units in accordance with program requirements.

The PHA may use up to two months of withheld and abated payment to assist with any required security deposit at the new unit. Funds will not be used for any other relocation assistance.

If the family receives a refund of a security deposit for the new unit, the PHA will not require any amount to be remitted to the PHA.

- 18-V.G. Leasing of Contract Units

#### **PHA Policy**

The owner must notify the PHA in writing (mail, fax, or email) within five business days of learning about any vacancy or expected vacancy.

The PHA will make every reasonable effort to refer families determined eligible to the owner for a suitability determination within 30 calendar days of receiving such notice from the owner. If the owner rejects the family after conducting a suitability screening, the owner must provide a copy of the rejection notice to the PHA. The owner may not offer a unit to a family until the PHA determines that the family is eligible for the program and has given the owner written confirmation.

~~The PHA will make every reasonable effort to refer families to the owner within 10 business days of receiving such notice from the owner.~~

- 18-V.G. Leasing of Contract Units

#### **PHA Policy**

The PHA will notify the family and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 14 business days of the PHA's determination. The PHA will offer the family the following types of continued assistance in the following order, based on the availability of assistance:

PBV assistance in **an appropriately sized unit in** the same building or project

PBV assistance in **an appropriately sized unit in** another project

Tenant-based voucher assistance

~~Families who need to move will declare at least three eligible options to which they are willing to move (specific PBV properties or a combination of PBV properties and tenant-based voucher assistance). For waitlists in which declaration is declared the family will be assigned the appropriate weighted point which will designate appropriate ranking on the waitlists.~~

~~When the family reaches the top of the waitlist for which willingness to move has been declared the PHA will offer the family the opportunity to receive continued housing assistance. The PHA will issue the housing option for which top of the list status is gained first.~~

~~If issued housing assistance is accepted, once processed the family will be removed from any other waitlists, they were on in which they were assigned weighted preference for continued housing assistance in another unit.~~

### **PHA Policy**

When the PHA offers a family another form of assistance that is not a tenant-based voucher, the family will be given 30 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 30-day time frame, the PHA will terminate the housing assistance payments at the expiration of this 30-day period.

~~The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, other medical emergency of a family member, or if the family's household composition is not in violation of HQS standards.~~ Except in the case of an offer by the PHA of PBV assistance or other project-based housing assistance in an appropriate size unit, the family accepts the offer but does not move out, the PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member, or to accommodate the family's efforts to locate affordable, safe, and geographically proximate replacement housing. The family must make such a request in writing prior to the end of the 30-day period. The PHA will only grant one extension, which will not exceed an additional 90 days.

- 18-VIII.B. Vacancy Payments

### **PHA Policy**

If the PHA determines that the owner is responsible for a vacancy and as a result is not entitled to keep the housing assistance payment, the PHA will notify the landlord of the amount of housing assistance payment that the owner must repay. The PHA will require the owner to repay the amount owed. Payment to owner will end on the date indicated on the rental agreement termination notice received by the PHA. Any payment released beyond the aforementioned date must be returned to the PHA by the owner in accordance with the policies in Section 16-IV.B.

#### **PHA Policy**

If an owner the HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified the PHA of the vacancy in accordance with the policy in Section 18-V.G. regarding filling vacancies.

In order for a vacancy payment request to be considered, it must be made in writing (including via email) within 10 business days of the end of the period for which the owner is requesting the vacancy payment. The request must include the required owner certifications and the PHA may require the owner to provide documentation to support the request. If the owner does not provide the information requested by the PHA within 10 business days of the PHA's request, no vacancy payments will be made.

If vacancy payments are made, the PHA will make vacancy payments for the period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will not exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit). Any vacancy payment will cover only the period the unit remains vacant.

### **Chapter 19 – SPECIAL PURPOSE VOUCHERS**

- 19-III.C. HCV Program Eligibility

#### **PHA Policy**

The PHA will not establish a minimum rent.

- 19-III.H. Project-Basing VASH Vouchers

#### **PHA Policy**

If the family fails to participate in case management when required by the VA, the PHA may terminate the family's assistance. The family will have 120 days to vacate the unit. The PHA may terminate assistance to the family at the earlier of (1) the time the family vacates or (2) the expiration of the 120-day period. If the family fails to vacate the unit within the established time, the owner may evict the family. If the owner does not evict the family, the PHA will remove the unit from the HAP contract or amend the HAP contract to substitute a different unit in the project if the project is partially assisted. The PHA may add the removed unit back onto the HAP contract after the ineligible family vacates the property.

- 19-IV.D. Waiting List Administration

### **PHA Policy**

The PHA will not establish a separate waiting list for the Mainstream program.

- 19-IV.F. Voucher Issuance

### **PHA Policy**

The initial voucher term for all Mainstream vouchers, including those issued when a family wishes to exercise portability, will be 120 days.

### **PHA Policy**

At least 30 days prior to the expiration of the initial term of the voucher, the PHA will contact the family to remind them of the expiration date of their voucher, the process for requesting an extension, and to inquire if the family needs assistance with their housing search. Depending on the family's preferred method of communication, the PHA may contact the family via telephone, text message, email, or other accessible communication method. The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities.

Families may request an extension, either orally or in writing, at any time prior to the expiration of the family's voucher. All requests for extensions will automatically be granted without the requirement for the family to provide documentation. The initial extension period will be for 90 days. If the family requires additional extensions beyond 90 days, the family may request additional extensions, either orally or in writing, at any time prior to the expiration of the extended voucher term. All subsequent extensions will also be for a period of 90 days and will not require the family to meet certain circumstances or provide documentation. Each time the family requests an extension, the PHA will inquire if the family needs assistance with their housing search and will provide a current listing of available accessible units known to the PHA.

## **Chapter TPS – EMERGENCY HOUSING VOUCHERS (EHVS)**

- TPS-I.B. Service Fees

### **PHA Policy**

The eligible uses for service fees include:

Housing search assistance, which may include activities such as, but not limited to, helping a family identify and visit potentially available units during their housing search, helping to find a unit that meets the household's disability-related needs, providing transportation and directions, assisting with the completion of rental applications and PHA forms, and helping to expedite the EHV leasing process for the family.

Application fees/non-refundable administrative or processing fees/refundable application deposit assistance. The PHA may choose to assist the family with some or all these expenses.

Holding fees are fees an owner requests that are rolled into the security deposit after an application is accepted but before a lease is signed. The PHA may cover part or all of the

holding fee for units where the fee is required by the owner after a tenant's application has been accepted but before the lease signing. The PHA and owner must agree how the holding fee gets rolled into the deposit, and under what conditions the fee will be returned. In general, owners need to accept responsibility for making needed repairs to a unit required by the initial housing quality standards (HQS) inspections and can only keep the holding fee if the client is at fault for not entering into a lease.

Security deposit assistance. The amount of the security deposit assistance may not exceed two months' rent to owner. The PHA may pay the security deposit assistance directly to the owner or may pay the assistance to the family. If paid to the family, the PHA will require documentation that the family paid the security deposit.

Utility deposit assistance/utility arrears. The PHA may provide utility deposit assistance for some or all of the family's utility deposit expenses. Assistance can be provided for deposits (including connection fees) required for the utilities to be supplied by the tenant under the lease. The PHA may pay the utility deposit assistance directly to the utility company or may pay the assistance to the family. If paid to the family, the PHA will require documentation the family paid the utility deposit. The PHA will not require the utility supplier or family to return the utility deposit assistance to the PHA at such time the deposit is returned by the utility supplier (less any amounts retained by the utility supplier). In addition, some families may have large balances with gas, electric, water, sewer, or trash companies that will make it difficult if not impossible to establish services for tenant-supplied utilities. The PHA may also provide the family with assistance to help address these utility arrears to facilitate leasing.

Owner recruitment and outreach for EHV. The PHA may use the service fee funding to conduct owner recruitment and outreach specifically for EHV. In addition to traditional owner recruitment and outreach, activities may include conducting pre-inspections or otherwise expediting the inspection process, providing enhanced customer service, and offering owner incentive and/or retention payments.

Owner incentive and/or retention payments. The PHA may make incentive or retention payments to owners that agree to initially lease their unit to an EHV family and/or renew the lease of an EHV family.

Payments will be made as a single payment at the beginning of the assisted lease term (or lease renewal if a retention payment). Owner incentive and retentions payments are not housing assistance payments, are not part of the rent to owner, and are not taken into consideration when determining whether the rent for the unit is reasonable.

