



Housing And Community Services Agency (HACSA) of Lane County

177 Day Island Road
Eugene, OR 97477

5 Year Plan for Fiscal Years 2015-2019 Annual Plan for Fiscal Year 2018

Public Hearing: June 16 2017 at 2:00 p.m.
In the Community Room at HACSA
300 West Fairview Drive
Springfield OR 97477

Written comments due June 16, 2017

Contact: Wesley Lucas
(541) 682-2565
Email: wlucas@hacsa.us

If you are in need of a reasonable accommodation in regard to this meeting, please contact Wesley Lucas at (541) 682-2565 at least 24 hours prior to the meeting time.



EXECUTIVE SUMMARY

MAY 2, 2017

The Agency is required by Section 511 of the Quality Housing and Work Responsibility Act of 1998 (and ensuing HUD requirements) to submit a 5-Year and Annual Plan to HUD. This year the Agency is only required to submit an Annual Plan covering FY 2018.

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

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

Section I PHA Annual Plan Update HUD form 50075

Section II Attachments and Appendices supporting HUD form 50075

Supporting Documentation has been updated as needed and the updates have been summarized in the attachments & appendices. The Supporting Documentation, along with this booklet, are available for inspection at both the Day Island and Fairview administration offices, through the RAB, and by contacting the resident commissioners who each have a notebook containing all supporting documents. Supporting Documents include, among other things, the Section 8 Administrative Policy, the Public Housing Statement of Policies (SOP), flat rent methodology and schedule, Public Housing Operating budget, Public Housing Maintenance Plan, and the Agency Audit.

Public Notice –

The publication of this booklet begins the 45 day comment period required by the regulations. At the end of this comment period, the Agency will hold a public hearing to address final questions and comments on the Plan. Following the public hearing, the Agency will submit the Plan to the HACSA Board of Commissioners for approval, followed by electronic submission to HUD no later than July 18, 2017.

SECTION I
PHA Annual Plan Update

HUD Form 50075-ST

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

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

Definitions.

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

A.	PHA Information.																																
A.1	<p>PHA Name: <u>Housing Authority and Community Services Agency (HACSA) of Lane County</u> PHA Code: <u>OR006</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2017</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>707</u>, Number of Housing Choice Vouchers (HCVs) <u>3053</u> Total Combined Units/Vouchers <u>3760</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C 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. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 15%;">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: 12.5%;">PH</th> <th style="width: 12.5%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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		PH	HCV																														
Lead PHA:																																	

B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><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 revised element(s): Please See Attachment 1: Revision of PHA Plan Elements</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review. Please see Attachment 2: Deconcentration Policy</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input 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>Please see Attachment 3: PHA Plan New Activities</p>
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: Please see Attachment 4: 2015 FY Audit</p>
B.5	<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 and Annual Plan. Please see Attachment 5: Progress Report</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(c) 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. Please see Attachment 6: RAB Comments</p>
B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD on October 1, 2015</p>

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

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

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

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

B. Annual Plan. All PHAs must complete this section.

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” ([24 CFR §903.7](#))

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(1\)](#)) Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. 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\(b\)](#)) 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 maintain 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\(d\)](#))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. ([24 CFR §903.7\(e\)](#))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. ([24 CFR §903.7\(f\)](#))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)](#)) A description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. ([24 CFR §903.7\(l\)](#))

Safety and Crime Prevention. Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. ([24 CFR §903.7\(m\)](#)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs

provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

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

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

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

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements 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 or Choice Neighborhoods. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

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

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

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, and; **5)** the number of units affected. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

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

Conversion of Public Housing. 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 under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21](#). (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. 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. (24 CFR §903.7(b))

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).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Civil Rights Certification. Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

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

B.5 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.6 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

B.7 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.

B.8 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

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

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

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

Public reporting burden for this information collection is estimated to average 9.2 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.

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SECTION II
PHA Annual Plan Update

Attachments & Appendices Supporting
HUD Form 50075-ST

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ATTACHMENT 1: REVISION OF PHA PLAN ELEMENTS

STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS

See [Appendix A:Housing Needs & Strategy](#)

DECONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION, AND ADMISSIONS

Deconcentration Update for PH:

HACSA has analyzed each of the Public Housing developments for concentrations of poverty, based on Fiscal Year 2016 data. Pengra Court (part of AMP 200) was the only Public Housing complex where the average resident incomes were below the HACSA's Established Income Range (EIR) for Public Housing.

HACSA will take the following actions to effect the concentration of poverty at this complex:

1. HACSA will admit only families between the Very Low and Low Income ranges until we have met our deconcentration goals. This strategy will be effective upon HUD approval.
2. HACSA will market the Family Self Sufficiency Program to families currently residing at Pengra Court
3. HACSA is currently moving to a Site Based Waiting List for Pengra Court. Once the site based list is established, HACSA will seek avenues to market to Low Income Families.

See [Appendix B: Admin Plan Modifications](#)

See [Appendix C:ACOP Modifications](#)

FINANCIAL RESOURCES

HACSA BUDGET - SUMMARY OF RESOURCES - FY 17

DIVISION/ PROGRAM	FUND BALANCE*	FEDERAL REVENUE	RENT	INTEREST	OTHER	TOTAL
CSA:						
Madrone	\$-	\$430,000	\$-	\$-	\$-	\$430,000
Emergency Housing Assistance	-	10,000	-	-	-	10,000
Weatherization	-	908,400	-	-	692,700	1,601,100
Development	104,700	-	1,193,000	-	-	1,297,700
Asset Management	270,800	-	-	-	229,700	500,500
FSH	-	-	12,000	300	-	12,300
Herran Center	611,900	33,000	180,500	-	-	825,400
Signpost House	301,400	-	95,200	-	400	397,000
Shelter + Care	13,700	437,400	-	-	-	451,100
ROSS	-	211,800	-	-	-	211,800
FSS	132,000	313,900	-	-	-	445,900
HACSA Corporate	810,400	-	-	-	-	810,400
	2,244,900	2,344,500	1,480,700	300	922,800	6,993,200
HOUSING:						
Conventional	789,400	1,732,800	1,987,300	-	207,700	4,717,200
Abbie Lane	303,500	198,000	49,000	-	-	550,500
Fourteen Pines	238,200	296,500	169,300	-	12,300	716,300
Village Oaks	26,900	90,000	300,000	-	11,000	427,900
Firwood	253,400	-	526,300	-	9,000	788,700
Capital Fund	-	894,700	-	-	-	894,700
Norsemen Village	243,000	166,800	136,400	-	-	546,200
Camas Place	57,800	-	219,200	-	3,700	280,700
Richardson Bridge	47,800	-	222,400	-	3,100	273,300
Jacob's Lane	234,700	-	328,300	-	5,100	568,100
Laurel Gardens	60,500	-	185,200	100	2,500	248,300
Walnut Park	(13,300)	-	178,200	-	-	164,900
The Orchards	(54,000)	-	159,800	-	2,000	107,800
	2,187,900	3,378,800	4,461,400	100	256,400	10,284,600
SECTION 8:						
Vouch&MR	2,914,100	18,066,200	-	-	-	18,066,200
	2,914,100	18,066,200	-	-	-	18,066,200
TOTALS	\$7,346,900	\$23,789,500	\$5,942,100	\$400	\$1,179,200	\$35,344,000

*FUND BALANCE represents management's estimate of net resources as of the beginning of the year.

RENT DETERMINATION

No changes

OPERATION AND MANAGEMENT

Resource Plan:

Updated the HACSA Resource plan to reflect use of an Energy Performance Contractor.

Added three additional examples of energy conservation measures:

- Separately metering irrigation lines
- Purchasing Energy Star appliances
- Replacing electric resistance heating with heat pump technology

Maintenance Plan:

Updated to add:

- During the previous fiscal year (2016) HACSA focused specifically on improving both maintenance turn time and leasing days.
- Each week the Property Managers meet with the Intake Coordinator, Program Supervisor and Division Director to view all upcoming vacancies and vacant units to ensure open communication regarding the progress of the unit turn and the expected unit ready date.

Pest Management Plan

No Changes

GRIEVANCE PROCEDURES

No Changes

HOMEOWNERSHIP PROGRAMS

Policy re: Refinancing the home during the term of the loan

Participants in the S8HO program may refinance their home once during the term of the loan unless a subsequent refinance is needed for major repairs or because they have the option of reducing the interest on their loan by 5 or more percentage points. Prior to entering into any refinance agreement with a lender, the participant must meet with the HACSA S8HO specialist to discuss the terms of the refinance to assure that the terms are affordable for the participant and will not put them in financial jeopardy. HACSA has the right to deny the option of a refinance should it be deemed unaffordable. Participants who are denied this option have the right to a hearing and will be notified of this with their denial letter.

