



HOMES FOR GOOD BOARD OF COMMISSIONERS MEETING
Wednesday, June 26th, 2024

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AGENDA

Homes for Good Housing Agency

BOARD OF COMMISSIONERS

Location of the meeting:

Homes for Good Administrative Building

100 W 13th Avenue

Eugene, OR 97401



Zoom

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

Wednesday, June 26th, 2024, at 1:30pm

The June 26th, 2024, the Homes for Good Board of Commissioners meeting will be held at the Homes for Good Administrative Building. It will also be available via a public video call with dial-in capacity. The public has the option to participate in person or by joining via video call or conference line.

Join Zoom Meeting:

<https://us02web.zoom.us/j/88069630164>

1. PUBLIC COMMENTS

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

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

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

3. ADJUSTMENTS TO THE AGENDA

4. **COMMISSIONERS' BUSINESS**

5. EMERGENCY BUSINESS

6. EXECUTIVE SESSION

None

7. ADMINISTRATION

A. Executive Director Report

8. CONSENT AGENDA

A. Approval of 05/22/2024 Board Meeting Minutes

9. PRESENTATION

Asset Portfolio Repositioning Analysis from Geller Silvis & Associates
(Geller Silvis & Associates) (Estimated 20 minutes)

10. ORDER 24-26-06-01H

In the Matter of Approving the PHA Annual Plan, MTW Supplement & 5-Year Plan
(Beth Ochs, Rent Assistance Director) (Estimated 20 minutes)

11. ORDER 24-26-06-02H

In the Matter of Approving Year III of the Strategic Equity Plan
(Equity Strategy Team) (Estimated 30 minutes)

12. OTHER BUSINESS

Adjourn.

On June 10th we were thrilled to welcome Audrey Banks to Homes for Good as our new Real Estate Development Director. Audrey brings with her an impressive background and a wealth of experience that we believe will be invaluable to the team's continued growth and success. Audrey holds a Master's Degree in Public Administration from the University of North Carolina. With over eight years of experience working in the public sector within municipal governments, and more than seven years of experience in the local real estate space, her expertise will be a significant asset to our organization. During the recruitment process, the hiring team was particularly impressed with Audrey's extensive knowledge, thoughtfulness and attention to detail.



Real Estate Development Director, Audrey Banks

Our Housing Choice Voucher (HCV) Program that is funded by the Department of Housing and Urban Development (HUD) has been put into a status that is called "shortfall" and they assign a special team to us that will assess our program, possibly make programmatic recommendation and likely increase our monthly funding allocations. What this means is that the monthly Housing Assistance Payments (HAP) we have been making to landlords on behalf of program participants exceed the amount that we are being allocated every month by HUD. We have been covering this shortage by making transfers out of the HCV Administrative Fee account. Since May HUD has reimbursed us two increments of \$400,000 for a total of \$800,000. The Shortfall Team has requested data from us so they can analyze our HAP and Administrative Fee expenditures and our first meeting with this Team is on July 8th.



Refreshing the plants at The Olive

MINUTES

Homes for Good Housing Agency

BOARD OF COMMISSIONERS



Wednesday, May 22nd, 2024, at 1:30 p.m.

Homes for Good conducted the May 22nd, 2024, meeting in person at the Homes for Good administrative building and via a public video call with dial-in capacity. The public was able to join the call, give public comments, and listen to the call.

CALL TO ORDER

Board Members Present:

Heather Buch

Michelle Thurston

Justin Sandoval

Pat Farr

Kirk Strohman

Chloe Chapman

Larissa Ennis

Joel Iboa

Destinee Thompson

Board Members Absent:

Quorum Met

1. PUBLIC COMMENT

None

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

None

3. ADJUSTMENTS TO THE AGENDA

None

4. **COMMISSIONERS' BUSINESS**

[Chloe Chapman] Springfield Chamber of Commerce in collaboration with Leadership Eugene Springfield is hosting a roundtable event to discuss the future of housing in the community with a focus on Accessory **Dwelling Units (ADU's)**. **The event is May 28th 4:00p – 5:00p** at the Springfield Chamber.

[Event Flyer](#)

5. EMERGENCY BUSINESS

None

6. EXECUTIVE SESSION

None

7. ADMINISTRATION

A. Executive Director Report

Jacob Fox discussed the annual Spring Spruce-Up event hosted by the Supportive Housing Division. It was an opportunity for Homes for Good staff to get out into the community and do landscaping repairs to Pengra Court (Springfield) and Veneta Villa (Veneta). The Pengra Court residents gave a special shoutout of appreciation that plants were put in the space.

Pacific Source Community Solutions has generously loaned Homes for Good \$4 million with the intent to increase affordable housing production in Lane County. The funds will be used for pre-construction costs.

The Homes for Good Energy Services Division to perform energy efficiency services for the Eugene Mission, which is a homeless shelter that serves the unhoused community. The upgrades by Energy Services includes not only energy efficient work but also structural revisions. This project was in partnership with Oregon Housing Community Services and Northwest Natural's **Low Income Energy Efficiency Program**.

The Real Estate Development Director recruitment process is coming to an end. The top candidate will be notified today of the selection. Additionally, Real Estate Development has two vacant positions, the Project Manager, and the Asset Manager. Matt Salazar has been the Interim Project Manager and will now be assuming that position. Victoria Smithweiland has been the Interim Real Estate Development Director and will assume the role of Asset Manager.

B. Quarterly Excellence Awards

Alli Schwartz presented the Quarterly Excellence Award to Bryan Olson

Jeff Champ presented the Quarterly Excellence Award to Will Hartley

8. CONSENT AGENDA

- A. Approval of 03/20/2024 Board Meeting Minutes
- B. Approval of 03/27/2024 Special Board Meeting Minutes
- C. ORDER 24-22-05-01H: In the Matter of Approving the Contract Modification of Contract 22-S-0008 Janitorial Turn-Over Cleaning for Residential Units

Vote Tabulations

Motion: Larissa Ennis

Second: Kirk Strohman

Discussion: *None*

Ayes: Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Chapman, Larissa Ennis, Joel Iboa, Pat Farr , Destinee Thompson

Abstain: *None*

Excused: *None*

The 05/22/2024 Consent Agenda was approved [9/0/0]

-
-
9. ORDER 24-22-05-02H: In the Matter of Authorizing the Financing & Development of Ollie Court Located at: 1520 W. 13th Ave in Eugene, Oregon
Interim Project Development Manager, Matt Salazar Presenting

Overview

Ollie Court is an 81-unit development with an early learning center co-located on site formerly known as the Naval Reserve.

This order is to approve all the financing that has been awarded to the Ollie Court development. Pooling all the funding sources together will allow for partnership agreements to be drafted and signed to move forward with the development.

An additional \$2 million in LIFT funding was requested and approved. The total amount of LIFT funding is now \$13 million which will go towards development fees.

Discussion Themes

- Construction loan term of 24-months and possible extensions
- Permanent loan pre-payment penalties

Vote Tabulations

Motion: Heather Buch

Second: Chloe Chapman

Discussion: Timeline for commercial tenants signing leases and rent calculations.

Ayes: Heather Buch, Michelle Thurston, Justin Sandoval, Kirk Strohman, Chloe Chapman, Larissa Ennis, Joel Iboa, Pat Farr , Destinee Thompson

Abstain: *None*

Excused: *None*

ORDER 24-22-05-02H was approved [9/0/0]

10. DISCUSSION: PHA Small Book Review

Rent Assistance Director, Beth Ochs Presenting

Overview

[see link: [PHA Small Book](#)]

Historically the Five-Year Plan has been a stand-alone document and is not often referred to in day-to-day operations. There has been a shift to imbedding it as an intentional Agency process and mirrors relevant portions of the Strategic Equity Plan.

Administrative Plan and ACOP have upcoming changes due to HOTMA. The changes started in 2016 by HUD are coming to fruition. **Some of the updates are dependent on PHA's completing software changes, others are policy changes.** Trainings are held on a regular basis and **'Frequently Asked Questions'** will be available at a later time.

MAJOR CHANGES:

Annual Plan

- Alignment of 5-year goals with Strategic Equity Plan.

Administrative Plan

- HOTMA changes related to income & **assets (subject to HOTMA's timeline implementation)**
- Changes to self-certification process.
- Removal of policies related to EID.

ACOP

- HOTMA changes related to income & assets.
- Minor update to transfer policy.
- Minor update to smoking policy.
- Update for NSPIRE inspection changes.
- Minor updates to Pet Policy.

Move To Work Supplement

- Alternative Reexam Schedule
- Exception Payment Standards
- PBV Portability Waiver for PSH

Discussion Themes

- Impact over time is unknown
- **Administration of the State of Oregon's Long-Term Rent Assistance through Lane County**

No action needed.

11. PRESENTATION: Move to Work Waiver Update

Rent Assistance Director, Beth Ochs Presenting

[see presentation: Reexamination Activity & Impact Analysis]

Discussion Themes

None

No action needed.

12. DISCUSSION: Board Meeting Planning Calendar

Executive Director, Jacob Fox Presenting

Overview

The intention is to have an opportunity to plan for regular updates to the board and set an annual (or bi-annual) cadence for said events. The board is encouraged to provide feedback and/or questions as time goes on.

Discussion Themes

- Begin scheduling board retreats
- Finance Subcommittee will help design the content for the Quarterly Financial Well-Being reports

No action needed.

13. OTHER BUSINESS

None

Meeting adjourned at 2:41 p.m.

Minutes Taken By: Jasmine Leary Mixon



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/26/2024

AGENDA TITLE: Asset Portfolio Repositioning Analysis from Geller Silvis & Associates

DEPARTMENT: Real Estate Development Division

CONTACT : Jacob Fox

EXT: 2527

PRESENTER: Geller Silvis & Associates

EXT: --

ESTIMATED TIME : 20 minutes

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

Approval Signature

EXECUTIVE DIRECTOR:

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

DATE: 06.18.2024

LEGAL STAFF :

DATE:

MANAGEMENT STAFF:

DATE:



109 NW Greenwood Ave, Suite 105,
Bend Oregon

A Mission Driven Social Enterprise
specializing in community revitalization
and real estate development, state and
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partnership management, as well as
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Experience



Geller Silvis & Associates, Inc. (GSA) was formed in 1995 with the mission to reduce poverty by providing access to affordable housing, education, and nutritional supports. The company is currently run by Mariana Crawford, President and CEO.

GSA delivers expertise in the development of affordable housing from concept through funding, construction and risk management services through lease up and recapitalizations. Its clients include affordable housing owners, investors, and nonprofit and for-profit housing and antipoverty organizations across the Pacific Northwest. GSA has assisted in the development of over 3,200 units of multifamily rental housing, procuring and closing over \$375 million in equity, grants, and loans.

In 2022, GSA completed a 100 one-, two- and three-bedroom apartments for Clackamas County families, formerly foster children and individuals at-risk of or previously homeless. The development is within walking distance of services, groceries stores, employment centers and adjacent to the I-205 bike path. Designed with a focus on transit proximity and access to services as well as energy efficiency.

Team Dedicated to Homes for Good



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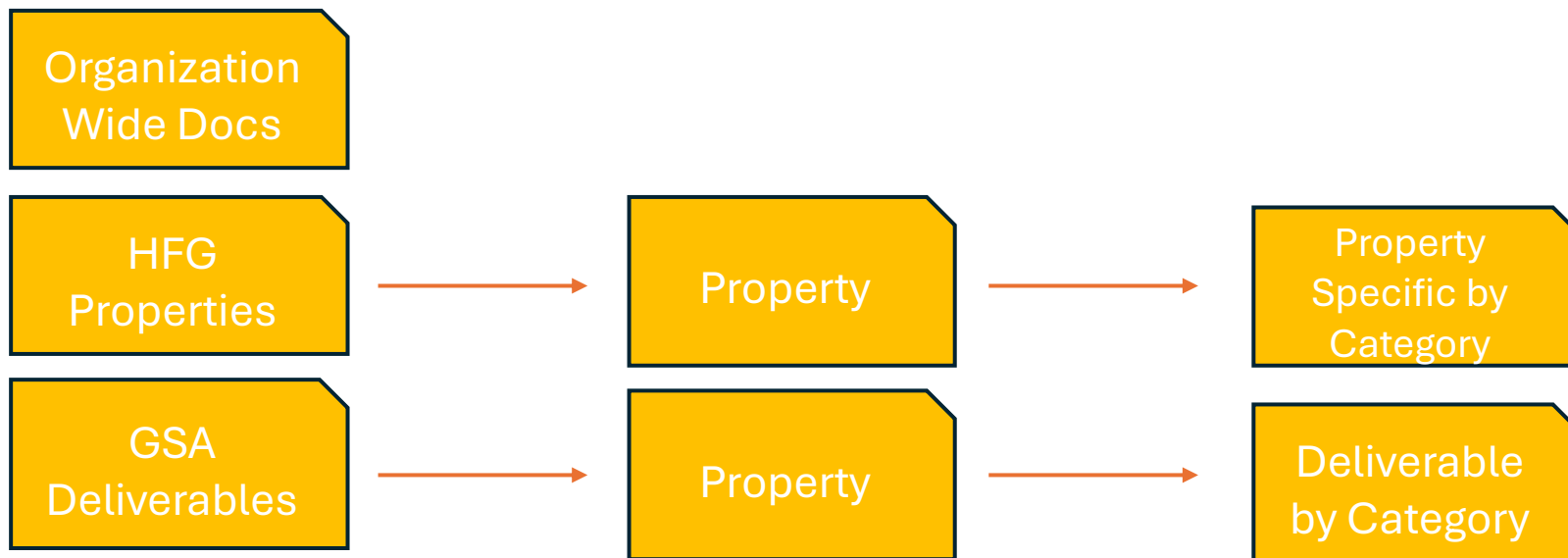
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Portfolio Analyzed

Property Name	Address	Units	Entity	Property Type
Camas	480 S. 2 nd St. Creswell, OR 97426	36	Rural Rental Assistance Payment	Rural Development
Jacob's Lane	3540 Jacob's Lane Eugene, OR 97402	63	HFG Communities Limited Partnership	LIHTC
Laurel Gardens	1775 West 12 th Ave. Eugene, OR 97402	41	HFG Communities Limited Partnership	LIHTC
Munsel Park	2021 12 th Ave. Florence, OR 97439	44	Munsel Park LP	Rural Development, LIHTC
New Winds	750 Laurel St. Florence, OR 97439	18	Discretely Presented Component Units	LIHTC
Norsemen Village	920 W 1 st Street Junction City, OR 97448	44	Rural Rental Assistance Payments	Rural Development
Sheldon Village	2475 Sheldon Village Eugene, OR 97401	77	Sheldon Village Apartments LP	LIHTC
Turtle Creek	975 Hatton Ave. Eugene, OR 97404	27	Discretely Presented Component Units	LIHTC
Walnut Park	925 Hatton Ave. Eugene, OR 97404	32	Walnut Park LP	LIHTC
Willakenzie	3202 Willakenzie Rd. Eugene, OR 97401	25	HFG Communities Limited Partnership	LIHTC
Total		407		

A systematic approach to analyzing and organizing the pertinent documents necessary for this analysis:

1. Create a standardized due diligence checklist to apply to all properties across the portfolio
2. Cross-reference documents provided to the due diligence checklist
3. Complete property-by-property analyses and provide property-by-property questionnaire denoting missing data and necessary context from Homes for Good
4. Use title company information and property management reports to cross reference due diligence data
5. Implement a proven file structure system to organize all data collected



We have made certain assumptions about rents and operating expenses for the purposes of direct comparison:

Rents

Scenario 1: 2024 Max LIHTC Rents

- Reflects all units to the maximum net tax credit rents for each AMI level

Scenario 2: Interim to Full 2024 Max LIHTC Rents

- We imagine a case where approximately half of the units have been moved to 2024 maximum net tax credit rents

Operating Expenses

For operating expenses, we are using March 2024 T12 expenses as a basis, with minimal adjustments:

- Management Fee
 - 5% of EGI as a starting baseline
- Payroll
 - Rebuilt payroll schedule, as a lender would Underwrite
 - Existing salaries for Community Managers and Maintenance
 - 20% Payroll Burden

We have proposed three scenarios, a refinance, tax credit syndication and disposition :

Refinance

1. Utilizing a HUD 223(f)
2. Generate enough proceeds to pay off existing hard debt and potential CAPEX requirements across the portfolio

Disposition

1. We envisioned a brokered sales process, where we put ourselves in the shoes of the buyer and how they would value the property
 1. We assumed a 6% cap rate to establish purchase price
 2. Aggregated the property's current hard debt
 3. Established a 2% closing cost
 4. Determined the net sale proceeds to the seller

Tax Credit Syndication

1. Maximize the Tax Credit Purchase Price by utilizing a seller note and soft-debt in order to generate the highest feasible per unit rehab scope and 100% paid developer fee
2. Assuming \$50,000/unit hard cost budget for rehab
3. Generate a gain on sale and a paid developer fee
4. Assumed a 5.5% cap rate to establish the purchase price

Refinance and Reposition Results

Property Name	Address	Units	Soft Debt	Hard Debt	UW NOI	Refi Loan Amount	Excess Proceeds	Per Unit Rehab
Camas	480 S. 2 nd St. Creswell, OR 97426	36	N/A	\$309,962.00	\$74,412.00	\$918,604.00	\$414,000.00	\$11,500.00
Jacob's Lane	3540 Jacob's Lane Eugene, OR 97402	63	N/A	\$855,515.00	\$161,725.00	\$1,996,462.00	\$882,000.00	\$14,000.00
Laurel Gardens	1775 West 12 th Ave. Eugene, OR 97402	41	N/A	\$841,201.00	\$58,190.00	\$702,247.00	-\$347,687.00	-\$8,480.17
Munsel Park	2021 12 th Ave. Florence, OR 97439	44	N/A	\$503,003.07	\$88,879.00	\$1,097,197.00	\$374,000.00	\$8,500.00
New Winds	750 Laurel St. Florence, OR 97439	18	\$876,611.00	N/A	-\$7,982.00	N/A	\$0.00	\$0.00
Norsemen Village	920 W 1 st Street Junction City, OR 97448	44	N/A	\$1,613,685.00	\$131,357.00	\$1,621,575.00	-\$165,612.00	-\$3,763.91
Sheldon Village	2475 Sheldon Village Eugene, OR 97401	77	\$775,000.00	\$3,541,808.00	\$347,164.00	\$4,305,287.00	\$462,000.00	\$6,000.00
Turtle Creek	975 Hatton Ave. Eugene, OR 97404	27	N/A	\$209,980.00	\$40,140.00	\$501,968.00	\$08,000.00	\$4,000.00
Walnut Park	925 Hatton Ave. Eugene, OR 97404	32	N/A	\$145,071.00	\$66,845.00	\$853,764.00	\$512,000.00	\$16,000.00
Willakenzie	3202 Willakenzie Rd. Eugene, OR 97401	25	N/A	\$336,698.00	\$37,975.00	\$468,787.00	-\$43,784.00	-\$1,751.36
Total		407	\$1,651,611.00	\$8,356,923.07		\$12,465,891.00	\$2,194,917.00	\$46,004.56
Total (USDA RD)		124	N/A	\$2,116,688.07		\$3,637,376.00	\$622,388.00	\$16,236.09
Total (Non-USDA RD)		283	\$775,000.00	\$5,930,273.00		\$8,828,515.00	\$1,572,529.00	\$29,768.47

Example Analysis: Jacob's Lane

The Unit Mix below shows the various rent scenarios for Jacob's Lane Apartments. In the property analysis, a Tax Credit Resyndication and Refinance and Reposition execution were evaluated across two rent scenarios. First is the full 2024 LIHTC Max rent assumption, second was an interim Max LIHTC rent assumption. We assume that 50% of the units, or 32 total units would be increased to LIHTC max rents through lease turns and increases to the payment standard on S8 Vouchers to FMR.

Unit Mix										
Beds	Baths	AMI % / Type	Units	Designation	2024 Asking Rent	2024 Max Gross	Interim Net Rent Scenario	UA	2024 Max Net	2025 Max Net
1	1	50.0%	10	Lease Turn	\$520	\$835	\$758	\$77	\$758	\$782
1	1	50.0%	14	Existing	\$494	\$835	\$494	\$77	\$758	\$782
1	1	50.0%	5	Existing	\$570	\$835	\$570	\$77	\$758	\$782
1	1	50.0%	1	Existing	\$498	\$835	\$498	\$77	\$758	\$782
2	1	50.0%	22	Lease Turn	\$613	\$1,002	\$907	\$95	\$907	\$936
2	1	50.0%	1	Existing	\$496	\$1,002	\$496	\$95	\$907	\$936
3	1	50.0%	10	Existing	\$721	\$1,002	\$721	\$112	\$890	\$919
Total / Weighted Average			63		\$ 582	\$ 922	\$ 722	89	\$ 833	\$ 860

Example Analysis: Jacob's Lane

Financial Summary			
		Refinance NOI	
		2025	
2024 Rent Growth	3.00%		
2025 Rent Growth	2.00%		
Expense Growth	3.00%	Per Unit	Per Unit
Revenue			
Gross Potential Rent		\$ 546,048	\$ 8,667
Total Gross Income		\$ 546,048	
Vacancy		(27,302)	
Vacancy %	5.0%		
Total Rental Income		\$ 518,746	
Other Income		\$ 8,707	\$ 138
Total Revenue		\$ 527,453	\$ 8,372
Expenses			
	Adjustments		
G&A	-	\$11,691	\$ 186
Payroll	-	\$93,733	1,488
Electricity	-	\$17,815	283
Gas	-	-	-
Water & Sewer	-	\$53,309	846
Trash	-	\$26,572	422
Contract Services	-	\$60,038	953
Repairs & Maintenance	-	\$16,326	259
Turnover	-	\$3,681	58
Marketing	-	\$366	6
Total Controllable Expenses		\$ 283,531	\$ 4,500
Management Fee	5%	\$25,937	\$412
Insurance	\$593	\$37,359	\$593
Real Estate Tax		-	-
Total Expenses (Pre-RR)		\$ 346,828	\$ 5,505
Replacement Reserves	\$300	\$18,900	300
Total Expenses (Including RR)		\$ 365,728	\$ 5,805
Net Operating Income		\$ 161,725	\$ 2,567
NOI Margin %		30.7%	

The proforma NOI for the interim LIHTC Max/Refinance and Reposition scenario is shown. This is the most feasible and likely execution for the property. Below the resulting cashflow is shown. After paying off the existing hard debt and paying loan fees, \$882k of excess proceeds are available for CapEx, approximately \$14k/unit.

Bridge -> Refinance							
Exit	0	0	0	0	0	0	0
Year #	0	1	2	3	4	5	
Year	2024	2025	2026	2027	2028	2029	
Date	Sep-24	Sep-25	Sep-26	Sep-27	Sep-28	Sep-29	
Permenant Loan Funding	-	\$1,996,462	-	-	-	-	-
Mortgage - Banner - HFG	-	(\$855,515)	-	-	-	-	-
HUD 223(f) Costs	-	(145,963)	-	-	-	-	-
HUD 223(f) RRs	-	(126,000)	-	-	-	-	-
HUD 223(f) CapEx	-	(882,000)	-	-	-	-	-
Net Cash Flows From Operations	\$11,424	\$11,544	\$46,028	\$46,380	\$41,390	\$41,959	
Total Cash Flows	\$ 11,424	\$(1,471)	\$ 46,028	\$ 46,380	\$ 41,390	\$ 41,959	

1. Assess feasibility of refinance and reposition execution across all properties
2. Determine most likely number of max LIHTC rent units at 9/1/2025 through turnover and increases to S8 Voucher Payment Standards
3. Identify Capital Needs for each property through a CNA report
4. Engage Lender(s) to confirm sizing of new refinance debt for each property



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/26/2024

AGENDA TITLE: In the Matter of Approving the PHA Annual Plan, MTW Supplement & 5-Year Plan

DEPARTMENT: Rent Assistance Division

CONTACT : Beth Ochs

EXT: 2547

PRESENTER: Beth Ochs

EXT: 2547

ESTIMATED TIME : 20min

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

Approval Signature

EXECUTIVE DIRECTOR:

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

DATE: 06.18.2024

LEGAL STAFF :

DATE:

MANAGEMENT STAFF:

DATE:



HOMES FOR GOOD MEMORANDUM

TO: Homes for Good Board of Commissioners

FROM: Beth Ochs, Rent Assistance Division Director

TITLE: In the Matter of Approving the PHA Annual Plan, MTW Supplement & 5-Year Plan

DATE: June 26, 2024

MOTION:

Seeking Board Approval to Submit the Annual, MTW Supplement and 5 Year Plan to HUD via the required HUD forms noted below.

DISCUSSION:

A. Issue

Homes for Good is seeking Board approval and certification that Homes for Good has complied with the applicable requirements listed on the Certification of Compliance with PHA Plan and Related Regulations, HUD form 50077-ST-HCV-HP and the MTW Certifications of Compliance, HUD form 50075-MTW

B. Background

Homes for Good is required by Section 511 of the Quality Housing and Work Responsibility Act of 1998 (and ensuing HUD requirements) to submit an Annual Plan to HUD. This year we are required to submit an Annual Plan covering FY 2025, which begins October 1, 2024, and ends September 30, 2025, and a 5 Year Plan covering FY 2025 – FY2029.

As in previous years, the focus of the Plans is to identify the programs and services provided under the Public Housing (PH) and Tenant Based Rental Assistance Programs and to allow public access and comment on those programs and services.

The Work Responsibility Act requires public housing authorities work with their Public Housing Resident Advisory Boards (RAB) on the planning and development of the Plans. In order to meet this requirement, Homes for Good began meeting with the RAB in January 2024. Homes for Good is submitting the Plan to the Homes for Good Board of Commissioners for deliberation and if approved the Plans will be electronically submission to HUD no later than July 18, 2024.

C. Analysis

The submittal of the Annual Plan includes the Move to Work Supplement.

The required analysis was completed for the transition to the tri-ennial income review cycle. The analysis focused on financial and 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 Housing Choice Voucher (HCV) households on fixed incomes. The results confirmed that no households will see a negative impact due to this policy change, and there was not a significant difference in the impact on households based on race or ethnicity.

Based on its analysis, Homes for Good determined this policy change will have a negative impact to the **agency's** Housing Assistance Payment (HAP) expenses, increasing annual HAP expenditures by \$144,867 per year. 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. However, Homes for Good 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.

D. Furtherance of the Strategic Equity Plan

The goals and focus of the 5 Year Plan align with the goals of the Strategic Equity Plan.

E. Alternatives & Other Options

HUD requires submission of the Plans by July 18, 2024. Should the board choose not to approve the Plans at this time exploration of an emergency board meeting before the July 18th deadline may be an option.

Homes for Good provided the required public hearings for the Plans on June 13, 2024. No comments were received.

F. Timing & Implementation

A copy of the Certification of Compliance with PHA Plan and Related Regulations, HUD form 50077 and the MTW Certifications of Compliance, HUD form 50075-MTW will be submitted to HUD upon written approval by the Homes for Good Chair.

Upon approval by the Board, Homes for Good will submit the Plans and aforementioned certifications to HUD.

G. Recommendation

Homes for Good recommends the board approve the request to submit the Annual and 5 Year Plans to HUD.

H. Follow Up

Homes for Good will revise its Plans in response to regulatory changes under HOTMA and will engage the board as applicable when said changes come into effect.

I. Attachments

- Certification of Compliance with PHA Plan and Related Regulations, HUD form 50077-ST-HCV-HP
- MTW Certifications of Compliance, HUD form 50075-MTW
- PHA Annual Plan Small Book

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**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 identify, 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).

Homes for Good
PHA Name

OR006
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 20_25 ___

5-Year PHA Plan for Fiscal Years 2025 - 2029 ___

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 – Jacob Fox

Name Board Chairman – Michelle Thurston

Signature

Date

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 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.

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.

MTW PHA NAME

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).

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

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.*



ANNUAL PLAN FOR FISCAL YEAR 2025

5-YEAR PLAN FOR FISCAL YEARS 2025-2030

 541-682-3755

 www.homesforgood.org

 100 West 13th Avenue, Eugene, OR 97401

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1. ANNUAL PLAN AND 5 YEAR 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 & 5-Year Plans Notice of 45-Day Comment Period and Public Hearing

Homes for Good Housing Agency is updating its PHA Annual & 5-Year Plans. These plans guide the planning and implementation of federal programs under the jurisdiction of the Department of Housing and Urban Development for the period beginning October 1, 2024. 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 29, 2024 and ends June 14, 2024. There will be a public hearing on June 13, 2024 at 1:30 p.m. at the Homes for Good Service Center first floor at 100 West 13th Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good PHA Annual & 5-Year Plan Public Hearing
Time: June 13, 2024 at 01:30 PM Pacific Time (US and Canada)

Online:

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

Meeting ID: 242 641 447 277

Passcode: Dx6cZu

Dial-in by phone:

[+1 689-206-0388](tel:+16892060388), [880802540#](tel:+1880802540) United States, Orlando

Phone conference ID: 880 802 540#

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

If you have any questions regarding the plans or would like to submit any written comments, please contact Amy Smith, Compliance & Data Analyst; at 100 West 13th Ave Eugene, OR 97401, asmith@homesforgood.org or 541-682-2537. To request a reasonable accommodation for this meeting, please call 541-682-2537 at least 24 hours prior to the meeting time.

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

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, 2024. 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 29, 2024 and ends June 14, 2024. There **will be** a public hearing on June 13, 2024 at 2:00 pm at the Homes for Good Service Center first floor at 100 West 13th Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good MTW Supplement to the Annual Plan Public Hearing
Time: June 13, 2024 at 02:00 PM Pacific Time (US and Canada)

Online:

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

Meeting ID: 264 634 643 847

Passcode: PQG48u

Dial-in by phone:

[+1689-206-0388](tel:+1689-206-0388), [5289576511](tel:+1528-957-6511) United States, Orlando

Phone conference ID: 528 957 651#

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 13th Ave Eugene, OR 97401 and on our website at homesforgood.org.