Moving expenses (including move-in fees and deposits). The PHA may provide assistance for some or all of the family's reasonable moving expenses when they initially lease a unit with the EHV. The PHA will not provide moving expenses assistance for subsequent moves.

Tenant-readiness services. The PHA may use fees to help create a customized plan to address or mitigate barriers that individual families may face in renting a unit with an EHV, such as negative credit, lack of credit, negative rental or utility history, or to

connect the family to other community resources (including COVID-related resources) that can assist with rental arrears.

Essential household items. The PHA may use services fee funding to assist the family with some or all of the costs of acquiring essential household items such as tableware, cooking equipment, beds or bedding, and essential sanitary products such as soap and toiletries.

Use of Service Fees will be assessed on a case by case basis upon request by the family.

In total, fees will not exceed more than \$2000.00 per family during the voucher term and/or any voucher term extensions.

Service Fees must be accessed within 30 days of the start date of the Housing Assistance Payment Contract.

- TPS-IV.C. PHA Screening

**PHA Policy**

While the PHA will deny admission to the program if any adult member (or head of household or spouse, regardless of age) fails to sign and submit consent forms, the PHA will first notify the family of the limited EHV grounds for denial of admission as part of the notice of denial that will be mailed to the family.

#### 4.3. 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 Draft Consolidated plan 2025.

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

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

Unless otherwise noted, all information below is from the Draft 2025 Eugene-Springfield Consolidated Plan. Of the 71,735 households in Eugene, 47% have low- and moderate income (less than 80% of the area median income). In Springfield, 50% of the 25,215 households are considered low- and moderate income. HUD provided numbers in the Consolidated plan indicated that 16.7% of total households were identified as extremely low income (less than 30% AMI) and 14.4% 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 Eugene-Springfield Consolidated Plan notes that housing costs in the Eugene-Springfield area have risen sharply over the past 25 years while incomes have risen slowly, forcing many households to pay more for housing than is affordable. Households paying more than 30% of household income are considered to have a 'housing cost burden'. Most of the renters in Eugene (54%) and Springfield (51%) are considered housing cost burdened, while approximately a third of homeowners are also cost burdened (Eugene – 32%, Springfield – 33%). The elderly makes up 15% of the very low income with a housing cost burden.

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

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

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

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

##### **Elderly families and families with disabilities**



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

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

### **Households of various races and ethnic groups residing in the jurisdiction**

In most income categories, there are racial or ethnic groups which are experiencing a disproportionately greater need than the needs of the income category as a whole. For people with very low incomes (30-50% MFI), American Indian/Alaskan Native and Black/African Americans experience a disproportionately greater need than the general population. For people with low incomes (50-80% MFI), Black/African Americans experience a disproportionate level of need. For people with moderate income (80%-100 MFI), Asian, Latino, and Black/African American experience a disproportionately greater need than the income category as a whole. In Eugene and Springfield, there are approximately 13% of the people who identified as a minority race in the 2010 census. There are five census tracts where a higher percentage (17%- 23%) of people identified as a minority race.

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

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

### **Affordability and supply**

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

Our strategies to increase the availability of affordable, accessible housing include aggressively pursuing additions to the housing supply through the use of government subsidies and incentives as well as public/private partnerships. Homes for Good has set aside units in numerous recent developments for incomes at or below 30% AMI and continues to work with Lane County to serve extremely low-income individuals and families from the centralized waitlist.

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

- New Construction
- Preservation
- Development Pipeline

## New Construction

3 New Construction Projects are projected to be completed in 2025, totaling 168 units.

Project	Description
Lazy Days	Homes for Good purchased a mobile home park up the McKenzie River that was destroyed in the Holiday Farm fire. The park will provide 30 units of housing including for homeownership. It began construction in June 2023. Phase 1 of construction with 20 modular homes was completed in March of 2025, and Phase 2 with 10 additional Park Model units will be completed in June 2025.
Ollie Court (under construction)	Homes for Good is partnering with Head Start of Lane County and Early Childhood CARES to develop an innovative model for housing that will include 81 units of new Affordable Housing with an Early Learning Center to address the need for affordable housing and affordable childcare in our community. The residential units are a mix of one, two, and three-bedroom units. Construction is anticipated to be completed in December 2025.
Bridges on Broadway (under construction)	Homes for Good is converting a former 50-room Red Lion Hotel into a 57-unit Permanent Supportive Housing (PSH) apartment community serving people experiencing chronic homelessness. Construction is scheduled to be completed at the end of July 2025.

## Preservation

There is 1 Preservation Project actively under construction consisting of 50 units.

Project	Description
Bridges on Broadway (under construction)	Lane County acquired a 50-unit hotel that it is using to house people displaced by wildfires. This 57-unit Permanent Supportive

Project	Description
	Housing development in Eugene will serve homeless individuals and includes 56 PBVs. It began construction in August 2024 and will be complete in August of 2025.
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

Project	Description
The Coleman	Homes for Good is partnering with Lane County and Sponsors Inc. to develop 52 units of affordable housing on property owned by Lane County on Highway 99 in Eugene. Homes for Good has submitted a funding application to the State of Oregon and is currently on the waiting list.
The Field on Quince	Homes for Good acquired a 6.88-acre parcel that will be used for the future development of 86 affordable units. The project will have two phases. We have submitted for LIFT Homeownership funding. This will be our first affordable homeownership application.
Rural Lane County	Homes for Good is working with Lane County and the cities of Cottage Grove and Florence to acquire land for rural affordable housing projects.
Glenwood	Homes for Good acquired property in the Glenwood area of Springfield that will be used for a future development of up to 150 units.
Permanent Supportive Housing	Homes for Good is working with Lane County and has identified several sites in the Metro area that will be used for future PSH projects.

### Impediments to Fair Housing

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

Three major impediments to providing equal housing to populations were identified in development of the annual plan as follows:

1. Limited awareness of Fair Housing policies in the broader community
2. Cultural differences and language barriers which inhibit access to Fair Housing
3. People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes.

To address these various impediments, we created an Access and Opportunity Planning Team which has guided the implementation of the Access and Opportunity Plan. This team helped guide the approval of an agency wide Access + Opportunity Plan that guides all facets of work at the agency. The AOP has four pillars which are designed to address these impediments in various ways and each pillar includes goals and tactics to implement the work. These are listed goals and tactics are included below as they apply.

**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.
- Deepen the partnership with the Fair Housing Council of Oregon beyond all staff training to determine when and how Homes for Good should address instances of racial and income discrimination. Joining various relevant boards, including the Rental Owners Association (ROA), Housing Policy Board, and Lane County Poverty and Homeless Board.
- 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 and has over 1,200 members.
- Provide two trainings per year for our non-profit local preference partner network and provide these partners an opportunity to give feedback on how the system could improve.
- Provide at least one presentation to local and state jurisdictions and one presentation to the business community that focuses on the Rent Assistance Division's local preferences and other housing referral partnerships like Permanent Supportive Housing and Project-Based Vouchers.
- Homes for Good supported the Juneteenth Celebration last summer and plans to continue supporting that event in the future.

**Impediment: Cultural differences and language barriers which inhibit access to fair housing.**

Strategies to address this impediment include:

- Conducted waitlist connect event at Plaza de Nuestra Comunidad and NAACP
- As part of an agency centralized list, identify culturally specific organizations, and organizations serving the historically marginalized members in the community that we currently work with, and want to partner with in the future. In the centralized agency list, we will identify organizational interest for the partnership, including who key leaders are, main points of contact, the organization's capacity, benefits for both organizations, and a description of the current partnership.
- Create and implement a plan for a mix of pre-created and organic content for social media channels, including the capacity to find and share content from the historically marginalized community, culturally specific organizations, and people with disabilities.
- Monitor and evaluate content shared to ensure no group is disproportionately represented to not present the appearance that one group of people disproportionately utilizes our services.
- Create opportunities for clients to share their experiences, balancing the needs of client privacy and the personal nature of housing.
- Determine whether to implement Local Preference partnership(s) with community organizations that are culturally specific or who have programmatic specialization in supporting people from historically marginalized communities and people with disabilities.
- Conduct targeted recruitments for bilingual employees. At the present time there are 18 English-Spanish bilingual employees. Homes for Good also has 1 staff member fluent in Polish.
- Homes for Good has implemented a Language Access Plan, which provides access to interpretation and translation services as needed for participants.

