

# Housing And Community Services Agency of Lane County

177 Day Island Road  
Eugene, OR 97401

## 5 Year Plan for Fiscal Years 2015-2019 Annual Plan for Fiscal Year 2017

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Written comments due June 26, 2016  
Public Hearing June 28, 2016 at 9:00 a.m.  
In the Conference Room at HACSA  
300 West Fairview Drive  
Springfield OR 97477

If you are in need of a reasonable accommodation in regard to this meeting, please contact Ela Kubok at (541) 682-2506 at least 24 hours prior to the meeting time.

**MISSION:** Making a difference in the quality of affordable housing and related community services

**VISION:** Safe, affordable, energy-efficient housing for all low-income Lane County residents



# EXECUTIVE SUMMARY

May 12, 2016

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 2017.

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 1	PHA Annual Plan Update HUD form 50075
Section 2	Certification Forms

Supporting Documentation has been updated as needed and the updates have been summarized in section B.1-B.8 of HUD 50075-ST. 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 17, 2016.

**SECTION 1**  
**PHA Annual Plan Update**

**HUD Form 50075-ST**

<b>Annual PHA Plan</b> <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 AND COMMUNITY SERVICES AGENCY OF LANE COUNTY HACSA</u> PHA Code: <u>OR006</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/01/2016</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>707</u> Number of Housing Choice Vouchers (HCVs) <u>3028</u> Total Combined Units/Vouchers <u>3735</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" 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: 10%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA: N/A</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: N/A																							
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Lead PHA: N/A																																	

**B. Annual Plan Elements**

**B.1 Revision of PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

**Statement of Housing Needs and Strategy for Addressing Housing Needs**

Housing And Community Services Agency of Lane County  
**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.

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.

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. During 2015 HACSA began 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, developed by HACSA, has 48 units and is expected to be ready for occupancy in November, 2016. Also during 2015, HACSA was awarded a 9% low income housing tax credit for a project called The Oaks at 14<sup>th</sup>. This project, constructed in partnership with Sponsor's Inc., will house 54 ex-offenders in West Eugene and will begin construction in May 2016 with occupancy projected for May, 2017. At the present time there are at least two other projects in HACSA's development pipeline.

**Affirmatively Furthering Fair Housing**

The Housing And Community Services Agency of Lane County (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](http://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.

#### **Impediments to Fair Housing**

**Impediment: There is a limited awareness of fair housing policies in the broader community**

##### Strategies/Outputs

- 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.
- Ms. Ochs presented to an audience of over 100 at the Eugene Fair Housing Conference during 2015.
- 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.
- Mr. Fox recently participated on a panel with Terry McDonald of St Vincent de Paul, presenting to the Eugene City Club on the topic of low income housing.
- 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 14<sup>th</sup>, a 55 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: There are cultural differences and language barriers which inhibit access to fair housing**

Strategies/Outputs:

- 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 one training session per month.
- 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.

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

Strategies/Outputs:

- 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.

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.**

**Housing and Community Services Agency of Lane County  
Deconcentration Policy [24 CRF 903.2]**

Housing and Community Services Agency of Lane County (HACSA) will provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments.

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

1. On annual basis, HACSA will determine the average income of all families residing in all of the PHA’s covered developments. In determining the average income for each development, HACSA will not adjust for unit size.
2. HACSA will 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.
3. If developments having average incomes outside the EIR are identified, HASCA will determine if these developments are consistent with its local goals and annual plan.

HACSA’s Section 8 Administrative Plan and Public Housing Admissions and Continued Occupancy Policies (ACOP) are submitted to HUD as part of the PHA Annual Plan process. Admission policies designed to promote deconcentration of poverty and income mixing can be found in the following sections:

<b>Program</b>	<b>Policy</b>	<b>Document</b>	<b>Location</b>
Public Housing	Eligibility	ACOP	Chapter 3,4
	Selection and Admissions	ACOP	Chapter 4, pt. III
	Deconcentration	ACOP	Chapter 12 pt. IV
	Deconcentration Analysis	PHA Plan	Element 1
	Tenant Statistical Data	PHA Plan	Element 1
Housing Choice Voucher	Waiting List Procedures	ACOP	Chapter 4, pt. I & II
	Eligibility	Section 8 Admin Plan	Chapter 3
	Applications	Section 8 Admin Plan	Chapter 4
	Waiting List	Section 8 Admin Plan	Chapter 4
	Briefings and Voucher Issuance	Section 8 Admin Plan	Chapter 5
	Owners	Section 8 Admin Plan	Chapter 13

HACSA updated its Analysis of Poverty Concentrations statement and statistical data.

Changes to other policies that govern eligibility, selection, and admissions include:

**Public Housing Program**

HACSA is adopting the Nan McKay Admissions and Continued Occupancy (ACOP) template and implementing the best practices recommend by Nan McKay.

*See Attachment A: Key Modifications to HACSA’s Admissions and Continued Occupancy Policies ( ACOP)*

**Housing Choice Voucher Program**

HACSA is adopting the Nan McKay Administrative Plan template and implementing the best practices recommend by Nan McKay.