If you have any questions regarding the plans or would like to submit any written comments, please contact Amy Smith, Compliance & Data Analyst; at 100 West 13th Ave Eugene, OR 97401, asmith@homesforgood.org or 541-682-2537. To request a reasonable accommodation for this meeting, please call 541-682-2537 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 (ADAM.). Homes for Good does not discriminate on the basis of disability status in the admission or access to its federally assisted programs or activities_

3. STREAMLINED ANNUAL PHA PLAN FOR FY2025

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

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

Definitions.

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

A. PHA Information							
A.1	PHA Name: <u>Homes for Good Housing Agency</u> PHA Code: <u>OR006</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>595</u> Number of Housing Choice Vouchers (HCVs) <u>3,306</u> Total Combined <u>3,901</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission						
<p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p>							
		Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
						PH	HCV
B. Plan Elements							
B.1	Revision of Existing PHA Plan Elements. (a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission? Y N: No <input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.						

	<p> <input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources. <input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination. <input type="checkbox"/> <input checked="" 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 </p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below: While all elements above are all marked “no”, Homes the Good made changes to its ACOP and Admin Plan. These are included in the sections that follow. Homes for Good’s PHA Plan Elements are also restated in this document for clarity:</p> <ul style="list-style-type: none"> • See Attachment B.1 Revision of PHA Plan Elements • See Attachment 1. Key Modifications ACOP FY25 • See Attachment 2. Key Modifications Admin Plan FY25 <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<p>B.2</p>	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N Yes – Project Based Vouchers</p> <p> <input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). </p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <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. It begins construction in July 2024 and will be complete in September 2025.</p> <p>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 Eugene will serve homeless individuals and includes 56 PBVs. It began construction in June 2024 and will be complete in May of 2025.</p>
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>See Attachment B.3 Progress Report</p>
<p>B.4.</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/26/2022.</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</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 FY2022 audit. A corrective action plan has been established and is currently in place.</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input 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>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.3</p>	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" 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>D. Affirmatively Furthering Fair Housing (AFFH).</p>	
<p>D.1</p>	<p>Affirmatively Furthering Fair Housing.</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> <p>Fair Housing Goal:</p>

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\(m\)](#))

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

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

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

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

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

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

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 . ([Notice PIH 2011-47](#))

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

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

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

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

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

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

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

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

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

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

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

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

C. Other Document and/or Certification Requirements

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

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

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

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

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

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

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

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to

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

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

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

Implementation of Housing Opportunity Through Modernization Act of 2016 (HOTMA)

In accordance with the requirements set forth in U.S. Department of Housing and Urban Development's (HUD) PIH 2023-27 (Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)) Homes for Good has imbedded policies into its Fiscal Year (FY) 2025 Administrative (Admin) and Admissions and Continued Occupancy Policy (ACOP) Plans to meet the aforementioned requirements.

HOTMA requires compliance with its final rule effective no later than January 1, 2025.

However, until HUD provides guidance to software vendors on the implementation of HOTMA HUD is requiring Public Housing Agencies to continue to follow existing regulatory guidance/policy until HOTMA is declared ready for use by HUD.

The attached Pre and Post HOTMA Regulatory Citation Matrix for Public Housing (PH) and Housing Choice Voucher (HCV) Programs provided by HUD provides guidance on what Code of Federal Regulations (CFR's) are affected by HOTMA.

For any CFRs noted in the matrix, users should utilize the applicable FY24 Admin or ACOP Plan unless otherwise noted in the matrix.

Homes for Good will update the matrix as HOTMA is deemed usable by HUD.

Pre and Post HOTMA Regulatory Citation Matrix for PH and HCV Programs

The following is a matrix to compare the pre-HOTMA and related post-HOTMA regulatory citations. The description column is very brief and is not a substitute for consulting the full text of the regulation for context and to identify policy changes.

	Pre-HOTMA	Post-HOTMA	Effective Date of Post-HOTMA Language
Net Family Assets	5.603 Net Family Assets	5.603 Net Family Assets	
Annual Income Definitions	5.609(a)	5.609(a); 5.603, 5.100	
Annual Income Exclusions	5.609(c)	5.609(b)	
Specific types of income/assets:			
• Income of minors	5.609(c)(1)	5.609(b)(3)	
• Foster care/guardianship payments	5.609(c)(2)	5.609(b)(4)	
• Lump-sum additions to net family assets	5.609(c)(3)	5.609(b)(24)(vii)	
• Medical care reimbursements	5.609(c)(4)	5.609(b)(6)	
• Income of live-in aide	5.609(c)(5)	5.609(b)(8)	
• Student Financial Assistance	5.609(c)(6) and (b)(9)	5.609(b)(9)	
• Special pay for Armed Forces exposed to hostile fire	5.609(c)(7)	5.609(b)(11)	
• Amounts received under training programs funded by HUD	5.609(c)(8)(i)	5.609(b)(12)(iv)	
• Amounts disregarded that are set aside for use under the Plan to Attain Self-Sufficiency (PASS) program	5.609(c)(8)(ii)	5.609(b)(12)(i)	
• Amounts received for reimbursement of out of pocket expenses incurred to participate in a specific program	5.609(c)(8)(iii)	5.609(b)(12)(ii)	
• Resident service stipend	5.609(c)(8)(iv)	5.609(b)(12)(iii)	
• Incremental earnings from participation in certain employment training programs	5.609(c)(8)(v)	5.609(b)(12)(iv)	
• Non-recurring income	5.609(c)(9)	5.609(b)(24)	
• Reparation payments paid by a foreign government for those persecuted during the Nazi era	5.609(c)(10)	5.609(b)(13)	
• Earned income of dependent full-time students in excess of dependent deduction	5.609(c)(11)	5.609(b)(14)	

• Adoption assistance payments	5.609(c)(12)	5.609(b)(15)	
• Deferred periodic amounts from SSI, SS, and VA	5.609(c)(14)	5.609(b)(16)	
• Refunds or rebates under State or local law for property taxes	5.609(c)(15)	5.609(b)(18)	
• Amounts authorized by State Medicaid agency or other State or Federal agency to enable a family member who has a disability to reside in the family's assisted unit	5.609(c)(16)	5.609(b)(19)	
• Distributions from trusts	5.603 Net Family Assets (2)	5.609(b)(2)	
• Business income	5.609(b)(2)	5.609(b)(28)	
• Federally mandated exclusions	5.609(c)(17)	5.609(b)(22)	
Calculation of Income	5.609(d)	5.609(c)	
Mandatory Deductions	5.611(a)	5.611(a)	
Permissive Deductions	5.611(b)	5.611(b)	
Hardship Exemptions for Deductions	NA	5.611(c),(d),(e)	
Self-Certification of Assets	960.259(c)(2) and 982.516(a)(3)	5.618(b); 960.259(c)(2) and 982.516(a)(3)	
Interim Reexaminations	982.516(c); 960.257(b)	982.516(c); 960.257(b)	
Safe Harbor Verifications	NA	5.609(c)(3)	

4. ANNUAL PLAN FY2025 ATTACHMENTS

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



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Key Modifications to Homes for Good Admissions and Continued Occupancy Policy Fiscal Year 2025 Effective Date 10-01-2024 to 9-30-2025

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

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Section	Previous Policy	Proposed Policy	Required Change?	Impact
3-I.K.	<p>PHA Policy</p> <p>A foster child is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.</p>	<p>PHA Policy</p> <p>A foster child or foster adult may be allowed to reside in the unit if their presence would not overcrowd the unit.</p>	Yes – HOTMA	New regulatory language from HUD
3-I.M	<p>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. For continued approval, the family may be required to submit a new, written request— subject to PHA verification—at each annual reexamination.</p> <p>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.</p> <p>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)]:</p>	<p>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. For continued approval, the family may be required to submit a new, written request— subject to PHA verification—at each annual reexamination.</p> <p>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.</p> <p>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)]:</p>	No	Aligns with other polices by streamling to business days vs. Calendar days

	<p>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.</p> <p>Within 14 calendar 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.</p>	<p>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.</p> <p>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.</p>		
3-II.B	<p>The PHA will not provide assistance to a family before the verification of at least one family member as a citizen, national, or eligible noncitizen.</p> <p>When a PHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 14 calendar days of the determination.</p> <p>The notice will explain the reasons for the denial of assistance and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services (USCIS), or to request a grievance hearing with the PHA. The grievance hearing with the PHA may be</p>	<p>The PHA will not provide assistance to a family before the verification of at least one family member as a citizen, national, or eligible noncitizen.</p> <p>When a PHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 14 business days of the determination.</p> <p>The notice will explain the reasons for the denial of assistance and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services (USCIS), or to request a grievance hearing with the PHA. The grievance hearing with the PHA may be</p>	No	Aligns with other polices by streamling to business days vs. Calendar days

	<p>requested in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the grievance hearing process.</p> <p>Grievance hearing procedures are contained in Chapter 14.</p>	<p>requested in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the grievance hearing process.</p> <p>Grievance hearing procedures are contained in Chapter 14.</p>		
3-III.B	<p>Currently engaged in is defined as any use of illegal drugs during the previous three months</p>	<p>Currently engaged in is defined as any use of illegal drugs during the previous three months.</p> <p>However, if the PHA is able to verify the household member who engaged in the illegal drug activity has completed, or is actively engaged, in a supervised drug rehabilitation program approved by the PHA, then the PHA will admit an otherwise eligible family.</p>	No	Expands access to housing. Aligns with Admin Plan
3-II.D.	<p>3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 5.230]</p>	<p>PHA Policy</p> <p>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.</p>	Yes – HOTMA	New regulatory language from HUD
3-III.D	<p>In the case of money owing to this or another PHA, the applicant will be notified by the PHA of the amount owed. The applicant will be given 14 calendar days to provide the PHA with proof of payment or documentation that a repayment</p>	<p>In the case of money owing to this or another PHA, the applicant will be notified by the PHA of the amount owed. The applicant will be given 14 business days to provide the PHA with proof of payment or documentation that a repayment</p>	No	Aligns with other polices by streamling to business days vs. Calendar days

	agreement has been reached and that the applicant is considered to be in good standing/up to date on payments.	agreement has been reached and that the applicant is considered to be in good standing/up to date on payments.		
3-III.F	<p>The PHA acknowledges that a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking may have an unfavorable history (e.g., a poor credit history, poor rental history, a record of previous damage to an apartment, a prior arrest record) due to adverse factors that would warrant denial under the PHA's policies.</p> <p>While the PHA is not required to identify whether adverse factors that resulted in the applicant's denial are a result of domestic violence, dating violence, sexual assault, stalking, or human trafficking the applicant may inform the PHA that their status as a victim is directly related to the grounds for the denial. The PHA will request that the applicant provide enough information to the PHA to allow the PHA to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim. The PHA will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and a copy of the form HUD-5382. The PHA will request in writing that an applicant wishing to claim this protection notify the PHA within 14 calendar days.</p>	<p>The PHA acknowledges that a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking may have an unfavorable history (e.g., a poor credit history, poor rental history, a record of previous damage to an apartment, a prior arrest record) due to adverse factors that would warrant denial under the PHA's policies.</p> <p>While the PHA is not required to identify whether adverse factors that resulted in the applicant's denial are a result of domestic violence, dating violence, sexual assault, stalking, or human trafficking the applicant may inform the PHA that their status as a victim is directly related to the grounds for the denial. The PHA will request that the applicant provide enough information to the PHA to allow the PHA to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim. The PHA will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and a copy of the form HUD-5382. The PHA will request in writing that an applicant wishing to claim this protection notify the PHA within 14 business days.</p>	No	Aligns with other polices by streamling to business days vs. Calendar days

6-I.B.	<p>Temporarily Absent Family Members PHA Policy Absences in excess of 30 days require the PHA’s approval.</p> <p>Absences Due to Placement in Foster Care PHA Policy If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.</p> <p>Individuals Confined for Medical Reasons PHA Policy An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.</p> <p>If there is a question about the status of a family member, the PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the</p>	<p>Temporarily Absent Family Members PHA Policy Absences in excess of 30 days require the PHA’s approval.</p> <p>Unless specifically excluded by the regulations, the income of all family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit.</p> <p>Absences Due to Placement in Foster Care PHA Policy If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be continue to counted as a family member.</p> <p>Family Members Confined for Medical Reasons PHA Policy If a family member is confined to a nursing home or hospital on a permanent basis, PHAs may determine that that person is no longer a member of the assisted household, and the income of that</p>	Yes – HOTMA	New regulatory language from HUD

	<p>family member is confined on a permanent basis and request that the person not be considered a family member.</p>	<p>person is not counted [New PH OCC GB, Income Determinations, p. 12].</p> <p>The PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.</p> <p>When an individual who has been counted as a family member is determined permanently absent, the family is eligible for the medical expense deduction only if the remaining head, spouse, or cohead qualifies as an elderly person or a person with disabilities</p>		
<p>6-I.F.</p>	<p>Business Expenses Net income is “gross income less business expense” [HCV GB, p. 5-19]. PHA Policy To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described below.</p>	<p>6-I.F. BUSINESS AND SELF-EMPLOYMENT INCOME [24 CFR 5.609(b)(2)] 8); Notice PIH 2023-27] PHA Policy To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described herein.</p>	<p>Yes – HOTMA</p>	<p>New regulatory language from HUD</p>

6-I.G.	NEW - HOTMA	<p>Calculating Income from Student Financial Assistance [HOTMA Student Financial Assistance Resource Sheet; Notice PIH 2023-27]</p> <p>PHA Policy If a student only receives financial assistance under Title IV of the HEA and does not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family’s annual income. The PHA will not calculate actual covered costs in this case.</p> <p>If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student’s financial assistance from the student’s actual covered costs. The PHA will include any amount of financial assistance in excess of the student’s actual covered costs in the family’s annual income.</p> <p>When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student’s actual covered costs first and then the other</p>	Yes – HOTMA	New regulatory language from HUD
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		<p>student financial assistance will be applied to any remaining actual covered costs. If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance” would be excluded from income.</p> <p>If the amount of assistance excluded under Title IV of the HEA is less than the actual covered costs, the PHA will exclude the amount of other student financial assistance up to the amount of the remaining actual covered costs.</p>		
6-I.H.	<p>6-I.H. PERIODIC PAYMENTS</p> <p>MTW Policy The PHA will not adjust the subsidy retroactively for any delayed start of periodic payments received and reported during the period in which the PHA is processing an annual reexam.</p> <p>PHA Policy When a delayed-start payment is received that is to be included and the family and reported during the period in which the PHA is processing an annual reexamination, the PHA will adjust the family’s rent retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with the PHA.</p>	<p>6-I.H. PERIODIC PAYMENTS [Notice PIH 2023-27]</p> <p>MTW Policy The PHA will not adjust the subsidy retroactively for any delayed start of periodic payments received and reported during the period in which the PHA is processing an annual reexam.</p> <p>PHA Policy The PHA will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.</p> <p>When a delayed-start payment is received that is to be included and the family report this during the period in</p>	Yes – HOTMA	New regulatory language from HUD

		<p>which the PHA is processing an annual reexamination, the PHA will adjust the family's rent retroactively for the period the payment was intended to cover.</p> <p>If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 9. If not, the PHA will consider the amount when processing the family's next annual recertification.</p> <p>Alimony and Child Support Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but which they do not receive. For example, a family's child-support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders [Notice PIH 2023-27].</p> <p>PHA Policy The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement.</p> <p>The PHA will count court-awarded amounts for alimony and child support unless the family</p>		
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		<p>certifies and the PHA verifies that the payments are not being made.</p> <p>In order to verify that payments are not being made, the PHA will review child support payments over the last three months.</p> <p>If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made.</p> <p>At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income.</p> <p>If the PHA determines and can appropriately verify that the family, in all likelihood, will not receive a similar payment, then the amount will not be considered when projecting annual income.</p> <p>If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income.</p>		
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		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-I.M.	<p>6-I.M. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME PHA Policy</p> <ul style="list-style-type: none"> • Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(b)(12)(i)] • Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(b)(13)] • Adoption assistance payments for the child in excess of the amount of the dependent deduction per adopted child [24 CFR 5.609(c)(12)] • Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(b)(20)] • Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the 	<p>6-I.M. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME [24 CFR 5.609(b)] PHA Policy</p> <ul style="list-style-type: none"> • The PHA defines <i>training program</i> as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual’s ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3]. • The PHA defines <i>incremental earnings and benefits</i> as the difference between (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4]. 	Yes – HOTMA	New regulatory language from HUD

	<p>developmentally disabled family member at home [24 CFR 5.609(c)(16)]</p> <ul style="list-style-type: none"> • Amounts specifically excluded by any other federal statute [24 CFR 5.609(c)(17), FR Notice 5/20/14]. HUD publishes an updated list of these exclusions periodically. It includes: • The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b)) • Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966, including WIC • Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058) • Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c)) • Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e) 	<ul style="list-style-type: none"> • In calculating the incremental difference, the PHA will use as the pre-enrollment income the total annualized amount of the family member's welfare assistance and earnings reported on the family's most recently completed HUD-50058. • End of participation in a training program must be reported in accordance with the PHA's interim reporting requirements (see Chapter 11). • Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(b)(12)(i)] • Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(b)(13)] • Adoption assistance payments for the child in excess of the amount of the dependent deduction per adopted child [24 CFR 5.609(c)(12)] • Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(b)(20)] • Amounts that HUD is required by federal statute to exclude from consideration as income for purposes of determining eligibility or benefits under a category of 		
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		<p>assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(b) apply. HUD will publish a notice in the Federal Register to identify the benefits that qualify for this exclusion. Updates will be published when necessary [24 CFR 5.609(b)(22)].</p> <ul style="list-style-type: none"> • HUD publishes an updated list of these exclusions periodically. The most recent list of exclusions was published in the <i>Federal Register</i> on May 20, 2014. It includes: • The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b)) • Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966, including WIC • Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058) • Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c)) • Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e) 		
6-II.A.	Part II: Assets 6-II.A. Overview	<p>PHA Policy The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset.</p>	Yes – HOTMA	New regulatory language from HUD

		<p>The PHA will use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected, (2) it is not feasible to anticipate a level of income over 12 months, or (3) the PHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income, but the property is currently vacant, the PHA can take into consideration past rental income along with the prospects of obtaining a new tenant.</p> <p>Any time current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases, the family may present information and documentation to the PHA to show why the asset income determination does not represent the family's anticipated asset income.</p> <p>6-II.C. ASSET INCLUSIONS AND EXCLUSIONS</p> <p>Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds [24 CFR 5.603(b)(1)] PHA Policy</p> <p>The PHA will include interest or dividends earned by investment accounts as actual income from assets even when the earnings are reinvested.</p> <p>The cash value of such an asset is determined by deducting from the market value any broker fees,</p>		
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		<p>penalties for early withdrawal, or other costs of converting the asset to cash.</p> <p>In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.</p> <p>Necessary and Non-Necessary Personal Property [24 CFR 5.603(b)(3)(i)] PHA Policy In determining the value of non-necessary 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.</p> <p>Lump-Sum Additions to Net Family Assets [24 CFR 5.609(b)(24)(viii); Notice PIH 2023-27] PHA Policy Any lump-sum receipts are only counted as assets if they are retained by a family in a form recognizable as an asset. [RHIIP FAQs]. For example, if the family receives a \$1,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets.</p> <p>Jointly Owned Assets [Notice PIH 2023-27] PHA Policy If the family demonstrates that they can only access a portion of the income from an asset,</p>		
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		<p>then only that portion's value is included in the calculation of income from assets.</p> <p>If an individual is a beneficiary who is entitled to access the account's funds only upon the death of the account's owner, and may not otherwise withdraw funds from an account, then the account is not an asset to the assisted family, and the family should provide proper documentation demonstrating that they are only a beneficiary on the account.</p> <p>6-II.D. DETERMINING INCOME FROM ASSETS</p> <p>Net Family Assets PHA Policy Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions such as settlement costs and transfer taxes [New PH OCC GB, <i>Income Determinations</i>, p. 24].</p>		
6-II.B.	6-II.B. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE [24 CFR 5.603(b)(2)]	PHA Policy The PHA will not include the value of assets disposed of for less than fair market value unless the cumulative fair market value of all assets disposed of during the past two years exceeds the gross amount received for the assets by more than \$1,000. Separation or Divorce PHA Policy	Yes – HOTMA	New regulatory language from HUD

		<p>All assets disposed of as part of a separation or divorce settlement will be considered assets for which important consideration not measurable in monetary terms has been received. In order to qualify for this exemption, a family member must be subject to a formal separation or divorce settlement agreement established through arbitration, mediation, or court order.</p> <p>Family Declaration PHA Policy Families must sign a declaration form at initial certification and each annual recertification identifying all assets that have been disposed of for less than fair market value or declaring that no assets have been disposed of for less than fair market value. The PHA may verify the value of the assets disposed of if other information available to the PHA does not appear to agree with the information reported by the family.</p>		
6-II.C.	6-II.C. ASSET INCLUSIONS AND EXCLUSIONS	<p>6-II.C. ASSET INCLUSIONS AND EXCLUSIONS</p> <p>Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds [24 CFR 5.603(b)(1)] PHA Policy The PHA will include interest or dividends earned by investment accounts as actual income from assets even when the earnings are reinvested. The cash value of such an asset is determined by deducting from the market value any broker fees, penalties for early withdrawal, or other costs of converting the asset to cash.</p>	Yes – HOTMA	New regulatory language from HUD

		<p>In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.</p> <p>Necessary and Non-Necessary Personal Property [24 CFR 5.603(b)(3)(i)] PHA Policy In determining the value of non-necessary 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 \$1000.00 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.</p> <p>Lump-Sum Additions to Net Family Assets [24 CFR 5.609(b)(24)(viii); Notice PIH 2023-27] PHA Policy Any lump-sum receipts are only counted as assets if they are retained by a family in a form recognizable as an asset. [RHIIP FAQs]. For example, if the family receives a \$1,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets.</p> <p>Jointly Owned Assets [Notice PIH 2023-27] PHA Policy If the family demonstrates that they can only access a portion of the income from an asset, then only that portion's value is included in the calculation of income from assets.</p>		
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		<p>If an individual is a beneficiary who is entitled to access the account's funds only upon the death of the account's owner, and may not otherwise withdraw funds from an account, then the account is not an asset to the assisted family, and the family should provide proper documentation demonstrating that they are only a beneficiary on the account.</p> <p>6-II.D. DETERMINING INCOME FROM ASSETS</p> <p>Net Family Assets PHA Policy Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions such as settlement costs and transfer taxes [New PH OCC GB, <i>Income Determinations</i>, p. 24].</p>		
<p>6-II.C.</p>	<p>Anticipating Expenses PHA Policy Generally, the PHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g., child care during school and non-school periods and cyclical medical expenses), the PHA will estimate costs based on historic data and known future costs.</p> <p>If a family has an accumulated debt for medical or disability assistance expenses, the PHA will</p>	<p>Anticipating Expenses PHA Policy Generally, the PHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g., child care during school and non-school periods and cyclical medical expenses), the PHA will estimate costs based on historic data and known future costs.</p> <p>If a family has an accumulated debt for medical or disability assistance expenses, the PHA will</p>	<p>Yes – HOTMA</p>	<p>New regulatory language from HUD</p>

	<p>include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. The PHA may require the family to provide documentation of payments made in the preceding year.</p>	<p>include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. The PHA may require the family to provide documentation of payments made in the preceding year.</p> <p>When calculating health and medical care expenses, the PHA will include those expenses anticipated to be incurred during the 12 months following the certification date reexam which are not covered by an outside source, such as insurance. The allowance is not intended to give a family an allowance equal to last year's expenses, but to anticipate regular ongoing and anticipated expenses during the coming year. Since these expenses are anticipated, the <i>PH Occupancy Guidebook</i> states "it is likely that actual expenses will not match what was anticipated. Typically, this would not be considered an underpayment as long as at the time of the annual reexamination, the expenses were calculated based on the appropriate verification" [New PH OCC GB, <i>Income Determinations</i>, p. 30]. For annual reexaminations, the PHA will use information for the previous 12-month period.</p>		
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6-III.B.	6-III.B. DEPENDENT DEDUCTION	<p>6-III.B. DEPENDENT DEDUCTION An allowance of \$480 is deducted from annual income for each dependent (which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25) [24 CFR 5.611(a)(1)]. <i>Dependent</i> is defined as any family member other than the head, spouse, or cohead who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults, and live-in aides are never considered dependents [24 CFR 5.603(b)].</p>	Yes – HOTMA	New regulatory language from HUD
6-III.C	6-III.C. ELDERLY OR DISABLED FAMILY DEDUCTION	<p>6-III.C. ELDERLY OR DISABLED FAMILY DEDUCTION A single deduction of \$525 is taken for any elderly or disabled family (which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25) [24 CFR 5.611(a)(2)]. An <i>elderly family</i> is a family whose head, spouse, cohead, or sole member is 62 years of age or older, and a <i>disabled family</i> is a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403].</p>	Yes – HOTMA	New regulatory language from HUD
6-III.E.	6-III.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]	<p>Earned Income Limit on the Disability Assistance Expense Deduction PHA Policy</p>	Yes – HOTMA	New regulatory language from HUD

		<p>The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family's request, the PHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.</p> <p>When the PHA determines that the disability assistance expenses enable more than one family member to work, the disability assistance expenses will be capped by the sum of the family members' incomes [New PH OCC GB, Income Determination, p. 28]</p> <p>Eligible Auxiliary Apparatus [Notice PIH 2023-27]</p> <p>Eligible Attendant Care [Notice PIH 2023-27] PHA Policy Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services</p>		
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		necessary to enable the person with disabilities to work are eligible.		
6-III.G	6-III.G. HARDSHIP EXEMPTIONS [24 CFR 5.611(c), (d), and (e)]	<p>6-III.G. HARDSHIP EXEMPTIONS [24 CFR 5.611(c), (d), and (e)] <i>Health and Medical Care and Disability Assistance Expenses [24 CFR 5.611(c); Notice PIH 2023-27]</i> <i>Phased-In Relief</i> PHA Policy The PHA will not continue the phased-in relief for families who move from the HCV program to public housing. These families will be treated as new admissions and the sum of expenses that exceeds 10 percent of annual income will be used to calculate their adjusted income.</p> <p>General Relief To qualify for a hardship exemption, a family must submit a request in writing. The request must show that the family’s health and medical and/or disability assistance expenses have increased (other than the transition to the higher threshold) or that the family’s financial hardship is a result of a change in circumstances. The PHA defines a change in circumstances as a decrease in income or increase in other expenses that has resulted in the family’s financial hardship but does not, on its own, trigger an interim reexam in accordance with PHA policies.</p>	Yes – HOTMA	New regulatory language from HUD

		<p>Examples of circumstances constituting a financial hardship may include the following situations: The family is awaiting an eligibility determination for a federal, state, or local assistance program, such as a determination for unemployment compensation or disability benefits; The family's income decreased because of a loss of employment, death of a family member, or due to a natural or federal/state declared disaster; or Other circumstances as determined by the PHA. The family must provide third-party verification of the hardship with the request. If third-party <i>verification</i> is not available, the PHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period. The PHA must promptly notify the family in writing of the change in the determination of adjusted income and the family's rent resulting from hardship exemptions. The notice must inform the family of when the hardship exemption will begin and expire [24 CFR 5.611(e)(2)].</p> <p>PHA Policy The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 14 business days of the determination. If the PHA denies the hardship exemption request, the PHA notice will also state that if the family does not agree with the PHA determination, the family may request a hearing.</p>		
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		<p>If the family qualifies for an exemption, the PHA will include the date the hardship exemption will begin and the date it will expire as well as information on how to request a 90-day extension based on family circumstances.</p> <p>If the family qualifies, the family will receive a deduction for the sum of eligible expenses that exceed five percent of annual income.</p> <p>The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever is earlier. However, the PHA may, at its discretion, extend the relief for one or more additional 90-day periods while the family's hardship condition continues. PHAs are not limited to a maximum number of 90-day extensions. PHAs must establish written policies regarding the types of circumstances that will allow a family to qualify for a financial hardship and when such deductions may be eligible for additional 90-day extensions. PHAs must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable.</p> <p>PHA Policy</p> <p>The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's satisfaction that the family continues</p>		
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		<p>to qualify for the hardship exemption based on circumstances described above. The PHA will require updated verification based on the family's current circumstances. Additional extension may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship exemption if the PHA determines that the family no longer qualifies for the exemption.</p> <p><i>Child Care Expense Hardship Exemption [24 CFR 5.611(d) and Notice PIH 2023-27]</i> PHA Policy</p> <p>The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the determination.</p> <p>If the PHA denies the hardship exemption request, the PHA notice will also state that if the family does not agree with the PHA determination, the family may request a grievance hearing.</p> <p>If the family qualifies for an exemption, the PHA will include all required information listed above as well as information on how to request a 90-day extension based on family circumstances.</p> <p>If the family qualifies, the hardship exemption and the resulting alternative adjusted income</p>		
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		<p>calculation must remain in place for a period of up to 90 days.</p> <p>The PHA may, at its discretion, extend the hardship exemptions for additional 90-day periods based on family circumstances and as stated in PHA policies. PHAs are not limited to a maximum number of 90-day extensions. . PHAs must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. PHAs must promptly notify families in writing if they are denied either an initial hardship exemption or an additional 90-day extension of the exemption. If the PHA denies the request, the notice must specifically state the reason for the denial.</p> <p>PHAs must notify the family if the hardship exemption is no longer necessary and the hardship exemption will be terminated because the circumstances that made the family eligible for the exemption are no longer applicable. The notice must state the termination date and provide 30 days' notice of rent increase, if applicable.</p> <p>PHA Policy</p> <p>The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's satisfaction that the family continues to qualify for the hardship exemption. The PHA</p>		
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		will require updated verification based on the family's current circumstances. Additional extensions may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship exemption if the PHA determines that the family no longer qualifies for the exemption.		
7-I.A.	7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259; 24 CFR 5.230; and Notice PIH 2023-27]	<p>Penalties for Failing to Consent [24 CFR 5.232]</p> <p>PHA Policy</p> <p>The PHA has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with PHA policy.</p> <p>In order for a family to revoke their consent, the family must provide written notice to the PHA. Within 14 business days of the date the family provides written notice, the PHA will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the PHA will notify the local HUD office.</p>	Yes – HOTMA	New regulatory language from HUD