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

Strategies to address this impediment include:

- Accessibility survey of all Homes for Good owned units has been conducted. The results of this will be used to accurately advertise what accessibility features are available in units and guide future capital improvements to improve accessibility.
- For new construction apartment communities, work with architects to hold focus group with people with disabilities and review design for common areas and Accessible units.

- Working closely with residents to ensure reasonable accommodations are approved when appropriate.
- Homes for Good, in partnership with Lane County, is working to expand the Housing First movement for people with disabilities or other barriers to housing.
- In addition to these specific strategies Homes for Good has made a strong commitment to promoting Fair Housing rights and Fair Housing choice by providing information regarding Fair Housing and Fair Housing choice to applicants, residents and staff. The following is a list of actions that Homes for Good has taken:
  - The Fair Housing logo “Equal Housing Opportunity” is prominently displayed on location signs at Homes for Good 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 its administrative office and in public areas at its various housing communities
  - The Agency’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed on the website: [www.HomesforGood.org](http://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 communities
  - HUD Form 1686-FHEO (\*Fair Housing – It’s Your Right\* Pamphlet) is available in English and Spanish in Homes for Good 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 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](http://www.HomesforGood.org)
- Applicants for, and recipients of, housing assistance from Homes for Good are advised of their right to request reasonable accommodation for their disability. Information regarding reasonable accommodations is provided on the pre-application for assistance, in initial determination of ineligibility, in the public housing and assisted housing lease agreements, in notices of eviction, in periodic resident newsletters, and discussed during the intake process during any informal settlement discussions and during other discussions with applicants and residents when inquiries are made about accommodating disabilities.
- Under the terms of a voluntary compliance agreement between the U.S. 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, people 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 is ongoing and representatives from a number of those social service and advocacy agencies serve on Homes for Good's family self-sufficiency advisory board.
- 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

### Financial Resources - Homes for Good

	Prior	FY 2024	FY 2025
Federal Grants			
Move to Work Housing Choice Voucher	\$ 28,154,822	\$ 27,265,339	\$ 29,781,124
Emergency Housing Voucher	2,597,989	1,535,520	2,455,790
Move to Work Public and Indian Housing	2,352,049	3,869,795	-
Public Housing	2,349,423	-	-
Housing Choice Voucher	1,970,995	-	-
Mainstream Vouchers	1,449,389	1,346,268	1,604,096
Move to Work Capital Fund	1,380,294	1,055,652	-
Weatherization Assistance for Low Income	1,307,130	-	2,611,236
Shelter + Care	856,345	829,788	879,790
Public Housing CARES	605,671	-	-
American Rescue Plan Act	588,285	-	-
Low Income Home Energy Assistance	543,984	-	-
Long Term Rent Assistance	-	-	390,732
Continuum of Care	363,279	-	-
VA Homeless Providers	-	-	152,868
Interest Reduction	318,772	307,788	-
Component - Blended	270,948	226,464	-
Section 8 New Construction & Substantial Reno.	263,417	360,516	-
Family Self Sufficiency	228,731	239,520	239,322
Resident Opportunity and Support Services	83,547	78,648	78,648
Family Unification	-	28,721	-
Total Federal Grants	\$ 45,685,070	\$ 37,144,019	\$ 38,193,606
Non-Federal Sources			
Dwelling Rent	\$ 7,212,823	\$ 9,433,340	\$ 6,264,247
Other Operating Income	6,525,863	5,641,178	7,728,599
Total Non-Federal Sources	\$ 13,738,686	\$ 15,074,518	\$ 13,992,846
Total Resources	\$ 59,423,756	\$ 52,218,537	\$ 52,186,452



## **Significant Amendment or Modification**

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

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

#### **Definition of Substantial Deviation from the 5 Year Plan:**

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

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

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

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

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

#### 4.4. ATTACHMENT B.2 NEW ACTIVITIES

##### **Project Based Vouchers**

Homes for Good's PHA plan goal #1 is to increase the number of affordable housing units in the County. One of the ways that the agency continues to do this is through the use of Project-Based Vouchers. The following Project Based Voucher developments are currently under construction. Both are located in Eugene and are planned to be placed in service in 2025:

Project	Description
Ollie Court (under construction)	Homes for Good was awarded a City of Eugene landbank site on 13 <sup>th</sup> Avenue in Eugene that will be used for the development of 80 affordable units and includes 80 PBVs. An Early Learning Center is being developed onsite on the ground floor. It began construction in August 2024 and will be complete in December of 2025.
Bridges on Broadway (under construction)	Lane County acquired a 50-unit hotel that it is using to house people displaced by wildfires. This 57-unit Permanent Supportive Housing development in downtown Eugene will serve homeless individuals and includes 56 PBVs. It began construction in August 2024 and will be complete in August of 2025.

#### 4.5. ATTACHMENT B.3 PROGRESS REPORT

Homes for Good has updated the annual and 5-year planning goals so that they align with those identified in our Access + Opportunity Plan.

### Goal 1: Increase the number of affordable housing units

Indicator	FY24 Progress	FY25 Progress
Create 300 new affordable housing units.	Completed projects include The Nel (45 units), The Keystone (15 units), Sarang (49 units), Hayden Bridge Landing (70 units), The Commons on MLK (51 units), Legion Cottages (4 units), Market District Commons (50 units), the Oaks at 14 <sup>th</sup> (54 units), and Bascom Village II (48 units). In addition, there are 405 - 455 additional units in pre-construction and construction. These include Ollie Court (formerly the Naval Reserve Site), the Field on Quince, Lazy Days, the Coleman, Bridges on Broadway, and Glenwood Place.	Construction is nearing completion of Lazy Days phase 1 (20 units) are complete, phase 2 (10 units are scheduled to be complete by Spring). Construction is in progress at Bridges on Broadway with completion scheduled for Summer 2025 (56 units), and Ollie Court with completion scheduled for Winter 2025 (81 units). In addition, there are approximately 400-450 additional units in pre-construction. These include the Field on Quince, The Coleman, Glenwood Place, Parcel 2 and International Way.
Increase number of permanent supporting housing units. (Featured projects: The Keystone, The Nel, Bridges on Broadway)	The Keystone (15 PSH units), The Commons on MLK (51 PSH units), and the Nel (45 PSH units) are complete. Bridges of Broadway (57 PSH units) will break ground in Spring 2024.	The Keystone (15 PSH units), The Commons on MLK (51 PSH units), and the Nel (45 PSH units) are complete. Bridges of Broadway (57 PSH units) will lease up in Fall 2025.
Maintain public housing vacancies at 3% or less.	Public Housing continues to maintain an average occupancy of above 97% (97.3% for FY24 YTD).	Public Housing continues to maintain an average occupancy of above 97% (98% FY25 YTD).
Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons.	As of March 1, 2024, Homes for Good has 181 Mainstream Vouchers. Utilization for CY2023 was over 100%.	As of March 1, 2025 Homes for Good continues to have 181 Mainstream Vouchers. Utilization for CY24 was over 100%
Collaborative community initiative to provide technical support funding to ensure 100%	As of March 2024, Homes for Good has 319 VASH vouchers, of which 263 are under lease.	As of March 2025, Homes for Good continues with 319 VASH vouchers, of which 282 are under lease.

Indicator	FY24 Progress	FY25 Progress
utilization of all 236 VASH vouchers in Lane County.		