*See Attachment B: Key Modifications to HACSA’s Section 8 Administrative Plan.*

**Rent Determination.**

No changes

**Financial Resources****HACSA BUDGET – SUMMARY OF RESOURCES - FY 16**

DIVISION/ PROGRAM	BEGINNING					TOTAL
	FUND BALANCE	FEDERAL REVENUE	RENT	INTEREST	OTHER	
<b>CSA:</b>						
Weatherization	0	1,288,452			591,875	1,880,327
Development	169,900				1,017,700	1,187,600
FSH	(2,900)		12,000			12,000
Heeran Center	420,653		180,500	100		601,253
Signpost House	226,886		95,200		400	95,600
Shelter + Care	(33,000)	440,000				440,000
ROSS	0	100,508				100,508
FSS	0	205,273				205,273
HACSA Corporate	857,842				32,605	890,447
	<u>1,639,381</u>	<u>2,034,233</u>	<u>287,700</u>	<u>100</u>	<u>1,642,580</u>	<u>5,413,008</u>
<b>HOUSING:</b>						
Conventional	1,379,537	1,747,500	1,802,900		1,322,106	4,872,506
Abbie Lane	270,440	170,700	38,800	200	5,700	215,400
Fourteen Pines	(133,803)	255,200	145,300	100	13,900	414,500
Village Oaks	(80,657)	77,300	267,000		13,500	357,800
Firwood	1,294		520,400	0	10,000	531,694
Capital Fund	0	1,224,430				1,224,430
Norsemen Village	(190,860)	170,000	106,300	100	5,200	281,600
Camas Place	49,990	90,000	127,500		6,600	224,100
Richardson Bridge	184,070		200,300		2,800	203,100
Jacob's Lane	204,895		317,000		1,300	318,300
Laurel Gardens	97,139		166,600	100	2,600	169,300
Walnut Park	23,863		183,100			183,100
The Orchards	916		167,500	0	1,800	169,300
	<u>1,806,824</u>	<u>3,735,130</u>	<u>4,042,700</u>	<u>500</u>	<u>1,385,506</u>	<u>9,165,130</u>
<b>SECTION 8:</b>						
Vouch & MR	639,072	15,959,800				15,959,800
	<u>639,072</u>	<u>15,959,800</u>		<u>0</u>	<u>0</u>	<u>15,959,800</u>
<b>TOTALS</b>	<b>4,085,277</b>	<b>21,729,163</b>	<b>4,330,400</b>	<b>600</b>	<b>3,028,086</b>	<b>30,537,938</b>

**Operation Management**

Incorporated Energy Plan into the Resource Conservation section of Maintenance Plan. Added water conservation information. Minor clerical edits to Maintenance Plan and Integrated Pest Maintenance Plan.

**Grievance Procedures.**

No changes.

### **Homeownership Programs**

Updated program statistics. Clerical edits to program description and participation requirements.

#### **The HACSA Section 8 HomeOwnership Program**

HACSA's Section 8 HomeOwnership program was restarted in 2015 after a brief hiatus used to review and update program guidelines. HACSA's Section 8 HomeOwnership Program follows best practices outlined by Nan McKay. In addition, participants are required to attend a Section 8 HomeOwnership Information Session as the first step towards participating in this program. Voucher holders who are still interested in the program are then referred to participate in the Family Self Sufficiency Program (FSS) where they receive assistance with becoming ready for homeownership and the responsibilities it entails. As an FSS participant, they are also eligible to build an Escrow savings account if they are working or self-employed, and are eligible to start an Individual Development Account to be used as a down payment. In FSS, participants address issues such as financial literacy, credit repair, and budgeting. In 2015, 18 Housing Choice Voucher holders attended Information Sessions for the S8 Home Ownership Program, and 12 of those applied for the FSS Program.

#### *Program Statistics:*

Currently, there are 20 families receiving homeownership assistance from HACSA.

- 6 families live in Springfield,
- 3 families live in Eugene,
- 3 families live in Oakridge,
- 3 families live in Junction City,
- 3 families live in Veneta, and
- 2 families live in Cottage Grove.

These families include:

- 45 family members, including 12 children from 5 families
- 13 families with a female head of household
- 7 families with a male head of household
- 7 families with an elderly head of household
- 14 families with the head of household being a person with a disability

### **Community Service and Self-Sufficiency Programs.**

No changes

### **Safety and Crime Prevention**

#### **Goals and Objectives for the Violence Against Women Act (VAWA) of 2013**

The VAWA act of 2013 provided special protections for victims of domestic violence, dating violence, sexual assault and stalking who are applying for or receiving assistance under the public housing program.

HACSA has adopted Nan McKay Admissions and Continued Occupancy template. Please refer to Part VII: Violence Against Women Act (VAWA): Notification, Documentation, and Confidentiality, pages 16-26. The Section 8 Admin plan has adopted a Nan McKay template. Please refer to Part IX: Violence Against Women Act (VAWA): Notification, Documentation and Confidentiality.