Policy re: Determination of Maintenance Allowance

When the portion of the mortgage payment HACSA will be paying is figured, there is an allowable deduction based on the amount of money that a household is expected to set aside each month for major repairs and maintenance on the home. This is called the monthly maintenance, major repair, and replacement allowance. Beginning with annuals done in 2017 we will be using a new formula to figure this amount. We will look at the tax assessed value of the home and then take 5% of that amount and divide it by the 12 months of the year to give the deduction amount we will be using. (The tax assessed value is determined by the county each year in November). An example of how this works is as follows: If a home is assessed at a value of \$100,000 we will take 5% of that \$100,000 which would be \$500. We would then divide that \$500 by 12 (12 months of the year) which would give that person a monthly rate of \$41.60. This is then an example of the amount that would be put into the family's savings account each month for repairs and maintenance to receive the \$500 deduction. All annual re-certifications taking place after January 1, 2017, will use this new method. You will be notified of your allowance amount when your 2017 annual review is completed. This change is unlikely to have any effect on the portion of the mortgage that HACSA pays.

COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS

No Changes

SAFETY AND CRIME PREVENTION

See [Appendix D: Safety & Crime Prevention: VAWA](#)

PET POLICY

See [Appendix E: Pet Policy](#)

ASSET MANAGEMENT

HACSA conducted Capital Needs Assessment on the entire Public Housing portfolio in 2015. The Public Housing and the Capital Projects Team has used this information to prioritize the 5-year plan for capital investment, rehabilitation and modernization of the public housing portfolio. In 2016, the Public Housing Division hired a management analyst to monitor short and long-term operations of the entire public housing inventory. In August, 2016 HACSA received approval of a multi-phase application to convert 112 scattered site units of public housing to Project Based Vouchers in two phases. The first phase will convert 12 units into and an existing project with the remaining 100 units to be converted in a future phase.

SUBSTANTIAL DEVIATION

No Changes

SIGNIFICANT AMENDMENT/MODIFICATION

No changes

ATTACHMENT 2: DECONCENTRATION

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

HACSA Policy

HACSA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

HACSA Policy

HACSA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

HACSA Policy

For developments outside the EIR HACSA will take the following actions to provide for deconcentration of poverty and income mixing:

Existing features and adding incentives and marketing to attract higher income families to lower income developments, to include, but not be limited to:

Family choice annually between income-based and flat rent

Community collaborations

Self-sufficiency programs and partnerships

Rent incentive(s)

ATTACHMENT 3: PHA PLAN NEW ACTIVITIES

HOPE VI OR CHOICE NEIGHBORHOODS

No New Activities

MIXED FINANCE MODERNIZATION OR DEVELOPMENT

No New Activities

DEMOLITION OR DEPOSITION

No New Activities

DESIGNATED HOUSING FOR ELDERLY AND/OR DISABLED FAMILIES

No New Activities

CONVERSION OF PUBLIC HOUSING TO TENANT-BASED ASSISTANCE

No New Activities

CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED ASSISTANCE UNDER RAD

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing access to private sources of capital to repair and preserve its affordable housing assets. HACSA submitted applications for participation in the RAD program in November of 2013. HACSA plans to convert 112 of its scattered sites to Project Based Vouchers (PBV) and transfer assistance to new sites under the guidelines of PIH Notice 2012-32, REV-2 and any successor notices. HACSA received a RAD Portfolio Award for 112 units and a CHAP (Commitment to Enter into Housing Assistance Payments) award for 56 of those units in March of 2015. HACSA submitted a revised multi-phase application in May of 2016 which resulted in a new CHAP being issued in August of 2016 that will allow conversion of the units as follows:

AMP 200 Springfield Sites (Partial Conversion): AMP 200 OR000600200 includes 20 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converts 3 units to Richardson Bridge, an existing HACSA development. The next phase will transfer the remaining 17 units to a new housing development. Application for the second phase will be made prior to July 1, 2018. The remaining units in AMP 200 will remain unchanged.

AMP 300, Eugene Scattered Sites (Partial Conversion): AMP 300 OR000600300 includes 92 scattered site units. A multi-phase application was approved in August 2016 for the initial phase that converts 9 units to Richardson Bridge, an existing HACSA development. The next phase will transfer the remaining 83 units to a new development. Application for the second phase will be made prior to July 1, 2018. The remaining units in AMP 300 will remain unchanged.

OCCUPANCY BY OVER-INCOME FAMILIES

No New Activities

OCCUPANCY BY POLICE OFFICERS

No New Activities

NON-SMOKING POLICIES

See [Appendix F: Non-Smoking Policies](#)

PROJECT-BASED VOUCHERS

HACSA has adopted a Project Based Voucher (PBV) program using up to 20 percent of its budget authority for project based assistance. The program is based on Nan McKay Best Practices and meets or exceeds all HUD requirements for a PBV program.

HACSA intends to solicit and select PBV proposals for rehabilitated and newly constructed units consistent with the adopted PBV program. The number of units has not yet been determined. HACSA will advertise and request for proposals (RFP) for both rehabilitated and newly constructed units and existing housing units. Consistent with the adopted program, HACSA will rate and rank proposals for rehabilitated and newly constructed housing using the following criteria:

- Owner experience and capability in building or rehabilitating housing
- Extent to which project furthers HACSA goal of deconcentrating poverty and expanding housing and economic opportunities.
- Extent to which special populations are provided for on site
- Projects with lower percentage of units assisted will rank higher

In addition, HACSA may also directly contact owners that have already been selected for federal, state or local housing assistance based on previously held competition.

As required by the adopted PBV program and consistent with [24 CFR 983.57(b)], HACSA will not select a proposal or enter into a HAP contract unless HACSA has determined the site is consistent with the goals of deconcentrating poverty and expanding housing and economic opportunity. HACSA must determine the site is suitable from the standpoint of facilitating and further compliance with applicable Civil Rights Laws, regulations, and Executive Orders, and that the site meets the HQS site and neighborhood standards at 24 CFR 982.401(1).

UNITS WITH APPROVED VACANCIES FOR MODERNIZATION

No New Activities

OTHER CAPITAL GRANT PROGRAMS

No New Activities

ATTACHMENT 4: 2015 FY AUDIT

FINDING NO. 2015-001 – CFDA 14.871 – HOUSING CHOICE VOUCHER

Criteria or Specific Condition – Chapter 24 of the Code of Federal Regulations, Section 982.517 requires that the Agency maintain an up-to-date utility allowance schedule for its Housing Choice Voucher program. These regulations require the Agency to review utility rate data for each utility category each year and to adjust its utility allowance schedule if there has been a rate change of 10 percent or more for a utility category or fuel type since the last time the utility allowance schedule was revised.

Condition – We examined a sample of 25 tenant files for review and noted the following:

- In four of the tenant files reviewed, the utility allowance was not updated from the prior year because an updated utility allowance for the current year had not been completed at the time the certifications were completed.
- In eight of the tenant files reviewed, the prior year's utility allowance was used in computing the tenant portion of the rent, even though the utility allowance schedule had been updated as required.

Effect – Using the incorrect utility rate does not change the total amount of rent, however it does change the breakdown between the amount the tenant pays and the rent subsidy amount. It is not practical to determine the aggregate amount of the differences due to the large volume of vouchers; the number of locations with different utility allowances; and the timing of implementation of the updated utility allowances.

Cause – A key staff member who oversaw the annual utility allowance updates left the Agency unexpectedly which resulted in the utility allowance updates and implementation not being completed on a timely basis.

Recommendations – The Agency should schedule the timing of updating the utility analysis so that it is consistent from year to year, set a consistent date for implementation, and communicate the changes in a timely manner to staff who are responsible for preparing new and annual recertifications. The Agency should also consider cross training so that staff turnover does not disrupt daily operations.

Response – HACSA has contracted with Nelrod, a consultant specializing in HUD Housing programs, to complete the utility allowance (UA) schedules in the fall of every year. Nelrod's first work products are ready for new and annual rent and UA calculations beginning July 2016. Staff training has taken place and written procedures for using UA schedules have also been created. Calendars have been marked as a reminder of the timing for UA update.

ATTACHMENT 5: PROGRESS REPORT

GOAL 1 OBJECTIVE: INCREASE THE NUMBER OF AFFORDABLE HOUSING UNITS.

Indicators:

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

Update for FY 2018 Annual Plan – HACSA has just completed two projects which have 102 housing units using Low Income Housing Tax Credits and other local funds. HACSA is currently in the predevelopment phase for the rehabilitation of 31 units and 2 projects consisting of 200 total units. Public Housing vacancy rates have remained below 3% during FY 2017.

GOAL 2 OBJECTIVE: CONTINUE TO RECEIVE HIGH PERFORMER STATUS.

Indicators:

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

Update for FY 2018 Annual Plan – HACSA Capital Funds are being obligated and expended in compliance with HUD’s deadlines. HACSA’s PHAS scores for the Fiscal Year Ended 9/30/16 indicate a High Performer status. These scores are based on the unaudited financial submission and could change when the audited submission to REAC is done, however we expect the final scores to remain in High Performer status.

GOAL 3 OBJECTIVE: IMPROVE COMMUNITY QUALITY OF LIFE AND ECONOMIC VITALITY.