## Goal 2: Continue to receive high performer status

Indicator	FY24 Progress	FY25 Progress
Homes for Good received high performer status for FY18 SEMAP.	As a Moving to Work agency, Homes for Good is not required to submit either SEMAP or PHAS until HUD updates these systems with ones that are specific to MTW agencies. However, Homes for Good continues to monitor many of the same metrics that are reported under SEMAP and PHAS in order to ensure effective operation of its programs.	As a Moving to Work agency, Homes for Good is not required to submit either SEMAP or PHAS until HUD updates these systems with ones that are specific to MTW agencies. However, Homes for Good continues to monitor many of the same metrics that are reported under SEMAP and PHAS in order to ensure effective operation of its programs.
Obligate all capital funds within 24 months of grant award.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.
Expend all capital funds within 48 months of grant award.		
Comply with the financial reporting requirements of asset management.		
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: Improve community quality of life and economic vitality

Indicator	FY24 Progress	FY25 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 is part of the Landlord Incentive cohort of the MTW program. As part of this cohort, Homes for Good implemented a number of waivers geared toward easing the burden on landlords. In addition, Homes for Good hired a Landlord Educator in place of the Housing Liaison. The Landlord Educator will work with tenants and landlords to address their housing concerns.	Homes for Good is part of the Landlord Incentive cohort of the MTW program. As part of this cohort, Homes for Good implemented a number of waivers geared toward easing the burden on landlords. In addition, Homes for Good hired a Landlord Educator in place of the Housing Liaison. The Landlord Educator works with tenants and landlords to address their housing concerns.
Continue to encourage and promote resident involvement in the Resident Advisory Board by maintaining and expanding the number of representatives from public and assisted housing, as well as the Section 8 program.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs including new participants from the HCV and PBV programs.
Enhance the customer service experience across agency programs by simplifying and aligning processes, providing access to services staff and by connecting participants to needed resources in the community.	Homes for Good implemented a new software system over the last year that includes multiple portals and the opportunity for various self-service functions for applicants, voucher holders, housing residents, and landlords.	Homes for Good continues to implement additional features in the new portals, providing addition opportunities for various self-service functions for applicants, voucher holders, housing residents, and landlords.
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 as well as more frequent resident updates related to Agency operations which are posted and emailed to all residents.	All communities continue to receive a monthly or quarterly residential newsletter as well as more frequent resident updates related to Agency operations which are posted and emailed to all residents.
Annually monitor income levels by development and provide targeted support to deconcentrate poverty. Bring higher income	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.

Indicator	FY24 Progress	FY25 Progress
PH households into lower income developments and vice versa, if necessary.		
Continue giving preferences to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units).	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).	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: Promote self-sufficiency and asset development of households served through public and assisted housing as well as the Section 8 homeownership program**

Indicator	FY24 Progress	FY25 Progress
Expand access to the Family Self-Sufficiency (FSS) program to reach enrollment of 200 households or more.	Homes for Good Family Self-Sufficiency program currently has 125 households enrolled in the FSS program, with an average escrow of \$5,200.	Enrollment has increased to approximately 124 households. Exploring outreach strategies to reach the 200-household goal, including, improving accessibility, more focus on promotion and targeted engagement with eligible families.
Maintain a minimum representation of 15 community services agencies on the Family Self-Sufficiency Advisory Board.	The FSS Advisory Board continues to grow with new organizations joining each year. Currently there are over 20 community partners engaged with this board.	The FSS Advisory Board continues to grow with new organizations joining each year. Currently there are over 18 community partners engaged with this board. Developed materials to educate LP partners on the benefits of the program and have identified key stakeholders to add to the board.
Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet. FSS video added to website.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet. FSS video added to website.

Indicator	FY24 Progress	FY25 Progress
Assist a minimum of two FSS participants a year in purchasing a home.	FSS assisted 1 participant in purchasing a home during 2023.	FSS assisted 1 participant in purchasing a home during 2024 and had 1 additional participant start the home buying process.
Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.	FSS is supporting 23 participants with IDA's, which includes 6 new participants.	FSS is currently supporting 14 participants with IDA's after funding reductions but was able to add 3 new participants this year.

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

Indicator	FY24 Progress	FY25 Progress
Complete the Rent Assistance Demonstration construction and sale of scattered site homes.	Homes for Good will complete scattered site sales in 2024.	Homes for Good has completed the sale of the last RAD home in 2025.
Focus preservation efforts communicating with local, state and national funders to help preserve affordable housing opportunities.	There is one Preservation project (Bridges on Broadway) actively under construction consisting of 50 units.	There is one Preservation project (Bridges on Broadway) actively under construction consisting of 57 units.
The Landlord Liaison continues with community engagement, providing routine educational seminars for landlords and supportive service organizations. Expansion of classes include courses specifically focused on housing quality standard guidelines, thus giving landlords the education and tools needed to prepare for successful housing inspections under HUD requirements.	T The Landlord Liaison position has been revamped and is now titled Landlord and Community Relations Specialist. This position provides education to landlord and community partners on the roles and responsibilities of public housing agencies. This position will also play a key role in educating those we serve, and our landlord community on the use of portals. For FY24 as of March 29, 2024 this position has provided 11 educational seminars and has tabled at 2 events	The Housing and Community Relations Specialist continues to provide educational seminars to landlords and local preference partners. From October 2024 to March 2025, 12 seminars were provided with an average attendance rate of 19 per event.

Indicator	FY24 Progress	FY25 Progress
Partnered with NEDCO to provide zero interest loans for security deposits to Section 8 and VASH families.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher recipients. For FY22 and as of Sept. 30, 2022 , 11 applications were received, and 6 approved. 4 families have paid in full, 1 defaulted and 1 was canceled. For FY 23 and as of Sept. 30, 2023, 7 applications were received, and 3 approved. 3 are actively paying.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher holders. For FY24: 16 applications were received, 7 approved, 9 cancelled and/or denied, 4 were paid off, 2 were past due and 1 is currently paying. From 10.01.24 to March 2025, 2 applications were submitted, 1 approved, 1 denied, and 1 is pending.

**Goal 6: 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	FY24 Progress	FY25 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	he transition of the Landlord Liaison position to the Housing and Community Resources Coordinator title reflects a more comprehensive understanding of the role's responsibilities. The expansion of local preference partnerships to 30 and collaboration with the local CofC for Governor Kotek's Emergency Declaration on Homelessness highlights Homes for Good's commitment to addressing housing needs in the community. The retention and utilization of all 184 Emergency Housing Vouchers as of March 22, 2204, demonstrate effective advocacy and support for individuals in need of stable housing solutions.	As of March 2025, local preference partnerships have grown to 50. Governor Kotek's Emergency Declaration on Homelessness created a pathway for Homes for Good to be one of three Public Housing Agencies in Oregon to administer the Long-Term Rental Assistance Program (LTRA). As the Program Administrator for LTRA Homes for Good is responsible for the distribution of 1.6 million dollars to eligible households in Lane County. HUD has reduced the allocation of Emergency Housing Vouchers to Public Housing Agencies across the nation. Homes for Good's allocation has been reduced by 22 vouchers.
Grow 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		



Indicator	FY24 Progress	FY25 Progress
Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program	We continue to maintain a professional working relationship with landlords/owners in our community through education and seminars on our tenant based voucher programs.	The Housing and Community Relations Specialist continues to provide educational seminars to landlords and local preference partners. From October 2024 to March 2025, 12 seminars were provided with an average attendance rate of 19 per event.
Monitor the payment standards and area rents on the private market to keep Section 8 families' portion of rent affordable and allow the Agency to serve the same number of families as in previous years.	<p>At time of setting the Payment Standards for CY23, 13.9% of 4-bedroom families were paying more than 41% of their income towards rent. As of 03.2023 success rate for tenant-based voucher utilization was 67%. The increase in rent portion for families could be contributed to loss of income and/or increase in contract rent costs. We will continue to monitor this information.</p> <p>At time of setting the Payment Standards for CY24, 16.7% of 4-bedroom families were paying more than 40% of their adjusted gross income towards rent. A 13.5% increase from last year. Homes for Good will continue to monitor rent burden and adjust payment standards in accordance with HUD regulations, which require adjustment to be made when more than 40% of families are paying more than 40% of their adjusted gross income towards rent. For the overall portfolio, 13.4% of families are paying more than 40% of adjusted gross income towards rent. As of 03.2024 success rate for tenant-based voucher utilization was 70%.</p>	For CY25 , the Payment Standards remained at 90% of Fair Market Rent (FMR) and were raised to 96% of FMR for 4 bed units. VASH and Emergency Housing Vouchers remain at 120% of FMR. The 4 bed units were increased because 44.2% of families living in 4 bed units were paying more than 30% of their adjusted gross income towards rent. HUD requires PS to be increased if more than 40% of families for a given voucher size are paying more than the 30% out of pocket for rent. Success rate for voucher usage is approximately 86%. Meaning for 100 vouchers issued, 86 are able to secure housing. Overall voucher usage for CY24 was 99.9%

Indicator	FY24 Progress	FY25 Progress
A Homes for Good staff member serves on the board for the local Rental Owners association	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association (ROA). The Landlord and Community Relations Specialist position attends general membership meetings and continues to contribute articles to the ROA's monthly newsletter which is distributed to over 1200 members representing over 20,000 rental units.	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association (ROA). The Landlord and Community Relations Specialist position attends general membership meetings and continues to contribute articles to the ROA's monthly newsletter which is distributed to over 1200 members representing over 20,000 rental units.