Our main objective is to maintain compliance with all applicable legal requirements of VAWA. In order to assure such compliance, training of appropriate staff managing HACSA housing developments regarding this policy is imperative. HACSA will seek to respond in accordance with this policy to reported incidents of domestic violence, dating violence, sexual assault, or stalking, including but not limited to providing housing opportunities for victims of domestic violence, dating violence, sexual assault, or stalking.

Minor edits and updated current law enforcement data access information.

### **Pet Policy**

No changes

### **Asset Management**

Updated RAD participation section of Asset Management statement to reflect multi-phased approach to the disposition of PH Scattered Site units.

**Substantial Deviation**

Updated definition of Substantial Deviation and Significant Amendment as follows:

**Housing And Community Services Agency Of Lane County  
Definitions of Substantial Deviation to the PHA 5 Year Plan and Significant Amendment to the 5 Year and Annual Plan**

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

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

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

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

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

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

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

(c) The PHA must submit its Deconcentration Policy for Field Office review.

*See section b.1, above*

**B.2 New Activities.**

(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| Y                                   | N                                   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
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(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.

**Hope VI or Choice Neighborhoods.**  
No activity

**Mixed Finance Modernization or Development.**  
No activity

**Demolition and/or Disposition.**  
No activity

	<p><b>Designated Housing for Elderly and/or Disabled Families.</b> No activity</p> <p><b>Conversion of Public Housing to Tenant-Based Assistance.</b> No activity</p> <p><b>Conversion of Public Housing to Project Based Assistance – Rental Assistance Demonstration (RAD) Program</b> 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 Rental Assistance (PBRA) or 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 will result in a new CHAP and allow conversion of the units as follows: <u>AMP 200 Springfield Sites (Partial Conversion):</u> AMP 200 OR000600200 includes 20 scattered site units. A multi-phase application was submitted in May 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. <u>AMP 300, Eugene Scattered Sites (Partial Conversion):</u> AMP 300 OR000600300 includes 92 scattered site units. A multi-phase application was submitted in May 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.</p> <p><b>Occupancy by Over-Income Families.</b> No activity</p> <p><b>Occupancy by Police Officers.</b> No activity</p> <p><b>Non-Smoking Policies</b> No changes to activity</p> <p><b>Project Based Vouchers</b> HACSA is adopting a Project Based Voucher (PBV) program using up to 20 percent of its budget authority for project based assistance. The program will be based on Nan McKay Best Practices and meet or exceed all HUD requirements for a PBV program. The program will include the following parts: <u>General Requirements</u> - This part describes general provisions of the PBV program including maximum budget authority requirements, relocation requirements, and equal opportunity requirements. <u>PBV Owner Proposals</u> - This part includes policies related to the submission and selection of owner proposals for PBV assistance. It describes the factors the PHA will consider when selecting proposals, the type of housing that is eligible to receive PBV assistance, the cap on assistance at projects receiving PBV assistance, subsidy layering requirements, site selection standards, and environmental review requirements. <u>Dwelling Units</u> - This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities. <u>Rehabilitated and Newly Constructed Units.</u> This part describes requirements and policies related to the development and completion of rehabilitated and newly constructed housing units that will be receiving PBV assistance. <u>Housing Assistance Payments Contract</u> - This part discusses HAP contract requirements and policies including the execution, term, and termination of the HAP contract. In addition, it describes how the HAP contract may be amended and identifies provisions that may be added to the HAP contract at the PHA’s discretion. <u>Selection of PBV Program Participants</u> - This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance. <u>Occupancy</u> - This part discusses occupancy requirements related to the lease, and describes under what conditions families are allowed or required to move. In addition, exceptions to the occupancy cap (which limits PBV assistance to 25 percent of the units in any project) are also discussed. <u>Determining Rent to Owner</u> - This part describes how the initial rent to owner is determined, and how rent will be re-determined throughout the life of the HAP contract. Rent reasonableness requirements are also discussed. <u>Payments to Owner</u> - This part describes the types of payments owners may receive under this program.</p> <p><b>Units with Approved Vacancies for Modernization.</b> No activity</p> <p><b>Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</b> HACSA is performing due diligence to identify our eligibility for the Securities Grants. If an emergency would arise, HACSA would apply for the Emergency Safety Grant, if eligible.</p>
B.3	<p><b>Civil Rights Certification.</b></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. See Section 2</p>