7-I.B.	7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]	<p>PHA Policy</p> <p>When available and applicable, the PHA may accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The PHA will still require third-party verification of all deductions such as the health and medical care expense or child care expense deductions. Further, if the family is eligible for and claims the disability assistance expense or child care expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.</p> <p>Prior to using any Safe Harbor determination from another program, the PHA will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the PHA will obtain third-party verification of all sources of income and assets (as applicable).</p> <p>The PHA will not accept other programs' determinations of income for any new admission or interim reexamination.</p> <p>With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the PHA will accept Safe Harbor</p>	Yes – HOTMA	New regulatory language from HUD
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		<p>determinations from any of the programs listed above.</p> <p>In order to be acceptable, the income determination must:</p> <ul style="list-style-type: none">• Be dated within 12 months of the dates listed above;• State the family size;• Be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members); and• Must state the amount of the family's annual income. <p>The determination need not list each source of income individually. If the PHA does not receive any acceptable income determination documentation or is unable to obtain documentation, then the PHA will revert to third-party verification of income for the family.</p> <p>When families present multiple verifications from the same or different acceptable Safe Harbor programs, the PHA will use the most recent income determination, unless the family presents acceptable evidence that the PHA should consider an alternative verification from a different Safe Harbor source.</p>		
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		<p>When the PHA uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the PHA. Depending on when the change occurred, the change may or may not impact the PHA's calculation of the family's total annual income.</p> <p>Changes that occur between the time the PHA receives the Safe Harbor documentation and the effective date of the family's annual reexam will not be considered. If the family has a change in income that occurs after the annual reexam effective date, the PHA will conduct an interim reexam if the change meets the requirements for performing an interim reexamination as outlined in Chapter 9. In this case, the PHA will use third-party verification to verify the change.</p>		
7-I.C.	<p>7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]</p>	<p>PHA Policy</p> <p>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, then PHA will use a streamlined income determinations where applicable.</p> <p>If 90 percent or more of a family's unadjusted income is from fixed income sources:</p> <p>The PHA may streamline the annual</p>	Yes – HOTMA	New regulatory language from HUD

		<p>reeexamination process by applying the verified inflationary adjustment factor to fixed-income sources.</p> <p>The family will be required to sign a self-certification stating that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year.</p> <p>The PHA will document in the file how the determination that a source of income was fixed was made.</p> <p>Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.</p> <p>If the family's sources of fixed income have changed from the previous year, the PHA will obtain third-party verification of any new sources of fixed income.</p> <p>When less than 90 percent of a family's unadjusted income consists of fixed income:</p> <p>The PHA will apply a COLA to each of the family's sources of fixed income.</p>		
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		<p>All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.</p> <p>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:</p> <p>Of all assets when net family assets exceed \$50,000;</p> <p>Of all deductions and allowances from annual income;</p> <p>If a family member with a fixed source of income is added;</p> <p>If verification of the COLA or rate of interest is not available;</p> <p>During the intake process and at least once every three years thereafter.</p>		
7-I.E.	7-I.E. LEVEL 5 AND 6 VERIFICATION: UP-FRONT INCOME VERIFICATION (UIV)	<p>EIV Income and IVT Reports</p> <p>PHA Policy</p> <p>Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine the family's annual income, the PHA will obtain EIV Income and IVT reports for all annual reexaminations for all families on a monthly basis. Reports will be generated as part of the regular reexamination process. The PHA will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual</p>	Yes – HOTMA	New regulatory language from HUD

		<p>reexamination.</p> <p>Income and IVT reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV.</p> <p>Income and IVT reports will be retained in resident files with the applicable annual documents or interim reexamination documents (if applicable) for the duration of tenancy.</p> <p>When the PHA determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.</p> <p>New Hires Report [Notice PIH 2023-27] PHA Policy</p> <p>In accordance with PHA policies in Chapter 9, the PHA does not process interim reexaminations for families who have increases in earned income. Except for instances in which the PHA uses Safe Harbor income determinations to determine a family's annual income, the PHA will only review the New Hires Report at annual reexamination.</p> <p>No Income Reported by HHS or SSA Report</p>		
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		<p>PHA Policy</p> <p>The PHA will generate the No Income Reported by HHS or SSA Report quarterly and will retain the report.</p> <p>The PHA will re-verify the status of tenants identified on the report quarterly. Based on the information provided by the family and in EIV, the PHA may require that family members provide verifications or sign release forms in order to obtain additional verification.</p> <p>When the PHA determines through this report and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.</p> <p>EIV Identity Verification Report</p> <p>PHA Policy</p> <p>The PHA will identify residents whose identity verification has failed by reviewing EIV's <i>Identity Verification Report</i> on a monthly basis.</p> <p>The PHA will attempt to resolve discrepancies by obtaining appropriate documentation from the tenant. When the PHA determines that discrepancies exist as a result of PHA errors, such as spelling errors or incorrect birth dates, it will</p>		
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		<p>correct the errors promptly.</p> <p>Deceased Tenants Reports [Notice PIH 2012-4 and Notice PIH 2023-27]</p> <p>PHA Policy</p> <p>The PHA will review the Deceased Tenants Report on a monthly basis.</p> <p>When the Deceased Tenants Report identifies an individual as being deceased, PHAs must immediately send a letter to the head of household or emergency contact person (if the head of household is deceased and there is no other adult household member) to confirm the death of the listed household member. The PHA must conduct a home visit to determine if anyone is residing in the unit.</p> <p>PHAs are required to list the move-out date for the family as of the date on which the family or designee of the deceased tenant's estate returned the keys and signed a vacate notice; the date the public housing lease was terminated; or the date the PHA legally regained possession of the unit, whichever occurs first.</p> <p>When the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for continued occupancy. The PHA may</p>		
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		<p>not designate the live-in aide as the new head of household or change the relation code on the Form HUD-50058.</p> <p>Upfront Income Verification Using Non-HUD Systems</p> <p>The PHA will inform all applicants and residents of its use of the following UIV resources:</p>		
7-I.F.	7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]	<p>EIV + Self-Certification</p> <p>PHA Policy</p> <p>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.</p> <p>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.</p>	Yes – HOTMA	New regulatory language from HUD

		<p>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.</p> <p>Written Third-Party Verification from the Source PHA Policy</p> <p>In general, the PHA will use third-party verification from the source in the following circumstances:</p> <p>At annual reexamination when EIV + self-certification is not used;</p> <p>For all new admissions; and</p> <p>For all interim reexaminations.</p> <p>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.</p> <p>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.</p>		
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7-I.G.	7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM [Notice PIH 2023-27]	<p>PHA Policy PHA may substitute Level 2 (Oral third-party verification) for written, third-party verification form, before moving to self-certification.</p>	Yes – HOTMA	New regulatory language from HUD
7-I.H.	7-I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]	<p>If written third-party verification forms are not returned within 5 business days, the PHA will accept self-certification from the family without attempting to obtain oral third-party verification.</p>	Yes – HOTMA	New regulatory language from HUD

		<p>If the PHA chooses to obtain oral third-party verification, the PHA will document in the file the date and time of the telephone call or visit, the name of the person contacted and the telephone number, as well as the information confirmed.</p> <p>When requesting third-party oral verification, PHA will wait 2 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.</p>		
7-I.1.	7-I.I. LEVEL 1: NON-THIRD-PARTY VERIFICATION TECHNIQUE: SELF-CERTIFICATION [Notice PIH 2023-27]	<p>PHA Policy</p> <p>When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.</p> <p>The PHA may require a family to certify that a family member does not receive a particular type of income or benefit.</p> <p>The self-certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.</p> <p>All self-certifications will include the following language:</p> <p>"I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. WARNING: Anyone who knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil</p>	Yes – HOTMA	New regulatory language from HUD

		penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802).”		
7-II.A.	PART II: VERIFYING FAMILY INFORMATION 7-II.A. VERIFICATION OF LEGAL IDENTITY	<p>PHA Policy</p> <p>The PHA will require families to furnish verification of legal identity for each household member.</p>	Yes – HOTMA	New regulatory language from HUD
7-I.B.	7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and Notice PIH 2023-27]	<p>PHA Policy</p> <p>The PHA will verify an individual’s SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual’s SSN are available.</p> <p>The PHA may only reject documentation of an SSN provided by an applicant or resident if the document is not an original document, if the original document has been altered, mutilated, is illegible, or if the document appears to be forged.</p> <p>PHA Policy</p> <p>The PHA will explain to the applicant or resident the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the PHA within 90 days.</p> <p>If an applicant family includes a child under 6 years of age who joined the household within the 6 months prior to the date of program admission,</p>	Yes – HOTMA	New regulatory language from HUD

		<p>an otherwise eligible family may be admitted and must provide documentation of the child's SSN within 90 days. A 90-day extension will be granted if the PHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control.</p> <p>PHA Policy</p> <p>The PHA will grant one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.</p> <p>When a resident requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the resident must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.</p> <p>When a resident requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the resident must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control. During the period the PHA is awaiting documentation of the SSN, the child will</p>		
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		<p>be counted as part of the assisted household.</p> <p>PHA Policy</p> <p>The PHA will grant one additional 90-day extension if needed for reasons beyond the resident's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.</p> <p>Social security numbers must be verified only once during continuously assisted occupancy.</p> <p>PHA Policy</p> <p>The PHA will verify each disclosed SSN by:</p> <p>Obtaining documentation from applicants and residents that is acceptable as evidence of social security numbers</p> <p>Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder</p> <p>Once the individual's verification status is classified as "verified," the PHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.</p> <p>PHA Policy</p> <p>Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will not remove and destroy copies of documentation accepted as evidence of social security numbers.</p>		
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7-II.C.	7-II.C. DOCUMENTATION OF AGE	<p>PHA Policy</p> <p>If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.</p> <p>Age must be verified only once during continuously assisted occupancy.</p>	Yes – HOTMA	New regulatory language from HUD
7-II.D.	7-II.D. FAMILY RELATIONSHIPS	<p>PHA Policy</p> <p>Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.</p> <p>Marriage</p> <p>PHA Policy</p> <p>Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage with a marriage certificate or other documentation to verify that the couple is married.</p> <p>In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax</p>	Yes – HOTMA	New regulatory language from HUD

returns).

Separation or Divorce

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a divorce or separation, the PHA will require the family to provide documentation of the divorce or separation with a certified copy of a divorce decree, signed by a court officer; a copy of a court-ordered maintenance or other court record; or other documentation that shows a couple is divorced or separated.

If no court document is available, documentation from a community-based agency will be accepted.

Absence of Adult Member

PHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill), if the PHA so requests.

Foster Children and Foster Adults

PHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

7-II.E.	7-II.E. VERIFICATION OF STUDENT STATUS	<p>PHA Policy</p> <p>The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:</p> <p>The family claims full-time student status for an adult other than the head, spouse, or cohead, or</p> <p>The family claims a child care deduction to enable a family member to further their education.</p>	Yes – HOTMA	New regulatory language from HUD
7-II.F.	7-II.F. DOCUMENTATION OF DISABILITY	<p>Family Members Receiving SSA Disability Benefits</p> <p>PHA Policy</p> <p>For family members claiming disability who receive disability payments from the SSA, the PHA will attempt to obtain information about disability benefits through HUD’s Enterprise Income Verification (EIV) system. If documentation is not available through HUD’s EIV system, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, the PHA will ask the family to obtain a benefit verification letter either by calling SSA at 1-800-772-1213 or by requesting one from www.ssa.gov. Once the family receives the benefit verification letter, they will be required to provide the letter to the PHA.</p>	Yes – HOTMA	New regulatory language from HUD

		<p>Family Members Not Receiving SSA Disability Benefits</p> <p>PHA Policy</p> <p>For family members claiming disability who do not receive SSI or other disability payments from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.</p>		
7-II.G.	7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]	<p>U.S. Citizens and Nationals</p> <p>PHA Policy</p> <p>Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.</p>	Yes – HOTMA	New regulatory language from HUD
7-II.H.	7-II.H. VERIFICATION OF PREFERENCE STATUS	<p>PHA Policy</p> <p>The PHA offers a preference for victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking as described in Section 4-III.B. To verify that applicants qualify for the preference, the PHA will follow documentation requirements outlined in Section 16-VII.D.</p>	Yes – HOTMA	New regulatory language from HUD

7-III.	PART III: VERIFYING INCOME AND ASSETS	<p>PHA Policy</p> <p>The following policies do not apply when the PHA uses a safe harbor income determination from a means-tested federal assistance program.</p>	Yes – HOTMA	New regulatory language from HUD
7-III.A.	7-III.A. EARNED INCOME	<p>Tips</p> <p>PHA Policy</p> <p>Unless tip income is included in a family member’s W-2 by the employer or in UIV verification sources, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year or tips anticipated to be received in the coming year.</p> <p>Wages</p> <p>PHA Policy</p> <p>When the PHA requires third-party verification of wages, for wages other than tips, the family must provide originals of the two most current, consecutive pay stubs.</p>	Yes – HOTMA	New regulatory language from HUD
7-III.B	7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME	<p>PHA Policy</p> <p>Business owners and self-employed persons will be required to provide:</p> <p>Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer’s transmittal receipt, summary of transmittal from online source, etc.).</p> <p>If accelerated depreciation was used on the tax</p>	Yes – HOTMA	New regulatory language from HUD

		<p>return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.</p> <p>For self-employed individuals who claim they do not have to file tax returns, the PHA will obtain a completed copy of IRS Form 4506-T to verify that no return has been filed.</p> <p>For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), the PHA will provide a format for the individual to declare their income and expenses. The PHA will also review the printed statement of monthly income from the applicable app for all hours worked and pay received as well as Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.</p> <p>The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations. At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>		
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7-II.D.	7-III.D. ALIMONY OR CHILD SUPPORT [Notice PIH 2023-27]	<p>PHA Policy</p> <p>The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.</p> <p>If the family declares that it receives regular payments, verification will be obtained in the following order of priority:</p> <ul style="list-style-type: none"> Third-party verification form from the state or local child support enforcement agency Copies of the receipts and/or payment stubs for the 12 months prior to PHA request Third-party verification form from the person paying the support Family's self-certification of amount received <p>Note: Families are not required to undertake independent enforcement action.</p>	Yes – HOTMA	New regulatory language from HUD
7-III.E.	7-III.E. NONRECURRING INCOME [Notice PIH 2023-27]	<p>PHA Policy</p> <p>The PHA will accept self-certification from the family stating that income will not be repeated in the coming year. However, the PHA may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.</p>	Yes – HOTMA	New regulatory language from HUD
7-III.F	7-III.F. ASSETS AND INCOME FROM ASSETS	<p>Net Family Assets [24 CFR 5.603]</p> <p>PHA Policy</p> <p>For families with net assets totaling \$50,000 or less, the PHA will accept the family's self-</p>	Yes – HOTMA	New regulatory language from HUD

		<p>certification of the value of family assets and anticipated asset income. 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.</p> <p>When verification is required, in determining the value of checking or savings accounts, the PHA will use the current balance.</p> <p>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</p> <p>Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2)]</p> <p>PHA Policy</p> <p>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</p>		
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		<p>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.</p> <p>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, or stalking, the PHA will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.</p>		
7-III.H.	7-III.H. NET INCOME FROM RENTAL PROPERTY	<p>PHA Policy</p> <p>The family must provide:</p> <p>A current executed lease for the property that shows the rental amount or certification from the current tenant</p> <p>A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income).</p> <p>If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement</p>	Yes – HOTMA	New regulatory language from HUD

		including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.		
7-III.J.	7-III.J. RETIREMENT ACCOUNTS	<p>PHA Policy</p> <p>The PHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken and any regular payments.</p>	Yes – HOTMA	New regulatory language from HUD
7-III.K.	7-III.K. INCOME FROM EXCLUDED SOURCES [Notice PIH 2023-27]	<p>PHA Policy</p> <p>The PHA will accept the family’s self-certification as verification of fully excluded income. The PHA may request additional documentation if necessary to document the income source.</p> <p>The PHA will verify the source and amount of partially excluded income as described in Part 1 of this chapter.</p>	Yes – HOTMA	New regulatory language from HUD
7-III.L.	7-III.L. ZERO INCOME REVIEWS [Notice PIH 2023-27]	<p>PHA Policy</p> <p>The PHA will check UIV sources and/or may request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, earned income, child support, etc. are not being received by families claiming to have zero annual income.</p> <p>For zero income households the PHA will require that each family member who claims zero income status complete a zero-income form. For zero income household members in a non-zero income</p>	Yes – HOTMA	New regulatory language from HUD

		<p>household the PHA will not require such form.</p> <p>If any sources of income are identified on the form, the PHA will verify the income in accordance with the policies in this chapter prior to including the income in the family's annual income.</p> <p>The PHA will only conduct interims in accordance with PHA policy in Chapter 9.</p>		
7-III.M.	7-III.M. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]	<p>PHA Policy</p> <p>The PHA will request written third-party verification of both the source and the amount of student financial assistance. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.</p> <p>In addition, unless the student's only source of assistance is assistance under Title IV of the HEA, the PHA will request written verification of the cost of the student's tuition, books, supplies, room and board, and other required fees and charges to the student from the educational institution.</p> <p>If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.</p>	Yes – HOTMA	New regulatory language from HUD
7-IV.B.	7-IV.B. HEALTH AND MEDICAL CARE EXPENSE DEDUCTION	<p>PHA Policy</p> <p>Medical expenses will be verified through:</p> <p>Written third-party documents provided by the</p>	Yes – HOTMA	New regulatory language from HUD

	<p>family, such as pharmacy printouts or receipts.</p> <p>When income is projected at new admission or interim, the PHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The PHA will also accept evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months.</p> <p>Written third-party verification forms if the family is unable to provide acceptable documentation.</p> <p>When income is projected at new admission or interim, if third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.</p> <p>Before placing bills and documentation in the tenant file, the PHA will redact all personally identifiable information.</p> <p>Unreimbursed Expenses</p> <p>To be eligible for the health and medical care expense deduction, the costs must not be reimbursed by another source.</p> <p>PHA Policy</p> <p>The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source. If expenses are verified through a third party, the third party must certify that the expenses are not paid or reimbursed from any other source.</p> <p>Expenses Incurred in Past Years</p>		
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		<p>PHA Policy</p> <p>When anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:</p> <p>The anticipated repayment schedule</p> <p>The amounts paid in the past, and</p> <p>Whether the amounts to be repaid have been deducted from the family's annual income in past years (if applicable).</p>		
7-IV.C.	7-IV.C. DISABILITY ASSISTANCE EXPENSES	<p><i>Attendant Care</i></p> <p>PHA Policy</p> <p>Expenses for attendant care will be verified through:</p> <p>Written third-party documents provided by the family, such as receipts or cancelled checks.</p> <p>Third-party verification form signed by the provider, if family-provided documents are not available.</p> <p>When income is projected at new admission or interim, if third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.</p> <p>Before placing bills and documentation in the tenant file, the PHA will redact all personally identifiable information.</p> <p><i>Auxiliary Apparatus</i></p>	Yes – HOTMA	New regulatory language from HUD

		<p>PHA Policy</p> <p>Expenses for auxiliary apparatus will be verified through:</p> <p>Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.</p> <p>Family Member(s) Permitted to Work</p> <p>PHA Policy</p> <p>The PHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.</p> <p>If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.</p> <p>Unreimbursed Expenses</p> <p>PHA Policy</p> <p>The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.</p>		
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7-IV.D.	7-IV.D. CHILD CARE EXPENSES	<p>Unreimbursed Expense</p> <p>PHA Policy</p> <p>The family and the care provider will be required to certify that the child care expenses are not paid by or reimbursed to the family from any source.</p> <p>Pursuing an Eligible Activity</p> <p>PHA Policy</p> <p><i>Information to be Gathered</i></p> <p>The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.</p> <p><i>Seeking Work</i></p> <p>Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date and require the family to submit to the PHA any reports provided to the other agency.</p> <p>In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at</p>	Yes – HOTMA	New regulatory language from HUD
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each subsequent reexamination for which this deduction is claimed.

Allowable Type of Child Care

PHA Policy

The PHA will verify that the type of child care selected by the family is allowable, as described in Chapter 6.

The PHA will verify that the fees paid to the child care provider cover only child care costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The PHA will verify that the child care provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

Reasonableness of Expenses

PHA Policy

The actual costs the family incurs will be compared with the PHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, the PHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

<p>8-II.A.</p>	<p>Part II: Inspections 8-II.A. OVERVIEW</p> <p>Annual Inspections [24 CFR 5.705] PHA Policy The PHA or a contractor will inspect all occupied units annually using HUD's Uniform Physical Condition Standards (UPCS).</p> <p>Attendance at Inspections PHA Policy Except at move-in inspections, the resident is not required to be present for the inspection. The resident may attend the inspection if they wish. If no one is at home, the inspector will enter the unit, conduct the inspection and provide a copy of the inspection report upon request. For other entries when a resident is not home, the PHA will leave a notice of the date, time, and purpose of entry.</p> <p>8-II.D. INSPECTION RESULTS Repairs The PHA is obligated to maintain dwelling units and the project in decent, safe and sanitary condition and to make necessary repairs to dwelling units [24 CFR 966.4(e)]. Correction timeframes differ</p>	<p><i>Self-Inspections [24 CFR 5.707]</i> Annually all PHAs are required to self-inspect their properties, including all units, to ensure units are maintained in accordance with NSPIRE standards in 24 CFR 5.703. As part of the self-inspection process, PHAs must ensure that deficiencies previously cited and repaired as a result of an NSPIRE inspection have not subsequently failed. The PHA must maintain the results of self-inspections for three years and must provide the results to HUD upon request.</p> <p>Attendance at Inspections PHA Policy While the resident is required to be present for move-in inspections, the resident is not required to be present for other types of inspection. The resident may attend the inspection if they wish. If no one is at home, the inspector will enter the unit, conduct the inspection and provide a copy of the inspection report upon request. For other entries when a resident is not home, the PHA will leave a notice of the date, time, and purpose of entry.</p> <p>Repairs Correction timeframes differ depending on whether repairs are considered emergency or non-emergency repairs.</p>	<p>Yes – NSPIRE</p>	<p>New regulatory language from HUD</p>
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	depending on whether repairs are considered emergency or non-emergency repairs.			
8-II.A.	<p><i>REPAIRS – CONT</i></p> <p>Non-emergency Repairs PHA Policy The PHA will correct non-life threatening health and safety defects deficiencies resulting in a non-emergency work order identified during a PHA conducted inspection within 15 business days of the inspection date. If the PHA is unable to make repairs within that period, the PHA will notify the family of an estimated date of completion. The family must allow the PHA access to the unit to make repairs.</p> <p>Housekeeping PHA Policy Residents whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, the PHA will provide proper notice of a lease violation. Reinspection will be conducted within 30 days to confirm that the resident has complied with the requirement to abate the problem. Failure to abate the problem or allow for a reinspection is considered a violation of the lease and may</p>	<p>Non-emergency Repairs PHA Policy The PHA will correct deficiencies resulting in a non-emergency work order identified during a PHA conducted inspection within 15 business days of the inspection date. If the PHA is unable to make repairs within that period, the PHA will notify the family of an estimated date of completion. The family must allow the PHA access to the unit to make repairs.</p> <p>Housekeeping PHA Policy Residents whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, the PHA will provide proper notice of a lease violation. Reinspection will be conducted within 30 days to confirm that the resident has complied with the requirement to abate the problem. Failure to abate the</p>	Yes – NSPIRE	New regulatory language from HUD

	<p>result in termination of tenancy in accordance with Chapter 13.</p> <p>Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke detector. Only one warning will be given. A second incidence will result in a lease termination notice.</p>	<p>problem or allow for a reinspection is considered a violation of the lease and may result in termination of tenancy in accordance with Chapter 13.</p> <p>Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke detector and/or carbon monoxide alarm. Only one warning will be given. A second incidence will result in a lease termination notice.</p>		
8-II.C.	<p>8-II.C. NSPIRE INSPECTIONS [24 CFR 5.705(c); Notice PIH 2023-16]</p>	<p>Notice to Residents [Notice PIH 2023-16]</p> <p>PHA Policy</p> <p>The PHA will provide all residents with at least seven days' notice of an NSPIRE inspection. Notice may be provided through multiple communication methods, including by posted notice on each resident's door and through email where applicable. All materials, notices, and communications to families regarding the inspection will be clearly communicated and provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act (Section 504) and HUD's Section 504 regulation, and Titles II or III of the Americans with Disabilities Act (ADA) and implementing regulations.</p>	Yes – NSPIRE	New regulatory language from HUD

		<p>24-Hour Corrections [24 CFR 5.711(c); Notice PIH 2023-16]</p> <p>PHA Policy The PHA will correct all Life-Threatening and Severe deficiencies within 24 hours. Correcting the deficiency means the PHA will resolve or sufficiently address the deficiency in a manner that it no longer poses a severe health or safety risk to residents or the hazard is blocked until permanent repairs can be completed. A correction could include controlling or blocking access to the hazard by performing a temporary relocation of the resident while repairs are made.</p> <p>While the PHA will complete all repairs expeditiously, if a permanent repair is not possible within 24-hours, the PHA will correct the deficiency by performing an interim repair to remove the health and safety hazard. If the correction is temporary or professional services or materials are unavailable within 24 hours, the PHA will provide a target date for permanent correction. Such interim repairs will be fully completed within a reasonable timeframe approved by HUD.</p> <p>The family must allow the PHA access to the unit to make repairs.</p> <p>Non-emergency Repairs</p> <p>PHA Policy If the PHA is unable to make repairs within the periods identified in the NSPIRE standards due to circumstances beyond the PHA's control (e.g., required parts or services are not available, weather conditions, etc.), the PHA will provide HUD with a timeframe for</p>		
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		<p>completing permanent repairs and obtain HUD approval. The PHA will also notify the family of an estimated date of completion. The family must allow the PHA access to the unit to make repairs.</p> <p>Except for emergencies, for safety reasons of animals and staff, management may or may not enter the dwelling unit to perform repairs where a pet resides unless accompanied for the entire duration of the repair by the pet owner or responsible person designated by the pet owner in accordance with the pet policies in Section 10-II.D.</p>		
<p>Exhibit 8-1</p>	<p><i>Exhibit 8-1: SMOKE-FREE POLICY</i></p> <p>Smoke-Free Properties There is no smoking allowed anywhere on Homes for Good property at the following locations:</p> <ul style="list-style-type: none"> • McKenzie Village, including Fairview building and Central Maintenance in Springfield • Pengra Court in Springfield • Scattered site single-family homes and duplexes in Eugene, Springfield, and Veneta • Maplewood Meadows in Eugene • Lindeborg Place in Junction City • Cresview Villa in Creswell • 100 West 13th Avenue Administration Building in Eugene <p>People may not smoke, or dispose of smoking materials, anywhere on these properties.</p> <p>Properties with 25-Foot Exclusion</p>	<p>PHA POLICIES</p> <p>Smoke-Free Properties There is no smoking allowed anywhere on Homes for Good property at the following locations:</p> <ul style="list-style-type: none"> • McKenzie Village, including Fairview building and Central Maintenance in Springfield • Pengra Court in Springfield • Scattered site duplexes in Veneta • Maplewood Meadows in Eugene • 100 West 13th Avenue Administration Building in Eugene <p>People may not smoke, or dispose of smoking materials, anywhere on these properties.</p> <p>Properties with 25-Foot Exclusion Smoking is prohibited within 25 feet of all buildings and other restricted areas at the following locations:</p>	<p>No</p>	<p>Aligns with current Public Housing Community Rules</p>

	<p>Smoking is prohibited within 25 feet of all buildings and other restricted areas at the following locations:</p> <ul style="list-style-type: none"> • Laurelwood Homes in Florence • Pengra Court in Springfield • Lindeborg Place in Junction City • Parkview Terrace in Eugene • Veneta Villa in Veneta • Riverview Terrace in Cottage Grove • Cresview Villa in Creswell • Designated Smoking Areas (DSA) <p>The PHA has established designated smoking areas at:</p> <ul style="list-style-type: none"> • Parkview Terrace, Eugene • Riverview Terrace, Cottage Grove • Veneta Villa, Veneta <p>Residents using the designated smoking areas must extinguish all smoking materials and dispose of them safely in receptacles provided for that purpose. The PHA may take steps to remove the DSA in the event of recurring problems with DSA cleanliness or safety.</p>	<ul style="list-style-type: none"> • Laurelwood Homes in Florence • Lindeborg Place in Junction City • Parkview Terrace in Eugene • Veneta Villa in Veneta • Riverview Terrace in Cottage Grove • Cresview Villa in Creswell 		
9-I.B.	<p>9-I.B. SCHEDULING ANNUAL REEXAMINATIONS</p> <p>PHA Policy</p>	<p>PHA Policy</p> <p>Generally, the PHA will schedule annual reexaminations to coincide with the family's anniversary date. The PHA will begin the annual reexamination process approximately 120 days in</p>	Yes – HOTMA	New regulatory language from HUD

<p>If the family transfers to a new unit, the PHA will perform a new annual reexamination, and the anniversary date will be changed.</p> <p>PHA Policy</p> <p>Families generally are required to participate in an annual reexamination interview, which must be attended by the head of household, spouse, or cohead. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation (See Chapter 2).</p> <p>Notification of annual reexamination interviews will be sent by first-class mail and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview.</p> <p>If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend the scheduled interview the PHA will send a second notification with a new interview appointment time.</p> <p>If a family fails to attend two scheduled interviews without PHA approval, the family will be in violation of their lease and may be</p>	<p>advance of the scheduled effective date.</p> <p><i>Anniversary date</i> is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).</p> <p>The PHA may also schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.</p> <p>Notification of and Participation in the Annual Reexamination Process</p> <p>PHA Policy</p> <p>The PHA's procedure for conducting annual reexaminations will be through mail, unless the family requests an in-person interview.</p> <p>Notification of annual reexamination due dates will be sent by first-class mail. In addition, it will inform the family of the information and documentation that must be provided to complete the annual reexamination process.</p> <p>If the family is unable to provide the required documentation within the specified timeframe, the family should contact the PHA in advance of the due date to request an extension. If a family does not provide the required documentation and the PHA has sent two reminders by mail, fax, email, or telephone, then the family will be in violation of their lease and may be terminated in accordance with policies in Chapter 13.</p> <p>An advocate, interpreter, or other assistant may</p>		
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	<p>terminated in accordance with the policies in Chapter 13.</p> <p>An advocate, interpreter, or other assistant may assist the family in the interview process.</p>	<p>assist the family in the interview process.</p>		
<p>9-I.C</p>	<p>9-I.C. CONDUCTING ANNUAL REEXAMINATIONS</p>	<p>PHA Policy</p> <p>Families will be asked to provide all required information (as described in the reexamination notice) to complete the reexamination process. The required information will include a PHA-designated reexamination form as well as supporting documentation related to the family's income, expenses, and family composition.</p> <p>If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.</p> <p>If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p> <p>The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the agency has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:</p> <ul style="list-style-type: none"> • Legal identity 	<p>Yes – HOTMA</p>	<p>New regulatory language from HUD</p>