4.6. ATTACHMENT C.2 FORM HUD-50077-SLL

<b>Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)</b>	<b>U. S Department of Housing and Urban Development</b> Office of Public and Indian Housing OMB No. 2577-0226 <b>Expires 3/31/2024</b>
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**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, \_\_\_\_\_, the \_\_\_\_\_  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years \_\_\_\_\_ and/or Annual PHA Plan for fiscal  
year \_\_\_\_\_ of the \_\_\_\_\_ is consistent with the  
*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

\_\_\_\_\_  
*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will  
prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official:	Title:
Signature:	Date:

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. This information is collected to  
ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

#### 4.7. ATTACHMENT C.3 FORM HUD-50077-ST-HCV-HP

<b>Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)</b>	<b>U.S. Department of Housing and Urban Development</b> Office of Public and Indian Housing <b>OMB No. 2577-0226</b> <b>Expires 3/31/2024</b>
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#### **PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or \_\_\_ Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning \_\_\_\_, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 20

5-Year PHA Plan for Fiscal Years 20 - 20

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director

Name Board Chairman

Signature

Date

Signature

Date

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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. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

## 5. MTW Supplement

**PHA Name:** Housing Authority & Comm Svcs Of Lane Co

**PHA Code :** OR006

**MTW Supplement for PHA Fiscal Year Beginning:** 10/1/2025

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

### **B. MTW Supplement Narrative.**

Homes for Good has a strong commitment and track record for bringing collaborative and innovative projects to the community. Homes for Good's initial MTW Supplement aimed to align the needs of the community and residents with the three (3) MTW Statutory Objectives in ways that help transform operations, encourage self-sufficiency, and better utilize the funding it receives. Since its last MTW Supplement, Homes for Good has decreased the amount of time it takes households to find and lease a suitable unit, saved approximately \$84,820 in administrative costs, and enabled 37 of households with reasonable accommodations to find housing easier using an Exception Payment Standard.

**Cost Effectiveness:** Homes for Good is dedicated to exploring MTW flexibility options such as implementing triennial reviews and eliminating deductions and/or modifying the HQS inspection schedule. Some of the waivers associated with cost effectiveness have already been implemented or will be implemented in the next Fiscal Year. Waivers related to cost-effectiveness allow Homes for Good to redirect staff time and resources toward activities that have a higher value for the participant and the community.

**Self-Sufficiency:** Homes for Good envisions the agency automatically enrolling households into its Self-Sufficiency Program upon participant entry, resulting in a dramatic increase in participation. While this years' MTW Supplement does not include modifications to the FSS program, Homes for Good plans to work internally to design the program and select the appropriate waivers in the future.

**Housing Choice:** Homes for Good is dedicated to exploring mortgage assistance and expanded homeownership programs. We believe homeownership is a key element in ending generational poverty. Homes for Good is also interested in increasing utilization of project-based vouchers. During FY2023, Homes for Good implemented several waivers that help streamline the use of project-based vouchers. While Homes for Good did not add any project-based vouchers in FY2025, these flexibilities will help the agency streamline the process of adding additional PBV units in the future.

As a member of the Landlord Incentives cohort of the Moving to Work program, Homes for Good implemented Pre-Qualifying Unit Inspections and Alternate Inspection Schedule. These are described in more detail in Section C of the MTW Supplement.

Homes for Good implemented other MTW flexibilities in its first year as an MTW agency as well. The activities selected for the year were prioritized using the following three objectives:

Reallocate resources to reduce paperwork and refocus staff efforts on navigation and prevention. Serve the greatest number of households possible through new affordable housing and housing service programs that help individuals in need and communities thrive; and activities implemented will further Homes for Good's Strategic Equity Plan by creating pathways to self-sufficiency and leading and growing ethically.

All activities entered into the FY26 MTW Supplement have been implemented. However, note that Homes for Good decided to hold off on implementing waiver 3.a for Public Housing until HUD is ready for MTW agencies to submit their 50058 records to the new Housing Information Portal (HIP).

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Currently Implementing
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	



Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Currently Implementing
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

**C. MTW Activities Plan that Housing Authority & Comm Svcs Of Lane Co Plans to Implement in the Submission Year or Is Currently Implementing**

**2.b. - Payment Standards- Fair Market Rents (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Homes for Good will use this waiver to allow the PHA to self-certify exception payment standards (EPS) in the case of reasonable accommodation. This waiver will increase the housing opportunities of our HCV Program participants needing accessibility features requiring a reasonable accommodation.

EPS's are those that are above 120% and currently require approval of the HUD field office. Homes for Good proposes using its MTW flexibility to allow it to self-certify EPS's (up to 150% of FMR) in the case of a reasonable accommodation. The current process to approve EPS's through the field office is time consuming and burdensome for the family, the housing agency, and HUD, and many times while approval was pending, the unit becomes unavailable. Units with accessibility features typically have significantly higher rents and, without an expedited approval of the EPS, households with accessibility needs are severely limited in their housing options.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

This waiver will impact households with approved reasonable accommodations in the Housing Choice Voucher program who are searching for units with accessibility features.

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to all tenant-based units

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

A total of 37 households with Reasonable Accommodations (RAs) were housed using the Exception Payment Standards (EPS) method during October 1, 2024, thru March 24, 2025. This streamlined process saved families and Homes for Good staff approximately 528 hours with Homes for Good using its MTW flexibility to approve these EPS over 120% of Fair Market Rent (FMR).

<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b></p> <p>3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p> <p>No</p>
<p><b>How many hardship requests have been received associated with this activity in the past year?</b></p> <p>No hardship were requested in the most recent fiscal year.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>Yes</p>
<p><b>What is the status of the Safe Harbor Waiver request?</b></p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement (see Section D).</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>No</p>
<p><b>Please explain the payment standards by FMR:</b></p> <p>EPS's are those that are above 120% and currently require approval of the HUD field office. Homes for Good proposes using its MTW flexibility to allow it to self-certify EPS's (up to 150% of FMR) in the case of a reasonable accommodation.</p>

## 2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

### **Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Homes for Good will use this waiver to eliminate the requirement that the PHA use a third-party entity to perform rent-reasonableness determinations for units and properties the agency owns, manages, or controls.

Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency.

Instead, Homes for Good will apply its current rent reasonableness process for non-owned/managed units to units it owns and manages. This process has adequate controls in place to ensure uniformity, auditability, transparency, and fairness of the determination.

### **Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The cost saved by performing rent reasonableness internally for units owned or managed by Homes for Good has gone from \$5,985 in FY24 to \$3,465 during the first part of FY25 (10/1/24-3/31/25).</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please explain or upload a description of the quality assurance method.</b></p> <p>Quality assurance is built into Homes for Goods process because the agency uses a third-party app that bases its results on objective measures. The comparables provided to establish rent reasonableness are documented within each tenant file.</p> <p>No document is attached.</p>
<p><b>Please explain or upload a description of the rent reasonableness determination method.</b></p> <p>Homes for Good will continue to use Nelrod's EZ Reasonable Rent Determinations (EZRRD) software to perform rent reasonableness determinations. EZRRD uses its five-method analysis system to compare multiple features per unit for a more in-depth analysis, and automatically identifies the three best comparables based on the system's objective market analysis.</p> <p>No document is attached.</p>

<p><b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>Homes for Good will implement a triennial recertification policy for elderly and disabled households in both its Public Housing and Housing Choice Voucher programs. This will benefit the client and the PHA by reducing the burden of the regular review cycle. Homes for Good plans to implement this policy in the Housing Choice Voucher program first, then implement in the Public Housing program the following year.</p> <p>Waiving these provisions will allow Homes for Good to implement a triennial recertification policy for elderly and disabled households in both its Public Housing and Housing Choice Voucher programs. This will benefit the client and the PHA by reducing the burden of the regular review cycle. Homes for Good plans to implement this policy in the Housing Choice Voucher program first, then implement in the Public Housing program the following year.</p> <p>To address changes in household circumstances, Homes for Good will continue to allow interims for households per its interim policies described at the end of the waiver.</p> <p>Homes for Good does not request to waive any of the safe harbors related to this waiver and will operate within the following safe harbors:</p> <p>Reexaminations must occur at least every three years.</p>

The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

Agency must implement an impact analysis. Agency must include a hardship policy

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Elderly and/or disabled families on fixed income

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Applies to any tenant based or project based household that is a family of elderly and/or disabled status with fixed income.