<p><b>B.4</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>B.5</b></p>	<p><b>Progress Report.</b></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.</p> <p><u>Goal 1 Objective: Increase the number of affordable housing units.</u>  Indicators:</p> <ul style="list-style-type: none"> <li>- Build and/or purchase 180 housing units using a mix of local and federal funding.</li> <li>- Maintain Public Housing vacancies at 3% or less.</li> <li>- Increase voucher total as private landlords opt-out of their current contracts. Estimated increase is 20 – 50 vouchers.</li> </ul> <p>FY 2017 Annual Plan Update – HACSA has received funding commitments for 102 units, which are now under construction. HACSA has another 200 units in our pipelines and we are in the predevelopment phase of these projects.</p> <p><u>Goal 2 Objective: Continue to receive high performer status.</u>  Indicators:</p> <ul style="list-style-type: none"> <li>- Obligate all Capital Funds within 24 months of grant award.</li> <li>- Expend all Capital Funds within 48 months of grant award.</li> <li>- Comply with the financial reporting requirements of Asset Management.</li> <li>- Comply with the new PHAS requirements (when published) to continue to receive high performer status.</li> <li>- Submit all PHAS reports within required timelines.</li> <li>- Meeting Capital Fund, financial reporting, and PHAS reporting requirements.</li> </ul> <p>FY 2017 Annual Plan Update – HACSA Capital Funds are being obligated and expended in compliance with HUD's deadlines. HACSA made an administrative mistake in submitting FY 15 audited financials and subsequently was categorized as a substandard performer for PHAS. HACSA has every expectation of achieving high performer status for FY 16.</p> <p><u>Goal 3 Objective: Improve community quality of life and economic vitality.</u>  Indicators:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Assist residents in maintaining Resident Newsletters at the majority of Public and Assisted Housing complexes.</li> <li>- Annually monitor income levels by development to deconcentrate poverty. Bring higher income PH households into lower income developments and vice versa, if necessary.</li> <li>- 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).</li> </ul> <p>FY 2017 Annual Plan Update – The TAG (aka the RAB) has been very active in HACSA's strategic planning process and the annual plan process. All other indicators in this section are being met.</p> <p><u>Goal 4 Objective: Promote self-sufficiency and asset development of assisted households.</u>  Indicators:</p> <ul style="list-style-type: none"> <li>- Maintain a minimum enrollment of 135 families in the Family Self-Sufficiency (FSS) Program.</li> <li>- Maintain a minimum representation of 15 community service agencies on the Family Self-Sufficiency Advisory Board.</li> <li>- 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.</li> <li>- Continue the promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.</li> <li>- Assist a minimum of two FSS participants a year in purchasing a home.</li> <li>- Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.</li> </ul> <p>FY 2017 Annual Plan Update – All indicators in this section are being met.</p>

	<p><u>Goal 5 Objective: To provide decent, safe and sanitary housing for very low income families while maintaining their rent payments at an affordable level.</u></p> <p>Indicators:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Allow two person households to rent a zero bedroom unit (studio apartment) which allows greater housing opportunities for those households.</li> <li>- 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.</li> <li>- Coordinate and transition privately subsidized families to the Section 8 Voucher Program.</li> </ul> <p>FY 2017 Annual Plan Update – All indicators in this section are being met.</p> <p><u>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.</u></p> <p>Indicators:</p> <ul style="list-style-type: none"> <li>- Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program.</li> <li>- A HACSA staff member serves on the board for the local Rental Owners Association.</li> <li>- 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.</li> </ul> <p>FY 2017 Annual Plan Update – All indicators in this section are being met.</p> <p><u>Goal 7 Objective: Maintain Section 8 Homeownership Program (with subsidy assistance)</u></p> <p>Indicators:</p> <ul style="list-style-type: none"> <li>- Provide information to participants from our community partners about the availability of down payment assistance and accessible low interest loans.</li> <li>- Keep Section 8 participants informed of the program through briefings and informational mailings when program reopens.</li> </ul> <p>FY 2017 Annual Plan Update – HACSA has reopened the Section 8 Homeownership Program and these two indicators are being met.</p>
<p><b>B.6</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y   N  <input type="checkbox"/>   <input checked="" 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.</p>
<p><b>B.7</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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.  <b>See Section 2</b></p>
<p><b>B.8</b></p>	<p><b>Troubled PHA.</b></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 type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C.</b></p>	<p><b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p><b>C.1</b></p>	<p><b>Capital Improvements.</b> 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 10/01/2015.</p>