Indicators:

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

Update for FY 2018 Annual Plan – The TAG (now called the Resident Advisory Board) has been very active in HACSA’s strategic planning process and the annual plan process. Resident newsletters continue to be sent to all sites and are also posted on the HACSA website. Elderly-disabled preferences remain the same. HACSA is deconcentrating poverty at Pengra Court by bringing in higher-income households.

GOAL 4 OBJECTIVE: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS.

Indicators:

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

Update for FY 2018 Annual Plan – The FSS program currently has an enrollment of 164 families and there are 16 agencies on the FSS Advisory Board. FSS is presented at all S8 Briefings for new tenants and included in all mailings at annuals for both PH and S8. Eight families purchased homes last year and 25 families have open IDA accounts

GOAL 5 OBJECTIVE: TO PROVIDE DECENT, SAFE AND SANITARY HOUSING FOR VERY LOW INCOME FAMILIES WHILE MAINTAINING THEIR RENT PAYMENTS AT AN AFFORDABLE LEVEL.

Indicators:

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

Update for FY 2018 Annual Plan – All indicators in this section are being met.

GOAL 6 OBJECTIVE: TO PROMOTE A HOUSING PROGRAM THAT MAINTAINS QUALITY SERVICE AND INTEGRITY WHILE PROVIDING AN INCENTIVE TO PRIVATE PROPERTY OWNERS TO RENT TO VERY LOW INCOME FAMILIES.

Indicators:

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

Update for FY 2018 Annual Plan – All indicators in this section are being met.

GOAL 7 OBJECTIVE: MAINTAIN SECTION 8 HOMEOWNERSHIP PROGRAM (WITH SUBSIDY ASSISTANCE)

Indicators:

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

Update for FY 2018 Annual Plan – HACSA has reopened the Section 8 Homeownership Program with an added requirement that participants first participate in the Family Self Sufficiency Program and attend one of the two briefings on Section 8 HomeOwnership prior to moving forward. Two families have purchased homes in the past year.

ATTACHMENT 6: RAB COMMENTS

HACSA staff presented the Annual PHA Plan during the RAB meetings on March 9th, 2017 and April 20th, 2017. Questions and comments were taken during both meetings. Comments about the proposed changes are listed below, with HACSA's response.

RAB Question: Will current residents need to pay the difference between the old and the new pet deposit?

HACSA Response: The pet deposit is collected at the time the pet is approved, and current residents will not be asked to pay the difference.

RAB Question: Does smoking in a car with the windows up count as "smoking on property?"

HACSA Response: HACSA has updated the community rules based on this comment, to make clear that smoking in a closed car, with the windows up, will not be considered a violation of the smoke-free policy.

RAB Question: Does the VAWA section of ACOP and the Admin Plan apply to children who are victims of abuse?

HACSA Response: HACSA's policies on VAWA apply to any person who is a victim of domestic violence, dating violence, sexual assault, or stalking; as defined in the policies and in regulation.

APPENDIX A: HOUSING NEEDS & STRATEGY

Statement of Housing Needs and Strategy for Addressing Housing Needs

The assessment of the impediments to fair housing and fair housing plan strategies, submitted by HACSA with its Annual PHA Plan for the Fiscal Year beginning October 1, 2015, was developed with input from the City of Eugene and the City of Springfield Consolidated plan 2015.

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

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

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

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

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

- A significant majority of low-income renters experience a housing cost burden, overcrowding, and/or substandard housing conditions (Eugene – 78%, Springfield – 76%).
- A significant majority of low-income renters spend more than 30% of their income on housing costs (Eugene – 76%, Springfield – 74%).
- A large percentage of low-income renters spend more than 50% of their income on housing costs (Eugene – 51%, Springfield – 34%).

(ii) Elderly families and families with disabilities

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

The Consolidated Plan also indicates that about 14% of population in the Cities of Eugene and Springfield lives with one or more disabilities (29,125 people). Persons with disabilities face a number of barriers related to

mobility, transportation, housing, employment, and access to services. In addition, persons with disabilities report many instances of discrimination.

(iii) Households of various races and ethnic groups residing in the jurisdiction

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

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

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

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

Our strategies to increase the availability of affordable, accessible housing include aggressively pursuing additions to the housing supply through the use of government subsidies and incentives as well as public/private partnerships. During 2016 HACSA completed construction on a multi-family housing complex in North Eugene. The complex, named Bascom Village, is a 101 unit complex which was developed in two phases. Phase I, developed by St. Vincent de Paul, has 51 units and was ready for occupancy in October, 2015. Phase II, completed by HACSA in 2016, has 48 units and is 100 percent occupied. In 2016 HACSA also broke ground on a project called The Oaks at 14th. This project, constructed in partnership with Sponsor's Inc., will house 54 ex-offenders in West Eugene and be completed in April 2017. HACSA will begin rehabilitation of an existing affordable housing development 32-unit affordable housing development in the summer of 2017. This will ensure these units are not lost from the inventory of affordable units. At the present time there are over 2 other projects in HACSA's development pipeline, which are target an additional 150 units.

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,

HACSA continues to believe that the lack of availability of affordable, accessible housing is a problem in our community and therefore, had maintained its efforts to promote affordable, accessible housing in addition to our efforts to overcome the more specific impediments which are directly related to the federal Fair Housing Act. Three major impediments to providing equal housing to populations were identified in development of the annual plan as follows:

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

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

- Participating in community engagement and is very involved in area- wide Fair Housing planning and efforts.
- Joining various relevant boards, including the Rental Owners Association (ROA), Human Rights Commission, Housing Policy Board, United Way Equity Coalition and Poverty Homeless Commission.
- Executive Director Jacob Fox is on the Poverty and Homelessness Board, and chairs their facilities committee; in that position Jacob strives to further the goals of Fair Housing.
- Rent Assistance Division Director Beth Ochs has joined the board of the Eugene/Springfield Rental Owners Association (ROA). In that role, Beth makes regular presentations to the ROA on topics related to Fair Housing.
- Real Estate Development Director, Steve Ochs is on the Housing Policy Board which sets local policy regarding housing and works to further Fair Housing Goals.
- Using every opportunity to make regular presentations to Springfield/Eugene groups including Eugene City Club, the University of Oregon, Chambers of Commerce and the Fair Housing Conference.
- Collaborating to create a central, county-wide housing waiting list so that when an individual contacts any agency in the County they will have access to all housing opportunities from numerous providers.
- HACSA continues to support Blacks in Government at their annual celebration and educational event.
- HACSA mandated a 4 hour all-staff training in Fair Housing laws.
- Updated Fair Housing information was added during a recent revision of the Section 8 program briefing packets.
- Section 8 Division leadership participates annually in the University of Oregon Internship Fair. This is an opportunity to inform students about HACSA's work in the community to promote Fair Housing.

- HACSA coordinated a community action committee in conjunction with its development of The Oaks at 14th, a 54 unit complex currently being developed as a LIHTC. This complex will serve ex-offenders who will receive on-site case management thru Sponsors.
- HACSA has produced updated maps showing concentrations of poverty in Lane County.
- HACSA has a presence on the Human Rights Commission and the United Way Equity Coalition.

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

- HACSA continues to support the work of the Inclusion Council (IC), an internal committee charged with scheduling training sessions for employees that focus on cultural differences. All employees are required to attend two per year. For the coming year, the IC has a goal to provide eight training sessions.
- During 2015 the IC coordinated 4 trainings with an average attendance of 21 employees. During the first four months of 2016, the IC coordinated 3 trainings with an average attendance of 20 employees.
- HACSA conducts targeted recruitments for bilingual employees. At the present time there are 7 bilingual employees (English/Spanish). HACSA also has staff members proficient in German, Polish, Hindi and French.
- HACSA is currently working on adding a program called Language-Line. This product will facilitate translations for non-English speakers trying to work with HACSA when their language is not one spoken by HACSA bi-lingual staff.
- HACSA was a participant in the Centro Latino Americano Health Fair.
- HACSA, along with staff from Centro Latino Americano, administered a Meyer Memorial Grant aimed at creating educational materials about fair housing and access to low income housing for Spanish speaking community members. Staff contacted 365 individuals by phone or mail and described two significant changes to Oregon laws affecting Section 8 renters. The first made it illegal for a landlord to reject an applicant because the applicant holds a Section 8 voucher. The second change created a fund to reimburse landlords for tenant damage upon move-out up to \$5000. This means that move-in deposits can be lower without landlords risking huge out of pocket expenses to return a rental unit to good condition.
- One of the products of the regional Equity and Opportunity Assessment was the creation of a composite map that shows where in the community there are more vulnerable populations living. The composite map combines people with Latino ethnicity, minority, youth, seniors, single headed households, and persons with a disability to see which census tracts have the greatest number of populations that may experience marginalization or disadvantages. HACSA uses this map to target outreach.