<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>Due to the delayed implementation of HIP for 50058 processing Homes for Good held off on implementing alternative reexaminations for Public Housing. Once HIP has been implemented and housing authorities no longer need to hold 50058's in preparation for HIP, Homes for Good will begin implementing this waiver for HIP.</p> <p>Since implementation of tri-reexaminations for the Housing Choice Voucher Program the administrative cost savings has been approximately \$66,410.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b></p> <p>3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p> <p>No</p>
<p><b>How many hardship requests have been received associated with this activity in the past year?</b></p> <p>No hardship were requested in the most recent fiscal year.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</b></p> <p>3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p><b>What is the recertification schedule?</b></p> <p>Once every three years</p>
<p><b>How many interim recertifications per year may a household request?</b></p> <p>2 or more</p>

**Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**

Homes for Good interim policies are as follows:

Homes for Good will allow households to request an interim if the household's income decreases.

Homes for Good will not require a household to report increases in income or changes.

Homes for Good will apply the most recent payment standard during the interim, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.

Note that under HOTMA, HUD requires the increased payment standard to be applied no later than the earliest of:

- a. The effective date of an increase in the gross rent that would result in an increase in the family share;
- b. The family's first regular or interim reexamination; or
- c. One year following the effective date of the increase in the payment standard amount.

Note that under Homes for Good's policy and associated MTW waiver, c) above may not always be met since the payment standard will not be applied until the next review, unless the household has an interim for other reasons. Therefore, Homes for Good amends this waiver to add 24 CFR 982.505(c)(4) to the list of policies that it waives.

### 5.a. - Pre-Qualifying Unit Inspections (HCV)

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

As part of the requirements of the Landlord Incentive cohort, Homes for Good (HFG) must select two (2) MTW activities related to landlord incentives in its initial plan year. One of the activities HFG selected is Waiver 5.a, Pre-Qualifying Unit Inspections.

HFG's landlord outreach revealed a strong desire among landlords to reduce the time it takes to approve the Request for Tenancy Approval (RFTA) during the lease-up process. Inspections for new move-ins typically happen once the RFTA is approved but prior to the tenant moving into the unit. Since the scheduling of the inspection and the potential for failures and re-inspections takes time, the current process can delay the move-in. The Pre-Qualifying Unit Inspections MTW activity will allow HFG to perform the inspection earlier in the process, enabling the household to move into the unit once the RFTA is approved.

HFG does not request waiving any of the safe harbors for this activity, which are listed below:

The pre-inspection must have been conducted within 90 days of the participant occupying the unit. The participant must be able to request an interim inspection.

HQS inspection standards must not be altered as found at 24 C.F.R. 982.401.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions (i.e., applicants) only

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to all tenant-based units

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

The number of pre-qualifying unit inspections approved in FY2024 was 3 and is currently at 2 pre-qualifying unit inspections for the first part of FY25 (10/1/24-3/31/25).

In FY24 the average time to approve a Request for Tenancy Approval (RTA) unit for pre-inspection was 9.6 days compared to 12 days average for regular inspection. Thus far the FY25 current average for pre-inspection is 7.5 days. Data for regular inspection for this FY is not currently available.



**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

**5.c. - Third-Party Requirement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Homes for Good will eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, or controls. Procuring and overseeing a third-party contractor for HQS inspections services is costly and time-consuming for the agency. Instead, Homes for Good will utilize its in-house HQS inspection team and the policies and procedures governing HQS inspections for the Housing Choice Voucher program. The HQS inspection process has built-in quality control measures in place that will help to ensure the inspections performed at properties owned or managed by Homes for Good are uniform fair and that the process is transparent and auditable. We conduct monitoring inspections to verify that the units comply with the required HQS and/or NSPIRE standards. These inspections are carried out by PHA staff who were not involved in the initial inspection. This practice ensures a high level of quality control by providing an independent review of the units.

Homes for Good does not request to waive any of the safe harbors related to this waiver and will operate within the following safe harbors:

The agency shall establish and make available a quality assurance method to ensure an objective analysis. The participant must be able to request an interim inspection.

HQS inspection standards must not be altered as found at 24 C.F.R. 982.401.

At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue; Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to all properties with project-based vouchers</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The estimated savings on Inspections for the first part of FY25 (10/1/24-4/3/25) is approximately \$15,890. (Please note cost varies per unit size, location, and whether a reinspection (RI) is needed for estimation).</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please explain or upload the description of the quality assurance method:</b></p> <p>Following will explain the quality assurance method</p> <p>In conducting quality control, PHA supervisory staff will use a random selection process to determine which units will be inspected for compliance with HQS and/or NSPIRE standards, as applicable.</p> <p>The review of these randomly selected units will be performed by PHA staff who were not involved in the initial inspection, ensuring a high level of quality assurance through independent evaluation.</p> <p>Additionally, upon request from HUD, PHA will provide further oversight by engaging a third-party inspector who is not a PHA staff member.</p> <p>No document is attached.</p>

<p><b>5.d. - Alternative Inspection Schedule (HCV)</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>As part of the requirements of the Landlord Incentive cohort, Homes for Good (HFG) must select two (2) MTW activities related to landlord incentives in its initial plan year. One of the activities HFG selected is Waiver 5.d, Alternative Inspection Schedule.</p> <p>Implementing an alternative schedule for Housing Quality Standard (HQS) inspections would increase inspector bandwidth for performing pre-inspections, re-inspections, and responding timeline to special inspection requests. HFG estimates that the increased bandwidth would allow inspectors to complete HQS inspections within 1-2 business days of the landlord contacting HFG.</p> <p>This activity will allow HFG to inspect its HCV units every three (3) years instead of annually or biennially. In lieu of the regular annual or biennial inspection, HFG hired a full-time Landlord Liaison to Field calls from applicants and tenants who are searching for housing, Work with tenants who have concerns or questions regarding their existing housing, Work with landlords to address concerns and understand the housing standards each unit must meet.</p> <p>With a Landlord Educator on staff, HFG is confident that HQS concerns and/or questions that may arise between inspections will be addressed through landlord and tenant outreach or special inspections, as both tenants and landlords have a dedicated communication channel to voice concerns.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>

<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>
Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies to all assisted households
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> The reduction in the amount of time it takes to approve a unit for move-ins has decreased from an average of 57 days to 53 days between CY 2023 to 2024.  The number of special inspections conducted in FY24 was 8, and thus far for FY25 is currently 5 (10/1/24-3/31/25).  The number of interactions between Homes for Good's landlord educator and landlords or tenants has increased from two events to nine events thus far in FY2025. There have been 374 additional interactions, such as phone calls and emails, between the landlord educator and landlords or tenants between October 1, 2024 thru March 31, 2025.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> Homes for Good implemented this waiver to allow Homes for Good to award project-based vouchers to non-Public Housing properties it owns without a selection process and without engaging in an initiative to improve, develop, or replace a Public Housing property or site. This waiver does not apply to other HUD-required selection requirements and the agency will ensure that the process to award vouchers is uniform and transparent.  Homes for Good will operate within the following safe harbors:  A subsidy layering review must be conducted. The agency must complete site selection requirements. HQS inspections must be performed by an independent entity according to 24 C.F.R. 983.59(b) or 24 C.F.R. 983.103(f) unless MTW 5.c is implemented. The agency is subject to Notice PIH 2013-27 where applicable, or successor. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies to all assisted households
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> There were no non-Public Housing properties owned by Homes for Good that were selected for project-based vouchers without a competitive process in FY25

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**9.h. - Limit Portability for PBV Units (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The Lane County Housing Authority (LCHA) (aka Homes for Good) requests to waive a safe harbor requirement under MTW Waiver 9.h., Limit Portability for PBV Unit. Under the activity Homes for Good will waive the requirement of providing a tenant-based voucher at 12 months when requested by a PBV household. As a safe harbor to the activity, portability cannot be restricted for more than 24 months. Homes for Good is seeking to waive this safe harbor and restrict mobility for its Permanent Supportive Housing PBV households with respect to a household's readiness to move. Homes for Good intends to offer portability to PSH PBV via a local preference based on scoring under Homes for Good's Move On assessment tool. Under this framework the overall timeframe for access to the tenant-based voucher is amended to allow for TBVs to be provided before 12 months or after 24 months, but no longer than 36 months.