**Key modification to HACSA's  
Admissions and Continued Occupancy Policies (ACOP)  
Proposed effective date 10-1-16**

Previous Policy	Proposed Policy	Required Change	Impact
HACSA allows residents/applicants to bring family members/friends to assist during interpretation when English is not primary language and no staff who could translate.	HACSA will create a language assistance plan and contract for telephone interpreter services.  Constituents that comprise more than 5% of Lane County residents, HACSA will work to provide translation of documents.	Yes	Positive impact for applicants and residents.
HACSA required unrelated adults to establish a stable family relationship.	The family may provide HACSA with documentation they have resided together or self-certify that each individual's income and resources are available to meet the family needs.	Yes	Reduced impact on applicants and residents who were previously required to get additional documentation.
In past, HACSA used the traditional definition of 'spouse' if not legally married, designating household member as 'co-head.'	If family states they have a common law marriage, member will now be coded as 'spouse.' Certification by the head of household of the relationship will normally be sufficient. If there is reasonable doubt, the family will be asked to provide further documentation.	No	No monetary or status impact to family.
HACSA did not have specific written policy regarding absences from public housing unit.	A family member absent for more than 90 consecutive days will no longer be considered a family member, with noted exceptions: Absent student will be considered a family member unless they have established a separate household or the family requests they be removed. Children in foster care will remain in the family unless HACSA confirms they are permanently removed.	Yes	Clearer definition and standardized practice.
HACSA did not require annual, on-going verification of need for live in aide.	HACSA may certify annually, the need for a live in aide.	No	Residents may be asked to provide verification of on-going need of live in aide. This policy will ensure residents are residing in correct bedroom size based on occupancy standards; not over-housing residents.
If applicant family was denied due to no eligible citizens, applicants had a right to request review with HACSA.	HACSA will add additional language applicant may appeal to US Citizen and Immigration Services or request an informal review with HACSA.	Yes	Informing applicants of additional rights to appeal.
HACSA obtained alternate ID through HUD website for families with a child under six, and without SSN, and family was required to provide HACSA verification of SSN within 90 days.	Option now only available to a child under six who has been added to a family within the prior six months.	Yes	No significant impact expected.
HACSA did not previously define being 'currently engaged' in the use of drugs.	'Currently engaged' in the use of an illegal drug within the previous six months.	Yes	Clearer definition and standardized practice.

Attachment A: Key modification to HACSA’s Admissions and Continued Occupancy Policies (ACOP)

Previous Policy	Proposed Policy	Required Change	Impact
HACSA routinely checked sex offender registration for applicants, but did not differentiate between lifetime registration and others.	If not a lifetime registered offender, HACSA may deny access to program. If lifetime registered offender, HACSA must deny.	Yes	Compliance with lifetime registry denial requirement.
HACSA had no written policy to allow an applicant family the opportunity to remove a registered sex offender from household, though it was the practice.	Families may choose to remove offender from application but must certify the offender may not be permitted to visit or stay as guest in public housing. HACSA may require documentation of another address.	Yes	Clearer definition and standardized practice.
HACSA currently includes Violence Against Women Act (VAWA) language on denial notices.	HACSA will also provide a copy of the HUD 50066.	Yes	Comply with VAWA requirements.
HACSA provided applicant a summary of the criminal history background or sex offender registration information at the time of denial.	HACSA will provide applicant and involved member with a summary of the criminal history 14 calendar days to dispute accuracy and relevance of information prior to a denial letter being sent.	Yes	Provides additional rights and protections to applicants.
HACSA allowed applicant family to request to be placed in unit smaller than occupancy guidelines under certain circumstances.	When HACSA approves occupancy in a smaller unit, the family must agree not to request a transfer for two years after admission unless they have a change in family composition.	No	Clearer definition and standardized practice. Ensure best use of housing resources.
HACSA maintains an outlying area waiting and Metro (Eugene/Springfield).	HACSA adopts site based waiting list. Applicants may specifically select any specific development.	No	Offers applicant the ability to apply for a particular development and/or area and allow for streamlined process internally for HACSA.
HACSA required to publish opening and closing of waiting list in newspaper and other media sources.	HACSA will publish opening and closing of waiting list in print and electronically to suitable media outlets and community agencies.	No	Allows HACSA flexibility to announce in most effective way and ability to use current technologies.
HACSA had several local preferences to accommodate internal transfers and a preference for families paying more than 30% of their income toward rent.	<p>The following preferences are worth 10 points:                      Victims of domestic or dating violence, sexual assault, or stalking in Section 8 properties managed by HACSA, who’s situation requires moving from their current housing situation.</p> <p>Persons with disabilities needing an accessible unit or reasonable accommodation living in Section 8 properties, managed by HACSA who cannot be reasonably accommodated in their development. According to Federal Regulation, HACSA will meet income targeting guidelines; local preference not required.</p> <p>Residents will be requesting the local preference will be required to provide verification of VAWA eligibility or the need for an accommodation.</p>	Yes	Eliminating local preferences that were not in compliance. Local preferences were not required for transfer procedures. Created two preferences to allow HACSA to accommodate transfers between HACSA managed programs.

Attachment A: Key modification to HACSA’s Admissions and Continued Occupancy Policies (ACOP)