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

- Quarterly meetings at VA to expedite referrals for homeless vets
- VASH vouchers in use at 12/31/2015 = 168; compared to 143 as of 12/31/2014
- HACSA is administering an Emergency Housing Assistance (EHA) grant which assists VASH voucher holders with miscellaneous costs related to lease-up. During the last grant-year, the total amount expended was \$30,209.
- Quarterly meetings with Shelter Plus Case service providers to expedite referrals for S+C Program
- Shelter Plus Care program participants at 12/31/2015 = 71; compared to 92 as of 12/31/2014
- HACSA Shelter Plus Care program staff has recalculated rent-reasonableness, making it easier for participants to find affordable units in good neighborhoods.
- HACSA has 40 ADA units in public housing
- HACSA has 42 ADA units in LIHTC properties
- Reasonable accommodations requested by Public Housing residents in calendar 2015 equaled 112. 99 of these were approved.
- Reasonable accommodations requested by Section 8 voucher-holders in the fiscal year ended 9-30-2015 equaled 94. 44 of these were approved.
- National Alliance on Mental Illness (NAMI) provides resident services at New Winds, an 18-unit LIHTC project in Florence, Oregon
- HACSA, 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 HACSA has made a strong commitment to promoting Fair Housing rights and Fair Housing choice by providing information regarding Fair Housing and Fair Housing choice to applicants, residents and staff. Following is a list of actions that HACSA has taken:

- The Fair Housing logo “Equal Housing Opportunity” is prominently displayed on location signs at HACSA’s two administrative offices and at its various housing complexes
- The Fair housing logo is prominently displayed on signs/banners at various HACSA locations, announcing the availability of low-income rental units
- The Fair Housing logo is on HACSA letterhead and business cards

- HACSA’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed in the lobbies of HACSA’s two administrative offices and in public areas at its various housing complexes
- HACSA’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed on HACSA’s website: www.hacsa.org
- Don Bucholtz, HACSA’s Public Housing Intake Coordinator, is listed on HACSA’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status, and in HACSA’s Statement of Policy, as HACSA’s 504/ADA Coordinator.
- HUD Form 928.1 (“We Do Business in Accordance With the Federal Fair Housing Law” poster) is prominently displayed in English and Spanish in HACSA’s two administrative offices and in public areas at the various housing complexes
- HUD Form 1686-FHEO (*Fair Housing – It’s Your Right* Pamphlet) is available in English and Spanish in HACSA’s two administrative offices
- *Filing a Housing ‘Discrimination Complaint* - a pamphlet created by Consumer Action with funding from the U.S Department of Housing and Urban Development (HUD) is available in English and Spanish at HACSA’s two administrative offices
- Applicants or residents with questions about Fair Housing issues are referred, or directed via website link, to the Fair Housing Council of Oregon, Legal Aid Services of Oregon (LSAO) or Lane County Law & Advocacy Center (LCLAC), the Oregon Advocacy Center (OAC), the Lane Independent Living Alliance (LILA), the Oregon Bureau of Labor and Industries (BOLI), and/or to the US Department of Housing & Urban Development (HUDF) / Office of Fair Housing and Equal Opportunity (FHEO)
- HACSA 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
- HACSA’s Policy on Reasonable Accommodation is prominently displayed in HACSA’s two administrative offices and in public areas of its various housing complexes. It is available to any applicant or resident and is included ad Appendix D in HACSA’s Statement of Policies. It is also posted on HACSA’s website at www.hacsa.org
- Applicants for, and recipients of, housing assistance from HACSA are advised of their right to request a reasonable accommodation to their disability. Information regarding reasonable accommodations is provided on the pre-application for assistance, in initial determination of ineligibility, in the public housing and assisted housing lease agreements, in notices of eviction, in periodic resident newsletters, and discussed during the intake process during any informal settlement discussions and during other discussions with applicants and/or residents when inquiries are made about accommodating disabilities.
- Under the terms of a voluntary compliance agreement between the us department of HUD/FHEO and HACSA, HACSA’s pre application for housing assistance requests information from applicants – which is not used in determining their eligibility for housing regarding their ethnicity, race, and disability status. This information is recorded and retained and available to HUD upon request

- HACSA created the diversity committee in April 2000. That committee was renamed the Inclusion Council in 2012. As a function of that committee, HACSA has completed outreach presentations to agencies representing youth, seniors/elderly, persons with physical and/or mental disabilities, and minorities, to help assure that a broad base of the community has access to information about the availability of housing. This outreach effort continues on an ongoing basis and representatives from a number of those social service/advocacy agencies serve on HACSA's family self-sufficiency advisory board, the inclusion council has also done outreach at the Festival Latina, the Asian celebration, project homeless connect, and other community gatherings
- HACSA maintains reception staff – as well as other staff in all departments that have ongoing contact with residents who are bilingual/bicultural in Spanish and English
- HACSA has also worked to increase the ability of low income community members to access housing by developing an innovative program in cooperation with community lending-works, the lending arm of NEDCO (neighborhood economic development corporation), to assist applicants to its agency-owned housing programs, in obtaining loans to cover the cost of their security deposits, as they lease up with HACSA. HACSA indemnifies the loans, guaranteeing payment to NEDCO, should the applicant default.

APPENDIX B: ADMIN PLAN MODIFICATIONS

KEY MODIFICATIONS TO HACSA'S ADMINISTRATIVE PLAN, PROPOSED EFFECTIVE DATE 10-1-17

Previous Policy	Proposed Policy	Required Change	Impact
Any family self-certifications must be made in a format acceptable to the PHA and must be signed in the presence of a PHA representative or notary public.	Any family self-certifications must be made in a format acceptable to the PHA and may be signed in the presence of a PHA representative or notary public.	No	Reduced impact on applicants and tenants who will no longer be required to present self-certifications in person to HACSA or seek out a notary public.
Annual/Biennial HQS Inspection. If the family misses the first scheduled appointment without requesting a new inspection date, the PHA will automatically schedule a second inspection. If the family misses two scheduled inspections without PHA approval, the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.	Annual/Biennial HQS Inspection. If the family misses the first scheduled appointment without requesting a new inspection date, the PHA will post a note on the door of family's unit. Family will have two business days to contact PHA. If the family does not contact the PHA within two business days the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.	No	Positive impact for tenants as they will have notification at their unit of having missed an inspection.
The maximum length of time that HAP may be abated is 90 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection. Reasonable notice of HAP contract termination by the PHA is 30 days.	The maximum length of time that HAP may be abated is 90 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection. Reasonable notice of HAP contract termination by the PHA is 60 days.	No	Provides tenant additional time to move if a HAP contract is terminated. Aligns with the state of Oregon's no cause notice of 60 days to a tenant.

Previous Policy	Proposed Policy	Required Change	Impact
Any documents needed for verification must be the original (not photocopies) and generally must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible. Print-outs from Web pages are considered original documents.	Any documents needed for verification must be the original (not photocopies) and generally must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible. Print-outs from Web pages, emails and faxes are considered original documents.	No	Allows PHA to accept documentation in multiple formats thus streamlining processes.
<p>HACSA is adopting a new preference based system of selection from the waiting list. In order to ensure that families on HACSA's waiting list at the time the new selection criteria becomes effective are treated fairly, selection will take place as follows:</p> <p>Category 1: Families on the waiting list at the time the new selection criteria becomes effective who claim a preference will be selected first, based on current lottery number. Category 2: Families not on the waiting list at the time the new selection criteria becomes effective who claim a preference will be selected second, based on date and time of application. Category 3: Families on the waiting list at the time the new selection criteria becomes effective who do not claim a preference will be selected third, based on current lottery number. Category 4: Families not currently on the waiting list at the time the new selection criteria becomes effective who apply and do not claim a preference will be selected last, based on date and time of application.</p>	<p>Applicants that qualify and are referred from a HACSA approved entity for HACSA's Local Preferences will be selected first from the waitlist based on date of application.</p> <p>All other applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers.</p>	No	Allows PHA to accept applications from applicants during an open lottery. This provides all applicants applying an equal opportunity to access the waiting list as opposed to being on a first come, first served basis.
The family must provide the required documentation to the PHA in person, during regular business hours, within 14 days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails to provide the required documentation within 14 business days.	The family may provide the required documentation to the PHA in person, during regular business hours, within 14 days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails to provide the required documentation within 14 business days.	No	Allows PHA to accept documentation via e-mail, fax, and standard mail as well as in person.