		<ul style="list-style-type: none"> • Age • Social security numbers • A person’s disability status • Citizenship or immigration status <p>If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be offered an opportunity to attend an Informal Settlement Discussion. Failure to respond or provide the required documents or information will result in lease enforcement.</p>		
9-I.E.	9-I.E. OTHER CONSIDERATIONS	<p>Criminal Background Checks</p> <p>PHA Policy</p> <p>Each household member age 18 and over will be required to execute a consent form for a criminal background check as part of the annual reexamination process.</p> <p>Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant’s household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].</p> <p>PHA Policy</p> <p>At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant’s household, is subject to a lifetime sex offender registration requirement in any state. The PHA will use the Dru Sjodin National Sex Offender</p>	Yes – HOTMA	New regulatory language from HUD

		<p>database to verify the information provided by the tenant.</p> <p>If the PHA proposes to terminate assistance based on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the tenant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to termination. [24 CFR 5.903(f) and 5.905(d)]. (See Chapter 13.)</p>		
9-I.F.	9-I.F. EFFECTIVE DATES	<p>PHA Policy</p> <p>In general, an <i>increase</i> in the tenant rent that results from an annual reexamination will take effect on the family’s anniversary date, and the family will be notified at least 30 days in advance.</p> <p>If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.</p> <p>If the PHA chooses to schedule an annual reexamination for completion prior to the family’s anniversary date for administrative purposes, the effective date will be determined by the PHA, but will always allow for the 30-day notice period.</p> <p>If the family causes a delay in processing the annual reexamination, <i>increases</i> in the tenant rent will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any underpaid rent and may be offered a repayment agreement in</p>	Yes – HOTMA	New regulatory language from HUD

		<p>accordance with the policies in Chapter 16.</p> <p>In general, a <i>decrease</i> in the tenant rent that results from an annual reexamination will take effect on the family's anniversary date.</p> <p>If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA.</p> <p>If the family causes a delay in processing the annual reexamination, <i>decreases</i> in the tenant rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.</p> <p>Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the PHA by the date specified, and this delay prevents the PHA from completing the reexamination as scheduled.</p>		
9-II.B.	<p>9-II.B. FULL REEXAMINATION OF FAMILY INCOME AND COMPOSITION</p>	<p>Frequency of Reexamination</p> <p>PHA Policy</p> <p>For families paying flat rents, the PHA will conduct a full reexamination of family income and composition once every three years.</p> <p>However, for flat rent families who become over-income, this policy will not apply. The PHA will instead conduct an interim reexamination at 12 and 24 months following the initial over-income determination as needed to verify the family</p>	Yes – HOTMA	New regulatory language from HUD

		<p>remains over-income. The family will continue to be given a choice between income-based and flat rent at each annual reexamination during the over-income grace period.</p> <p>If the family is subsequently determined to no longer be over-income:</p> <p>If the determination is the result of an annual reexamination, the family will be given a choice between income-based or flat rent at reexam. If the family selects flat rent, the PHA will resume reexamination of family income and composition once every three years.</p> <p>If determination is as a result of an interim reexamination, the PHA will conduct an annual reexamination for the family at their next scheduled annual date. If the family selects flat rent, the PHA will resume reexamination of family income and composition once every three years. Families will only be given the choice between income-based and flat rent at annual reexamination.</p> <p>Reexamination Policies</p> <p>PHA Policy</p> <p>In conducting full reexaminations for families paying flat rents, the PHA will follow the policies used for the annual reexamination of families paying income-based rent as set forth in Sections 9-I.B through 9-I.E above.</p>		
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9-II.C.	<p>9-II.C. REEXAMINATION OF FAMILY COMPOSITION (“ANNUAL UPDATE”)</p>	<p>Scheduling PHA Policy For families paying flat rents, annual updates will be conducted in each of the 2 years following the full reexamination.</p> <p>In scheduling the annual update, the PHA will follow the policy used for scheduling the annual reexamination of families paying income-based rent as set forth in Section 9-I.B. above.</p> <p>Conducting Annual Updates PHA Policy Generally, the family will not be required to attend an interview for an annual update. However, if the PHA determines that an interview is warranted, the family may be required to attend.</p> <p>Notification of the annual update will be sent by first-class mail and will inform the family of the information and documentation that must be provided to the PHA. The family will have 14 business days to submit the required information to the PHA. If the family is unable to obtain the information or documents within the required time frame, the family may request an extension. The PHA will accept required documentation by mail, by email, by fax, or in person.</p> <p>If the family’s submission is incomplete, or the family does not submit the information in the required time frame, the PHA will send a second written notice to the family. The family will have 14 business days from the date of the second notice</p>	Yes – HOTMA	New regulatory language from HUD
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		<p>to provide the missing information or documentation to the PHA.</p> <p>If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.</p> <p>Criminal Background Checks</p> <p>PHA Policy</p> <p>Each household member age 18 and over will be required to execute a consent form for criminal background check as part of the annual update process.</p>		
9-III.B	<p>9-III.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION</p>	<p>Reporting</p> <p>PHA Policy</p> <p>All families, those paying income-based rent as well as flat rent, must report all changes in family and household composition that occur between annual reexaminations (or annual updates) within 14 business days of the change.</p> <p>The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.</p> <p>New Family and Household Members Requiring Approval</p> <p>PHA Policy</p> <p>Families must request PHA approval to add a new</p>	Yes – HOTMA	New regulatory language from HUD

		<p>family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 14 consecutive days or a total of 30 cumulative calendar days during any 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.</p> <p>If adding a person to a household (other than a child by birth, adoption, or court-awarded custody) will require a transfer to a larger size unit (under the transfer policy in Chapter 12), the PHA will approve the addition only if the family can demonstrate that there are medical needs or other extenuating circumstances, including reasonable accommodation, that should be considered by the PHA. Exceptions will be made on a case-by-case basis.</p> <p>The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (See Chapter 7, Part II).</p> <p>If the PHA determines that an individual does not meet the PHA's eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.</p> <p>The PHA will make its determination within 14 business days of receiving all information required</p>		
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		<p>to verify the individual's eligibility.</p> <p>Departure of a Family or Household Member</p> <p>PHA Policy</p> <p>If a household member ceases to reside in the unit, the family must inform the PHA within 14 business days. This requirement also applies to family members who had been considered temporarily absent, who are now permanently absent.</p> <p>The PHA will process an interim if the family's adjusted income will decrease as a result of a family member permanently moving out of the unit.</p> <p>Interim Increases [24 CFR 960.257(b)(3) and Notice PIH 2023-27]</p> <p><i>Increases 10 Percent or Greater</i></p> <p>PHA Policy</p> <p>When a family reports an increase in their earned income between annual reexaminations, the PHA will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination.</p> <p>The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income.</p> <p>The PHA will not perform an interim reexamination when a family reports an increase in income</p>		
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(whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with the PHA policies in Chapter 15.

Family Reporting

PHA Policy

The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last three months of the certification period. Families must report changes in income within 14 business days of the date the change takes effect. The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.

Within 14 business days of the family reporting the change, the PHA will determine whether the change will require an interim reexamination.

If the change will not result in an interim reexamination, the PHA will note the information in the tenant file but will not conduct an interim reexamination. The PHA will send the family written notification within 14 business days of making this determination informing the family that the PHA will not conduct an interim reexamination.

If the change will result in an interim

		<p>reexamination, the PHA will determine the documentation the family will be required to submit based on the type of change reported and PHA policies in Chapter 7. The PHA will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 14 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, email, fax, or in person. The PHA will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information.</p> <p>Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview is warranted, the family may be required to attend.</p>		
<p>9-III.D. EFFECTIVE DATES</p>		<p>Changes Not Reported Timely [24 CFR 960.257(b)(6)(ii) and (iii) and Notice PIH 2023-27]</p> <p>PHA Policy</p> <p>In general, when the family fails to report a change in income or family composition timely, and the change would lead to a rent decrease, the PHA will apply the decrease the first of the month following completion of the interim reexamination.</p> <p>However, the PHA will apply the results of the interim reexamination retroactively where a family's ability to report a change in income promptly may have been hampered due to</p>	<p>Yes – HOTMA</p>	<p>New regulatory language from HUD</p>

		<p>extenuating circumstances such as a natural disaster or disruptions to PHA management operations. The PHA will decide to apply decreases retroactively on a case-by-case basis. When the PHA applies the results of interim decreases retroactively, the PHA will clearly communicate the effect of the retroactive adjustment to the family and may enter into a repayment agreement in accordance with PHA policies</p>		
10-II.C.	<p>10-II.C. STANDARDS FOR PETS [24 CFR 5.318; 960.707(b)]</p>	<p>PHA Policy</p> <p><i>Common household pet</i> means a domesticated animal, such as a dog, cat, bird, rodent (including rabbit), turtle or fish that is traditionally recognized as a companion animal and is kept in the home for pleasure rather than commercial purposes.</p> <p>The following animals are not considered common household pets: Reptiles (except turtles)</p> <p>Animals used for commercial breeding</p> <p>PHA Policy</p> <p>Dogs and cats must be spayed or neutered</p>	<p>Recommended Updated in response to Management and Operating Review suggestions from OHCS</p>	<p>Provides clarity to what pets are allowed</p> <p>Clarifies that we do not check pet registration annually, however it can be requested at any time</p>

		<p>at the time of registration or, in the case of underage animals, within 30 days of the pet reaching 6 months of age. Exceptions may be made upon veterinary certification that subjecting this particular pet to the procedure would be temporarily or permanently medically unsafe or unnecessary.</p> <p>Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration and at the request of the PHA.</p>		
10-IV.B	<p>Refund of Deposit PHA Policy The PHA will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit, within 30 days of move-out or removal of the pet from the unit.</p>	<p>Refund of Deposit PHA Policy The PHA will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit, within 30 days of move-out or notice to the PHA of removal of the pet from the unit.</p>	No	Clarifies timing of return of pet deposit
12-I.C.	<p>12-I.C. EMERGENCY TRANSFER PROCEDURES PHA Policy Any condition that would produce an emergency work order would qualify a family for an emergency transfer if the repairs cannot be made within 24 hours.</p>	<p>12-I.C. EMERGENCY TRANSFER PROCEDURES PHA Policy Any condition that would produce an emergency work order would qualify a family for an emergency transfer if the repairs or abatement of emergency</p>	No	Clarifies when a transfer is required

		conditions cannot be made within 24 hours.		
12-I.D.	<p>12-I.D. COSTS OF TRANSFER</p> <p>PHA Policy</p> <p>The PHA will bear the reasonable costs of temporarily accommodating the tenant and of long term transfers, if any, due to emergency conditions.</p> <p>The reasonable cost of transfers includes the cost of packing, moving, and unloading.</p> <p>The PHA will establish a moving allowance based on the typical costs in the community of packing, moving, and unloading. To establish typical costs, the PHA will collect information from companies in the community that provide these services.</p>	<p>12-I.D. COSTS OF TRANSFER</p> <p>PHA Policy</p> <p>The PHA will bear the reasonable costs of temporarily accommodating the tenant and of long term transfers, if any, due to emergency conditions.</p> <p>The reasonable cost of transfers includes the cost of packing, moving, and unloading.</p> <p>The PHA will establish a moving allowance based on the typical costs in the community of packing, moving, and unloading. To establish typical costs, the PHA will collect information from companies in the community that provide these services.</p> <p>The PHA will pay the costs for-the family's eligible moving expenses up to the PHA's established moving allowance.</p>	No	Clarifies moving costs due to emergency conditions
12-II.B.	<p>12-II.B. TYPES OF PHA REQUIRED TRANSFERS</p> <p>PHA Policy</p> <p>The types of transfers that may be required by the PHA, include, but are</p>	<p>12-II.B. TYPES OF PHA REQUIRED TRANSFERS</p> <p>PHA Policy</p> <p>The types of transfers that may be required by the PHA, include,</p>	No	Clarifies moving costs do not need to be through reimbursement method

	<p>not limited to, transfers to make an accessible unit available for a disabled family, transfers to comply with occupancy standards, transfers for demolition, disposition, revitalization, or rehabilitation, and emergency transfers as discussed in Part I of this chapter.</p> <p>Transfers required by the PHA are mandatory for the tenant.</p>	<p>but are not limited to, transfers to make an accessible unit available for a disabled family, transfers to comply with occupancy standards, transfers for demolition, disposition, revitalization, or rehabilitation, and emergency transfers as discussed in Part I of this chapter.</p> <p>Transfers required by the PHA are mandatory for the tenant. The family will be given 15 days to vacate the unit after receipt of written notice.</p>		
12-II.D.	<p>12-II.D. COST OF TRANSFER PHA Policy</p> <p>The PHA will bear the reasonable costs of transfers that the PHA requires, except that residents will be required to bear the cost of occupancy standards transfers (under or over housed transfers).</p> <p>The reasonable costs of transfers include the cost of packing, moving, and unloading.</p> <p>The PHA will establish a moving allowance based on the typical costs in the community of packing, moving, and unloading. To establish typical costs, the PHA will collect information from</p>	<p>12-II.D. COST OF TRANSFER PHA Policy</p> <p>The PHA will bear the reasonable costs of transfers that the PHA requires, except that residents will be required to bear the cost of occupancy standards transfers (under or over housed transfers). The reasonable costs of transfers include the cost of packing, moving, and unloading.</p> <p>The PHA will establish a moving allowance based on the typical costs in the community of packing, moving, and unloading. To establish typical costs, the</p>	No	Clarifies moving costs do not need to be through reimbursement method

	<p>companies in the community that provide these services. The PHA will reimburse the family for eligible out-of-pocket moving expenses up to the PHA's established moving allowance.</p>	<p>PHA will collect information from companies in the community that provide these services. The PHA will pay the costs for the family's eligible moving expenses up to the PHA's established moving allowance.</p>		
13-II.J.	<p>13-II.J. Initial Notice of Over-Income Status PHA Policy At annual or interim reexamination, if a family's income exceeds the applicable over-income limit, within 10 business days the PHA will notify the family in writing of the determination and that if the family continues to be over-income for 24 consecutive months, the family will be subject to the PHA's over-income policies. The notice will state that the family may request a hearing if the family disputes the PHA's determination in accordance with PHA policies in Chapter 14.</p> <p>Second Notice of Over-Income Status [24 CFR 960.507(c)(2)] <u>PHA Policy</u> If a family's income exceeds the applicable over-income limit after 12 consecutive months, within 10 business days, the PHA will notify the family in writing of the determination and that if the family continues to be over-income for 24 consecutive months, the family will be subject to the PHA's over-income policies. The notice will provide an estimate of the alternative non-public housing rent applicable to the family at the close of the 24 consecutive month period. The notice will also state that the family may request a hearing if the family disputes the PHA's determination in accordance with PHA policies in Chapter 14.</p>	<p>Initial Notice of Over-Income Status [24 CFR 960.507(c)(1)]; Notice PIH 2023-03 PHA Policy At annual or interim reexamination, if a family's income exceeds the applicable over-income limit, within 10 business days of the determination, the PHA will notify the family in writing of the determination. The notice will state and that if the family continues to be over-income for 24 consecutive months, the family will be subject to the PHA's over-income policies. The notice will state that the family may request a hearing if the family disputes the PHA's determination in accordance with PHA policies in Chapter 14. The PHA will ensure that all notices and communications are provided in a manner that is effective for persons with hearing, visual, and other impairments.</p> <p>Second Notice of Over-Income Status [24 CFR 960.507(c)(2) ; Notice PIH 2023-03; Notice PIH 2023-27] PHA Policy</p>	Yes – HOTMA	New regulatory language from HUD

<p>Final Notice of Over-Income Status [24 CFR 960.507(c)(3) and 960.509] <u>PHA Policy</u> If a family's income exceeds the applicable over-income limit for 24 consecutive months, the PHA will notify the family in writing of the determination within 10 business days of the date of the determination. The notice will state that the family will be charged the alternative non-public housing rent in accordance with PHA continued occupancy policies and HUD regulations and provide the family's new rent amount.</p> <p>The notice will also include a new non-public housing lease and inform the family that the lease must be executed by the family and the PHA no later than 60 days from the date of the notice or at the next lease renewal, whichever is sooner. The family will continue to be a public housing program participant until the family executes the new non-public housing lease. The notice will also state that failure to execute the lease within this time period stated in the notice will result in termination of tenancy no more than six months after the date of the notice. The PHA will permit an over-income family to execute a lease beyond this time period, but before termination of tenancy, if the over-income family pays the PHA the total difference between the alternative non-public housing rent and their public housing rent dating back to the point in time that the over-income family was required to execute the new lease.</p> <p>Once the family signs the new non-public housing lease, the family will no longer be a public housing participant family. The family will no longer be subject to income examinations, are precluded from participating in the resident council, and cannot participate in any programs that are only for public housing or low-income families.</p>	<p>If a family's income continues to exceeds the applicable over-income limit after 12 consecutive months, within 10 business days of the determination, the PHA will notify the family in writing of the determination. The notice will state that if the family continues to be over-income for 24 consecutive months, the family will be subject to the PHA's over-income policies. The notice will provide an estimate of the alternative non-public housing rent applicable to the family at the close of the 24 consecutive month period. The notice will also state that the family may request a hearing if the family disputes the PHA's determination in accordance with PHA policies in Chapter 14. The PHA will ensure that all notices and communications are provided in a manner that is effective for persons with hearing, visual, and other impairments.</p> <p>Final Notice of Over-Income Status [24 CFR 960.507(c)(3) and 960.509; Notice PIH 202303; Notice PIH 2023-27] <u>PHA Policy</u> If a family's income exceeds the applicable over-income limit for 24 consecutive months, the PHA will notify the family in writing of the determination within 10 business days of the date of the determination. The PHA will ensure that all</p>	
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	<p>The non-public housing over-income lease will contain all required provisions listed at 24 CFR 960.509. The initial term of the lease will be for one year. Upon expiration of the initial lease term, the lease will not renew automatically, and subsequent leases will state renewal terms. At any time, the PHA may terminate tenancy in accordance with 24 CFR 960.509(b)(11) and in accordance with state and local law.</p> <p>Upon execution of the lease, the tenant will be required pay the amount of monthly tenant rent (known as the alternative non-public housing rent) determined by the PHA in accordance with HUD regulations. The PHA will comply with state and local law in giving the tenant written notice stating any changes in the amount of tenant rent. Charges assessed under the lease will be due in accordance with state and local law</p>	<p>notices and communications are provided in a manner that is effective for persons with hearing, visual, and other impairments. The notice will state that the family will be charged the alternative non-public housing rent in accordance with PHA continued occupancy policies and HUD regulations and provide the family's new rent amount.</p> <p>The notice will also include a new non-public housing lease and inform the family that the lease must be executed by the family and the PHA no later than 60 days from the date of the notice or at the next lease renewal, whichever is sooner. The family will continue to be a public housing program participant until the family executes the new non-public housing lease. The notice will also state that failure to execute the lease within this time period stated in the notice will result in termination of tenancy no more than six months after the date of the notice. The PHA will permit an over-income family to execute a lease beyond this time period, but before termination of tenancy, if the over-income family pays the PHA the total difference between the alternative non-public housing rent and their public housing rent dating back to the point in time that the over-income family was required to execute the new lease.</p>		
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		<p>Once the family signs the new non-public housing lease, the family will no longer be a public housing participant family. The family will no longer be subject to income examinations, are precluded from participating in the resident council, and cannot participate in any programs that are only for public housing or low-income families. The PHA will not provide such families with hearing or grievance rights.</p>		
<p>14-III.E</p>	<p style="text-align: center;">Failure to Appear [24 CFR 966.56(c)]</p> <p><u>PHA Policy</u> If the PHA offers remote hearings, the notice will also state that the resident may request a remote hearing. If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the resident informing them of the right to request a hearing, the resident will be notified that the hearing will be conducted remotely. The resident will be informed of the processes involved in a remote hearing and that the PHA will provide technical assistance, if needed, before the hearing. If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 30 minutes. If the tenant appears within 30 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 30 minutes of the scheduled time, they will be considered to have failed to appear.</p>	<p><u>PHA Policy</u> If the family does not appear within 20 minutes of the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, the PHA's decision will stand.</p>	<p>No</p>	<p>Align with Admin Plan</p>

	<p>If the tenant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The hearing officer will reschedule the hearing only if the tenant can show good cause for the failure to appear, or it is needed as a reasonable accommodation for a person with disabilities.</p> <p>“Good cause” is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Extenuating circumstances will be considered on a case-by-case basis.</p>			
14-III.G	<p>General Procederes [24 CFR 966.56(d), (e)]</p> <p>Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.</p> <p>Oral evidence: the testimony of witnesses</p> <p>Documentary evidence: a writing which is relevant to the case, for example, a letter written to the PHA. Writings include all forms of recorded communication or representation, including letters, emails, words, pictures, sounds, videotapes or symbols or combinations thereof.</p> <p>Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.</p> <p>Real evidence: A tangible item relating directly to the case.</p> <p><i>Hearsay Evidence</i> is evidence of a statement that</p>	<p>General Procederes [24 CFR 966.56(d), (e)]</p> <p>Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.</p> <p>Oral evidence: the testimony of witnesses</p> <p>Documentary evidence: a writing which is relevant to the case, for example, a letter written to the PHA. Writings include all forms of recorded communication or representation, including letters, emails, words, pictures, sounds, videotapes or symbols or combinations thereof.</p> <p>Demonstrative evidence: Evidence created specifically for the hearing and</p>	No	Provides clarification about hearsay evidence and aligns with Admin Plan

	<p>was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.</p> <p>If the PHA fails to comply with the discovery requirements (providing the tenant with the opportunity to examine PHA documents prior to the grievance hearing), the hearing officer will refuse to admit such evidence.</p> <p>Other than the failure of the PHA to comply with discovery requirements, the hearing officer has the authority to overrule any objections to evidence.</p>	<p>presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.</p> <p>Real evidence: A tangible item relating directly to the case.</p> <p><i>Hearsay Evidence</i> is evidence based not on a witness' personal knowledge. In and of itself, hearsay evidence carries no weight when making a finding of fact. The hearing officer may include hearsay evidence when considering their decision if it is corroborated by other evidence. Even though hearsay evidence is generally admissible in a hearing, the hearing officer will not base a hearing decision on hearsay alone unless there is clear probative value and credibility of the evidence, and the party seeking the change has met the burden of proof.</p> <p>If the PHA fails to comply with the discovery requirements (providing the tenant with the opportunity to examine PHA documents prior to the grievance hearing), the hearing officer will refuse to admit such evidence.</p> <p>Other than the failure of the PHA to comply with discovery requirements, the hearing officer has the authority to overrule any objections to evidence.</p>		
15-II.C.	<p>15-II.C. PHA-CAUSED ERRORS OR PROGRAM ABUSE</p> <p>PHA Reimbursement to Family PHA Policy</p>	<p>De Minimis Errors [24 CFR 5.609(c)(4); Notice PIH 2023-27] PHA Policy</p> <p>The PHA will reimburse a family for any family overpayment of rent,</p>	Yes – HOTMA	New regulatory language from HUD

	The PHA will reimburse a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error or staff program abuse.	regardless of whether the overpayment was the result of staff-caused error, staff program abuse, or a de minimis error.		
16-III.A.	<p>PART III: FAMILY DEBTS TO THE PHA</p> <p>OVERVIEW</p> <p><u>PHA Policy</u></p> <p>When an action or inaction of a resident family results in the underpayment of rent or other amounts, the PHA holds the family liable to return any underpayments to the PHA. The PHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover overpayments.</p>	<p>OVERVIEW</p> <p>PHA Policy</p> <p>When an action or inaction of a resident family results in the underpayment of rent or other amounts, the PHA holds the family liable to return any underpayments to the PHA. The PHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover-underpayments.</p>	Yes – HOTMA	New regulatory language from HUD

Implementation of Housing Opportunity Through Modernization Act of 2016 (HOTMA)

In accordance with the requirements set forth in U.S. Department of Housing and Urban Development's (HUD) PIH 2023-27 (Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)) Homes for Good has imbedded policies into its Fiscal Year (FY) 2025 Administrative (Admin) and Admissions and Continued Occupancy Policy (ACOP) Plans to meet the aforementioned requirements.

HOTMA requires compliance with its final rule effective no later than January 1, 2025.

However, until HUD provides guidance to software vendors on the implementation of HOTMA HUD is requiring Public Housing Agencies to continue to follow existing regulatory guidance/policy until HOTMA is declared ready for use by HUD.

The attached Pre and Post HOTMA Regulatory Citation Matrix for Public Housing (PH) and Housing Choice Voucher (HCV) Programs provided by HUD provides guidance on what Code of Federal Regulations (CFR's) are affected by HOTMA.

For any CFRs noted in the matrix, users should utilize the applicable FY24 Admin or ACOP Plan unless otherwise noted in the matrix.

Homes for Good will update the matrix as HOTMA is deemed usable by HUD.

Pre and Post HOTMA Regulatory Citation Matrix for PH and HCV Programs

The following is a matrix to compare the pre-HOTMA and related post-HOTMA regulatory citations. The description column is very brief and is not a substitute for consulting the full text of the regulation for context and to identify policy changes.