Waiving the portability requirement will lower the cost of turning units for households moving to a tenant-based voucher, help the PBV project to cashflow by continuing to assist households, decrease the administrative burden associated with program unit transfers, and ensure that households on Homes for Good's waitlists are offered a tenant-based voucher first.

Homes for Good previously received approval to waive the following Safe Harbor: Portability under this activity must not be restricted for more than 24 months.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue; Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies only to a subset or subsets of assisted households

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

Currently assisted households only

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Other – another specifically defined target population or populations.

**If Other Selected in Previous Question: Please describe this target population in the text box.**

Families living in Permanent Supportive Housing Project Based Voucher Units

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

<p><b>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</b></p> <p>Only applies to families living in Permanent Supportive Housing Project Based Voucher Units</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>No families have moved out of a PSH PBV project with a Housing Choice Voucher (HCV). Currently, only one family (PBV at Nel) is sitting on the Choice Mobility waitlist. Homes for Good currently does not have a tenant-based voucher to issue this family</p> <p>An additional 17 families have expressed interest in moving out of Homes for Good PSH PBV projects. Of these families 8 have participated in a Move on Assessment to determine eligibility. Of those 8 families 6 did not meet the "Move on Readiness" benchmarks and are actively working with supportive services to meet the necessary requirements, the other two families were determined to be "Move on Ready" and their referrals were sent to exercise portability.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>Yes</p>
<p><b>What is the status of the Safe Harbor Waiver request?</b></p> <p>The waiver was previously approved.</p>
<p><b>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</b></p> <p>Homes for Good requests to waive the following safe harbor. Detailed information related to this safe harbor waiver request are included in Section D of the MTW Supplement to the PHA Plan.</p> <p>Portability under this activity must not be restricted for more than 24 months.</p> <p>Homes for Good not request to waive any other safe harbors related to this waiver and will operate within the following safe harbors:</p> <p>The agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households.</p> <p>Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.</p>

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>Yes, the Safe Harbor Waiver request(s) for 2b, 9h is(are) attached.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b> No</p>

<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b> No</p>
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<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2022	\$2,106,617	\$2,106,617	\$0	2030-09-30
2023	\$1,710,993	\$1,515,064	\$195,929	2031-09-30
2024	\$2,475,046	\$2,407,233	\$639,169	2032-09-30
2025	\$1,983,264	\$1,926,063	\$696,370	2033-09-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		0
49%-30% Area Median Income		0
Below 30% Area Median Income		0
Total Local, Non-Traditional Households		<b>0</b>

\*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No	
<b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b> N/A	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPER TY NAME/ ADDRES S	0/ 1 B B R	2 B B R	3 B B R	4 B B R	5 B B R	6 + B R	TOTA L UNIT S	POPULATI ON TYPE*	if 'Populati on Type' is Other	# of Section 504 Accessib le (Mobility )**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

<b>Family Size:</b>	<b>Occupied Number of Local, Non-Traditional units by Household Size</b>
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	<b>0</b>

<b>H.</b>	<b>Public Comment</b>
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	
Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)	

<b>I.</b>	<b>Evaluations.</b>
No known evaluations.	

**MTW CERTIFICATIONS OF COMPLIANCE*****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

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**MTW PHA NAME**


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**MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

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**NAME OF AUTHORIZED OFFICIAL**


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**TITLE**


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**SIGNATURE**


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**DATE**

*\* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

## 6. MTW Supplement Attachments

### 6.1. Homes for Good Hardship Policy

# Homes for Good Hardship Policy

April 22, 2024

## Purpose

As a Moving to Work (MTW) housing authority, Homes for Good has the ability to waive certain HUD policies that may result in unintended negative impacts on specific households. When such policies are implemented, MTW agencies must have a hardship policy in place that allows impacted households to request relief.

MTW agencies may choose to have separate hardship policies for each MTW waiver or a single hardship policy that covers all waivers. Homes for Good chose to implement a single hardship policy for all applicable waivers. However, the agency may choose to implement additional hardship policies in the future if additional waivers are implemented that do not align with this policy.

## Households Eligible for Hardship Exemption

A family qualifies for a hardship exemption when their total family share exceeds 50% of the gross income used to determine a household's rent subsidy. Total family share is defined as the family's portion of rent plus the family's utility allowance. Exceptions to this policy include the following circumstances:

- When the family's share exceeds 50% of gross income due to the family's choice to rent a unit with more bedrooms than the household's voucher size; or
- When the household has not been negatively impacted by any MTW waivers.

## Submission of a Hardship Exemption

Hardship requests must be received by the 15th of each month to be eligible for a revised rent effective on the first of the next month. Hardship exemption requests and adjustments will not be retro-active.

A Hardship Request will be considered "received" when all of the following applicable documents have been submitted:

- Completed Hardship Request Form, available on Homes for Good's website;

- For households who have recently lost earned income- proof of application for unemployment;
- For households with minor children- proof of application for TANF and/or child support;
- Proof of application / participation in one of Homes for Good's self-sufficiency programs; and/or
- Proof of application for low-income energy assistance through Homes for Good or an external community partner.

## Process for Agency Review and Determination

When a family requests a hardship exemption from an MTW waiver, Homes for Good will take the following actions:

- Determine whether a hardship exists prior to the first of the following month, taking into account the aforementioned 15<sup>th</sup> of the month deadline:
  - If the request does not meet the hardship standards, there will not be any adjustments to the family's portion of rent by Homes for Good.
  - If the request does meet the hardship standards, the agency will adjust the total family share of rent plus utilities allowances the family is responsible for by the first of the following month as follows: set the total family share to the greater of \$0 or 40% of the family's adjusted gross income.

## Family Notification

Homes for Good will take the following actions in order to promote this policy among its applicants and program participants:

- Include a copy of the hardship policy in the publicly-viewable version of its MTW Supplement to the PHA Plan, the agency's Administrative and Occupancy Plan (ACOP), and the agency's Administrative Plan;
- Notify applicants of this hardship policy at intake;
- Review this hardship policy with families at recertification; and
- Consider if a family qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

## Grievance Procedure

If Homes for Good denies a hardship request, the family may file a grievance according to the agency's Grievance Policy found in both Homes for Good's ACOP and Administrative Plan.

# Reexamination Activity Impact Analysis

April 22, 2024

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## Description of the Waiver

Homes for Good proposes to implement a triennial reexamination schedule for all elderly and disabled households within the Housing Choice Voucher (HCV) program who are on fixed incomes. Under this waiver, impacted households will have a reexamination once every three (3) years. As part of this policy change, the following policy decisions were made:

- 1. Approved rent increases will use an interim 50058 and will apply the most current payment standard.
- 2. Homes for Good will conduct an interim reexamination when an adult household member is added and not when a minor household is added.
- 3. If a family moves into a new unit, a full reexamination will be conducted, and the household’s reexamination schedule will be reset.

4. Eligible households will receive an automatic adjustment to their income by the Cost-of-Living-Adjustment (COLA) factor used by the Social Security Administration (SSA). SSA's COLA adjustments will be posted here prior to the beginning of each calendar year: <https://www.ssa.gov/cola/>.

## Definitions Used in the Analysis

- **Work able:** household does not receive an elderly/disabled allowance.
- **Fixed Income:** indicates that a household does not have any earned income.
- **Race and ethnicity:** race and ethnicity applies to the head of household only, not other individual household members.
- **Large families:** a family of four (4) or more members.
- **ELI:** Extremely Low Income, equal to 30% or less of the area median income
- **VLI:** Very Low Income, equal to income between 30% and 50% of the area median income
- **LI:** Low Income, equal to income between 50% and 80% of the area median income

## Impact Analysis Method

Homes for Good first selected the metrics to review based on anticipated impact of the waiver. The chart below shows the metrics and the method for analysis. The results of these data points informed the other subsequent analysis of the impact on the agency's finances and households by demographic and will help Homes for Good to set a baseline for analyzing the impact of this activity in the future.