Previous Policy	Proposed Policy	Required Change	Impact
<p>When applicants with disabilities are denied assistance, the notice of denial must inform them of the PHA’s informal review process and their right to request an informal hearing. In addition, the notice must inform applicants with disabilities of their right to request reasonable accommodations to participate in the informal hearing process.</p>	<p>When applicants with disabilities are denied assistance, the notice of denial must inform them of the PHA’s informal review process and their right to request an informal review. In addition, the notice must inform applicants with disabilities of their right to request reasonable accommodations to participate in the informal hearing review.</p>	<p>Yes</p>	<p>Distinguishes between the review process for applicants and current participants by referring to one process as “a review” while the other process is referred to as an “informal hearing”</p>
<p>Be at least 24 years old by December 31 of the award year for which aid is sought Be an orphan or a ward of the court through the age of 18, Be a veteran of the U.S. Armed Forces. Be a graduate or professional student Be married Have one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)</p>	<p>The individual is at least 24 years old by December 31 of the award year for which aid is sought The individual is an orphan, in foster care, or a ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual’s state of legal residence The individual is a veteran of the U.S. Armed Forces or is currently serving on active duty in the Armed Forces for other than training purposes The individual is a graduate or professional student The individual is married The individual has one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent) The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by: A local educational agency homeless liaison. The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director A financial aid administrator</p>	<p>No</p>	<p>Provides a broader definition of what defines an independent student thus allowing more persons to benefit from the deductions allowed under the independent student rule.</p>

Previous Policy	Proposed Policy	Required Change	Impact
	<p>The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances If the PHA determines that an individual meets the definition of a vulnerable youth such a determination is all that is necessary to determine that the person is an independent student for the purposes of using only the student’s income for determining eligibility for assistance. • A vulnerable youth is an individual who meets the U.S. Department of Education’s definition of independent student in paragraphs (b), (c), or (h), as adopted in Section II of FR Notice 9/21/16:</p> <p>The individual is an orphan, in foster care, or a ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older</p> <p>The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual’s state of legal residence</p> <p>The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:</p> <p>A local educational agency homeless liaison The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director A financial aid administrator</p>		
Deny assistance if any PHA has ever terminated assistance under the program for any member of the family.	Remove this policy	No	Provides additional housing subsidy opportunities to persons who otherwise would have potentially been denied.

Previous Policy	Proposed Policy	Required Change	Impact
<p>If the PHA has established an exception payment standard for a designated part of an FMR area and a family's unit is located in the exception area, the PHA must use the appropriate payment standard for the exception area.</p>	<p>If the PHA has established an exception payment standard for a designated part of a zip code area or FMR area and a family's unit is located in the exception area, the PHA must use the appropriate payment standard for the exception area.</p>	<p>Yes</p>	<p>Includes zip code in establishing exception payment standards</p>
<p>The PHA will verify a student's independence from his/her parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following: Either reviewing and verifying previous address information to determine whether the student has established a household separate from his/her parents for at least one year or reviewing and verifying documentation relevant to determining whether the student meets the U.S. Department of Education's definition of independent student (see section 3-II.E) Reviewing prior year income tax returns to verify whether a parent has claimed the student as a dependent Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0.</p>	<p>Reviewing the student's prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education's definition of independent student (see section 3-II.E) Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0, except in cases in which the PHA determines that the student is a vulnerable youth (see section 3-II.E)</p>	<p>No</p>	<p>Allows PHA to verify student status regardless of whether parent claimed student as a dependent on their income tax or not.</p>
<p>If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an environmental intervention blood lead level, the PHA must complete a risk assessment of the dwelling unit.</p>	<p>If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an environmental intervention blood lead level, the PHA must complete a risk assessment of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider.</p>	<p>Yes</p>	<p>Provides a deadline to notify the public health department or other medical health care provider.</p>

Previous Policy	Proposed Policy	Required Change	Impact
HUD requires the PHA to make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 5 percent decrease in the Fair Market Rent that goes into effect at least 60 days before the contract anniversary date.	HUD requires the PHA to make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 10 percent decrease in the Fair Market Rent that goes into effect at least 60 days before the contract anniversary date.	Yes	Broadens the scope in which a rent reasonless determination is required.
If a family requests permission to move with continued assistance based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will request documentation in accordance with section 16-IX.D of this plan. The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.	If a family requests permission to move with continued assistance based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will request documentation in accordance with section 16-IX.D of this plan. The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file. The PHA has adopted an emergency transfer plan, which is included as exhibit 16-3 to this plan	Yes	Provides additional guidance for victims of domestic violence in regards to housing options.
During the annual reexamination process, the PHA will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from his/her parents based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.	During the annual reexamination process, the PHA will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from his/her parents or is considered a vulnerable youth based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.	Yes	Provides a broader definition of what defines a student, thus allowing more persons to benefit from the deductions allowed under the independent student rule.

Previous Policy	Proposed Policy	Required Change	Impact
Did not exist	<p>Units Selected Non-Competitively [FR Notice 1/18/17] For certain public housing projects where the PHA has an ownership interest or control and will spend a minimum amount per unit on rehabilitation or construction, the PHA may select a project without following one of the two processes above.</p> <ul style="list-style-type: none"> • <u>PHA Policy</u> • The PHA will reserve the right attach PBVs to projects owned by the PHA as described above. 	No	This will preserve affordable housing stock in Lane County.

Previous Policy	Proposed Policy	Required Change	Impact
Did not exist	<p>PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them.</p> <p>In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. In order to be excepted, the unit must meet the following conditions:</p> <ul style="list-style-type: none"> • The unit must be covered under a PBV HAP contract that first became effective on or after 4/18/17; and • In the five years prior to the date the PHA either issued the RFP or selected the project, the unit either: <ul style="list-style-type: none"> - Received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for Elderly (Section 202), Housing for Persons with Disabilities (section 811), Rent Supplement (Rent Supp), or Rental Assistance Program (RAP); or - The unit was subject to a rent restriction through a loan or insurance program as a result of Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for Elderly Persons (Section 202), or Housing for Persons with Disabilities (Section 811) <p>Units that have previously received either PBV or HCV assistance are not covered under the exception.</p> <p>PHA Policy The PHA may project-base any of the above unit types.</p>	No	This will preserve and increase affordable housing stock in Lane County.

Previous Policy	Proposed Policy	Required Change	Impact
<p>Didn't exist</p>	<p>PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV assistance. To qualify for the exception, the unit must: Be covered by a PBV HAP contract that first became effective on or after 4/18/17; and In the five years prior to the date the PHA either issued the RFP under which the project was selected or the PHA selected the project without competition, the unit met at least one of the two following conditions: The unit received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for the Elderly (Section 303), Housing for Persons with disabilities (Section 811), the Rental Supplement program, The unit was subject to a rent restriction as a result of one of the following HUD loans or insurance programs: Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for the Elderly (Section 202), or Housing for Persons with Disabilities (Section 811) Units that were previously receiving PBV assistance are not covered by the exception. Both existing and rehabilitation units are eligible for this exception. Newly constructed units qualify if they meet the definition of replacement unit described in FR Notice 1/18/17. The PHA may have PBV units that are subject to the per project cap exception.</p>	<p>No</p>	<p>To reach a wider tenant base with supportive services.</p>

Previous Policy	Proposed Policy	Required Change	Impact
<p>The PHA will not require families living in excepted units to receive supportive services. Therefore, excepted units will be limited to units in a single family building and those made available for elderly or disabled families.</p>	<p>The PHA may develop housing for occupancy by families in need of services. This may include disabled families, families in need of particular supportive services, or families participating in the Family Self-Sufficiency (FSS) program. Families will not be required to accept and receive supportive services for the exception to apply to the unit. The following types of services may be provided depending on the needs of the family:</p> <ul style="list-style-type: none"> Transportation for activities such as grocery shopping, attending medical and dental appointments; Supervised taking of medications; Treatment for drug rehabilitation in the case of current abusers; Treatment for alcohol addiction in the case of current abusers; Training in housekeeping and homemaking activities; Family budgeting; Child care; Parenting skills; Computer labs; and Work skills development and job training. 	<p>No</p>	<p>Reaches a wider tenant base with supportive services.</p>

Previous Policy	Proposed Policy	Required Change	Impact
Did not exist	<p>Additional Project-Based Units [FR Notice 1/18/17] The PHA may project-base an additional 10 percent of its units above the 20 percent program limit, if the units:</p> <ul style="list-style-type: none"> • Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302). • Are specifically made available to house families that are comprised of or include a veteran. <ul style="list-style-type: none"> - <i>Veteran</i> means an individual who has served in the United States Armed Forces. • Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403. • Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates. <p><u>PHA Policy</u> The PHA may set aside units above the 20 percent program limit.</p>	No	Reaches a wider tenant base with supportive services.
For families starting the program effective January 1, 2017 or later, the PHA will conduct an HQS inspection semi-annually while the family is receiving homeownership assistance.	Policy removed	No	Allows families receiving home ownership assistance to assess their own housing standards.