	Pre-HOTMA	Post-HOTMA	Effective Date of Post-HOTMA Language
Net Family Assets	5.603 Net Family Assets	5.603 Net Family Assets	
Annual Income Definitions	5.609(a)	5.609(a); 5.603, 5.100	
Annual Income Exclusions	5.609(c)	5.609(b)	
Specific types of income/assets:			
• Income of minors	5.609(c)(1)	5.609(b)(3)	
• Foster care/guardianship payments	5.609(c)(2)	5.609(b)(4)	
• Lump-sum additions to net family assets	5.609(c)(3)	5.609(b)(24)(vii)	
• Medical care reimbursements	5.609(c)(4)	5.609(b)(6)	
• Income of live-in aide	5.609(c)(5)	5.609(b)(8)	
• Student Financial Assistance	5.609(c)(6) and (b)(9)	5.609(b)(9)	
• Special pay for Armed Forces exposed to hostile fire	5.609(c)(7)	5.609(b)(11)	
• Amounts received under training programs funded by HUD	5.609(c)(8)(i)	5.609(b)(12)(iv)	
• Amounts disregarded that are set aside for use under the Plan to Attain Self-Sufficiency (PASS) program	5.609(c)(8)(ii)	5.609(b)(12)(i)	
• Amounts received for reimbursement of out of pocket expenses incurred to participate in a specific program	5.609(c)(8)(iii)	5.609(b)(12)(ii)	
• Resident service stipend	5.609(c)(8)(iv)	5.609(b)(12)(iii)	
• Incremental earnings from participation in certain employment training programs	5.609(c)(8)(v)	5.609(b)(12)(iv)	
• Non-recurring income	5.609(c)(9)	5.609(b)(24)	
• Reparation payments paid by a foreign government for those persecuted during the Nazi era	5.609(c)(10)	5.609(b)(13)	

• Earned income of dependent full-time students in excess of dependent deduction	5.609(c)(11)	5.609(b)(14)	
• Adoption assistance payments	5.609(c)(12)	5.609(b)(15)	
• Deferred periodic amounts from SSI, SS, and VA	5.609(c)(14)	5.609(b)(16)	
• Refunds or rebates under State or local law for property taxes	5.609(c)(15)	5.609(b)(18)	
• Amounts authorized by State Medicaid agency or other State or Federal agency to enable a family member who has a disability to reside in the family's assisted unit	5.609(c)(16)	5.609(b)(19)	
• Distributions from trusts	5.603 Net Family Assets (2)	5.609(b)(2)	
• Business income	5.609(b)(2)	5.609(b)(28)	
• Federally mandated exclusions	5.609(c)(17)	5.609(b)(22)	
Calculation of Income	5.609(d)	5.609(c)	
Mandatory Deductions	5.611(a)	5.611(a)	
Permissive Deductions	5.611(b)	5.611(b)	
Hardship Exemptions for Deductions	NA	5.611(c),(d),(e)	
Self-Certification of Assets	960.259(c)(2) and 982.516(a)(3)	5.618(b); 960.259(c)(2) and 982.516(a)(3)	
Interim Reexaminations	982.516(c); 960.257(b)	982.516(c); 960.257(b)	
Safe Harbor Verifications	NA	5.609(c)(3)	

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

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2025
EFFECTIVE DATE 10-1-2024 TO 9-30-2025**

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

INTRODUCTION 1
CHAPTER 2 – FAIR HOUSING AND EQUAL OPPORTUNITY 1
CHAPTER 6 – INCOME AND SUBSIDY DETERMINATIONS 1
CHAPTER 7 – VERIFICATION 12
CHAPTER 11 – REEXAMINATIONS 26

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)
PROPOSED EFFECTIVE DATE 10-1-2024**

Section	Previous Policy	Proposed Policy	Required Change	Impact
2-I.C	None	<p>Applicants or tenant families who wish to file a VAWA complaint against the PHA may notify the PHA either orally or in writing.</p> <p>The PHA will advise the family of their right to file a VAWA complaint with HUD’s Office of Fair Housing and Equal Opportunity (FHEO). The PHA will inform the family that not later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO’s online complaint form via mail, email, or telephone.</p> <p>The PHA will attempt to remedy complaints made against the PHA and will conduct an investigation into all allegations of discrimination.</p> <p>The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)</p>	Yes	New Regulatory Language from HUD. Provides guidance and timelines for filing a VAWA complaint.
6-I.C	<p>When EIV is obtained and the family does not dispute the EIV employer data, the PHA will use current tenant-provided documents to project annual income. When the tenant-provided documents are pay stubs, the PHA will make every effort to obtain current and consecutive pay stubs dated within the last 60 days.</p> <p>The PHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:</p> <p>If EIV or other UIV data is not available,</p>	<p>When the PHA cannot readily anticipate income based upon current circumstances (e.g., in the case of temporary, sporadic, or variable employment, seasonal employment, unstable working hours, or suspected fraud), the PHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.</p> <p>Any time current circumstances are not used to project annual income, a clear rationale for the</p>	Yes	New Regulatory Language from HUD. Removal of Enterprise Income Verification (EIV). HUD now requires Public Housing Agencies to vet income without the use of EIV and document a rationale for income sources that were utilized.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>If the family disputes the accuracy of the EIV employer data, and/or If the PHA determines additional information is needed. In such cases, the PHA will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.</p> <p>When the PHA cannot readily anticipate income based upon current circumstances (e.g., in the case of seasonal employment, unstable working hours, or suspected fraud), the PHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.</p> <p>Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income.</p> <p>Known Changes in Income If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated by applying each income amount to the appropriate part of the 12-month period.</p> <p>Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the reexamination. In such a case the PHA would calculate annual income as follows: ($\\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}$) + ($\\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks}$).</p> <p>The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then require an interim</p>	<p>decision will be documented in the file. In all such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income.</p> <p>In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.</p> <p>Known Changes in Income If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated projected by applying each income amount to the appropriate part of the 12-month period.</p> <p>Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the new admission or interim reexamination. In such a case the PHA would calculate annual income as follows: ($\\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}$) + ($\\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks}$).</p> <p>The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then, should the change in income require the PHA to conduct an interim reexamination, conduct an interim reexamination in accordance with PHA policy in Chapter 11.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>reevaluation when the change actually occurs. This requirement will be imposed even if the PHA's policy on reevaluations does not require interim reevaluations for other types of changes.</p> <p>When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the reevaluation interview date.</p>			
6-I.D	<p>Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.</p>	None	Yes	<p>HUD required the removal of sporadic income. HUD now has an array of other regulatory language to abide by in counting income. Details on how income is being counted can be found here: 24 CFR 5.609(a); Notice PIH 2023-27</p>
6-I.G	<p>If a student only receives financial assistance under Title IV of the HEA and does not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family's annual income. The PHA will not calculate actual covered costs in this case.</p> <p>If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student's financial assistance from the student's actual covered costs. The PHA will include any amount of financial assistance in excess of the student's actual covered costs in the family's annual income.</p> <p>Example 1 Actual covered costs: \$20,000 Other student financial assistance: \$25,000</p>	None	Yes	<p>HUD now requires student financial assistance to be counted as noted in the new policy. Prior to this HUD also required student financial assistance to be counted as income but not under a policy. This regulatory change is a result of HOTMA. With this change the cost of housing expense for eligible students is now factored into the expenses of the family. Prior to HOTMA, this expense was not factored in when</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>Excluded income: \$20,000 (\$25,000 in financial assistance - \$20,000 in actual covered costs) Included income: \$5,000.</p> <p>When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the other student financial assistance will be applied to any remaining actual covered costs.</p> <p>If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance" would be excluded from income.</p> <p>Example 2 Actual covered costs: \$25,000 Title IV HEA assistance: \$26,000 Title IV HEA assistance covers the students entire actual covered costs. Other Student Financial Assistance: \$5,000 Excluded income: The entire Title IV HEA assistance of \$26,000. Included income: All other financial assistance of \$5,000.</p> <p>If the amount of assistance excluded under Title IV of the HEA is less than the actual covered costs, the PHA will exclude the amount of other student financial assistance up to the amount of the remaining actual covered costs.</p> <p>Example 3 Actual covered costs: \$22,000 Title IV HEA assistance: \$15,000 The remaining amount not covered by Title IV HEA assistance is \$7,000 (\$22,000 in actual covered costs - \$15,000 in Title IV HEA assistance).</p>			<p>determining subsidy assistance.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>Other Student Financial Assistance: \$5,000 \$7,000 in remaining actual covered costs - \$5,000 in other financial assistance Excluded income: \$15,000 entire amount of the Title IV HEA Assistance + \$5,000 in other financial assistance. Included income: \$0. Example 4 Actual covered costs: \$18,000 Title IV HEA Assistance: \$15,000 The remaining amount not covered by Title IV HEA assistance is \$3,000 (\$18,000 in actual covered costs - \$15,000 in Title IV HEA Assistance) Other student Financial Assistance: \$5,000 When other student financial assistance is applied, financial assistance exceeds actual covered costs by \$2,000 (\$3,000 in actual covered costs - \$5,000 in other financial assistance). Included income: \$2,000 (the amount by which the financial aid exceeds the student's actual covered costs).</p>			
6-II.C	None	<p>In determining the value of non-necessary 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 \$1,000 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.</p>	Yes	<p>New regulations from HUD that places assets into two categories, Necessary and non-necessary personal property. Non-necessary personal property includes items such as boats and gems/precious metals.</p>
6-II.D	<p>The PHA initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC). The PHA will review the passbook rate annually. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook</p>	None	Yes	<p>HUD has removed the policy for setting the passbook rate and has changed it to a regulation. The discretionary flexibility to set it within the 0.75 of</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	rate will be set at the current national rate. The effective date of changes to the passbook rate will be determined at the time of the review.			the national rate has been removed.
6-III.D	Families that claim to have incurred health and medical care expenses may declare such expenses via submittal of third-party receipt of expense.		Yes	New Regulatory Language from HUD.
6-III.E	Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service or assistance animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included	None	Yes	HUD has changed this from a policy to a regulation.
6-III.E	Attendant care includes, but is not limited to, reasonable costs for home medical care, nursing services, in-home or center-based care services, interpreters for persons with hearing impairments, and readers for persons with visual disabilities.	None	Yes	HUD has changed this from a policy to a regulation.
6-III.G	None	The PHA will not continue the phased-in relief for families who move from public housing to HCV. These families will be treated as new admissions and the sum of expenses that exceeds 10 percent of annual income will be used to calculate their adjusted income.	Yes	Implementation of HOTMA. Families start anew in having their expenses utilized in assessing adjusted income.
6-III.G		To qualify for a hardship exemption, a family must submit a request in writing. The request must show that the family's health and medical and/or disability assistance expenses have increased (other than the transition to	Yes	For families that have more than 5% but less than 10 % of gross annual income in medical care and/or disability

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>the higher threshold) and that the family's financial hardship is a result of a change in circumstances. The PHA defines a change in circumstances as a decrease in income or increase in other expenses that has resulted in the family's financial hardship but does not, on its own, trigger an interim reexam in accordance with PHA policies.</p> <p>Examples of circumstances constituting a financial hardship may include the following situations:</p> <p>The family is awaiting an eligibility determination for a federal, state, or local assistance program, such as a determination for unemployment compensation or disability benefits.</p> <p>The family's income decreased because of a loss of employment, death of a family member, or due to a natural or federal/state declared disaster; or</p> <p>Other circumstances as determined by the PHA.</p> <p>The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.</p>		<p>assistance expenses; these families could potentially apply for this hardship exemption. to lower their threshold for medical care and/or disability expenses, which is then layered into the calculation of their adjusted income.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
6-III.G	None	<p>The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 14 business days of the determination. If the PHA denies the hardship exemption request, the PHA notice will also state that if the family does not agree with the PHA determination, the family may request a hearing.</p> <p>If the family qualifies for an exemption, the PHA will include the date the hardship exemption will begin and the date it will expire as well as information on how to request a 90-day extension based on family circumstances</p>	Yes	Provides clarity on the process of determination and implementation of hardship exemptions relating to medical expense.
6-III.G		<p>The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's satisfaction that the family continues to qualify for the hardship exemption based on circumstances described above. The PHA will require updated verification based on the family's current circumstances. Additional extension may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship</p>	Yes	Offers the family an opportunity to request an extension for a hardship exemption for medical expenses.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		exemption if the PHA determines that the family no longer qualifies for the exemption.		
6-III.G		<p>For a family to qualify, they must demonstrate that their inability to pay rent would be as a result of the loss of this deduction. The PHA defines this hardship as a potential decrease in income or increase in other expenses that would result from the loss of the childcare expense and such loss would impact the family's ability to pay their rent.</p> <p>Some factors to consider when determining if the family is unable to pay rent may include determining that the rent, utility payment, and applicable expenses (child care expenses or health and medical expenses) are more than 40 percent of the family's adjusted income, or verifying whether the family has experienced unanticipated expenses, such as large medical bills, that have affected their ability to pay their rent.</p> <p>The family must also demonstrate that the childcare expense is still necessary even though the family member is no longer employed or furthering their education. The PHA will consider qualification under this criterion on a case-by case basis (for example, if the family member who was employed has left their job in order to provide uncompensated care to an elderly friend or family member who is severely ill and lives across town).</p> <p>The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PHA will document the file with the reason and will</p>	Yes	If the childcare expense deduction is ending for a family, they may request a hardship exemption.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.		
6-III.G		<p>The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 14 business days of the determination. If the PHA denies the hardship exemption request, the PHA notice will also state that if the family does not agree with the PHA determination, the family may request an informal hearing.</p> <p>If the family qualifies for an exemption, the PHA will include all required information listed above as well as information on how to request a 90-day extension based on family circumstances.</p>	Yes	Provides clarity on the process of determination and implementation of hardship exemptions relating to childcare expense deduction.
6-III.G	None	<p>The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's satisfaction that the family continues to qualify for the hardship exemption. The PHA will require updated verification based on the family's current circumstances. Additional extension may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship exemption if the PHA determines that the family no longer qualifies for the exemption.</p>	Yes	Offers the family an opportunity to request an extension for a hardship exemption for childcare expense deduction.

Section	Previous Policy	Proposed Policy	Required Change	Impact
6-III.H.	None	The PHA has opted not to use permissive deductions.	Yes	New Regulatory Language from HUD. No additional deductions will be applied to income.
6-IV.D	None	<p>The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required. The PHA will consider the following criteria as valid reasons for granting individual relief:</p> <p>The family's consumption was mistakenly portrayed as excessive due to defects in the meter or errors in the meter reading.</p> <p>The excessive consumption is caused by a characteristic of the unit or owner-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation. The allowance should be adjusted to reflect the higher consumption needs associated with the unit until the situation is remedied. The resident should be granted individual relief until the allowance is adjusted.</p> <p>The excessive consumption is due to special needs of the family that are beyond their control, such as the need for specialized equipment in the case of a family member who is ill, elderly, or who has a disability.</p> <p>In determining the amount of the reasonable accommodation or individual relief, the PHA will allow a reasonable measure of additional usage as necessary. To arrive at the amount of additional utility cost of specific equipment, the family may provide information from the manufacturer of the equipment, or the family or PHA may conduct an internet search for an estimate of usage or additional monthly cost.</p>	Yes	Adds criteria for when a family may be approved for a higher utility allowance, including non-disability related reasons. Families will be provided information on utility relief programs.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Information on reasonable accommodation and individual relief for charges in excess of the utility allowance will be provided to all families at admission as part of the information on payment standards and utility allowances in the briefing packet. The PHA will also provide information on utility relief programs or medical discounts (sometimes referred to as "Medical Baseline discounts") that may be available through local utility providers.</p> <p>At its discretion, the PHA may reevaluate the need for the increased utility allowance at any regular reexamination.</p> <p>If the excessive consumption is caused by a characteristic of the unit or PHA-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation, the individual relief to the resident will cease when the situation is remedied.</p>		
7-I.B	None	<p>When available and applicable, the PHA may accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The PHA will still require third-party verification of all deductions such as the health and medical care expense or childcare expense deductions. Further, if the family is eligible for and claims the disability assistance expense or childcare expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.</p> <p>Prior to using any Safe Harbor determination from another program, the PHA will ask the</p>	Yes	<p>If Safe Harbor is established, PHA would be able to utilize annualized income from an approved entity in determining annual income for the purpose of PHA requirements.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the PHA will obtain third-party verification of all sources of income and assets (as applicable). The PHA will not accept other programs' determinations of income for any new admission or interim reexamination.</p> <p>With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the PHA will accept Safe Harbor determinations from any of the programs listed above.</p> <p>In order to be acceptable, the income determination must:</p> <ul style="list-style-type: none"> Be dated within 12 months of the dates listed above. State the family size. Be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members); and Must state the amount of the family's annual income. <p>The determination need not list each source of income individually. If the PHA does not receive any acceptable income determination documentation or is unable to obtain documentation, then the PHA will revert to third-party verification of income for the family.</p> <p>When families present multiple verifications from the same or different acceptable Safe Harbor programs, the PHA will use the most recent income determination, unless the family presents acceptable evidence that the PHA</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>should consider an alternative verification from a different Safe Harbor source.</p> <p>When the PHA uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the PHA. Depending on when the change occurred, the change may or may not impact the PHA's calculation of the family's total annual income. Changes that occur between the time the PHA receives the Safe Harbor documentation, and the effective date of the family's annual reexam will not be considered. If the family has a change in income that occurs after the annual reexam effective date, the PHA will conduct an interim reexam if the change meets the requirements for performing an interim reexamination as outlined in Chapter 11. In this case, the PHA will use third-party verification to verify the change.</p>		
7-I.E	None	<p>In accordance with PHA policies in Chapter 11, the PHA does not process interim reexaminations for families who have increases in earned income. Except for instances in which the PHA uses Safe Harbor income determinations to determine a family's annual income, the PHA will only review the New Hires Report at annual reexamination.</p>	Yes	New Regulatory Language from HUD. This will help ensure that income reporting is accurate for the annual reexamination.
7-I.E	None	<p>The PHA will generate the No Income Reported by HHS or SSA Report quarterly and will retain the report.</p> <p>The PHA will re-verify the status of participants identified on the report quarterly. Based on the information provided by the family and in EIV, the PHA may require that family members</p>	Yes	New Regulatory Language from HUD. This will help ensure that income reporting is accurate for the annual reexamination.

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		<p>provide verifications or sign release forms in order to obtain additional verification.</p> <p>When the PHA determines through this report and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity</p>		
7-I.F.	<p>Third-party documents provided by the family must be dated within 60 days of receipt by the PHA.</p> <p>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.</p> <p>As verification of earned income, the PHA will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.</p>	<p>In general, the PHA will use third-party verification from the source in the following circumstances:</p> <p>At annual reexamination when verification is not obtained under Level 6 or Level 5 (see 7-I.E UP-FRONT INCOME VERIFICATION (UIV))</p> <p>For all new admissions; and</p> <p>For all interim reexaminations.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>When pay stubs are used, the PHA will require the family to provide the two most current,</p>	Yes	<p>New Regulatory Language from HUD. Provides family a larger window of time to provide third-party documents for income verification.</p>

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		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.		
7-I.F.		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 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.		New Regulatory Language from HUD. When EIV is used for income verification, the family must certify that it is accurate.
7-I.G.	The PHA may send third-party verification forms directly to the third party. Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA. The PHA will proceed to oral third-party verification if	PHA may substitute Level 2 (Oral third-party verification) for written, third-party verification form, before moving to self-certification.	No	Provides a quicker process for verifying income.

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	the third-party verification forms are not returned within five business days.			
7-I.H.	<p>In collecting third-party oral verification, PHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided. When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.</p> <p>When requesting third-party oral verification, PHA will wait 2 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.</p>	<p>If written third-party verification forms are not returned within 5 business days, the PHA will accept self-certification from the family without attempting to obtain oral third-party verification. If the PHA chooses to obtain oral third-party verification, the PHA will document in the file the date and time of the telephone call or visit, the name of the person contacted and the telephone number, as well as the information confirmed.</p> <p>When requesting third-party oral verification, PHA will wait 2 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.</p>	No	Provides a quicker process for verifying income.
7-I.I.	<p>When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA. The PHA may require a family to certify that a family member does not receive a particular type of income or benefit. The self-certification must be made in a format acceptable to the PHA, and may be signed in the presence of a PHA representative or notary public.</p>	<p>When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA. The PHA may require a family to certify that a family member does not receive a particular type of income or benefit. The self-certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.</p> <p>All self-certifications will include the following language: "I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. WARNING: Anyone who</p>	No	Helps to ensure accuracy of information that is self-certified by requiring perjury statement be signed. Not required, however HUD recommends.

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		knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)."		
7-II.B	None	The PHA will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.	No	New Regulatory Language from HUD. Expands the acceptable documentation to verify SSN
7-III.A	None	The following policies do not apply when the PHA uses a safe harbor income determination from a means-tested federal assistance program. Unless tip income is included in a family member's W-2 by the employer or in UIV verification sources, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year or tips anticipated to be received in the coming year. When the PHA requires third-party verification of wages, for wages other than tips, the family must provide originals of the two most current, consecutive pay stubs.	Yes	Clarifies that a PHA does not need to assess for tips/wages if the PHA uses another entity to determine income.
7-III.B	Business owners and self-employed persons will be required to provide: An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted, and the business owner or self-employed person must certify to its accuracy. All schedules completed for filing federal and local taxes in the preceding year. If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of	Business owners and self-employed persons will be required to provide: Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.). If accelerated depreciation was used on the tax return or financial statement, an accountant's	No	Best practice language from HUD to obtain IRS Form 4506-T for families with self-employment income who did not file taxes. Additionally, provides guidance on assessing income from employment such as Uber and DoorDash.

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	<p>depreciation expense, computed using straight-line depreciation rules.</p> <p>The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.</p> <p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>	<p>calculation of depreciation expense, computed using straight-line depreciation rules.</p> <p>For self-employed individuals who claim they do not to file tax returns, The PHA will obtain a completed copy of IRS Form 4506-T to verify that no return has been filed.</p> <p>For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), the PHA will provide a format for the individual to declare their income and expenses, and or utilize the Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.</p> <p>The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.</p> <p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>		
7-III.C	<p>To verify the SS/SSI benefits of applicants, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s), the PHA will help the applicant request a benefit verification letter from SSA's web site at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the applicant has received the benefit verification letter, they will be required to provide it to the PHA.</p> <p>To verify the SS/SSI benefits of participants, the PHA will obtain information about social security/SSI benefits</p>	None	Yes	Per HUD the old policy has changed to a regulation. The regulation provides 120 days to provide SSA/SSI information. The prior policy provided 60 days.

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	<p>through the HUD EIV System and confirm with the participant(s) that the current listed benefit amount is correct. If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, the PHA will request a current SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s) the PHA will help the participant request a benefit verification letter from SSA's web site at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the participant has received the benefit verification letter, they will be required to provide it to the PHA.</p>			
7-III.D	<p>The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments. If the family declares that it receives regular payments, verification will be obtained in the following order of priority:</p> <ul style="list-style-type: none"> Copy of the ledger/payment history from the support enforcement agency for the 60 days prior to PHA request Third-party verification form from the state or local child support enforcement agency The third-party verification form for the purpose of verification from the state or local support enforcement agency is the submittal of the release of information signed by the applicant/tenant and submitted by the PHA to request the required documentation. Third-party verification form from the person paying the support. <p>Refer to the verification hierarchy in Chapter 7-I for subsequent verification steps.</p> <p>If the family declares that it receives irregular or no payments, in addition to the verification process listed above, the family must provide evidence that it has</p>	<p>The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.</p> <p>If the family declares that it receives regular payments, verification will be obtained in the following order of priority:</p> <ul style="list-style-type: none"> Third-party verification from the state or local child support enforcement agency Copies of the receipts and/or payment stubs for the 12 months prior to PHA request Third-party verification form from the person paying the support. Family's self-certification of amount received. <p>Note: Families are not required to undertake independent enforcement action.</p>	No/Yes	<p>Best practice language from HUD. Removes requirement for family to attempt to enforce child support payments.</p> <p>HUD regulatory change from 60 days to 12-month review period for payments made.</p>

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	<p>taken all reasonable efforts to collect amounts due. This may include:</p> <p>A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts.</p> <p>If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts.</p> <p>Note: Families are not required to undertake independent enforcement action.</p>			
7-III.E	None	The PHA will accept self-certification from the family stating that income will not be repeated in the coming year. However, the PHA may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.	Yes	Provides additional guidance on how to assess what was formally known as sporadic income.
7-III.F	<p>For families with net assets totaling \$5,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable.</p> <p>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.</p> <p>The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and every three years thereafter.</p>	<p>For families with net assets 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 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.</p> <p>When verification is required, in determining the value of checking or savings accounts, the PHA will use the current balance.</p>	Yes	New Regulatory Language from HUD. Raises the limit for when self-certification can be used.

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		<p>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.</p>		
7-III.F	None	<p>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.</p> <p>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, or stalking, the PHA will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.</p>	Yes	New Regulatory Language from HUD. Requires family to self-certify whether they own real property.
7-III.G	<p>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</p>	<p>The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.</p>	No	New Regulatory Language from HUD. Allows self-certification.

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	The amount reported by the family in the certification appears obviously in error.	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.		
7-III.J	<p>The PHA will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.</p> <p>The type of original document that will be accepted depends upon the family member's retirement status.</p> <p><i>Before</i> retirement, the PHA will accept an original document from the entity holding the account with a date that shows it is the most recently scheduled statement for the account but in no case earlier than 6 months from the effective date of the examination.</p> <p><i>Upon</i> retirement, the PHA will accept an original document from the entity holding the account that reflects any distributions of the account balance, any lump sums taken and any regular payments.</p> <p><i>After</i> retirement, the PHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken and any regular payments.</p>	The PHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken and any regular payments.	No	Best practice language from HUD. Expands the time frame for retirement documentation to 12 months.
7-III.M	For a student subject to having a portion of their student financial assistance included in annual income in accordance with 24 CFR 5.609(b)(9), the PHA will request written third-party verification of both the source and the amount. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.	<p>The PHA will request written third-party verification of both the source and the amount of student financial assistance. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.</p> <p>In addition, unless the student's only source of assistance is assistance under</p>	Yes	New Regulatory Language from HUD. When student financial aid is from excluded, does not require verifying school expenses. Expands the types of costs that are included when required.

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	<p>In addition, the PHA will request written verification of the student's tuition, fees, and other required charges.</p> <p>If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.</p>	<p>Title IV of the HEA, the PHA will request written verification of the cost of the student's tuition, books, supplies, room and board, and other required fees and charges to the student from the educational institution.</p> <p>If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.</p>		
7-IV.B	<p>Medical expenses will be verified through: Written third-party documents provided by the family, such as pharmacy printouts or receipts. The PHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The PHA will also accept evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months. Written third-party verification forms, if the family is unable to provide acceptable documentation. If third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.</p>	<p>Medical expenses will be verified through: Written third-party documents provided by the family, such as pharmacy printouts or receipts. When income is projected at new admission or interim, the PHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The PHA will also accept evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months. Written third-party verification forms, if the family is unable to provide acceptable documentation. When income is projected at new admission or interim, if third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.</p>	Yes	New Regulatory Language from HUD. Increases regulatory obligation to protect medically sensitive information.

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		<p>Before placing bills and documentation in the tenant file, the PHA will redact all personally identifiable information. If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].</p>		
7-IV.C	<p>The PHA will accept written third-party documents provided by the family. If family-provided documents are not available, the PHA will provide a third-party verification form directly to the care provider requesting the needed information. Expenses for attendant care will be verified through: Written third-party documents provided by the family, such as receipts or cancelled checks. Third-party verification form signed by the provider, if family-provided documents are not available.</p>	<p>Expenses for attendant care will be verified through: Written third-party documents provided by the family, such as receipts or cancelled checks. Third-party verification form signed by the provider, if family-provided documents are not available. When income is projected at new admission or interim, if third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.</p>	Yes	New Regulatory Language from HUD. Increases regulatory obligation to protect medically sensitive information.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>If third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.</p>	<p>Before placing bills and documentation in the tenant file, the PHA will redact all personally identifiable information. If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].</p>		
11-I.E	None	<p>When income is calculated using a streamlined income determination or Safe Harbor determination from a means-tested federal public assistance program in accordance with PHA policies in Chapter 7, the above is not applicable. However, where the family disagrees with the PHA or other agency's determination of income or the PHA has other reason to use third-party verification in these circumstances, then the above will apply.</p>	Yes	<p>New Regulatory Language from HUD. Allows alternative verification of income.</p>
11-II.B	<p>The PHA will not conduct a reexamination of income when a new family member is added. However, the PHA will verify all other aspects of program eligibility, such as</p>	<p>All families must report all changes in family and household composition that occur between annual reexaminations within 14 business days of the change.</p>	Yes	<p>Interim policy is revised to be in alignment with new regulatory Language from HUD.</p>

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	<p>criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member. However, if the new member qualifies for a dependent deduction, an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.</p>	<p>The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.</p>		
11-II.C	None	<p>When a family reports an increase in their earned income between annual reexaminations, the PHA will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination. The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income. The PHA will not perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with the PHA policies in Chapter 14.</p>	Yes	New Regulatory Language from HUD. Provides thresholds for when interim ups will be completed.
11-II.C	<p>The PHA will conduct interim reexaminations in each of the following instances: For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and</p>	<p>The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last</p>	Yes	New Regulatory Language from HUD requiring interim ups to be completed.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>conclusion of the 24-month eligibility period. The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint. Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam). The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.</p> <p>If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file but will not conduct an interim reexamination unless the family requests an interim to increase rent. An example would be an FSS participant whose increases in rent are deposited into his or her FSS escrow account. If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, the PHA will conduct an interim reexamination. See Section 11-II.D. for effective dates.</p>	<p>three months of the certification period. Families must report changes in income within 14 business days of the date the change takes effect. The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing. Within 14 business days of the family reporting the change, the PHA will determine whether the change will require an interim reexamination.</p> <p>If the change will not result in an interim reexamination, the PHA will note the information in the tenant file but will not conduct an interim reexamination. The PHA will send the family written notification within 14 business days of making this determination informing the family that the PHA will not conduct an interim reexamination.</p> <p>If the change will result in an interim reexamination, the PHA will determine the documentation the family will be required to submit based on the type of change reported and PHA policies in Chapter 7. The PHA will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 14 business days of receiving a request from the PHA. This time frame may be extended</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>for good cause with PHA approval. The PHA will accept required documentation by mail, email, fax, or in person. The PHA will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information.</p> <p>Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview is warranted, the family may be required to attend.</p>		

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 Consolidated plan 2020.

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

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

Unless otherwise noted, all information below is from the 2020 Eugene-Springfield Consolidated Plan. In Eugene- Springfield 44% of households in the plan area have extremely low, very low or low-moderate incomes. HUD provided numbers in the Consolidated plan indicated that 14.8% of total households were identified as extremely low income (less than 30% AMI) and 12.3% as low income (between 30 and 50% AMI). More households with children under age 6 (55%) and households with people over age 75 (54%) have low incomes.

The 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% 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

6 New Construction Projects were recently completed totaling 260 units. There is 1 New Construction Project actively under construction consisting of 81 units.

Project	Description
The Commons on MLK (\$13 million total budget)	This 51-unit Housing First project completed construction in January of 2021 is a powerful partnership with Lane County to implement the priorities/goals of the Poverty and Homelessness Board.
Sarang (1 of 2 projects part of \$32 million Rental Assistance Demonstration Preservation RAD replacement Project)	This 49-unit project is one of two different sites in one financial transaction. Homes for Good received approval from HUD through the RAD program to sell 100 single family homes and duplexes that receive a Public Housing rental/operating subsidy and converting these subsidies to a Section 8 subsidy that will be place into 100 newly constructed units. This project was completed in June of 2021 and provides 49 of the units in Eugene.
Hayden Bridge Landing (2nd RAD replacement project)	This 70-unit project is the second site in the one financial transaction and was completed in June of 2021. This project provides replacement of the remaining 53 units in Springfield with attached rental subsidy and an additional 17 units that will provide much-needed one-bedroom units.
The Keystone (\$5 million total budget)	This 15-unit Permanent Supportive Housing development in Eugene serves homeless families and includes 15 PBVs. It was completed in fall of 2021.
The Nel (\$15 million total budget)	This 45-unit Permanent Supportive Housing development in Eugene serves homeless individuals and includes 45 PBVs. It began construction in May 2021 and was completed in July of 2022.
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 and was completed in fall 2024.
Ollie Court (under construction)	Homes for Good was awarded a City of Eugene landbank site on 13 th Avenue in Eugene that will be used for the development of 80

Project	Description
	affordable units and includes 80 PBVs. An Early Learning Center is being developed onsite on the ground floor.

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 Housing development in Eugene will serve homeless individuals and includes 56 PBVs. It began construction in June 2024 and will be complete in May 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 intends to pursue funding from the State of Oregon in 2024 and 2025.
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. Homes for Good intends to submit a funding application to the State of Oregon in 2024 and 2025 for this development.
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 Equity Strategy Team which has guided the implementation of the Strategic Equity Plan. This team helped guide the approval of an agency wide Strategic Equity Plan (SEP) that guides all facets of work at the agency. The SEP has four pillars which are designed to address the 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.
- Executive Director Jacob Fox is on the Poverty and Homelessness Board and chairs their facilities committee; in that position Jacob strives to further the goals of Fair Housing.
- Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Lane County Rental Owner's Association (ROA). This board meets monthly 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 Centro Latino Americano and NAACP
- As part of an agency centralized list, identify culturally specific organizations, and organizations serving the BIPOC 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 BIPOC 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 the BIPOC 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 ~~for~~ group with people with disabilities and review design for common areas and Accessible units.
- Quarterly meetings with Shelter Plus Care service providers to expedite referrals for S+C Program.
- 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
- 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
- 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

	<u>Prior</u>	<u>FY 2023</u>	<u>FY 2024</u>
Federal Grants			
Move to Work Capital Fund	381,537.00	1,505,294.00	1,055,652.00
Component - Blended		246,732.00	226,464.00
PIH Family Self Sufficiency	277,095.00	228,731.00	239,520.00
N/C S/R Section 8	280,573.00	99,552.00	360,516.00
Interest Reduction	358,217.00	318,772.00	307,788.00
Mainstream	1,134,252.00	1,449,389.00	1,346,268.00
Move to Work LIPH	727,106.00	2,352,049.00	3,869,795.00
Public Housing CARES	46,531.00	-	-
Public Housing	2,722,163.00	-	-
HCV	17,738,995.00	-	-
HCV Cares	467,503.00	-	-
ROSS	68,660.00	83,547.00	78,648.00
Shelter + Care	823,817.00	856,345.00	829,788.00
Move to Work HCV	8,655,161.00	30,230,645.00	27,265,339.00
EHV	848,472.00	2,597,989.00	1,535,520.00
Family Unification	9,197.00	34,649.00	28,721.00
Total federal grants	\$ 34,539,279	\$ 40,003,694	\$ 37,144,019
	34,539,279.00	40,003,694.00	43,098,644.00
Non-Federal sources			
Dwelling rent	\$ 9,079,022	\$ 10,824,030	\$ 9,433,340
Other operating income	32,348,593	16,120,896	5,641,178
Total non-federal sources	\$ 41,427,615	\$ 26,944,926	\$ 15,074,518
Total resources	\$ 75,966,894	\$ 66,948,620	\$ 52,218,537

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:

Definitions of Substantial Deviation on 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 Summer 2025:

Project	Description
Ollie Court (under construction)	Homes for Good was awarded a City of Eugene landbank site on 13 th 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 July 2024 and will be complete in September 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 June 2024 and will be complete in May of 2025.

