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

HIGHLIGHTS:

Chapter 4: Applications, Waiting List, and Tenant Selection

Modifications to Local Preferences to expand housing opportunities

Chapter 6: Income and Subsidy Determinations

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

Chapter 9: General Leasing Policies

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

Chapter 11: Reexaminations

Adjustments of reporting timelines to align with other reporting requirements

Chapter 12: Termination of Assistance and Tenancy

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

Any questions regarding the changes please contact Amy Cook at acook@homesforgood.org

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

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

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

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

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

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