Previous Policy	Proposed Policy	Required Change	Impact
<p>Families will not be permitted to use any other special housing types unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.</p>	<p>Families will be permitted to use the Single Room Occupancy special housing type and Cooperative Housing special housing type. Families will not be permitted to use any other special housing types unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities</p>	<p>No</p>	<p>Allows families to access a wider array of housing options.</p>
<p>The PHA must reimburse a family for any underpayment of subsidy, regardless of whether the underpayment was the result of staff-caused error or staff or owner program abuse. Funds for this reimbursement must come from the PHA's administrative fee reserves.</p>	<p>The PHA must reimburse a family for any underpayment of subsidy, regardless of whether the underpayment was the result of staff-caused error or staff or owner program abuse. Funds for this reimbursement must come from the PHA's administrative fee reserves.</p> <p>However, based on PIH Notice 2016-4 the PHA's field office has advised that underpayment of subsidy can be reimbursed by using HAP, HAP RNP and HUD held program reserves for the calendar year. If HAP, HAP RNP and HUD held reserves have been exhausted for the Calendar Year in which the correction is needed then the PHA would need to utilize Admin Fees or non-federal funds to reimburse participants.</p>	<p>Yes</p>	<p>Allows different funding sources to reimburse families for underpayment of subsidy.</p>

APPENDIX C: ACOP MODIFICATIONS

KEY MODIFICATIONS TO HACSA'S ADMISSIONS AND CONTINUED OCCUPANCY POLICIES (ACOP), PROPOSED EFFECTIVE DATE 10-1-17

Previous Policy	Proposed Policy	Required Change	Impact
Form HUD 50066	Form HUD 5382	Yes	Compliance: must use current VAWA form.
<p>ACOP Section 3 – HACSA will perform criminal background checks through local law enforcement for all adult household members</p> <p>HACSA may use the OSP LEDS database and court records to screen applicants for admission.</p>	<p>HACSA will perform criminal background checks through local law enforcement, or through a commercial screening company, for all adult household members</p> <p>HACSA may use the OSP LEDS database and court records or a commercial screening company to screen applicants for admission.</p>	No	Allows for more flexibility for HACSA to accomplish background checks
<p>ACOP Section 3 – Other Permitted Reasons for Denial of Admission: Previous Behavior</p>	<p>In the case of money owing to another PHA, or the owner of a rental or assisted property, the Applicant will be notified by HACSA of the amount owed. The Applicant will be given 14 days to provide HACSA with proof of payment or documentation that an repayment agreement has been reached and that the Applicant is considered to be in good standing/up to date on payments.</p> <p>In the case of money owing to HACSA, the Applicant will be notified by HACSA of the total amount owed. The Applicant will be given 14 days to provide HACSA with proof of payment in full.</p>	No	

Previous Policy	Proposed Policy	Required Change	Impact
<p>ACOP Section 4 – Closing the Waiting List</p> <p>HACSA will publish a notice announcing the closing of the waiting list when the estimated waiting period for a development reaches 12 months of more for the most current applicants.</p> <p>HACSA will announce the reopening of the waiting list at least 14 calendar days prior to the date applications will first be accepted.</p>	<p>HACSA will publish a notice announcing the closing of the waiting list when the estimated waiting period for a development reaches 12 months of more for the most current applicants. HACSA will publish a notice announcing the closing of the waiting list and notify community agencies.</p> <p>HACSA will announce the reopening of the waiting list at least 14 calendar days prior to the date applications will first be accepted. HACSA will publish a notice announcing the opening of the waiting list and notify community agencies.</p>	Yes	Will bring ACOP language into compliance with expanded 2013 rules (published in Nov 2016) and 2017 PIH Notice 3.
<p>ACOP Section 4 – Selection Method: Local Preferences</p> <p>Victims of domestic violence, dating violence, sexual assault or stalking living in properties managed by HACSA, (currently Abbie Lane, Fourteen Pines, and Village Oaks), whose situation requires moving out of the current unit.</p> <p>Persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by HACSA, who cannot be reasonably accommodated in those properties.</p>	<p>Victims of domestic violence, dating violence, sexual assault or stalking living in Section 8 properties managed by HACSA, (currently Abbie Lane, Fourteen Pines, and Village Oaks), or holding a Housing Choice Voucher issued by HACSA, whose situation requires moving out of the current unit.</p> <p>Persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by HACSA, or holding a Housing Choice Voucher issued by HACSA, who cannot be reasonably accommodated in those properties.</p>	No	Provides additional flexibility to residents in need of emergency and high-priority transfers.

Previous Policy	Proposed Policy	Required Change	Impact
<p>ACOP Section 4 –</p> <p>Income targeting goals will also be considered in accordance with HUD requirements and HACSA policy.</p>	<p>Income targeting and deconcentration goals will also be considered in accordance with HUD requirements and HACSA policy.</p> <p>To meet deconcentration goals, effective 10/1/17, admission to Pengra Court Apartment will be limited to families whose gross income falls between the Very Low Income Limit and the Low Income Limit.</p>	No	To meet income deconcentration goals at Pengra Court
<p>ACOP Section 5 – Time Limit for Unit Offer Acceptance or Refusal</p> <p>Applicants must accept or refuse a unit offer within the 3 business days of the date of the unit offer.</p> <p>Offers made by telephone will be confirmed by letter.</p>	<p>Time Limit for Unit Offer Acceptance or Refusal</p> <p>Applicants must accept or refuse a unit offer within the 3 business days of the date of the unit offer. Applicants who fail to respond within 3 business days will be considered to have refused the unit.</p> <p>Offers made by telephone will be confirmed by letter. Offers made by mail will be given three additional days for mailing.</p>	No	Clarify language
<p>ACOP Section 6 – Medical expenses</p> <p>The most current IRS Publication 502, Medical and Dental Expenses, will be used as a reference to determine the costs that qualify as medical expenses.</p>	<p>The most current IRS Publication 502, Medical and Dental Expenses, will be used as a reference to determine the costs that qualify as medical expenses.</p> <p>In addition to costs allowed by the IRS, HACSA will allow all necessary cost incurred for service and assistance animals.</p>	Yes	Compliance

Previous Policy	Proposed Policy	Required Change	Impact
ACOP Section 8 – Leasing	<p>PHAs must adopt smoke-free policies, which must be implemented no later than July 18, 2018. A model policy is attached as Exhibit 8-1</p> <ul style="list-style-type: none"> • Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking • HACSA’s smoke free policy <p>Smoke-free policies</p>	Yes	Compliance – meets the HUD requirements for Smoke-Free Housing Rule and implementation of VAWA 2013.
<p>ACOP Section 10 – Pet Policy</p> <p>The following animals are not considered common household pets:</p> <p>Reptiles</p> <p>Rats or mice</p> <p>Insects...</p>	<p>The following animals are not considered common household pets:</p> <p>Reptiles</p> <p>Insects</p>	Yes	<p>Compliance – allow rats/mice per HUD guidance</p> <p>Optional - Eliminated specific breed restrictions for dogs, for redundancy reasons with current weight and size restrictions.</p>
<p>ACOP Section 10 – Pet Policy</p> <p>Pet Deposits in Elderly/Disabled complexes.</p> <p>Residents are required to pay a pet deposit in addition to any other required deposits. The amount of the deposit is \$150...</p>	<p>Residents are required to pay a pet deposit in addition to any other required deposits. HACSA has set the reasonable fixed deposit amount at \$200...</p>	No	Raising cost of pet damages

Previous Policy	Proposed Policy	Required Change	Impact
<p>ACOP Section 10 –</p> <p>Pet Deposits in General Occupancy complexes</p> <p>Residents are required to pay a pet deposit of \$150, in addition to any other required deposits.</p>	<p>Residents are required to pay a pet deposit of \$200, in addition to any other required deposits.</p>		

Previous Policy	Proposed Policy	Required Change	Impact
ACOP Section 12 – Emergency Transfers	<p>The VAWA 2013 final rule requires the PHA to adopt an emergency transfer plan for victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>A verified incident of domestic violence, dating violence, sexual assault, or stalking. For instances of domestic violence, dating violence, sexual assault, or stalking, the threat may be established through documentation outlined in section 16-VII.D, or by any proof accepted by the PHA.</p> <p>The PHA will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. The PHA will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available. If an internal transfer to a safe unit is not immediately available, the PHA will assist the resident in seeking an external emergency transfer either within or outside the PHA’s programs.</p> <p>The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan.</p>		Will bring ACOP language into compliance with expanded 2013 rules (published in Nov 2016) and 2017 PIH Notice 3.

Previous Policy	Proposed Policy	Required Change	Impact
ACOP Section 12 – Types of resident-requested transfers	Such circumstances may, at HACSA’s discretion, include an assessment by law enforcement indicating that a family member is the actual or potential victim of a criminal attack, retaliation for testimony, or a hate crime, or domestic violence, dating violence, sexual assault, or stalking. For instances of domestic violence, dating violence, sexual assault, or stalking, the threat may also be established through documentation outlined in section 16 VII.D, or by any proof accepted by the PHA.	Yes	The removed types of high-priority transfers are now considered emergency transfers under VAWA 2013
ACOP Section 13 – Mandatory Lease Provisions	<p>A record of arrest(s) will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity. [This language appears multiple times under different provisions]</p> <p>A pattern of illegal drug use means more than one incident of any use of illegal drugs during the previous six months.</p> <p>A pattern of such alcohol abuse means more than one incident of any such abuse of alcohol during the previous six months.</p>	Yes	Clarifies HACSA’s definitions and requirements regarding mandatory reasons for lease termination, and for use of arrest records.

Previous Policy	Proposed Policy	Required Change	Impact
ACOP Section 13- Consideration of Circumstances	<p>While a record of arrest(s) will not be used as the sole basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:</p> <p>Any statements made by witnesses or the participant not included in the police report</p> <p>Whether criminal charges were filed</p> <p>Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal</p> <p>Any other evidence relevant to determining whether or not the participant engaged in disqualifying activity</p> <p>Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property.</p>	Yes	Clarifies HACSA's policies and requirements around the use of arrest records and police reports.