Previous Policy	Proposed Policy	Required Change	Impact
Applicant was allowed to be held at top of waiting list to await a specific location without restriction.	Applicants will be allowed a maximum of two unit offers. Unit offers will be at different site based locations. Applicant must accept or refuse within three business days. If applicant refuses second offer, applicant will be removed from waiting list and notified of their right to an informal hearing.	No	Streamlined waiting list process. Clearer definition and standardized practice.
Residents may be eligible for an Earned Income Disregard over 48 month period.	Residents who are eligible for Earned Income Disregard, have a 24 month, lifetime maximum.	Yes	Implementing new HUD definitions.
HACSA required applicants or residents to provide copies of Social Security verification for payment amounts and eligibility when the information was not available through the EIV system.	HACSA may now also use DHS screens (UIV) to verify disability status and/or payment amounts	No	Fewer applicants/residents required to go to SSA for verification
HACSA often required paystubs or payroll verification for multiple months of income.	HACSA will require the family to provide paystubs or payroll documentation for a minimum of the month current month (or 30 day period). HACSA may require additional documentation as needed to determine rent or eligibility.	No	Fewer applicants/residents will be required to obtain payroll/paystubs for multiple months.
HACSA verified excluded income.	HACSA will accept the family’s self-certification as verification of fully excluded income sources. Additional verification may be required based on other policy or rule. HACSA will continue to verify the source and amount of partially excluded income.	No	Fewer applicants/residents will be required to obtain verification of fully excluded income sources.
<p>Security deposit amounts were as follows:                      \$100.00 for Public Housing Units located at:                          Veneta Villa                          Parkview Terrace                          Riverview Terrace                          Cresview Villa                          Lindeborg Place</p> <p>Public Housing Units located at:                          McKenzie Village                          Laurelwood Homes                          Pengra Court                          Veneta Scattered Sites                          Scattered Sites                          Maplewood Meadows</p> <p>1 bedroom - \$100.00                      2 bedroom - \$300.00                      3 bedroom - \$450.00                      4 bedroom - \$450.00</p>	<p>New security deposits will be:</p> <p>1 bedroom - \$275.00                      2 bedroom - \$425.00                      3 bedroom - \$575.00                      4 bedroom - \$650.00</p>	No	This change will assist HACSA to cover the increasing costs associated with cleaning and repairing units after a resident vacates and decrease the amount of bad debt being written off to cover the charges. Applicants are eligible to work with a community partner for loan assistance for the security deposit amount.
Rent may be paid by money order, check or ACH (direct automatic withdrawal)	Adds language that HACSA may accept electronic debit or credit for the payment of rent.	No	Allow additional payment options for residents.

Attachment A: Key modification to HACSA’s Admissions and Continued Occupancy Policies (ACOP)

Previous Policy	Proposed Policy	Required Change	Impact
HACSA currently charges a late fee of \$25.00	HACSA will charge a late fee of \$50.00	No	Will cover the increasing administrative costs to process late payments of rent. Residents are encouraged to use ACH (automatic withdrawal) to avoid late fees. Raising the late fee amount will also encourage residents to make rent payments on time as required by their lease agreements.
HACSA Statement of Policies did not clearly outline additional unit inspections that may occur.	<p>Expand language that includes reasons to inspect such as; but not limited to:  Housekeeping, Unit Condition, Suspected Lease Violation, Preventative Maintenance, Routine Maintenance, Preparation for HUD, REAC inspections and when reasonable cause exists to believe an emergency exists. HACSA will follow the terms of the lease and Oregon Landlord Tenant Law to provide notice to residents.</p> <p>For regular annual inspections, HACSA will provide residents a minimum of 7 calendar days’ notice prior to the inspection.</p> <p>HACSA may enter unit at any time without prior notice when there is reasonable cause to believe an emergency exists.</p> <p>Residents needing to reschedule an appointment must notify HACSA within 24 hours prior to the scheduled inspection. HACSA will reschedule no more than once without verifiable good cause.</p>	No	Clarifying language added.
HACSA conducted annual verification of fixed income sources	HACSA will streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. Third party verification of fixed sources must still occur at intake and every three years thereafter.	No	Part of HUDs May Streamlining Rule. Fewer residents will be required to verify fixed income sources.
HACSA’s reexamination application did not ask resident if the resident or any member of the resident’s household was subject to lifetime sexual offender registration requirements.	HACSA’s reexamination application will ask residents if the resident or any member of the resident’s household was subject to lifetime sexual offender registration requirements. HACSA will also check both LEDS and the Dru Sjodin National Sex Offender database annually	Yes	Compliance

Attachment A: Key modification to HACSA’s Admissions and Continued Occupancy Policies (ACOP)

Previous Policy	Proposed Policy	Required Change	Impact
HACSA practice inconsistent about the effective date of annual reexamination when the family caused a delay in the processing.	<p>If the family causes a delay in the processing of the annual examination, decreases in the rent will be applied prospectively, from the first day of the month following completions of the reexamination process.</p> <p>If they family caused a delay in the reexamination process, an increase in rent will be applied retroactively, to the scheduled effective date of the annual reexamination.</p>	No	Clearer definition and standardized practice.
Families on rent were not receiving an annual reexamination of household composition	Families choosing flat rent will receive a reexamination to determine family composition, sign releases, etc. The income for these families must only be recertified every three years.	Yes	Compliance
Residents are required to report increases in income of more than \$200. HACSA would verify income and adjust rent accordingly	Residents are required to report all increases in income, including new employment. HACSA will only conduct interim reexaminations for families that qualify for EID only when the family’s rent will change as a result of the increase or when requested by the resident (for example an FSS participant). In all other cases, HACSA will note the information in the file, but will not conduct an interim reexamination.	No	This change will decrease the administrative work required to change a residents rent when the family increases their income. The interim process is time consuming and often results in very small changes in rent. This will streamline process and will allow families to report but not see an immediate increase in their rent.
A family may report a decrease in income expected to last 30 days or more anytime during the month. The effective date would be the first of the following month, unless the family causes a delay.	A family may report a decrease in income expected to last 30 days or more and provide verification of the decrease in income before HACSA’s accounting cut-off (currently the 25 <sup>th</sup> of the month) for the effective date to be the 1 <sup>st</sup> of the following month. Income decreases reported and verified on or after the account cut off will be effective the second month	No	This language will clarify and resolve a current issue with residents reporting changes in income without providing documentation. The documentation process may then delay the rent change for multiple months. This change will align the accounting process for closing the books with the interim reexamination process.
HACSA revises utility allowances to all families annually (at one time during the year)	New utility allowances will be applied to a families rent calculation at the next interim or annual reexamination following the effective date of the new utility allowance	No	Streamline process
HACSA charges \$5.00 per occurrence for removal of pet waste.	HACSA charges \$10.00 per occurrence for removal of pet waste	No	Increases pet waste removal charge based on increased cost for HACSA staff to travel to a unit and remove waste.