4.5. ATTACHMENT B.3 PROGRESS REPORT

Goal 1: Increase the number of affordable housing units

Indicator	FY23 Progress	FY24 Progress
Create 300 new affordable housing units.	Funding applications were submitted for Ollie Court (81 units), Quince Street (86 units) and Bridges on Broadway (57 units) in the Spring of 2023.	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 th (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.
Increase number of permanent supporting housing units. (Featured projects: The Keystone, The Nel, Bridges on Broadway)	Bridges on Broadway (57 units PSH) submitted for funding in Spring of 2023.	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.
Maintain public housing vacancies at 3% or less.	Public Housing continues to maintain an average occupancy of above 97% (98.5% for FY21 YTD).	Public Housing continues to maintain an average occupancy of above 97% (97.3% for FY24 YTD).
Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons.	As of March 1, 2023, Homes for Good has 181 Mainstream Vouchers. Utilization for CY2022 was 97.6%.	As of March 1, 2024, Homes for Good has 181 Mainstream Vouchers. Utilization for CY2023 was over 100%.
Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County.	As of March 2023, 248 VASH vouchers are under lease. We received an additional 50 VASH vouchers, for a total of 319 vouchers. We have provided local preference for the VA team to utilize PBV sites for VASH voucher holders. We continue with a Remote Video Inspection (RVI) project with the VA. RVI, an	As of March 2024, Homes for Good has 319 VASH vouchers, of which 263 are under lease.

Indicator	FY23 Progress	FY24 Progress
	initiative deployed by HUD in response to COVID-19 provides a process for in field proxy inspectors to connect via video platform within office Housing Quality Standard Inspection staff to complete required HUD inspections.	

Goal 2: Continue to receive high performer status

Indicator	FY23 Progress	FY24 Progress
Homes for Good received high performer status for FY18 SEMAP.	Homes for Good will no longer be required to submit SEMAP as the requirement to do so is removed with our designation as a Move to Work agency.	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.	Homes for Good continues to receive high performer status.	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.
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	FY23 Progress	FY24 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.	Due to budget constraints, Housing Liaison has been removed from the budget and the Resident Services team has worked to increase tenant education resources available through our Rent Well program.	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.
Continue to encourage and promote resident involvement in the Resident Advisory Board by maintaining and expanding the number of representatives from public and assisted housing, as well as the Section 8 program.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.
Enhance the customer service experience across agency programs by simplifying and aligning processes, providing access to services staff and by connecting participants to needed resources in the community.	Homes for Good continues to work to streamline and simplify agency processes and increasing availability of Resident Services and other support staff.	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.
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 COVID-19 and 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 PH households into lower income developments and vice versa, if necessary.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.

Indicator	FY23 Progress	FY24 Progress
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	FY23 Progress	FY24 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 128 households enrolled and have worked to adapt recruitment and intake to meet COVID-19 precautions.	Homes for Good Family Self-Sufficiency program currently has 125 households enrolled in the FSS program, with an average escrow of \$5,200.
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 20 community partners engaged with this board.
Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet. Info Sessions have moved from monthly to every other week to increase availability and attendance.	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.
Assist a minimum of two FSS participants a year in purchasing a home.	FSS has assisted 2 participants in purchasing homes this year and are working with several more to hopefully complete purchases by the end of the fiscal year.	FSS assisted 1 participant in purchasing a home during 2023.
Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.	FSS has assisted 6 households in opening IDA's this year. Funding for this opportunity has decreased this year but we are hopeful that it	FSS is supporting 23 participants with IDA's, which includes 6 new participants.

Indicator	FY23 Progress	FY24 Progress
	will return to pre-pandemic levels by the start of the fiscal 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	FY23 Progress	FY24 Progress
Complete the Rent Assistance Demonstration construction and sale of scattered site homes.	Homes for Good has completed construction of the replacement housing	Homes for Good will complete scattered site sales in 2024.
Focus preservation efforts communicating with local, state and national funders to help preserve affordable housing opportunities.	Provided offer on 100-unit affordable project in Springfield through the PUSH program which gives Homes for Good first right of refusal if owner sell in the next few years.	There is one Preservation project (Bridges on Broadway) actively under construction consisting of 50 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.	The Landlord Liaison position continues to provide routine education on accessing housing through Homes for Good to both landlord and community partners.	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
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 FY21 and as of April FY22, 17 loans have been requested. 10 were approved. 3 families have	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.

Indicator	FY23 Progress	FY24 Progress
	paid the loans back, 2 families defaulted and 5 are actively paying the loan back. For FY 22 and as of March 2023 – 29 applications were received, and 21 approved. 9 families have paid in full and 2 defaulted. 10 are actively paying.	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.

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	FY23 Progress	FY24 Progress
Increase success of Section 8 participants, particularly those coming out of homelessness or transitioning from permanent supportive or transitional housing through engagement with the Housing Liaison	The Landlord Liaison continues to provide education to local preference partners. Homes for Good has expanded partnerships and now has 23 local preference partners. Homes for Good received 184 Emergency Housing Vouchers (EHV). These vouchers are to serve homeless person, persons fleeing domestic violence and persons fleeing human trafficking. As of March 2023, we have 179 vouchers in use. 18 PHAs across Oregon were awarded EHV. These funds also provide a \$2K per household assistance option for items such as move in costs and essential household items. As of April 1, 2022, these funds have been utilized to assist 151 families.	The 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.
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		
Maintain a professional working relationship with landlords/owners in our community		We continue to maintain a professional working relationship with landlords/owners in our community through education and

Indicator	FY23 Progress	FY24 Progress
through education and seminars on the Section 8 program		seminars on our tenant based voucher programs.
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 CY22, 3.2% of 4-bedroom families were paying more than 41% of their income towards rent. A 1.6% decrease since FMR study implementation. As of 03/2022 success rate for tenant-based voucher utilization was 62%. In 02/2022 utilization was at 70%. Some of this fluctuation can be attributed to lack of housing stock and the impacts COVID-19 has had on the community as a whole.</p> <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>
A Homes for Good staff member serves on the board for the local Rental Owners association	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association (ROA). The Landlord Liaison position attends general membership meetings and contributes articles to the ROA's monthly newsletter which is distributed to over 1200 members representing over 20,000 rental units. The Landlord Liaison position also provides routine educational seminars for ROA members on aspects of the housing subsidy	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.

Indicator	FY23 Progress	FY24 Progress
	process. We have also obtained the credentials to issue Continuing Education Credits (CEUs) to participating Landlords.	

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

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

Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024
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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(0)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(0) 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(0) 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(0)(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 identify, 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 24 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	Signature
Date	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 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.

form HUD-50077-ST-HCV-HP (3/31/2024)

5. 5-YEAR PHA PLAN (FOR ALL PHAS)

5-Year PHA Plan <i>(for All 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, 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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information																										
A.1	<p>PHA Name: <u>Homes for Good Housing Agency</u> PHA Code: <u>OR006</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2024</u> The Five-Year Period of the Plan (i.e. 2019-2023): <u>2025 - 2030</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 15%;">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																		
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program																			
		PH	HCV																								
B.	Plan Elements																										
B.1	<p>Mission: State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years.</p> <p>Our mission is Homes. People. Partnerships. Good.</p> <p>Homes for Good is Lane County's housing agency and our primary work is to help low-income residents with the logistics of affordable housing. At a higher level, we are neighbors united to get every Lane County resident who needs help, into a home.</p>																										
B.2	<p>Goals and Objectives: Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <p>See Attachment B.2 Goals and Objectives</p>																										
B.3	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p>See Attachment B.3 Progress Report</p>																										
B.4.	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>See Section 12-ILE of Homes for Good's Administrative Plan</p> <p>See Part VII of Homes for Good's Admissions and Continued Occupancy Plan (ACOP)</p>																										

C.	Other Document and/or Certification Requirements.
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>See Attachment C.1 Significant Amendment or Modification</p>
C.2	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year 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 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.3	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p> <p>Homes for Good will update this section with any elements challenged during the public process, if any.</p>
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</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>
	<p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p>

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-50075-5Y - 5-Year PHA Plan for All PHAs

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

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **Five-Year Period** that the Plan covers, i.e. 2019-2023, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

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

B. Plan Elements.

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

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR § 903.6(b)(1))

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

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

C. Other Document and/or Certification Requirements.

C.1 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year 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 2.

C.2 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB have comments?

(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR § 903.17(b), 24 CFR § 903.19)

C.3 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.

C.4 Required Submission for HUD FO Review.

Challenged Elements.

(a) Did the public challenge any elements of the Plan?

(b) If yes, 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.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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 in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, 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.

6. 5-YEAR FY2025-FY2030 PLAN ATTACHMENTS

6.1. ATTACHMENT B.2 GOALS AND OBJECTIVES

In July, 2023, Homes for Good completed its Strategic Equity Plan (SEP) for FY2024. The SEP includes Themes, Goals, and Tactics for the agency to follow in order to strategically advance its diversity and equity goals. Since the development of the SEP, the agency has continually used the Themes, Goals, and Tactics identified in it to guide the agency in its decision-making process, including prioritizing projects and activities and communicating those priorities to the communities at large. The agency's Equity Strategy Team updates the Board quarterly on its progress. The SEP can be found on Homes for Good's website here: [SEP](#)

Because the SEP Themes, Goals, and Tactics have been embedded in the agency's work, the leadership team elected to update the annual and 5-year planning goals so that they align with those identified in the SEP. The themes and goals from the SEP are listed below.

Pillar 1: Listen to Our Communities – Our Agency lives within the sphere of our community, and cannot be separated from that context. In order to be a responsible community organization, we must collaborate-- and most importantly listen-- to other organizations and people within our community. We must learn from their experiences and base operational changes on them to improve their experience. These goals focus on local partnership and collaboration.

Goal 1.1: *Client Satisfaction:* Based on input received through client engagement efforts such as focus groups and surveys we will measure client satisfaction with how we have modified policies, procedures and performed site improvements.

Goal 1.2: *Housing in Rural Communities:* Increase housing production in rural communities through intentional relationship building with local leaders.

Goal 1.3: *Design and Build to Meet Community Need:* We will focus development and rehabilitation efforts including housing type, design and scale based on input from residents and especially historically underserved and/or underrepresented communities in affordable housing programs.

Pillar 2: Tell the Human Story – The people we serve are the heart of our work. As a social service organization, we work for and with people. These goals focus on keeping a human-centered approach. They include efforts to gather participant feedback and use that in programmatic changes, amplifying those voices on our media platforms, and improved empathy and client interactions for non-client facing staff.

Goal 2.1: *Increase Understanding of Homelessness in the Community:* Through social media campaigns, we will foster empathy by amplifying stories of Homes for Good clients with an emphasis on clients who were formerly unhoused to increase community awareness of why so many people are experiencing homelessness.

Goal 2.2: *Increase Housing Supply for Households Coming out of Homelessness:* Catalyze progress by educating and engaging the business community in

efforts to increase housing supply in Lane County to address homelessness and housing instability for low wage workers.

Pillar 3: Create Pathways to Self Sufficiency – We usually associate "Self-Sufficiency" with our "Family Self-Sufficiency Program," but creating pathways to self-sufficiency looks to improve more than just one program. With these goals, we hope to make process and programmatic improvements to promote wealth building, and improve the mental and physical health of our all of our Residents and Program Participants.

- Goal 3.1: *Increase FSS Enrollment:* We will increase enrollment in the Family Self-Sufficiency Program by 50%.
- Goal 3.2: *Leverage Medicaid Funds for Rent Assistance:* We will optimize funding of services through Medicaid billing for rent assistance, supportive housing and climate resilience to ultimately increase self-sufficiency and health outcomes of people we serve.
- Goal 3.3: *Increase Homeownership:* We will increase the Housing Choice Voucher Home Ownership Program by 25% through partnerships with non-traditional housing developers.
- Goal 3.4: *Increase Employment:* We will create long term stable employment opportunities by hiring at least two program participants through targeted recruitments.
- Goal 3.5: *Increase Use of Disadvantaged Contractors:* We will increase the annual amount we compensate BIPOC and women owned businesses and contractors by 20%.
- Goal 3.6: *Increase Youth Employment:* We will create educational and employment opportunities for youth in our programs through intentional partnerships with local organizations serving youth.

Pillar 4: Lead and Grow Ethically - "Leading and Growing Ethically" means we will lead the way in creating a racially and socially just organizational culture. These goals focus on improving our employee experience, recruiting and retaining a diverse workforce, utilizing technologies to provide more access to our programs, and reducing the Agency's carbon footprint.

- Goal 4.1: *Reduce Hate and Bias Incidents:* We will develop and implement a robust data collection and reporting mechanism to accurately document and respond to hate & bias incidents in our communities and workplace, allowing us to set a baseline and ultimately reduce hate & bias incidents by 10% this plan year.
- Goal 4.2: *Maintain Stable Workplace:* We will maintain a staff turnover rate at or below the average public employers in Oregon.
- Goal 4.3: *Recruit Staff Representative of those we Serve:* We will align staff demographics with the diverse populations within our programs through targeted recruitments, fostering cultural competence, empathy and effectiveness in our services.

Goal 4.4: *Leverage Partnerships to Reach the Underserved*: We will optimize local preference partnerships through data analysis and education.

Goal 4.5: *Leverage MTW Flexibilities*: We will optimize move-to-work flexibilities.

Goal 4.6: *Reach more Underserved and Underrepresented Households*: We will grow the number of families & individuals from historically underserved and/or underrepresented communities on our programs and waitlists by 10% by enhancing accessibility and mitigating barriers through educational opportunities and intentional relationship building with culturally specific organizations.

6.2. ATTACHMENT B.3 PROGRESS REPORT

Goal 1: Increase the number of affordable housing units

Indicator	FY23 Progress	FY24 Progress
Create 300 new affordable housing units.	Funding applications were submitted for Ollie Court (81 units), Quince Street (86 units) and Bridges on Broadway (57 units) in the Spring of 2023.	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 th (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.
Increase number of permanent supporting housing units. (Featured projects: The Keystone, The Nel, Bridges on Broadway)	Bridges on Broadway (57 units PSH) submitted for funding in Spring of 2023.	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.
Maintain public housing vacancies at 3% or less.	Public Housing continues to maintain an average occupancy of above 97% (98.5% for FY21 YTD).	Public Housing continues to maintain an average occupancy of above 97% (97.3% for FY24 YTD).
Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons.	As of March 1, 2023, Homes for Good has 181 Mainstream Vouchers. Utilization for CY2022 was 97.6%.	As of March 1, 2024, Homes for Good has 181 Mainstream Vouchers. Utilization for CY2023 was over 100%.
Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County.	As of March 2023, 248 VASH vouchers are under lease. We received an additional 50 VASH vouchers, for a total of 319 vouchers. We have provided local preference for the VA team to utilize PBV sites for VASH voucher holders. We continue with a Remote Video Inspection (RVI) project with the VA. RVI, an	As of March 2024, Homes for Good has 319 VASH vouchers, of which 263 are under lease.

Indicator	FY23 Progress	FY24 Progress
	initiative deployed by HUD in response to COVID-19 provides a process for in field proxy inspectors to connect via video platform within office Housing Quality Standard Inspection staff to complete required HUD inspections.	

Goal 2: Continue to receive high performer status

Indicator	FY23 Progress	FY24 Progress
Homes for Good received high performer status for FY18 SEMAP.	Homes for Good will no longer be required to submit SEMAP as the requirement to do so is removed with our designation as a Move to Work agency.	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.	Homes for Good continues to receive high performer status.	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.
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	FY23 Progress	FY24 Progress
<p>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.</p>	<p>Due to budget constraints, Housing Liaison has been removed from the budget and the Resident Services team has worked to increase tenant education resources available through our Rent Well program.</p>	<p>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.</p>
<p>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.</p>	<p>The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.</p>	<p>The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs.</p>
<p>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.</p>	<p>Homes for Good continues to work to streamline and simplify agency processes and increasing availability of Resident Services and other support staff.</p>	<p>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.</p>
<p>Enhance resident and agency communication through Resident Newsletters, improved website access, email communication and social media.</p>	<p>All communities continue to receive a monthly or quarterly residential newsletter as well as more frequent resident updates related to COVID-19 and Agency operations which are posted and emailed to all residents.</p>	<p>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.</p>
<p>Annually monitor income levels by development and provide targeted support to deconcentrate poverty. Bring higher income PH households into lower income developments and vice versa, if necessary.</p>	<p>Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.</p>	<p>Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.</p>

Indicator	FY23 Progress	FY24 Progress
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	FY23 Progress	FY24 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 128 households enrolled and have worked to adapt recruitment and intake to meet COVID-19 precautions.	Homes for Good Family Self-Sufficiency program currently has 125 households enrolled in the FSS program, with an average escrow of \$5,200.
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 20 community partners engaged with this board.
Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet. Info Sessions have moved from monthly to every other week to increase availability and attendance.	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.
Assist a minimum of two FSS participants a year in purchasing a home.	FSS has assisted 2 participants in purchasing homes this year and are working with several more to hopefully complete purchases by the end of the fiscal year.	FSS assisted 1 participant in purchasing a home during 2023.
Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.	FSS has assisted 6 households in opening IDA's this year. Funding for this opportunity has decreased this year but we are hopeful that it	FSS is supporting 23 participants with IDA's, which includes 6 new participants.

Indicator	FY23 Progress	FY24 Progress
	will return to pre-pandemic levels by the start of the fiscal 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	FY23 Progress	FY24 Progress
Complete the Rent Assistance Demonstration construction and sale of scattered site homes.	Homes for Good has completed construction of the replacement housing	Homes for Good will complete scattered site sales in 2024.
Focus preservation efforts communicating with local, state, and national funders to help preserve affordable housing opportunities.	Provided offer on 100-unit affordable project in Springfield through the PUSH program which gives Homes for Good first right of refusal if owner sell in the next few years.	There is one Preservation project (Bridges on Broadway) actively under construction consisting of 50 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.	The Landlord Liaison position continues to provide routine education on accessing housing through Homes for Good to both landlord and community partners.	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
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 FY21 and as of April FY22, 17 loans have been requested. 10 were approved. 3 families have	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

Indicator	FY23 Progress	FY24 Progress
	paid the loans back, 2 families defaulted and 5 are actively paying the loan back. For FY 22 and as of March 2023 – 29 applications were received, and 21 approved. 9 families have paid in full and 2 defaulted. 10 are actively paying.	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.

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	FY23 Progress	FY24 Progress
Increase success of Section 8 participants, particularly those coming out of homelessness or transitioning from permanent supportive or transitional housing through engagement with the Housing Liaison	The Landlord Liaison continues to provide education to local preference partners. Homes for Good has expanded partnerships and now has 23 local preference partners. Homes for Good received 184 Emergency Housing Vouchers (EHV). These vouchers are to serve homeless person, persons fleeing domestic violence and persons fleeing human trafficking. As of March 2023, we have 179 vouchers in use. 18 PHAs across Oregon were awarded EHV. These funds also provide a \$2K per household assistance option for items such as move in costs and essential household items. As of April 1, 2022, these funds have been utilized to assist 151 families.	The 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.
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		
Maintain a professional working relationship with landlords/owners in our community		We continue to maintain a professional working relationship with landlords/owners in our community through education and

Indicator	FY23 Progress	FY24 Progress
through education and seminars on the Section 8 program		seminars on our tenant based voucher programs.
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 CY22, 3.2% of 4-bedroom families were paying more than 41% of their income towards rent. A 1.6% decrease since FMR study implementation. As of 03/2022 success rate for tenant-based voucher utilization was 62%. In 02/2022 utilization was at 70%. Some of this fluctuation can be attributed to lack of housing stock and the impacts COVID-19 has had on the community as a whole.</p> <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>
A Homes for Good staff member serves on the board for the local Rental Owners association	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner's Association (ROA). The Landlord Liaison position attends general membership meetings and contributes articles to the ROA's monthly newsletter which is distributed to over 1200 members representing over 20,000 rental units. The Landlord Liaison position also provides routine educational seminars for ROA members on aspects of the housing subsidy	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.

Indicator	FY23 Progress	FY24 Progress
	process. We have also obtained the credentials to issue Continuing Education Credits (CEUs) to participating Landlords.	

6.3. ATTACHMENT C.1 SIGNIFICANT AMENDMENT OR MODIFICATION

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

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

Definition of Substantial Deviation from the 5 Year Plan:

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

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

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

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

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

6.4. ATTACHMENT C.3 FORM HUD-50077-SLL

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

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.

7. MTW Supplement

7.1. Section A: PHA Information

A.	PHA Information
A.1	<p>PHA Name: <u>Homes for Good (Housing and Community Services Agency of Lane County)</u></p> <p>PHA Code: <u>OR006</u></p> <p>MTW Supplement for PHA Fiscal Year Beginning: (MM/DD/YYYY): <u>09/01/2024</u></p> <p>PHA Program Type: <u>Combined Public Housing and Section 8</u></p> <p>MTW Cohort Number: <u>4 – Landlord Incentives</u></p> <p>MTW Supplement Submission Type: <u>Annual Submission</u></p>

7.2. Section B: Narrative

B.	Narrative
B.1	<p>MTW Supplement Narrative.</p> <p>The narrative provides the MTW agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the fiscal year and its short and long-term goals.</p> <p>The MTW agency should provide a description of how it seeks to further the three MTW statutory objectives during the coming Fiscal Year. Those three MTW statutory objectives are: (1) to reduce cost and achieve greater cost effectiveness in federal expenditures; (2) to give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and (3) to increase housing choices for low-income families.</p>
	<p>Homes for Good has a strong commitment and track record for bringing collaborative and innovative projects to the community. With its initial MTW Supplement to the PHA Plan (“MTW Supplement”), Homes for Good used its MTW flexibility 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.</p> <p>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.</p> <p>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 during the next Fiscal Year.</p> <p>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.</p>

	<p>During FY2023, Homes for Good implemented several waivers that help streamline the use of project-based vouchers.</p> <p>As a member of the Cohort #4 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.</p> <p>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:</p> <ol style="list-style-type: none"> 1. Reallocate resources to reduce paperwork and refocus staff efforts on navigation and prevention; 2. Serve the greatest number of households possible through new affordable housing and housing service programs that help individuals in need and communities thrive; and 3. Activities implemented will further Homes for Good’s Strategic Equity Plan by creating pathways to self-sufficiency and leading and growing ethically. <p>All activities entered into the FY24 MTW Supplement have been implemented except for the alternative reexamination schedule (waivers 3a and 3b). Homes for Good decided to amend its application of the alternative reexamination schedule based on several factors, including the projected financial impact of the activity and conformity with the agency’s new housing and voucher management system, Yardi. This waiver is described in more detail in Section C of this MTW Supplement.</p>
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7.3. Section C: MTW Waivers

Waiver	Rent Reasonableness 3 rd Party Requirement (2.d)	
Narrative	<p>Homes for Good proposes waiving certain provisions of 24 CFR 982.352(b) and 983.303, eliminating 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.</p> <p>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.</p>	
MTW Statutory Objectives	X	Cost effectiveness
		Self-sufficiency
		Housing choice
Cost Implications		Neutral (no cost implications)
		Increase revenue
		Decrease revenue
		Increase expenditures
	X	Decrease expenditures
Applicability	Homes for Good will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls.	

Goal Update	Based on the Fiscal year goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during the implementation.
	Homes for Good’s FY2024 MTW Supplement was approved by HUD on April 4, 2024 and implementation of this activity is underway. As part of the implementation of this waiver, Homes for Good will track the following metrics and will provide baselines and outcomes in its FY2026 MTW Supplement: <ul style="list-style-type: none"> • Amount saved by not using 3rd party contractor for rent reasonableness • Number of RR determinations made at PHA-owned properties
Safe Harbor Waiver	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: <ol style="list-style-type: none"> The agency shall establish and make available a quality assurance method to ensure impartiality. The agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area. At the Department’s request, the agency must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.
Hardship Policy	This waiver does not require a hardship policy.
Impact Analysis	This waiver does not require an impact analysis.
Quality Assurance Method	Please explain or upload a description of the quality assurance method
	Quality assurance is built into Homes for Goods process because the agency uses a third-party app that bases its results on objective measures. In addition, Homes for Good will randomly sample 10% of the rent reasonableness determinations entered into the system each year and compare each one to rent reasonable determination paperwork uploaded into the agency’s document management system.
RR Determination Method	Please explain or upload a description of the rent reasonableness determination method.
	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.

Waiver	Alternative Re-Exam Schedule (3.a / 3.b)
Narrative	Homes for Good proposes waiving certain provisions of the following policies: Sections 3(a)(1), 3(a)(2)(E), and 8(o)(5) of the 1937 Act 24 CFR Parts 960.257(a)-(b), 982.516(a)(1) and 982.516(c)(2) 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

	<p>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>In lieu of an annual certification, elderly and disabled 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/.</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>
MTW Statutory Objectives	X Cost effectiveness
	Self-sufficiency
	Housing choice
Cost Implications	X Neutral (no cost implications)
	Increase revenue
	Decrease revenue
	Increase expenditures
Decrease expenditures	
Applicability	This waiver will be applied to all elderly and disabled households participating in Homes for Good's Public Housing or Section 8 programs.
Goal Update	Based on the Fiscal year goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during the implementation.
	Homes for Good did not implement this activity in FY2024 and made significant changes to it for FY2025.
Safe Harbor Waiver	<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> <ul style="list-style-type: none"> i. Reexaminations must occur at least every three years. ii. 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. iii. Agency must implement an impact analysis. iv. Agency must include a hardship policy.
Hardship Policy	This waiver will be subject to Homes for Good's agency MTW hardship policy, which can be in Homes for Good's Administrative Plan.
Impact Analysis	An impact analysis has been completed and will be uploaded as part of the waiver submission process.
Schedule	<input type="checkbox"/> Once every two years
	X <input checked="" type="checkbox"/> Once every three years
	<input type="checkbox"/> Other (describe below)
	Describe other:
Interims	How many interim recertifications per year may a household request?
	0

	<input type="checkbox"/> 1
	<input checked="" type="checkbox"/> 2 or more
Addressing Changes in Circumstance	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: <ul style="list-style-type: none"> • 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.

Waiver	Pre-Qualifying Unit Inspections (5.a)
Narrative	<p>As part of the requirements of the Landlord Incentive cohort, Homes for Good must select two (2) MTW activities related to landlord incentives in its initial plan year. One of the activities Homes for Good selected is Waiver 5.a, Pre-Qualifying Unit Inspections.</p> <p>Homes for Good'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 Homes for Good to perform the inspection earlier in the process, enabling the household to move into the unit once the RFTA is approved.</p>
MTW Statutory Objectives	<input type="checkbox"/> Cost effectiveness <input type="checkbox"/> Self-sufficiency <input checked="" type="checkbox"/> Housing choice
Cost Implications	<input type="checkbox"/> Neutral (no cost implications) <input type="checkbox"/> Increase revenue <input type="checkbox"/> Decrease revenue <input checked="" type="checkbox"/> Increase expenditures <input type="checkbox"/> Decrease expenditures
Applicability	This activity will apply to all Housing Choice Voucher new admissions in which the unit is vacant and available for pre-inspection.
Goal Update	<p>Based on the Fiscal year goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Homes for Good's FY2024 MTW Supplement was approved by HUD on April 4, 2024 and implementation of this activity is underway. As part of the</p>

	<p>implementation of this waiver, Homes for Good will track the following metrics and will provide baselines and outcomes in its FY2026 MTW Supplement:</p> <ul style="list-style-type: none"> • Number of pre-qualifying unit inspections performed • Reduction of number of days from RFTA approval to move in • Reduction in number of days to lease up
Safe Harbor Waiver	<p>Homes for Good does not request waiving any of the safe harbors for this activity, which are listed below:</p> <ol style="list-style-type: none"> 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.
Hardship Policy	This activity does not require a hardship policy.
Impact Analysis	This activity does not require an impact analysis.
How long is the pre-inspection valid for?	Ninety (90) days.

Waiver	Third-Party Requirement for PBV Inspections (5.c)	
Narrative	<p>Homes for Good proposes waiving certain provisions of Section 8(o)(11) of the 1937 Act, 24 CFR Part 982.352(b)(iv), and 24 CFR Part 983.103(f). Waiving these provisions will allow Homes for Good to 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.</p> <p>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.</p>	
MTW Statutory Objectives	X	Cost effectiveness
		Self-sufficiency
		Housing choice
Cost Implications		Neutral (no cost implications)
	X	Increase revenue
		Decrease revenue
	X	Decrease expenditures
Applicability	Homes for Good will apply this waiver to units in all Project-Based Voucher properties it owns, manages, and controls.	
Goal Update	Based on the Fiscal year goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during the implementation.	