Data Point	Data Analysis Method
Number of fixed income households	Review most recent 50058 data
Annual staff time in hours to process recertifications (no interims)	Staff survey, timing exercises, other means
Annual postage cost to mail certification documents to households (if applicable and no interims)	HAB Financial Statement
Average number of interims due to decrease in income over last 3 years.	Review of last 3 years of 50058 data
Average number of interims due to decrease in income over last 3 years for fixed income households. Decreased in income or increase in expenses.	Review of last 3 years of 50058 data
Average decrease in income for interims downs (fixed income)	Review of last 3 years of 50058 data



Data Point	Data Analysis Method
Average tenant rent decrease for interim downs (fixed income)	Review of last 3 years of 50058 data
Number of zero-income households	Review most recent 50058 data

These metrics were assigned to members of the Homes for Good project team, who then gathered the required data elements. Next, an in-depth analysis was performed using 50058 data from the last three (3) years. The goal of the analysis is to identify the following:

1. Financial impact to the agency
2. Disparate impact based on demographics

Answers to the other impact analysis questions were derived from these analyses. Note that Homes for Good does not anticipate that the policy changes will have a negative impact on any specific households, but instead measured the positive impact to identify cases where certain groups were impacted more positively than others. The analysis confirmed that there will not be a negative impact to the families currently on program.

## Update for the FY2025 MTW Supplement

Homes for Good first asked for approval of this activity in its FY2024 MTW Supplement to the PHA Plan but did not implement it due to a major software implementation at the agency. As initially proposed, the activity would have applied to all HCV households and the impact analysis showed a significant financial impact to the agency.

Homes for Good used the time over the last year assess options that would be more cost neutral while still resulting in significant administrative savings. The result was to narrow the scope of the activity so that it only applied to elderly and disabled households on fixed incomes, which still represents 68% of Homes for Good's population.

## Results

### Data Points Used in the Analysis

The chart below shows the results for the original data points measured.

Data Point	Result
Number of fixed income households	2,603
Number of work able households	978
Number of near-elderly households (will turn 62 in next three years)	327
Annual staff time in hours to process recertifications (no interims) – includes hours spent on hearings for missing paperwork, processing follow-up letters, etc.	737.25 Hours per month
Annual postage cost to mail certification documents to households (if applicable and no interims)	\$12,805.58
Average number of interims due to decrease in income over last 3 years.	531
Average number of interims due to decrease in income over last 3 years for fixed income households. Decreased in income or increase in expenses.	201
Average decrease in income for interims downs (per year)	\$10,900.00
Average tenant rent decrease for interim downs (per month)	\$220.00
Average decrease in income for interims downs (fixed income – per year)	\$8,808.00
Average tenant rent decrease for interim downs (fixed income – per month)	\$187.00

## Financial Impact to the Agency

Based on its analysis, Homes for Good determined this policy change will have a negative impact to the agency's HAP expenses, increasing annual HAP expenditures by \$144,867 per year (see row "t" in the chart below). This is measured by looking at the increases in income that have been processed over the last three years and the associated increase in rent and decrease in HAP, taking into account 2023's annual COLA adjustment of 3.2%. By changing the review cycle to every three (3) years, the incremental decreases in HAP expense will not be fully realized. The chart below shows a summary of this analysis for the different groups that were considered. The fixed income column is highlighted since Homes for Good ultimately chose to apply this policy to fixed income households only.

Metric	Fixed Inc Only	Formula
- Control: Number of Annuals Last 3 Years	7,149	
a. Avg Increase in Income Last 3 Years	\$1,861	
b. Number of Households with Increase in Income Last 3 Years	4,161	
c. Avg Decrease in Income Last 3 Years	\$2,559	
d. Number of Households with Decrease in Income Last 3 Years	453	
e. Total Annual HAP Based on Last Annual	15,114,636	
f. HAP Reductions due to COLA Year 1	\$241,524	
g. HAP Increases due to Income Decreases Year 1	\$386,392	$c \times d$
h. Projected HAP Year 1	\$15,259,504	$e - f + g$
i. Number of Interim Ups Last 3 Years	131	
j. Avg Cost to Process Interim	\$27	
k. Avg Cost to Process Annual	\$135	
l. Total Annual Cost to Process Interim Ups	\$1,179	$(i \times j) / 3$
m. Number of Interim Downs Last 3 Years	497	
n. Average Number of Interims Last 3 Years	1,249	
o. Estimated Number of Interims Under New Policy	166	$m / 3$
p. Average Number of Annuals Last 3 Years	2,083	
q. Estimated Number of Annuals Under New Policy	694	$p / 3$
r. Total Annual Reduction in Number of Reviews Under New Policy	2,472	$(p - q) + (n - o)$
s. Cost Savings Due to Reduction in Reviews	\$234,488	$(k \times (p - q)) + (j \times (n - o)) + \text{Postage}$
t. Impact on HAP expenditures	\$144,868	$h - e$
u. Total Annual Cost Savings (Loss)	\$89,621	$e - h + s$

## Demographic Impact

To measure the demographic impact, Homes for Good looked at the number of income increases over the last three (3) years by demographic group, including race, ethnicity, large families, elderly, income level, and disabled households. Race and ethnicity data is based on the head of household only. This assessment was done for all elderly and disabled HCV households on fixed incomes. The results shown in the chart below confirm the following:

1. No households will see a negative impact due to this policy change, so the analysis shows which households had a more positive impact than others;
4. There was not a significant difference in the impact on households based on race or ethnicity.

5. The higher a household's income is, the more likely they are to have an increase in income and higher the increase in income is likely to be.

Metric	Asian	African American	Native HI/Pacific	Native Amer.	White	Hispanic	Non-Hispanic	Large Family	Disabled	Elderly	ELI	VLI	LI	Formula
a. Total Fixed Income Population (# annuals/move-ins last 3 years)	107	316	51	439	6,668	417	6,733	333	6,445	3,069	6,245	793	101	
b. Households with Increase in Income Last 3 Years	59	183	27	253	3,883	233	3,928	179	3,764	1,961	3,544	529	79	
c. Percent of Population with Increase	55%	58%	53%	58%	58%	56%	58%	54%	58%	64%	57%	67%	78%	b / a
d. Average Income Increase	\$2,426	\$2,307	\$8,945	\$2,255	\$1,839	\$3,435	\$1,768	\$6,118	\$1,794	\$1,359	\$1,158.25	\$3,604.92	\$15,632.24	

## Other Impact Analysis Questions

Below are answers to the additional impact analysis questions identified in the MTW Operations Notice.

#	Question	Answer
1	Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)	While there is a chance that one or more families becomes over-income and remain housed (see question 2 below), Homes for Good anticipates any impact to the waitlist or the amount of time families on the waitlist to be inconsequential.
2	Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)	Homes for Good anticipates that this policy change could result in a family becoming over-income and remaining on program until the next review. This would most likely impact Low Income households, whose increases in income were the largest over the last three years (\$15,632 vs. \$3,544 for ELI families). These households only represent only 1.5% of the fixed income population, so the rate of occurrence will be minimal.
3	Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program	With an increase in HAP, Homes for Good may see a slight reduction in utilization due to this policy change. However, the agency anticipates that the administrative savings from the activity will offset the increase in HAP.
4	Impact on meeting the MTW statutory goals of cost effectiveness, self sufficiency, and/or housing choice	Cost effectiveness Homes for Good's analysis shows that by reducing the number of annuals and interims, this policy change will save the agency \$244,488 per year in administrative expenses
		Self-sufficiency Since this policy only applies to elderly and disabled households on fixed incomes, this metric does not apply.
		Housing choice Homes for Good does not anticipate any impact on housing choice

#	Question	Answer	
5	Impact on the agency's ability to meet the MTW statutory requirements	1. Ensure that 75% of newly assisted households have very low incomes	Homes for Good will continue to use its current admissions policies, ensuring that this requirement is met.
		2. Establish a reasonable rent policy that encourages employment and self-sufficiency	Since this policy only applies to elderly and disabled households on fixed incomes, this metric does not apply.
		3. Continue to assist substantially the same number of households	The agency expects that this policy will not impact its ability to meet the STS requirement.
		4. Continue to assist a comparable mix of households by family size	This policy will not have an impact on the household size of households served, although the analysis has shown that larger households will see more benefit from this policy change than small households.
		5. Meet Housing Quality Standards requirements	This policy change will not have any impact on HQS.
6	Impact on the rate of hardship requests and the number granted and denied as a result of this activity	Homes for Good does not anticipate any hardships as a result of this policy change as it will not have a negative impact on household's rent or utility payments. However, the standard Homes for Good Hardship Policy will apply in the event this policy results in a hardship.	

## Conclusions

Homes for Good recognizes that the change to reexamination frequency will have a negative impact on the funds it has available to house families in the HCV program. However, the agency also anticipates that this policy will have a positive impact on households and that the increase in HAP expenditures will be offset by reduced administrative costs.