Previous Policy	Proposed Policy	Required Change	Impact
<p>ACOP Section 14: Grievance Procedures</p> <p>The PHA must provide the family a notice of VAWA rights as well as the HUD VAWA self-certification form (form HUD-50066) in accordance with the Violence against Women Reauthorization Act of 2013, and as outlined in 16-VII.C. The notice and self-certification form must accompany the written notification of the denial of the resident's right to an informal settlement discussion.</p>	<p>Moved to a different section</p>	<p>Yes</p>	<p>These documents are now required by HUD to be given to residents at specified times different than in the current policy.</p>
<p>ACOP Section 16: Establishing Flat Rents and Public Housing Maximum Rents</p>	<p>Removed section on Maximum Rents</p>	<p>Yes</p>	<p>Maximum rents are no longer used by HUD</p>
<p>ACOP Section 16: General Repayment Agreement Guidelines</p> <p>HACSA does not require a down-payment.</p>	<p>HACSA may require a down payment.</p>	<p>No</p>	<p>Increases HACSA's flexibility in collecting money owed.</p>
<p>ACOP Section 16: Reporting Requirements for Children with Environmental Intervention Blood Lead Level</p>	<p>Changed to "Elevated Blood Lead Level" throughout section.</p>	<p>Yes</p>	<p>Change in HUD language</p>

Previous Policy	Proposed Policy	Required Change	Impact
<p>ACOP Section 16: VAWA Notification</p> <p>HACSA will post the information regarding VAWA in its offices and on its Web site. This information is also provided to applicants during the intake process and will available to anyone who requests it.</p>	<p>HACSA will post the information regarding VAWA in its offices and on its Web site. This information is also provided to applicants during the intake process and will available to anyone who requests it.</p> <p>A notice of occupancy rights under VAWA to applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)</p> <p>A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)</p> <p>A copy of the PHA’s emergency transfer plan (Exhibit 16-3)</p> <p>A copy of HUD’s Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)</p> <p>The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibit 16-1)</p> <p>Contact information for local victim advocacy groups or service providers</p>	<p>Yes</p>	<p>Compliance with VAWA 2013</p>

Previous Policy	Proposed Policy	Required Change	Impact
<p>ACOP Section 16: VAWA Notification</p> <p>The VAWA information provided to applicants and tenants will consist of the notice of VAWA rights in Exhibit 16-1 and a copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.</p>	<p>The VAWA information provided to applicants and participants will consist of the notices in Exhibit 16-1 and 16-2</p>	<p>Yes</p>	<p>Compliance with VAWA 2013</p>

APPENDIX D: SAFETY & CRIME PREVENTION: VAWA

HACSA EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

Attachment: Certification form HUD-5382

Housing Authority and Community Services Agency of Lane County (HACSA)

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Public Housing Program,

Assisted Housing Program (Abbie Lane, Village Oaks, and 14 Pines),

and

Housing Choice Voucher Program

Emergency Transfers

HACSA is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),¹ HACSA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of HACSA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the PHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

¹Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

²Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S.

Department of Housing and Urban Development (HUD), the federal agency that oversees that the **Public Housing, Assisted Housing, and Housing Choice Voucher programs** are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer, if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify HACSA's management office and submit a written request for a transfer to **any HACSA office**. HACSA will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under HACSA's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Confidentiality

HACSA will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HACSA written permission to release the information on a time-limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person or persons that committed an act of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence against Women Act for All Tenants for more information about HACSA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

HACSA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. HACSA will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. HACSA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If HACSA has no safe and available units for which a tenant who needs an emergency transfer is eligible, HACSA will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, HACSA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Emergency Transfers: Public Housing (PH) Program

If you are a public housing resident and request an emergency transfer as described in this plan, HACSA will attempt to assist you in moving to a safe unit quickly. HACSA will make exceptions as required to policies restricting moves.

Emergency transfers for which you are not required to apply for assistance include the following:

- Public housing unit in a different development
- Public housing unit in the same development, if you determine that the unit is safe

At your request, the PHA will refer you to organizations that may be able to further assist you.

You may also request an emergency transfer to the following programs for which you are required to apply for assistance:

- HCV tenant-based program
- HCV project-based assistance
- Assisted housing program

At your request, HACSA will refer you to organizations that may be able to further assist you.

Emergency Transfers: Assisted Housing Program (Village Oaks, Abbie Lane, 14 Pines)

If you are a resident and request an emergency transfer as described in this plan, HACSA will attempt to assist you in moving to a safe unit quickly. HACSA will make exceptions as required to policies restricting moves.

At your request, the PHA will refer you to organizations that may be able to further assist you.

You may also request an emergency transfer to the following programs for which you are required to apply for assistance:

- Public housing program
- HCV tenant-based program
- HCV project-based assistance

At your request, the O/A will refer you to organizations that may be able to further assist you.

Emergency Transfers: Housing Choice Voucher (HCV) Program

Tenant-based assistance: If you are a participant in the tenant-based HCV program and request an emergency transfer as described in this plan, the PHA will assist you to move to a safe unit quickly using your existing voucher assistance. The PHA will make exceptions to program regulations restricting moves as required.

At your request, the PHA will refer you to organizations that may be able to further assist you.

Project-based assistance: If you are assisted under the project-based voucher (PBV) program, you may request an emergency transfer under the following programs for which you are not required to apply:

- Tenant-based voucher, if available
- Project-based assistance in the same project (if a vacant unit is available and you determine that the vacant unit is safe)
- Project-based assistance in another development owned by the PHA

Emergency transfers under VAWA will take priority over waiting list admissions for these types of assistance.

You may also request an emergency transfer under the following programs for which you are required to apply:

- Public housing program
- PBV assistance in another development not owned by the PHA

At your request, the PHA will refer you to organizations that may be able to further assist you.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse, and Incest National Network's National Sexual Assault Hotline at 1-800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking include:

- Lane County District Attorney's Office, Victim Services Division (www.lanecounty.org)
- Sexual Assault Task Force (SAFT) – Referral services for victims of violence (www.oregonsaft.org)
- Sexual Assault Support Services (SASS) – Support survivors of sexual assault (www.sass-lane.org)
- Womenspace – Housing for victims of domestic violence (www.womenspaceinc.org)
- Kids'FIRST – Advocates for abused children (www.kidsfirstcenter.net)
- Court Appointed Special Advocates (CASA) – Help for abused children www.casa-lane.org
- Relief Nursery – Child abuse and neglect prevention agency (www.reliefnursery.org)

APPENDIX E: PET POLICY

CHANGES TO PET RULES & POLICIES

Previous Policy	Proposed Policy	Required Change	Impact
HACSA's Assistance/ Companion/ Service Animal Guidelines	HACSA's Assistance & Service Animal Guidelines	No	Makes policy more clear. "Companion animals" does not appear as a category in HUD documents.
Pets are domesticated animals, such as a dog, cat, bird, rabbit, fish, or turtle, which are traditionally kept in the home for pleasure	Pets are domesticated animals, such as a dog, cat, bird, rodent , rabbit, fish, or turtle, which are traditionally kept in the home for pleasure	Yes	To match language in HUD documents and federal regulations.
	Assistance & Service Animals are not pets	No	Clarifies what is and is not a pet.
H. HACSA shall refuse to register a pet if: 1) It is not a common household pet (as defined and allowed by HACSA). 2) The Resident fails to provide complete pet registration information or fails to update the registration as requested by HACSA or, if HACSA reasonably determines, based on the Resident's habits and practices, that the Resident will be unable to keep the pet in compliance with the Pet Rules and Policies and other lease obligations.	H. HACSA shall refuse to register a pet if: 1) It is not a common household pet (as defined and allowed by HACSA). 2) The Resident fails to provide complete pet registration information or fails to update the registration as requested by HACSA or, if HACSA reasonably determines, based on the Resident's habits and practices, that the Resident will be unable to keep the pet in compliance with the Pet Rules and Policies and other lease obligations. 3) There is already another animal dwelling in the unit that would result in the resident going over the maximum number of animals as established in Section 3 of this Policy.	No	Clarifies reasonable limit on number of animals that can be allowed in a unit.

Previous Policy	Proposed Policy	Required Change	Impact
<p>h) The following breeds or mixed breeds of will not be allowed:</p> <ul style="list-style-type: none"> • German Shepherd • Rottweiler • Doberman Pinscher • Pit Bull • Chow • Spitz <p>HACSA reserves the right to prohibit other breeds, as necessary.</p>	Eliminated	No	Restriction was redundant with weight/height requirements.
3) Rodents (ONLY rabbit, guinea pig, hamster or gerbil)	3) Rabbits and Rodents	Yes	Match language in HUD documents and federal regulations.
None	An application for a pet cat or dog will not be approved if there is already a cat or dog living in the unit.	No	Clarifies limit on number of animals allowed in a unit.
The deposit for a dog or cat is \$150.00	The deposit for a dog or cat is \$200.00	No	Provides HACSA with additional coverage in case of pet damage by tenants. Law allows HACSA to set a deposit of up to \$300.