	Homes for Good’s FY2024 MTW Supplement was approved by HUD on April 4, 2024 and implementation of this activity is underway. As part of the implementation of this waiver, Homes for Good will track the following metrics and will provide baselines and outcomes in its FY2026 MTW Supplement: <ul style="list-style-type: none"> • Number of HQS inspections HFG staff performed on HFG owned units • Amount saved by not using 3rd party inspectors
Safe Harbor Waiver	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: <ol style="list-style-type: none"> I. The agency shall establish and make available a quality assurance method to ensure an objective analysis. II. the participant must be able to request an interim inspection. III. HQS inspection standards must not be altered as found at 24 C.F.R. 982.401. IV. At the Department’s request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS.
Hardship Policy	This waiver does not require a hardship policy.
Impact Analysis	This waiver does not require an impact analysis.
Quality Assurance	Please explain or upload a description of the quality assurance method. Homes for Good will apply the SEMAP standards and methods to the sample selection of PBV units that were inspected by Homes for Good staff. Once the sample selection has been made, the agency will conduct Quality Assurance inspections on those units in order to ensure consistency and transparency.

Waiver	Alternative Inspection Schedule (5.d)
Narrative	<p>As part of the requirements of the Landlord Incentive cohort, Homes for Good must select two (2) MTW activities related to landlord incentives in its initial plan year. One of the activities Homes for Good 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. Homes for Good estimates that the increased bandwidth would allow inspectors to complete HQS inspections within 1-2 business days of the landlord contacting Homes for Good.</p> <p>This activity will allow Homes for Good to inspect its HCV units every three (3) years instead of annually or biennially. In lieu of the regular annual or biennial inspection, Homes for Good hired a full-time Landlord and Community Relations Specialist to</p> <ol style="list-style-type: none"> 1. Work with tenants who have concerns or questions regarding their existing housing, 2. Work with landlords to address concerns and understand the housing standards each unit must meet.

	With a Landlord and Community Relations Specialist on staff, Homes for Good 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.	
MTW Statutory Objectives	X	Cost effectiveness
		Self-sufficiency
		Housing choice
Cost Implications	X	Neutral (no cost implications)
		Increase revenue
		Decrease revenue
		Increase expenditures
		Decrease expenditures
Applicability	Homes for Good will apply this policy to all Housing Choice Voucher inspections.	
Goal Update	Based on the Fiscal year goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during the implementation.	
	<p>Homes for Good's FY2024 MTW Supplement was approved by HUD on April 4, 2024 and implementation of this activity is underway. As part of the implementation of this waiver, Homes for Good will track the following metrics and will provide baselines and outcomes in its FY2026 MTW Supplement:</p> <ul style="list-style-type: none"> • Reduction in number of inspections performed • Time saved by reducing number of inspections • Increase in number of special inspection requests 	
Safe Harbor Waiver	<p>Homes for Good does not request waiving any of the safe harbors for this activity, which are listed below:</p> <ol style="list-style-type: none"> i. Units must be inspected at least once every three years. ii. The participant must be able to request an interim inspection. iii. HQS inspection standards as found at 24 C.F.R. 982.401 must not be altered. <p>The Department must be able to conduct or direct the agency to perform an inspection at any time for health and safety, as well as accessibility, purposes</p>	
Hardship Policy	This activity does not require a hardship policy.	
Impact Analysis	This activity does not require an impact analysis.	

Waiver	Eliminate PBV Selection Process for PHA-Owned Projects (9.c)
Narrative	Homes for Good proposes waiving certain provisions of 24 CFR Part 983.51 as superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will 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.

MTW Statutory Objectives	X	Cost effectiveness
		Self-sufficiency
		Housing choice
Cost Implications		Neutral (no cost implications)
		Increase revenue
		Decrease revenue
	X	Increase expenditures
Applicability		Decrease expenditures
	Homes for Good will apply this waiver to any newly project-based voucher properties it owns, manages, or controls, including existing projects, rehabilitation projects, new construction or other projects receiving new project-based assistance.	
Goal Update	Based on the Fiscal year goals listed in the activity's previous Fiscal Year narrative, provide a description about what has been accomplished or changed during the implementation.	
	Homes for Good's FY2024 MTW Supplement was approved by HUD on April 4, 2024 and implementation of this activity is underway. As part of the implementation of this waiver, Homes for Good will track the following metrics and will provide baselines and outcomes in its FY2026 MTW Supplement: <ul style="list-style-type: none"> • Number of new PHA-Owned PBV properties 	
Safe Harbor Waiver	<p>Homes for Good understands that the implementation of Waiver 5.c overrides the following safe harbor for Waiver 9.c:</p> <p style="padding-left: 40px;">i. 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).</p> <p>Homes for Good will operate within the following additional safe harbors:</p> <p style="padding-left: 40px;">i. A subsidy layering review must be conducted.</p> <p style="padding-left: 40px;">ii. The agency must complete site selection requirements.</p> <p style="padding-left: 40px;">iii. The agency is subject to Notice PIH 2013-27 where applicable, or successor.</p> <p style="padding-left: 40px;">iv. Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.</p>	
Hardship Policy	This waiver does not require a hardship policy.	
Impact Analysis	This waiver does not require an impact analysis.	

Waiver	Limit Portability for PBV (9.h)
Narrative	Homes for Good requests to waive a safe harbor requirement under MTW Waiver 9.h., Limit Portability for PBV Unit. Under the activity, certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 are waived allowing agencies to 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

	<p>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.</p> <p>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 waitlists are offered a tenant-based voucher first.</p>	
MTW Statutory Objectives	X	Cost effectiveness
		Self-sufficiency
		Housing choice
Cost Implications		Neutral (no cost implications)
	X	Increase revenue
		Decrease revenue
		Increase expenditures
	X	Decrease expenditures
Applicability	This waiver only applies to households in Homes for Good’s Permanent Supportive Housing program.	
Goal Update	Based on the Fiscal year goals listed in the activity’s previous Fiscal Year narrative, provide a description about what has been accomplished or changed during the implementation.	
	<p>Homes for Good’s FY2024 MTW Supplement was approved by HUD on April 4, 2024 and implementation of this activity is underway. As part of the implementation of this waiver, Homes for Good will track the following metrics and will provide baselines and outcomes in its FY2026 MTW Supplement:</p> <ul style="list-style-type: none"> • Number of PSH PBV households requesting to move • Number of PSH PBV moves approved through HFG’s Move On assessment tool 	
Safe Harbor Waiver	<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 style="padding-left: 40px;">i. 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 style="padding-left: 40px;">i. 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>	

	ii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.
Hardship Policy	This waiver does not require a hardship policy.
Impact Analysis	This waiver does not require an impact analysis.

7.4. Section D: Safe Harbor Waivers

D. Safe Harbor Waivers.	
Eliminate PBV Selection Process for PHA-Owned Projects (9.c)	
(a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor	Eliminate PBV Selection Process for PHA-Owned Projects, waiver 9.c
(b) the specific safe harbor and its implementing regulation	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).
(c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver	Homes for Good proposes waiving certain provisions of 24 CFR Part 983.51 as superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will 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.
(d) a description of the local issue and why such an expansion is needed to implement the MTW activity	In addition to waiver 9.c, Homes for Good is also requesting approval of waiver 5.c, allowing it to perform HQS inspections on units that it owns. Waiver 5.c is in direct conflict of the safe harbor for waiver 9.c listed above under (b). Homes for Good believes that the HQS quality control measure already in place eliminate the need for a third party inspector. In addition, the anticipated cost and time savings achieved through the implementation of this waiver will allow the agency to focus its resources on activities that have a higher overall value for its clients.
(e) an impact analysis,	
(f) a description of the hardship policy for the MTW activity	While Homes for Good standard MTW hardship policy will be available to all households, the agency does not anticipate this safe harbor waiver having a direct impact on the households it serves and therefore does not anticipate that it will result in hardship requests.

D. Safe Harbor Waivers.		
	(g) 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	Comments will be added to the supplement once received.
Limit Portability for PBV (9.h)		
	(a) the name and number of the MTW Waiver and associated activity for which the MTW agency is seeking to expand the safe harbor	Limit Portability for PBV, waiver 9.h
	(b) the specific safe harbor and its implementing regulation	Portability under this activity must not be restricted for more than 24 months.
	(c) the proposed MTW activity the MTW agency wishes to implement via this Safe Harbor Waiver	Homes for Good proposes waiving certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. These waivers will allow the Homes for Good to waive the requirement that PHA's provide a tenant-based voucher to project-based households after being on a project-based voucher for twelve (12) months for Permanent Supportive Housing (PSH) projects. Instead, Homes for Good proposes offering portability to PSH project-based voucher households via local preference referral from an approved entity. For non PSH project-based voucher households the current twelve (12) months of occupancy before portability can be obtained will remain.
	(d) a description of the local issue and why such an expansion is needed to implement the MTW activity	
	(e) an impact analysis,	
	(f) a description of the hardship policy for the MTW activity	Homes for Good standard MTW hardship policy will apply.
	(g) a copy of all comments received at the public hearing along with the MTW agency's description	Comments will be added to the supplement once received.

D.	Safe Harbor Waivers.	
	of how the comments were considered, as a required attachment to the MTW Supplement	

7.5. Section E: Agency-Specific Waivers

E.	Agency-Specific Waivers.	
E.1	Agency-Specific Waivers for HUD Approval:	
	a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice)	<p>Homes for Good proposes waive Certain provisions of section 8(o)(1)(B) and 8(o)(13)(H) of the 1937 Act and 24 C.F.R. 982.503-505 and 983.301, allowing it to self-certify exception payment standards (EPS) at or below 150% of the fair market rent 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.</p> <p>EPS's are those that are above 120% of the fair market rent and currently require approval of the HUD headquarters. Homes for Good proposes using its MTW flexibility to allow it to self-certify all EPS's in the case of a reasonable accommodation where the EPS is at or below 150% of the fair market rent.</p> <p>The current process requires Homes for Good to request approval from HUD headquarters through the HUD field office. This process 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.</p>
	b) how the initiative achieves one or more of the 3 MTW statutory objectives	This waiver will increase housing choice for households receiving reasonable accommodations for accessibility features.
	c) a description of which population groups and household types that will be impacted by this activity	This waiver will impact households with approved reasonable accommodations in the Housing Choice Voucher program who are searching for units with accessibility features.
	d) any cost implications associated with the activity	Homes for good anticipates a slight increase in HAP expenditures due to this policy change. This increase will be the result of the reduction in time it takes to approve an exception payment standard, increasing the likelihood that the family is able to find a unit with the desired accessibility features.

E.	Agency-Specific Waivers.	
E.1	Agency-Specific Waivers for HUD Approval:	
	e) an implementation timeline for the initiative	Homes for Good will begin applying this new policy at the start of the next fiscal year after HUD approval.
	f) an impact analysis	<ul style="list-style-type: none"> - Staff time savings – general turnaround time of 7 days to receive response from HUD - Reduction in amount of time it takes to process an EPS – the 7 days of wait time will be eliminated once the PHA can review EPS - Increase in HAP expenditures – 7X the avg PUC of \$644 (TYT data) = \$4,508 X 12 = \$54,096 - Number of RTA’s that fall through -July 22 thru March 23 – 7 RTAs fell thru due to LL not willing to wait
	g) a description of the hardship policy for the initiative	While Homes for Good standard MTW hardship policy will be available to all households, since this policy is favorable to households needing certain accommodations, the agency does not anticipate that it will result in hardship requests.
	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	Comments will be added to the supplement once received.

7.6. Section F: Public Housing Operating Subsidy Grant Reporting

F.	Public Housing Operating Subsidy Grant Reporting
F.1	Please provide the public housing Operating Subsidy grant information in the table below for Operating Subsidy grants appropriated in each Federal Fiscal Year the PHA is designated an MTW PHA.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2022	\$1,946,964	\$1,946,964	\$0	9/30/2030
2023	\$2,246,880	\$2,246,880	\$0	9/30/2031
2024	\$2,630,963.50	\$1,704,169.50	\$926,794	9/30/2032

7.7. Section G: MTW Statutory Requirements

G.	MTW Statutory Requirements
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>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</p>

	families housed upon admission during the PHA’s most recently completed Fiscal Year for its Local, Non- Traditional program households.
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Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	0

*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.

G.2	Establishing Reasonable Rent Policy
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Question	Input options and instructions
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?	No, Homes for Good has not implemented any rent reform waivers or activities.

G.3	Substantially the Same (STS) – Local, Non-Traditional
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Questions	Input options and instructions
Please provide the total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	Homes for Good does not currently have a Local Non-Traditional program
Please provide the total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	Homes for Good does not currently have a Local Non-Traditional program
How many units, developed under the local, non-traditional housing development activity, were available for occupancy during the prior full calendar year (by bedroom size)?	Homes for Good does not currently have a Local Non-Traditional program

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional
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In order to demonstrate that the MTW statutory requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the MTW agency will provide information for its most recently completed Fiscal Year in the following table.

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

Family Size	Occupied Number of Local, Non-Traditional Units by Household Size	
1 Person	0	
2 Person	0	

3 Person	0	
4 Person	0	
5 Person	0	
6+ Person	0	
Totals	0	
G.5	Housing Quality Standards	
	Certification is included in MTW Certifications of Compliance for HCV and local, non-traditional program. The public housing program is monitored through physical inspections performed by the Real Estate Assessment Center (REAC).	

7.8. Section H: Public Comments

H.	Public Comments
H.1	Input options and instructions
Please provide copy of all comments received by the public, Resident Advisory Board, and tenant associations.	N/A
Please attach a narrative describing the MTW agency's analysis of the comments and any decisions made based on these comments.	N/A
If applicable, was an additional public hearing held for an Agency-Specific Waiver and/or Safe Harbor waiver?	N/A
If yes, please attach the comments received along with the MTW agency's description of how comments were considered.	N/A

7.9. Section I: Evaluation

I.	Evaluation
I.1	Please list any ongoing and completed evaluations of the MTW agency's MTW policies, that the PHA is aware of, including the information requested in the table below. In the box "Title and short description," please write the title of the evaluation and a brief description of the focus of the evaluation.
Question	Input options and instructions
Does the PHA have an agency-sponsored evaluation?	No.

7.10. Section J: MTW Certifications of Compliance

J	MTW Certifications of Compliance
J.1	The MTW agency must execute the MTW Certifications of Compliance form and submit as part of the MTW Supplement submission to HUD. Certification is provided below.

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 identify, 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.

8. MTW Supplement Attachments

8.1. 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 15th 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
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 x 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 x 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 x (p - q)) + (j x (n - o)) + 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.

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

ORDER 24-26-06-01H

In the Matter of Approving the PHA Annual
Plan, MTW Supplement & 5-Year Plan

WHEREAS, Homes for Good is required by Section 511 of the Quality Housing and Work Responsibility Act of 1998 (and ensuing HUD requirements) to submit a Certification of Compliance with PHA Plan and Related Regulations for both its Annual and 5 Year Plan(s).

WHEREAS, Homes for Good is required by Move to Work to submit an MTW Certification of Compliance with its MTW Supplement.

NOW IT IS THEREFORE ORDERED THAT:

The Homes for Good Board approve the submittal of the Annual Plan, 5 Year Plan and MTW Supplement by way of signature on the following documents:

Certification of Compliance with PHA Plan and Related Regulations, HUD Form 50077-ST-HCV-HP

MTW Certifications of Compliance, HUD Form 50075- MTW

DATED this _____ day of _____, 2024

Chair, Homes for Good Board of Commissioners

Secretary, Homes for Good Board of Commissioners



BOARD OF COMMISSIONERS AGENDA ITEM

BOARD MEETING DATE: 06/26/2024

AGENDA TITLE: In the Matter of Approving Year III of the Strategic Equity Plan

DEPARTMENT: Executive

CONTACT : Jasmine Leary Mixon

EXT: 2501

PRESENTER: Equity Strategy Team

EXT: --

ESTIMATED TIME : 30 minutes

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

Approval Signature

EXECUTIVE DIRECTOR:

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

DATE: 06.18.2024

LEGAL STAFF :

DATE:

MANAGEMENT STAFF:

DATE:



HOMES FOR GOOD MEMORANDUM

TO: Homes for Good Board of Commissioners
FROM: Equity Strategy Team
TITLE: In the Matter of Approving Year III of the Strategic Equity Plan
DATE: June 26th, 2024

MOTION:

It is moved that the Board of Commissioners approve Homes for Good's Strategic Equity Plan which effective July 2024 to June 2025.

DISCUSSION:

A. Issue

Homes for Good Housing Agency is requesting Board approval for the Strategic Equity Plan that was created to formalize a strategy on how to address barriers to housing, services, and programs.

B. Background

To further our Diversity, Equity, and Inclusion goals, Homes for Good established an internal Equity Strategy Team (EST) to address racial disparities within our organization, promote equity in our hiring and promotional practices, as well as to provide greater opportunities in contracting and services available to the people we serve. One of the primary goals of the EST was to develop a Strategic Equity Plan for the agency that would alleviate barriers for our contractors, partners, and participants in accessing our programs and services.

We launched the development of the Strategic Equity Plan in the Fall of 2020 with a work session with the Homes for Good Board of Commissioners. In the first two quarters of 2021 we continued the development of this plan by actively engaging our staff members to get their advice and input on the plan. In the Summer of 2021, we brought back the Strategic Equity Plan to the Homes for Good Board of Commissioners for advice and input during another work session.

The results of the initial draft led to the creation of a framework for a 3-year plan that infuses Diversity, Equity, and Inclusion into a larger strategic plan to make sure all efforts are being steered in the direction of more equitable and inclusive services. The Strategic Equity Plan has been divided by four overarching themes: Listen to Our Communities, Tell the Human Story, Create Pathways to Self-Sufficiency, and Lead and Grow Ethically.



In June of 2022 the Homes for Good Board of Commissioner's approved the Strategic Equity Plan for Year 1 (July 2022 – June 2023), and the plan was put into action. Homes for Good staff documented and reported progress on the plan by bringing quarterly progress reports to the Board of Commissioners and distributing these reports to staff and residents.

In March of 2024, the Homes for Good EST started writing the Strategic Equity Plan for Year 3 (July 2022 – June 2023). This plan uses the Year 2 (July 2023 - June 2024) plan as a base, modifying the goals to show progress over the past year, and to focus the goals on better customer service for our residents and clients.

The EST drafted the Year 3 plan over March - June 2023, engaging with Board members in two separate SEP subcommittee meetings, a Board gallery walk, the Leadership team, Manager team, and an All-Staff gallery walk. Engagements allowed the plan to be revised, refined, and clarified to make sure progress could be made within the next year towards the goals with the objective of being more measurable.

C. Alternatives & Other Options

If the plan is not approved, the EST will revise the plan based on feedback or shortcomings and bring the plan back to the board in August of 2024.

D. Timing & Implementation

Progress and implementation of certain tactics have already begun. Upon approval of the plan, other tactics will start to be implemented, and progress will begin to be compiled for a quarterly report.

E. Recommendation

It is recommended that the Board of Commissioners approve the Strategic Equity Plan for July 2024 – June 2025.

F. Follow Up

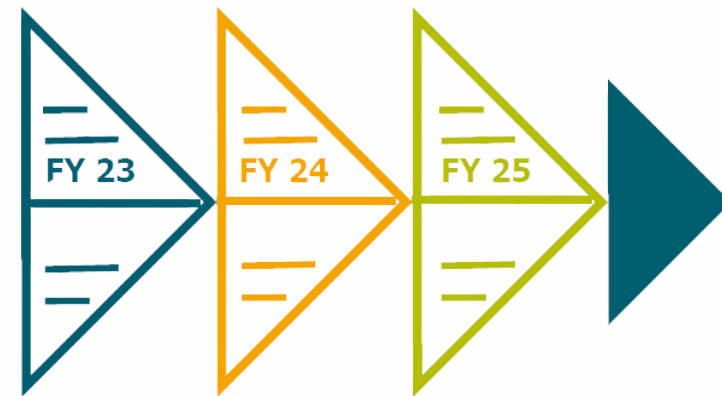
The EST will bring two annual updates to the Board of Commissioners of progress made towards the Strategic Equity Plan goals. These will progress reports will occur in January 2024 (July-December progress) and July 2025 (January-June progress).

G. Attachments

- Strategic Equity Plan Year III [July 2024 – June 2025]



Strategic Equity Plan



July 2024 - June 2025

Homes. People. Partnerships. Good.

Homes for Good's Organizational Chart

Executive



Rent Assistance

Supportive Housing

Energy Services

Real Estate

Finance

Communications

Human Resources

IT

Rent Assistance
The Rent Assistance team focuses on administering voucher based rental assistance programs, our lobby & customer experience, as well as program intake. Includes Housing Specialists, Office Assistants & Housing Inspectors.

Finance
The Finance team is responsible for managing all financial operations.

Supportive Housing
The Supportive Housing team manages the Public Housing Portfolio and provides resident services to residents living in our communities. Includes Property Management, Maintenance, Resident Services & Family Self Sufficiency.

Communications
The Communications team focuses on outreach and communication efforts to educate and inform residents, partners and the public about Homes for Good programs.

Energy Services
The Energy Services team is responsible for administering the Department of Energy Weatherization Assistance Program, as well as the Heat Crisis Program. Includes Energy Auditors and administrative staff.

Human Resources
The Human Resources team is responsible for employee relations and talent management within the organization.

Real Estate
The Real Estate team is responsible for developing new affordable housing, managing relationships with outside property managers and coordinating Capital Projects for the Public Housing portfolio. Includes Project Development, Asset Management & Capital Projects team members.

IT
The IT team is responsible for managing information technology at Homes for Good office locations & sites.



Strategic Equity Plan July 2024 - June 2025

Our Diversity, Equity & Inclusion
Journey so far

2018 Overall DEI Theme: Getting Organized to Do the Work

- Staff began conversations about the collective need to intentionally integrate DEI into the fabric of our organization.
- We identified the need to hire outside consultants to help chart and support our DEI journey
- We engaged with, and learned from, other organizations like Lane County that had begun intentional engagement in terms of DEI growth.

2019 Overall DEI Theme: Baseline Organizational Readiness, Capacity Building & Education

- Consultants facilitated the creation of The CORE Team to help guide our DEI journey. The CORE team met throughout the year to guide our DEI journey. Joint meetings between the CORE Team and the Leadership Team (LT) also occurred periodically.
- The Consultants reviewed data related to our organization like demographics of our employees, demographics of our clients and demographics of our applicants.
- The Consultants and the CORE Team led an all-day staff learning session focused on building a collective understanding the racial equity culture change process, key terms and elements of race and racism and to explore Homes for Good's culture and how to embed racial equity more deeply into the organization.
- The Consultants facilitated a joint meeting between the CORE Team and the LT to compile and summarize the work from the last year, including the staff input received at the staff learning session, creating building blocks of focus for our SEP, which are reflected in the current SEP overarching goals.

2020 Overall DEI Theme: Use the Move to our New Administrative Building, the Olive, to Continue the Growth of DEI into our Organizational Culture. Create Equity Strategy Team.

- CORE Team officially closes out their work as a team.
- The EST application process launched, and the team members were selected. Staff members along with our two Appointed Commissioners served as the selection committee.
- The Consultants facilitated a joint meeting between the EST and the CORE Team to share the history of the DEI work and begin the process of building the Equity Strategy Team. They also facilitated another
- Equity Strategy Team meeting focused on relationship building and building capacity for engagement.

2021 Overall DEI Theme: Develop the Strategic Equity Plan (SEP)

- Equity Strategy Team held reoccurring meetings and began the development of the Strategic Equity Plan framework, format, and overarching goals.
- The Strategic Equity Plan overarching goals that were drafted were informed by our DEI work in 2019 and 2020 and shaped most recently by the Equity Strategy Team. These goals were shared with all staff and we received some very valuable feedback that will be integrated in overarching goals.
- The EST held multiple staff engagements, and presentations at the Homes for Good Board of Commissioners meetings to gain feedback and direction on the Overarching Goals and Tactics to achieve those goals in preparation for public outreach and engagement.

2022 Overall DEI Theme: Develop Strategic Equity Plan (SEP)

- The Equity Strategy Team held reoccurring meetings and drafted the FY23 Strategic Equity Plan
- In May of 2022, the EST did public outreach for feedback on the proposed Strategic Equity Plan
- In June of 2022 the Homes for Good Board of Commissioners Approved our Strategic Equity Plan
- In October of 2022, the Equity Strategy Team and the Leadership Team presented the Quarter One progress for Strategic Equity Plan goals.

2023 Overall DEI Theme: Develop Strategic Equity Plan (SEP)

- The EST held reoccurring meetings and began the to revise the FY 23 plan for FY 24
- transforming goals and tactics with a focus on customer service.
- The EST continued to collect progress on the Strategic Equity Plan and present them to the Board on a quarterly basis.
- The EST recruited four new team members to be part of the writing process.
- The EST held multiple engagements to gather feedback and edits for the plan including going to the Resident Advisory Board twice, two engagements with Homes for Good Board of Commissioner members, an all-staff presentation, and meetings with the Leadership team and Supervisor team.

2024 Overall DEI Theme: Simplify SEP Goals & Tactics to Focus on Measurable Outcomes

- The EST hosted an all-staff gallery walk to seek feedback to inform 2024-2025 SEP goals & tactics. The Leadership Team hosted a gallery walk with the board of commissioners.
- The EST met with twice the board DEI subcommittee to seek strategic input.
- Based on feedback from the board and staff, the SEP goals and tactics were refined and clarified to ensure progress could reasonably be made within the next plan year, and to ensure goals were connected to measurable outcomes.



Strategic Equity Plan July 2024 - June 2025

Meet the Equity Strategy Team



REBECCA MURPHY-LYONS
Programs & Grants Specialist



TRAVIS BAKER
Property Manager



MARIA HUFFMAN
Painter



CORI LARSON
Real Estate Accounting
Administrator



LIVI CAMBA
Resident Services Specialist



JOSÉ ZARATE
Family Self Sufficiency Coordinator



JASMINE LEARY-MIXON
Executive Support



JORDYN SHAW
Communications Administrative
Specialist



BAILEY MCEUEN
Human Resources Director



JACOB FOX
Executive Director



Strategic Equity Plan July 2024 - June 2025

The Four Pillars

Our Strategic Equity Plan (SEP) is unlike other strategic plans in that it infuses our Diversity, Equity & Inclusion goals into a larger strategic plan for the Agency to make sure all of our efforts are steering us in the direction of more equitable & inclusive services, communities and work environment.

The SEP is an annual plan that outlines our goals & tactics we will execute to achieve those goals. Goals are tied to one of our “pillars” that guide this work.

**Listen to our
Communities**



**Tell the Human
Story**



**Create Pathways
to Self-Sufficiency**



**Lead & Grow
Ethically**





Strategic Equity Plan July 2024 - June 2025

Transforming Goals from Plan
Year 2024 - 2025

In writing the 2024-2025 Strategic Equity Plan, the Homes for Good Equity Strategy Team took goals from the 2023-2024 plan and refined goals and tactics to:

1. Reflect progress we have made in the last year, and
2. Refine & focus goals to ensure feasibility and measurable outcomes

2023-2024

We will strategically incorporate principles of Climate Justice as an organization to address the disproportionate impact on low-income communities and communities of color while incorporating best practices for carbon footprint and greenhouse gas reduction.

2023-2024

We will strategically prioritize measurable outcomes in executing tactics toward goal achievement to assess our growth and success effectively.

2023-2024

We will introduce clients to the use of electronic forms via Yardi Voyager & utilize computers in on-site community rooms to continue familiarization with electronic systems and portals the Agency offers.

2023-2024

We will focus on goals and tactics that are realistic and achievable for our teams within the plan year.



Pillar #1

Listen to Our Communities

Homes for Good lives within the sphere of our community, and cannot be separated from that context. In order to be a responsible community organization, we must collaborate, and most importantly listen, to other organizations and people within our community.

We must learn from their experiences and base operational changes on them to improve their experience. The goals and tactics outlined in this section focus on local partnership and collaboration.

Pillar #1 Listen to Our Communities

Goal #1

Measure client satisfaction with policy & procedure modifications and site improvements.

Rent Assistance

- Expand customer service survey to participants served remotely
- Seek feedback about experiences of hate & bias

Real Estate

- Develop processes with 3rd party sites to allow ongoing feedback both internally and with residents.

Supportive Housing

- Increase attendance at the Resident Advisory Board by publicizing meetings through flyers and social media posts.

Supportive Housing

- Seek feedback about experiences of hate & bias.
- Increase resident participation for PSH survey by 100%.

Goal #2

Increase the housing production pipeline in rural communities by 140 units.

Finance

- Identify and seek feedback from jurisdictions and organizations in rural Lane County with which we have a financial relationship.

Real Estate

- Cultivate relationships with rural jurisdictions in their land acquisition & housing production efforts.

Goal #3

Focus development & rehabilitation efforts based on input from residents and especially from historically underserved communities.

Real Estate

- Develop accessible units based on community need.
- In collaboration with RA & SHD, publish accessibility report.

Supportive Housing

- Collaborate with RED team to host 2 annual listening sessions to collect feedback about housing design & development.

Executive

- Coordinate sponsorship & participation in events for orgs serving the BIPOC communities.



Pillar #2

Tell the Human Story

The people we serve are the heart of our work. As a social service organization, we work for and with people.

The goals and tactics outlined in this section focus on keeping a human-centered approach. They include efforts to gather participant feedback and use that in programmatic changes, amplify those voices on our social media platforms, and improve empathy and client interactions for non-client facing team members.

Pillar #2 Tell the Human Story

Goal #4

Through social media campaigns, foster empathy by amplifying stories of participants with an emphasis on the formerly unhoused to increase community awareness of why so many people are experiencing homelessness.

Rent Assistance

- Provide opportunities thru surveys for participants to provide quotes with permission to use in internal & external communications.

Supportive Housing

- Schedule 2 annual resident engagements to collect stories and feedback for community sharing.

Rent Assistance

- Create a system that gathers success stories from program participants & landlords.

Supportive Housing

- Provide quarterly report with information related to eviction prevention services provided by Resident Services.

Communications

- Implement a system for storytelling the successes of FSS participants & graduates.

Communications

- Create a social media campaign showcasing Homelessness is a Housing Problem spanning 8-10 posts.