Attachment A: Key modification to HACSA’s Admissions and Continued Occupancy Policies (ACOP)

Previous Policy	Proposed Policy	Required Change	Impact
HACSA did not define minimum work hours needed to be exempt from community service requirements.	<p>HACSA will consider 10 hours per week as the minimum number of hours needed to qualify for a work activity exemption</p> <p>A family will also be considered exempt if they qualify for SNAP benefits.</p>	Yes	Compliance
HACSA policy did not address transfers for residents due to demolition or disposal of the PH unit or for modernization.	<p>If HACSA requires a move for demo, disposition or modernization and the plan is to relocate the family to another PH unit, the family will be placed on the transfer list</p> <p>Transfers will be processed in the following order:</p> <ol style="list-style-type: none"> <li>1. Emergency transfers (hazardous maintenance conditions)</li> <li>2. High-priority transfers (verified medical condition, threat of harm or criminal activity, and reasonable accommodation)</li> <li>3. Transfers to make accessible units available</li> <li>4. Demolition, renovation, etc.</li> <li>5. Occupancy standards</li> <li>6. Other HACSA -required transfers</li> <li>7. Other tenant-requested transfers</li> </ol> <p>Residents will receive one offer to transfer. Refusal without good cause may result in lease termination. When transfer is at resident request, refusal without good cause will result in removal from transfer list and the resident must wait at least 6 months to reapply for a transfer.</p>	Yes	Compliance and standardize practice
Eligibility for transfer language missing or unclear	HACSA will only consider a transfer for residents who have not engaged in criminal activity, do not owe back rent or charges, have a history of late payments, have housekeeping violations, history of damaging property or when utilities cannot be property turned on in the head of households name.	No	Clearer definition and standardized practice. Ensures that lease violation issues are address before HACSA transfers family to another unit.
HACSA did not define “repeated” late payment of rent.	Three late payment of rent notices in a 12 month period will constitute “repeated” late payment	No	Clearer definition and standardized practice.
HACSA did not define period of time family could be away from unit without notifying HACSA	Family must notify HACSA for absences of more than 7 days and obtain approval for extended absences.	No	Clearer definition and standardized practice.

Attachment A: Key modification to HACSA’s Admissions and Continued Occupancy Policies (ACOP)

Previous Policy	Proposed Policy	Required Change	Impact
HACSA generally mailed termination of lease notices to residents. (occasionally also posted the notice in a sealed envelope on the door)	HACSA will mail termination notices and may also attempt to deliver notices directly to resident or adult household member or post in a sealed envelope on the door. All termination notices will be in compliance with VAWA requirements.	No	Clearer definition and standardized practice.
HACSA refers to the Community Service Agreement used to inform a family that they didn’t complete the required hours as a Promissory Note	HACSA will refers to the Community Service Agreement used to inform a family that they didn’t complete the required hours as a Work Out Agreement	No	Align with HUD language
HACSA practice did not provide for audio taping an informal hearing	HACSA will audio tape an informal hearing when requested by an Applicant. HACSA will not provide a transcript of the audio tape.	Yes	Compliance
HACSA policy does not clearly address criminal prosecution.	When HACSA determines program abuse, that meets or exceeds the threshold for prosecution, the matter will be forwarded to the appropriate entity for prosecution	No	Compliance and good business practice
HACSA determined maximum rents in accordance with HUD policy. Max rents were not based on the flat rents	HACSA will base maximum rent on the flat rate for the unit	Yes	Compliance
HACSA policy did not address residents with a repayment agreement, who accrued new charges	HACSA will not enter into a repayment agreement with a family if there is already a repayment agreement in place. HACSA may at its discretion allow the family to sign a new repayment agreement for both the existing and new amounts owed. HACSA will not allow a repayment agreement for current rent.	No	Clearer definition and standardized practice.