CHANGES TO ASSISTANCE & SERVICE ANIMAL GUIDELINES

Previous Policy	Proposed Policy	Required Change	Impact
HACSA's Assistance/ Companion/ Service Animal Guidelines	HACSA's Assistance & Service Animal Guidelines	No	Makes policy more clear. "Companion animals" does not appear as a category in HUD documents.

Previous Policy	Proposed Policy	Required Change	Impact
<p>Assistance Animals are animals that are needed as a reasonable accommodation for persons with disabilities. Assistance Animals are animals that work, provide assistance, perform tasks for the benefit of a person with a disability or provide emotional support that alleviates one or more identified symptoms or effects of a person’s disability. Assistance Animals may also be called Companion Animals or Service Animals, which are described below: Companion Animals are animals that do not have specific disability related training but are necessary in coping with a disability (e.g., an animal that provides emotional support to a person with a panic disorder).</p> <p>Service Animals are animals that have been trained to assist persons with a specific disability and that do, in fact, assist the person with the disability. Service Animals include animals trained to assist a person with a disability with walking, hearing, balance, self care, communication, transportation and similar activities. A seeing-eye or hearing-ear dog would be an example of a Service Animal.</p>	<p>A Service Animal is defined by the Americans with Disabilities Act (ADA) as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. A seeing-eye or hearing-ear dog would be an example of a Service Animal. The US Department of Justice specifies that providing emotional support, well-being, comfort, or companionship does not constitute “work or tasks” for purposes of this definition. The ADA requires Service Animals to be admitted to all places where the public would normally be allowed to go, unless the animal is out of control, or is not housebroken. The ADA definition of Service Animal also includes individually trained miniature horses, under certain circumstances. This policy will exclusively use the definition of “Service Animal” provided in this paragraph.</p> <p>Assistance Animals are animals that are considered a Reasonable Accommodation for persons with disabilities to live in HACSA housing, and are regulated under the Fair Housing Act (FHAct). Assistance Animals are animals that work, provide assistance, or perform tasks for the benefit of a person with a disability or provide emotional support that alleviates one or more identified symptoms or effects of a person’s disability. Assistance Animals are sometimes also referred to as Companion Animals, Support Animals, Therapy Animals, or Service Animals – in keeping with HUD guidance this policy will exclusively use the term “Assistance Animal” as defined in this paragraph.</p>	<p>Yes</p>	<p>Matches HUD definitions of Assistance Animal and Service Animal to ensure compliance with federal law.</p>

Previous Policy	Proposed Policy	Required Change	Impact
None	<p>Service Animals (as defined by the ADA) and trainee Service Animals (as defined by Oregon law) will be admitted anywhere that a member of the public would ordinarily be allowed to go, such as HACSA’s offices and public areas. A Service Animal may accompany an applicant throughout the leasing process, and will be approved through a Reasonable Accommodation as an Assistance Animal before living with the resident.</p>	Yes	Clarifies HACSA’s obligations to service animals and their owners, under Federal and State laws.
<p>Species: Assistance/Companion/Service Animals are limited to domesticated animals, such as a dog, cat, bird, rabbit, fish, or turtle.</p> <p>Size: Typically, dogs are limited to a maximum adult weight of 30 lbs. and a maximum adult shoulder height of 15”.</p> <p>Number: Typically, households are limited to one dog or one cat per household.</p> <p>Breeds: Typically, the following breeds or mixed breeds of dogs are not allowed:</p> <ul style="list-style-type: none"> • German Shepherd • Rottweiler • Doberman Pinscher • Pit Bull • Chow • Spitz 	<p>Species: Service Animals as defined under the ADA are limited to individually-trained dogs (or similarly trained miniature horses).</p> <p>While dogs are the most common kind of Assistance/Companion/Service Animal, other animals may qualify if they meet the definition provided in this policy.</p> <p>Number: If an applicant/resident requires multiple assistance animals, each animal must serve a disability-related function, and each must be individually approved through the reasonable accommodation process.</p>	No	Eliminates general limits and reinforces use of Reasonable Accommodation process for Assistance Animal applications.

Previous Policy	Proposed Policy	Required Change	Impact
<p>Spaying/Neutering: As a large housing provider, HACSA is acutely aware of its responsibility to provide safe, decent, and sanitary housing to its residents. HACSA routinely approves 50-70 Assistance/Companion/Service animals per year for its Applicants/Residents, as well as dozens of Pet animals, often in close living quarters. Supported by information from the Humane Society of the United States, Lane County Animal Regulation Authority, and Shelter Operations, Greenhill Humane Society, HACSA requires that all dogs and cats be spayed/neutered as soon as is practicable, but no later than the age of six (6) months, and that the Applicant/Resident provide adequate documentation of such sterilization (e.g., a certificate signed by a licensed veterinarian or designated State or local authority). [Please Note: This spay/neuter requirement does not apply to Assisted/Multi-Family Housing; i.e., to Abbie Lane Courts, Fourteen Pines Apartments, or Village Oaks Apartments. Although HACSA strongly encourages the spaying/neutering of all dogs and cats, Assistance/Companion/Service animals in Assisted/Multi-Family Housing are not required to be spayed/neutered, per HUD Handbook 4350.1, Chapter 32.]</p>	<p>Eliminated</p>	<p>No</p>	<p>Removal of this requirement from residents of public housing ensures consistent application across programs.</p>

Previous Policy	Proposed Policy	Required Change	Impact
<p>Exceptions to HACSA's Assistance/Companion/Service Animal Guidelines (e.g., asking for approval for a larger dog, or for a breed of dog or species of animal that is typically not allowed, or for multiple animals) will be considered, on a case-by-case basis.</p>	<p>Exceptions to HACSA's Assistance & Service Animal Guidelines will be considered, on a case-by-case basis.</p>	<p>No</p>	<p>Match language elsewhere in document.</p>

APPENDIX F: NON-SMOKING POLICIES

HACSA SMOKE-FREE POLICY

In accordance with HUD regulations, HACSA has adopted these smoke-free policies. The policies are effective as of October 1, 2017.

Due to the increased risk of fire, increased maintenance costs, and the known health effects of secondhand smoke, smoking is prohibited in all living units and interior areas, including but not limited to hallways, rental and administrative offices, community centers, day care centers, laundry centers, and similar structures. Smoking is also prohibited in outdoor areas within 25 feet from public housing and administrative office buildings.

This policy applies to all employees, residents, household members, guests, and service persons. Residents are responsible for ensuring that household members and guests comply with this rule.

The term “smoking” means any inhaling, exhaling, burning, or carrying while burning, of any cigar, cigarette, pipe, or other prohibited tobacco product in any manner or any form. Prohibited tobacco products include water pipes or hookahs.

Violation of the smoke-free policy constitutes a violation of the terms of the public housing lease. Consequences of lease violations include termination of tenancy.

HACSA POLICIES

Designated Smoking Areas (DSA)

HACSA will, by October 1, 2017, establish designated smoking areas (DSAs) at the following properties:

- Riverview Terrace
- Fourteen Pines
- Village Oaks

Residents using the DSA must extinguish all smoking materials and safely dispose of them in receptacles provided for that purpose. HACSA may take steps to remove the DSA in the event of recurring problems with DSA cleanliness or safety.

Due to space limitations, HACSA will NOT provide DSAs at the following properties:

- Laurelwood Homes
- McKenzie Village
- Pengra Court
- Scattered Sites in Eugene, Springfield, and Veneta
- Maplewood Meadows
- Parkview Terrace
- Lindeborg Place
- Veneta Villa
- Cresview Villa
- Abbie Lane

Residents may not smoke, or dispose of smoking materials, anywhere on the HACSA properties that have no DSA. The Oregon Indoor Clean Air Act requires that residents who smoke on off-property sidewalks must remain at least 10 feet from all buildings.

Electronic Nicotine Delivery Systems (ENDS)

Electronic nicotine delivery systems (ENDS) include e-cigarettes, nicotine inhalers, and vaping devices.

Use of ENDS is prohibited in public housing units, common areas, or in outdoor areas on HACSA properties, except in designated smoking areas.

Effective Date

HACSA's effective date(s) of this smoke-free policy is as follows:

The smoke-free policy will be effective for all residents, household members, employees, guests, and service persons on October 1, 2017.

Enforcement

HACSA must enforce smoke-free policies when a resident violates this policy. When enforcing the lease, HACSA will provide due process and allow residents to exercise their right to an informal settlement and formal hearing, in accordance with HACSA's grievance policies. HACSA will not evict a resident for a single incident of smoking in violation of this policy. As such, HACSA will use graduated enforcement. Prior to pursuing eviction for violation of smoke-free policies, HACSA will take specific, progressive monitoring and enforcement actions, while at the same time educating tenants and providing smoking cessation information. All resident will be required to sign a lease rider/addendum or lease that includes language regarding the smoke-free policy. Tenancy termination and eviction will be pursued only if there are repeated, uncorrected violations of the smoking policy. HACSA may terminate tenancy at any time for violations of the lease and failure to otherwise fulfill household obligations if resident behavior disturbs other residents' peaceful enjoyment and is not conducive to maintaining the property in a decent, safe, and sanitary condition.