Goal #5

Catalyze progress by educating and engaging the business community in efforts to increase housing supply in Lane County to address homelessness & housing stability for low wage workers.

Rent Assistance

- Increase the number of educational events for the landlord community by 20%.

Rent Assistance

- Develop an avenue to celebrate partnering landlords.



Pillar #3

Create Pathways to Self-Sufficiency

We usually associate “self-sufficiency” with our “Family Self-Sufficiency Program,” but creating pathways to self-sufficiency looks to improve more than just one program.

Through execution of the goals and tactics outlined in this section, we strive to make process and programmatic improvements to promote wealth building, and improve the mental, physical and financial health of our residents and program participants.

Pillar #3

Create Pathways to Self-Sufficiency

Goal #6

We will increase enrollment in the Family Self-Sufficiency Program by 50%.

Supportive Housing

Include FSS outreach materials with the Chane of Income process.

Supportive Housing

- Rebrand & rename FSS program.
- Re-initiate opt-out model for FSS at Keystone & Ketanji Court as pilot sites.

Finance

- Complete financial impact analysis on FSS program growth & determine the financial feasibility of 50% participation growth.

Supportive Housing

- Complete software set up to expand FSS program into HUD Multifamily Housing (MFH) sites.
- Enroll 5 new participants from MFH sites.

Goal #7

We will optimize funding of services through Medicaid billing for rent assistance, supportive housing and climate resilience to ultimately increase self-sufficiency and health outcomes of people we serve, increasing the amount of Medicaid funding used to support Resident Services by at least \$100k during the plan year.

Supportive Housing

- Complete enrollment as a Health Related Social Needs (HRSN) provider.
- Create team to develop Medicaid billing plan.

Supportive Housing

- Three Resident Services team members will complete Traditional Health Worker training.

Finance

- Analyze the financial feasibility of becoming a Medicaid billing entity.

Goal #8

We will increase participation in the the Housing Choice Voucher (HCV) Home Ownership program by 25% through partnerships with non-traditional housing developers.

Supportive Housing

- Create program materials to be shared with lenders & partners to increase program understanding.

Supportive Housing

- Create a program briefing video in Spanish.
- Host an annual Home Ownership workshop to help connect participants to home ownership resources.

Pillar #3 Create Pathways to Self-Sufficiency

Goal #9

We will create long term stable employment opportunities by hiring two people we serve in our programs through targeted recruitments.

Supportive Housing

- Showcase employment opportunities to people we serve through resident newsletters, Resident Services communication and site bulletin boards to increase visibility.

Supportive Housing

- Re-initiate the FSS Program Internship, people we serve.

Human Resources

- Prioritize the creation of two English-Spanish bilingual internships by September 30, 2024.

Goal #10

Through equitable contracting efforts, we will increase the annual amount we compensate BIPPOC & women owned businesses and contractors by 20%.

Executive

- Utilize the existing Lane County database to solicit bids & services from local minority-owned, women-owned & service disabled owned businesses.

Real Estate

- Create educational materials about Section 3 programs & equitable contracting initiatives.
- Provide staff training on COBID certifications.

Real Estate

- Lead quarterly outreach events through CADE Business Accelerator meetings & Oregon Association of Minority Entrepreneurs.

Executive

- Ensure at least 50% of food purchases for staff events are from small/local businesses.

Goal #11

We will create educational & employment opportunities for youth in our programs through intentional partnerships with local organizations serving youth.

Supportive Housing

- Host a youth Intern in partnership with Connected Lane County.

IT

- Host a youth Intern in partnership with Connected Lane County.



Pillar #4 Lead & Grow Ethically

“Leading & Growing Ethically” means we will lead the way in creating a racially and socially just organizational culture.

The goals and tactics outlined in this section focus on improving our employee experience, recruiting and regaining a diverse workforce, utilizing technologies to provide more access to our programs, and reducing the Agency’s carbon footprint.

Pillar #4 Lead & Grow Ethically

Goal #12

We will develop and implement a robust data collection and reporting mechanism to accurately document and respond to hate & bias incidents in our communities and workplace, allowing us to set a baseline and ultimately reduce hate & bias incidents by 10% this plan year.

Supportive Housing

- Provide bystander intervention training to Homes for Good's communities.
- Ensure annual fair housing training for staff.
- Train staff on Hate & Bias Response procedure.

Human Resources

- Continue budgeting and programming DEI staff trainings; at least 2 per year..
- 70% of employees have an intermediate understanding of the history of racism in Lane County.

Supportive Housing

- Develop materials introducing our Hate & Bias Response Toolkit to communities, including Kids Club to increase resident awareness & understanding.
- Ensure at least 25% of Division staff attend CSH annual Cultural Humility conference.

Real Estate

- Develop materials introducing our Hate & Bias Response Toolkit to third party managed sites.

Rent Assistance

- Implement a "housing discrimination" note category in software tools & train staff on it's use.
- Review reports on a monthly basis, taking appropriate action when necessary.

Goal #13

We will maintain a staff turnover rate at or below the average for public employers in Oregon.

Human Resources

- Increase favorable onboarding experiences by 10%.
- Increase employee engagement score by 10%.
- Develop Learning & Development program based on engagement survey results.

Human Resources

- Expand employee assistance program to include an emphases on improving retirement, savings & educational outcomes.

Goal #14

We will align staff demographics with the diverse populations within our programs through targeted recruitments, fostering cultural competence, empathy, and effectiveness in our services.

Human Resources

- Create targeted recruitments to the Spanish speaking community.
- Evergreen job ads for Spanish speaking applicants to create a qualified pool.

Human Resources

- Increase candidate favorability score by 10%.
- Set baseline & increase favorable onboarding survey responses by 10%.

Supportive Housing

- Increase favorable responses to two employee engagement survey questions, specifically, "I have access to the things I need to do my job well" and "At Homes for Good there is open & honest two way communication."

Pillar #4 Lead & Grow Ethically

Goal #15

We will optimize local preference partnership through data analysis & education.

Rent Assistance

- Utilize Waitlist Connect 2021 data to define geographic areas in which we will provide in-person support for waitlist events.

Rent Assistance

- Create & facilitate local preference quarterly meetings to increase cross-cultural communication, foster understanding on why we value LP and promote inclusivity.

Rent Assistance

- Identify metrics to define LP partners who are meeting goals of the preference.
- Report the metrics out & adjust LP partnerships in relationship to metrics.

Rent Assistance

- Develop Agency overview training & materials.

Goal #16

We will grow the number of families & individuals from historically underserved and/or underrepresented communities on our programs & waitlists by 10% by enhancing accessibility and mitigating barriers through educational opportunities and intentional relationship building with culturally specific organizations.

Communications

- Prioritize tabling & community presentations to connect with & education communities we haven't engaged with.

Rent Assistance

- Host educational workshops about certification & recertification process.
- Implement triennial recertifications.

Real Estate

- Focus efforts on meeting the needs of historically underserved populations through partnerships with culturally specific organizations.
- Partner with Rent Assistance to develop a comprehensive list of non-profit partners.

Rent Assistance

- Continue to identify & implement MTW flexibilities.
- Develop a plan to increase BIPOC families served utilizing EHV data.

Supportive Housing

- Develop action plan to decrease racial disparities in PSH exits to homelessness by 10%.
- Expand FSS Advisory Board membership to orgs serving the BIPOC community.

Supportive Housing

- Provide volunteer opportunities to business partners through a Day of Caring community project.

Real Estate

- We will explore the viability of creating a Pan Tribal Affordable Housing Community by developing relationships with tribal nations connected to Lane County

Pillar #4 Lead & Grow Ethically

Goal #17

We will increase households served by the Weatherization Assistance Program by 10%.

Executive

- Once all vital documents are translated, review Language Access Plan & make necessary changes.

Energy Services

- Based on feedback from constituents, updating and simplifying the WX application on the Homes for Good website, as well as adding a method to collect feedback within the application

Energy Services

- Do targeted outreach to the populations identified as highest need according to the Climate and Economic Justice mapping tool.

Goal #18

We will ensure our financial stability by optimizing current processes & implementing best practices.

Finance

- Develop an array of financial reports that will allow charts and budget dashboard that can inform decision making.

Finance

- Complete comprehensive assessment of indirect overhead allocation methodology and direct allocation methodology.

IT

- Update & improve the IT Disaster Recover Plan.
- Implement security enhancements to further secure Agency data.

Goal #19

We will optimize the use of technology to enhance customer service.

Communications

- Work with Resident Services to create materials and communicate to residents about new software functionalities.

IT

- Add resident computers to remote site communities. Expand staff work options at remote sites.

Pillar #4 Lead & Grow Ethically

Goal #20
We will address sustainability & the effects of climate change in our communities.

Executive

- Reduce use of paper products in office spaces by purchasing alternative products for toilet paper and paper towels.

Energy Services

- Identify and apply to Climate Justice and Carbon Reduction grants to develop an internal Sustainability and Carbon Neutrality strategy for the next 5 years.
- Apply for at least one grant to electrify program fleet vehicles.

Energy Services

- Utilize a Climate and Economic Justice Map to identify the most vulnerable populations and plan to use that for Waitlist prioritization and targeted outreach

Energy Services

- Provide community cooling spaces utilizing funding from programs like Community Heat Pump Deployment & Landlord Provided Cooling Space Initiative.

Supportive Housing

- Based on recommendations from Lane County recycling assessment and implement improved signage and instructions provided at intake. Tracked by reduction in waste charges.

Real Estate

- Explore solar investment tax credits to encourage the use of solar power for future developments.

Real Estate

- Explore Earth Advantage Net Zero requirements to design future developments toward those goals.



Strategic Equity Plan July 2024 - June 2025

Pillars, Goals & Tactics Table

Our goals and tactics are visualized in a table organized by the four main pillars of the plan. Goals are aligned to pillars, and team tactics are aligned to goals.

Pillar

Goal



Team



Tactic



-----PILLAR I: LISTEN TO OUR COMMUNITIES-----

<p>Based on input received through client engagement efforts such as focus groups and surveys we will measure client satisfaction with how we have modified policies, procedures and performed site improvements.</p>	<p>Increase housing production pipeline in rural communities by 140 units.</p>	<p>We will focus development and rehabilitation efforts including housing type, design, and scale based on input from residents and especially historically underserved and/or underrepresented communities in affordable housing programs.</p>
<p>Agency/Executive</p> <ul style="list-style-type: none"> With the collaboration of the Equity Strategy Team and Managers create a centralized document with outside-Agency resources to share with residents and community members 	<p>Finance</p> <ul style="list-style-type: none"> Identify businesses, jurisdictions and organizations based in Rural Lane County that Homes for Good has a financial relationship with. Determine whether to ask these entities for feedback on how Homes for Good can improve the financial relationship. 	<p>Agency/Executive</p> <ul style="list-style-type: none"> Continue to coordinate participation in events for culturally specific organizations, organizations serving the BIPOC Communities through tabling and selective sponsorships, with a focus on partners or organizations we are partnering with in other projects (have existing MOUs, etc.)
<p>Communications</p> <ul style="list-style-type: none"> Understanding best practices for accessibility on social media and websites—including designing for color blindness, and formatting for screen readers, and incorporating best practices into our website and social media past alt text. Create accessibility best practices procedure for communications staff to use (this assumes one of the survey questions we identify will be related to the website) 	<p>RED/Asset Management/CAP</p> <ul style="list-style-type: none"> We will cultivate relationships with rural Lane County jurisdictions to identify ways Homes for Good can support these jurisdictions in their land acquisition and housing production efforts. 	<p>Communications</p> <ul style="list-style-type: none"> Communicating effects of being a Moving to Work Agency , create at least 1 social media campaign spanning 4-5 posts.



Strategic Equity Plan Year III: Goals + Tactics

-----PILLAR I: LISTEN TO OUR COMMUNITIES-----

<p>Based on input received through client engagement efforts such as focus groups and surveys we will measure client satisfaction with how we have modified policies, procedures and performed site improvements.</p>	<p>Increase housing production pipeline in rural communities by 140 units.</p>	<p>We will focus development and rehabilitation efforts including housing type, design, and scale based on input from residents and especially historically underserved and/or underrepresented communities in affordable housing programs.</p>
<p>Agency/Executive</p> <ul style="list-style-type: none"> With the collaboration of the Equity Strategy Team and Managers create a centralized document with outside-Agency resources to share with residents and community members 	<p>Finance</p> <ul style="list-style-type: none"> Identify businesses, jurisdictions and organizations based in Rural Lane County that Homes for Good has a financial relationship with. Determine whether to ask these entities for feedback on how Homes for Good can improve the financial relationship. 	<p>Agency/Executive</p> <ul style="list-style-type: none"> Continue to coordinate participation in events for culturally specific organizations, organizations serving the BIPOC Communities through tabling and selective sponsorships, with a focus on partners or organizations we are partnering with in other projects (have existing MOUs, etc.)
<p>Communications</p> <ul style="list-style-type: none"> Understanding best practices for accessibility on social media and websites—including designing for color blindness, and formatting for screen readers, and incorporating best practices into our website and social media past alt text. Create accessibility best practices procedure for communications staff to use (this assumes one of the survey questions we identify will be related to the website) Optimize website functionality to improve user experience. 	<p>RED/Asset Management/CAP</p> <ul style="list-style-type: none"> We will cultivate relationships with rural Lane County jurisdictions to identify ways Homes for Good can support these jurisdictions in their land acquisition and housing production efforts. 	<p>Communications</p> <ul style="list-style-type: none"> Communicating effects of being a Moving to Work Agency , create at least 1 social media campaign spanning 4-5 posts.
<p>Finance</p> <ul style="list-style-type: none"> Support the activation of Yardi Rent Café portals. Transition to Yardi – improve our efficiency and capabilities, and expand self-service options for residents, landlords, and applicants 		<p>Supportive Housing</p> <ul style="list-style-type: none"> SH and RED teams will collaborate to host annual listening sessions to collect and incorporate resident/participant feedback in housing design and development.
<p>IT</p> <ul style="list-style-type: none"> Support the activation of Yardi Rent Café portals. Implement a new phone system with better mobility and customer service features. Work with RA to provide training laptops for the Yardi resident portal rollout. 		<p>RED/Asset Management/CAP</p> <ul style="list-style-type: none"> Develop appropriate number of accessible units in new construction based on recent survey feedback/need in community and working with Rental Assistance and Supportive housing, publish accessibility report, making it easier for people who need accessible units to get them. SH and RED teams will collaborate to host two annual listening sessions to collect and incorporate resident/participant feedback in housing design and development. Identify and partner with organizations that specialize in the types of housing Homes for Good has not developed in the past. We will explore the viability of creating a Pan Tribal Affordable Housing Community by developing relationships with tribal nations connected to Lane County including the Coquille Indian Tribe, the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians and the Confederated Tribes of Grand Ronde.
<p>Rent Assistance</p>		

<ul style="list-style-type: none"> We will expand the customer service survey to participants served remotely. Make policy/procedure modifications to policy/procedure based on 2023 survey and track changes in satisfaction post modifications. Identify questions - experience discrimination/hate and bias. 		
Supportive Housing <ul style="list-style-type: none"> Publicize RAB and meeting through site flyers and social media posts, including participants in PSH and PBV programs. Make policy/procedure modifications to PSH policy/procedure based on 2024 survey and track changes in satisfaction post modifications. Identify questions - experience discrimination/hate and bias. Increase resident participation from PSH in resident survey for 2024 (other programs will not have survey until 2025) 		
RED/Asset Management/CAP <ul style="list-style-type: none"> Develop processes with 3rd party sites to allow ongoing feedback both internally and with residents. 		

-----PILLAR II: TELL THE HUMAN STORY-----

<p>Through social media campaigns, we will foster empathy by amplifying the stories of Homes for Good clients with an emphasis on clients who were formerly unhoused to increase community awareness of why so many people are experiencing homelessness.</p>	<p>Catalyze progress by educating and engaging the business community in efforts to increase housing supply in Lane County to address homelessness and housing instability for low wage workers.</p>
Communications <ul style="list-style-type: none"> Create a campaign on the basis of the book homelessness is a housing issue, informational social media campaign to span 8-10 posts. Implement a system for storytelling the successes of FSS participants and graduates. 	Agency/Executive <ul style="list-style-type: none"> Develop scope of work for Building Home Housing Production Team 2.0 work. Engage with private sector developers and construction companies to gather their input on how to increase housing production of lower middle-income housing.
Rent Assistance <ul style="list-style-type: none"> Complete a participant survey that creates an opportunity for participants to provide quotes with permission to use them for internal and external communications. Create a platform that gathers success stories from Rent Assistance programs from both participants and partnering landlords. 	Rent Assistance <ul style="list-style-type: none"> Increase the number of educational events for the landlord community by 20%. Develop an avenue to celebrate partnering landlords.
Supportive Housing <ul style="list-style-type: none"> Schedule 2x annual resident quarterly to collect resident stories and feedback for community sharing. Provide quarterly report with information related to eviction prevention services provided by Resident Services 	

-----PILLAR III: CREATE PATHWAYS FOR SELF-SUFFICIENCY-----

<p>We will increase enrollment in the Family Self-Sufficiency Program by 50%.</p>	<p>We will optimize funding of services through Medicaid billing for rent assistance, supportive housing and climate resilience to ultimately increase self-sufficiency and health outcomes of people we serve, increasing the amount of Medicaid funding used to support Resident Services by at least \$100k during the plan year.</p>	<p>We will increase the Housing Choice Voucher Home Ownership Program by 25% through partnerships with non-traditional housing developers.</p>
<p>Finance</p> <ul style="list-style-type: none"> Complete financial impact analysis on FSS program growth and determine whether PH Operating Subsidy can be increased to offset the increase in Escrow account disbursements. 	<p>Finance</p> <ul style="list-style-type: none"> Analyze the financial feasibility of becoming a Medicaid billing entity. 	<p>Supportive Housing</p> <ul style="list-style-type: none"> Create S8HO program materials to be shared with lenders and program partners to increase program understanding. Create a bilingual S8HO briefing video Host annual Home Ownership workshop/fair to help connect participants to Home Ownership resources.
<p>Supportive Housing</p> <ul style="list-style-type: none"> Assess steps to rebrand & rename the Family Self-Sufficiency program to help redefine program success beyond employment and increased earnings. Re-initiate "opt out" model at Keystone and Ketanji Court as pilot sites during 2024. Complete Yardi set up to expand FSS program into HUD Multifamily sites and enroll 5 new participants from MFH in 2024. Create staff "onboarding" materials for FSS that highlight program basics and "opportunity" periods that are best to apply to FSS. Include FSS outreach materials with the Change of Income process. 	<p>Supportive Housing</p> <ul style="list-style-type: none"> We will complete our enrollment as an HRSN provider and establish referral process through Connect Oregon. We will create a team to develop and execute a Medicaid billing plan. Three Resident Services team members will complete traditional health worker training. 	
<p>We will create long-term stable employment opportunities by hiring two people we serve in our programs through targeted recruitment.</p>	<p>Through equitable contracting we will increase the annual amount we compensate BIPOC, and women owned business and contractors by 20%.</p>	<p>We will create educational and employment opportunities for youth in our programs through intentional partnerships with local organizations serving youth.</p>
<p>HR</p> <ul style="list-style-type: none"> Prioritize the creation of two Homes for Good English-Spanish bilingual internships by 09.30.2024. 	<p>Agency/Executive</p> <ul style="list-style-type: none"> Ensure at least 50% of food purchases for staff events is from small/local businesses Utilize the existing Lane County database to solicit bids and services for local minority-owned, women-owned and service-disabled owned businesses. 	<p>Supportive Housing</p> <ul style="list-style-type: none"> Host a youth Intern in Partnership with Connected Lane County.

<p>Supportive Housing</p> <ul style="list-style-type: none"> • Re-initiate the Family Self Sufficiency Program Internship. • Include quarterly newsletters and Homes for Good job postings at site bulletin boards to increase visibility of employment opportunities to people we serve • Showcase recruitment advertisements to the people we serve through Resident Services communications. 	<p>RED/Asset Management/CAP</p> <ul style="list-style-type: none"> • Collaborate with Communications to create educational materials about Section 3 programs and equitable contracting initiatives. • Expand framework for promoting procurement opportunities to those who meet Section 3 or MWESB definitions including BIPOC, and women owned businesses, including a contractor interface on the website. • Work with General Contractors to build project specific plans for reaching MWESB attainment goals. • Provide staff training on COBID certifications including bilingual assistance. Host educational opportunities. • Lead quarterly outreach events through CADE Business Accelerator meetings and Oregon Association of Minority Entrepreneurs. • Post General Conditions jobs with contractors on social media. 	<p>IT</p> <ul style="list-style-type: none"> • Host a youth Intern in Partnership with Connected Lane County.
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-----PILLAR IV: LEAD & GROW ETHICALLY-----

<p>We will develop and implement a robust data collection and reporting mechanism to accurately document and respond to hate & bias incidents in our communities and workplace, allowing us to set a baseline and ultimately reduce hate & bias incidents by 10% this plan year.</p>	<p>We will maintain a staff turnover rate at or below the average public employers in Oregon.</p>	<p>We will align staff demographics with the diverse populations within our programs through targeted recruitments, fostering cultural competence, empathy, and effectiveness in our services.</p>	<p>We will optimize local preference partnerships through data analysis and education.</p>
<p>Finance</p> <ul style="list-style-type: none"> Develop tracking mechanism for us to be able to track and report increased compensation to BIPOC and other historically marginalized businesses. 	<p>HR</p> <ul style="list-style-type: none"> Increasing favorable onboarding experience by 10% Increase employee engagement score by 10%. Expand employee assistance program to include an emphasis on improving financial, retirement, savings & educational outcomes. Develop Learning & Development program based on Culture Amp Engagement results. 	<p>HR</p> <ul style="list-style-type: none"> Targeted recruitments to Spanish speaking community Evergreen job posting for Spanish speaking applicants to create qualified pool Increasing candidate favorability score by 10% Set baseline and increase favorable responses in onboarding surveys by 10% 	<p>Rent Assistance</p> <ul style="list-style-type: none"> Utilize Waitlist Connect 2021 data to define geographical areas in which we will provide in person support for waitlist events. Create and facilitate Local Preference quarterly meetings to increase cross-cultural communication, foster understanding on why we value local preference, and promote inclusivity. Identify metrics that will be utilized to define Local Preference partners who are meeting the goals of the preference. Report the metrics out and adjust Local Preference partnerships in relationship to metrics. Collaborate with Communications to develop training and presentation materials and train the Landlord and Community Relations Specialist to provide an Agency Overview presentation that can be used when partners request for their staff to be trained about our services.
<p>HR</p> <ul style="list-style-type: none"> 70% of employees have intermediate understanding of the history of racism in Lane County, Oregon. Add question to engagement survey. Continue annual budgeting and programming of DEI related staff training; at least 2 per year. 	<p>Supportive Housing</p> <ul style="list-style-type: none"> SHD will increase staff positive responses to at least two employee engagement survey areas, specifically to "I have access to the things I need to do my job well" and "At Homes for Good there is open and honest two-way communication". 		
<p>Rent Assistance</p> <ul style="list-style-type: none"> Implement a "housing discrimination" Yardi Memo note 			

<p>category, train staff on its use and review notes generated on a monthly basis with Leadership Team. Take appropriate action based on trending notes.</p>			
<p>Supportive Housing</p> <ul style="list-style-type: none"> • Provide annual bystander intervention training at Homes for Good communities. • Ensure at least 25% of SHD staff attend CSH annual Cultural Humility – Centering Racial Equity and Anti-Oppressive Practices. • Ensure annual fair housing training for staff. • Develop materials to introduce our Bias Response Toolkit, including educational materials for Kids Club to increase resident understanding of discrimination. • Staff training on hate & bias response procedure and racial/social justice 			
<p>RED/Asset Management/CAP</p> <ul style="list-style-type: none"> • Develop materials to introduce our Bias Response Toolkit for third party managed sites 			
<p>Supportive Housing</p> <ul style="list-style-type: none"> • Provide annual bystander intervention training at Homes for Good communities. • Ensure at least 25% of SHD staff attend CSH annual Cultural Humility – Centering Racial Equity and Anti-Oppressive Practices. • Ensure annual fair housing training for staff. • Develop materials to introduce our Bias Response Toolkit, including educational materials for Kids Club to increase resident understanding of discrimination. • Staff training on hate & bias response procedure and racial/social justice 			

<p>We will grow the number of families & individuals from historically underserved and/or underrepresented communities on our programs and waitlists by 10% by enhancing accessibility and mitigating barriers through educational opportunities and intentional relationship building with culturally specific organizations.</p>	<p>Increase households served by the Weatherization Assistance Program by 10%</p>	<p>Ensure financial sustainability by optimizing current processes and implementing best practices.</p>	<p>Optimize technology to enhance customer service.</p>	<p>Address sustainability and the effects of climate change in our communities.</p>
<p>Communications</p> <ul style="list-style-type: none"> • Prioritize tabling, and community presentations that help connect and educate communities we historically have not engaged with i.e. Plaza de Nuestra Comunidad. 	<p>Agency/Executive</p> <ul style="list-style-type: none"> • After all vital documents are translated, review the Language Access Plan, and make any necessary changes. 	<p>IT</p> <ul style="list-style-type: none"> • Update and improve the IT disaster recovery plan. • Implement security enhancements to further secure Agency data. 	<p>Communications</p> <ul style="list-style-type: none"> • Working with Resident Services, create and Materials, and communicate to residents about new software functionalities with Yardi to do things like pay rent, submit forms, etc. 	<p>Agency/Executive</p> <ul style="list-style-type: none"> • Reduce use of paper products in office spaces by purchasing alternative products for toilet paper and paper towels.
<p>Rent Assistance</p> <ul style="list-style-type: none"> • Create and execute educational workshop(s) about Homes for Good's certification and re-certification processes. • Engagement with MTW Cohorts in identifying and implementing MTW flexibilities Continue to work with HUD Portland Field Office and HUD in DC on the disconnect between HUD definition of registered sex offender and State of Oregon definition with the goal of amending the national definition. • Implementation of triennial certification (include how BIPOC families fall struggle with paperwork process) • Utilization of the data gained from participation in the Emergency Housing Voucher (EHV) Cohort to develop plan to increase the BIPOC families we house. 	<p>Energy Services</p> <ul style="list-style-type: none"> • Based on feedback from constituents, updating and simplifying the WX application on the Homes for Good website, as well as adding a method to collect feedback within the application • Do targeted outreach to the populations identified as highest need according to the Climate and Economic Justice mapping tool. 	<p>Finance</p> <ul style="list-style-type: none"> • Develop an array of financial reports that will allow charts and budget dashboard that can inform decision making. • Complete comprehensive assessment of indirect overhead allocation methodology and direct allocation methodology. 	<p>IT</p> <ul style="list-style-type: none"> • Add resident computers to remote site community rooms. • Expand staff work options at remote sites. • Continue the Yardi software implementation, cleanup, and optimization. 	<p>Supportive Housing</p> <ul style="list-style-type: none"> • Based on recommendations from Lane County recycling assessment and implement improved signage and instructions provided at intake. Tracked by reduction in waste charges.
<p>Supportive Housing</p> <ul style="list-style-type: none"> • Develop action plan to decrease racial disparities in PSH exits to homelessness by 10% 				<p>RED/Asset Management/CAP</p> <ul style="list-style-type: none"> • Explore Solar Investment Tax Credits to encourage solar at more future developments

<ul style="list-style-type: none"> • Work to expand membership of the FSS Advisory Board to organization serving the BIPOC community. • Provide volunteer opportunities to business partners through a Day of Caring community project. 				<ul style="list-style-type: none"> • Explore Earth Advantage Net Zero requirements to design future developments toward those goals
<p>RED/Asset Management/CAP</p> <ul style="list-style-type: none"> • We will focus efforts on meeting the needs of historically underserved populations in our community through partnerships with culturally specific organizations, such as the NAACP, OAME/CADE, and Plaza de Nuestra Comunidad. • Partnering with RA develop a comprehensive list of non-profit partners and analyze the communities they serve to ensure we are providing housing for communities that have been typically underserved. • We will explore the viability of creating a Pan Tribal Affordable Housing Community by developing relationships with tribal nations connected to Lane County including the Coquille Indian Tribe, the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians and the Confederated Tribes of Grand Ronde. 				<p>Energy Services</p> <ul style="list-style-type: none"> • Identify and apply to Climate Justice and Carbon Reduction grants to develop an internal Sustainability and Carbon Neutrality strategy for the next 5 years. • Utilize a Climate and Economic Justice Map to identify the most vulnerable populations and plan to use that for Waitlist prioritization and targeted outreach https://screeningtool.geoplatform.gov/en/#12.68/44.06415/-123.1515 • Identify and apply for at least one grant to begin the process of electrifying our auditor fleet • Utilize the funding from programs like the Community Heat Pump Deployment Program and the Landlord Provided Cooling Space Initiative to provide AC or cooling centers for our residents

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

ORDER 24-26-06-02H

In the Matter of Approving Year III of the
Strategic Equity Plan

WHEREAS, the Homes for Good Equity Strategy Team was created to guide the agency in furthering Diversity, Equity, and Inclusion goals; and

WHEREAS, the Equity Strategy Team created a Strategic Equity Plan that outlines the goals and actions steps of the agency to address barriers to housing, programs, and services over the course of the next year; and

WHEREAS, the goals and action steps of the Strategic Equity Plan were shared with the residents, staff, and the board for feedback, comments, and concerns;

WHEREAS, the board Strategic Equity Plan committee met on 04/03/24 and 05/01/24 for recommendations and feedback on drafts of the Strategic Equity Plan

WHEREAS, the board recommended more measurable goals and tactics for the Strategic Equity Plan; and

WHEREAS, it has been determined that the goals and actions steps that the Equity Strategy Team drafted are aligned with the input and recommendations;

NOW IT IS THEREFORE ORDERED THAT:

The Homes for Good Board of Commissioners review and approve Year III of the Strategic Equity Plan for July 2024 – June 2025.

DATED this _____ day of _____, 2024

Chair, Homes for Good Board of Commissioners

Secretary, Homes for Good Board of Commissioners