## Key Modifications to HACSA's Section 8 Administrative Plan Proposed effective date 10-1-16

Previous Policy	Proposed Policy	Required Change	Impact
At application or when a family is adding a new family member they must be able to show relationship by blood, marriage, or operation of law to head of household or spouse.	The family may provide HACSA with documentation they have resided together or self-certify that each individual's income and resources are available to meet the family needs.	Yes	Reduced impact on applicants and tenants who were previously required to get additional documentation.
A permanently absent family member will be determined permanently absent if verification is provided and will not be allowed to return to the unit for one year.	The family must request PHA approval for the return of any adult family members that the PHA previously determined to be permanently absent.	Yes	Positive impact for tenants as they will not have to wait the one year period for the return of a family member.
If a family consists of only a single head of household and they are absent from their assisted unit for a consecutive 180 days then they are considered permanently absent and their assistance is terminated.	The PHA will request verification of the family member's permanent absence from a responsible medical professional.	Yes	Positive impact for tenants as assistance is no longer terminated without verification.
Absence due to foster care. If the time period is to be greater than six months from the date of removal of the child/ren the voucher size may be reduced at the annual income review.	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.	Yes	Clearer definition and standardized practice.
Live in Aides cannot later become a part of the family under the Section 8 Program.	Language removed	Yes	Positive impact for tenants as they will define their family composition.
Any PH resident who comes to the top of the Section 8 waiting list must be out of their PH.	Language removed	Yes	Positive impact for tenants as they will not have to move from PH in order to pursue a Section 8 subsidy.
No clear language regarding what resources were to be used to screen applicants for admission regarding sex offender status.	The PHA will use the Dru Sjödin National Sex Offender data base to screen applicants for admission.	No	Clearer definition and standardized practice.
Local preferences lacked clear definitions and process.	Clearer definitions and implementation of local preferences established	No	Clearer definition and standardized practice.
Placement on the waiting list. To be considered the remaining member of an applicant family, the person must have been residing in the household for at least six months prior to coming to the top of the waiting list and have been added to the application within six months of coming to the top of the waiting list.	Language removed.	Yes	Positive impact for applicants. Will be able to establish family composition at any time.
HACSA currently includes Violence Against Women Act (VAWA) language on denial notices.	HACSA will also provide a copy of the HUD 50066.	Yes	Comply with VAWA requirements.
Notification of withdrawing an applicant from the waiting list. If the notice is returned by the post office with a forwarding address the notice will be resent to the address indicated.	If the notice is returned by the post office the applicant will be removed from the waiting list without further notice. If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if it is determined that the lack of response was due to PHA error, or to circumstances beyond the family's control.	No	Positive impact for applicants. Will allow access to vouchers more quickly as process is streamlined.

## Attachment B: Key Modifications to HACSA’s Administrative Plan

Previous Policy	Proposed Policy	Required Change	Impact
HACSA had adopted a Project Based Voucher component into Admin Plan.	HACSA will be implementing a Project Based Voucher Program.	No	Positive impact for tenants as it will diversify the use of vouchers
Suspension of voucher. When a Request for Tenancy Approval and proposed lease is received by the PHA the term of the voucher will not be suspended while the PHA is processing the request.	The PHA must provide for suspension of the initial or any extended term of the voucher from the date the family submits a request for PHA approval of the tenancy until the date the PHA notifies the family in writing whether the request has been approved or denied.	Yes	Positive impact for tenants as it will allow full access of the voucher for housing search.
Joint Custody of Dependents. Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 51 percent or more each week.	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 51 percent or more of the time.	No	Positive impact for applicants and tenants as it allows for a broader definition of dependent.
Medical Expenses. Nonprescription medicines must be doctor recommended in order to be considered a medical expense. Nonprescription medicines will be counted toward medical expenses for families who qualify if the family furnishes legible receipts. Medical transportation costs will be reviewed on a case by case situation by the Section 8 Supervisor.	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.	No	Provides clearer definition.
If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 110 percent of the published FMR.	If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR.	Yes	Positive impact for applicant and families as it provides increased access to funds under reasonable accommodation.
No previous policy in place for “healthy living environment”	The PHA must define a “healthy living environment” for the local climate. There must be a permanently installed heating source able to provide a room temperature of 68°F. Heating devices must conform to applicable laws and fuel-burning appliances must be properly ventilated.	Yes	Clearer definition and standardized practice.
Residents may be eligible for an Earned Income Disregard over 48 month period.	Residents who are eligible for Earned Income Disregard, have a 24 month, lifetime maximum.	Yes	Implementing new HUD definitions.
Additional Local Requirements to meet Housing Quality Standard (HQS) Inspection. Refuse container must be a garbage can with lid.	Language removed. HACSA will follow guidance in HUD regulations for HQS which state there must be services for the sanitary disposal of food waste and refuse, including temporary storage facilities where necessary.	No	Allows other options for refuse.
Additional Local Requirements to meet Housing Quality Standard (HQS) Inspection. A bedroom must be at least 70 square feet.	Language removed. HACSA will follow guidance in HUD regulations for HQS which state a bedroom must have two working outlets and a window.	No	Reduces restrictions on what defines a bedroom allowing increased housing opportunities for applicants and tenants.
Additional Local Requirements to meet HQS Inspection. The water heater must have a temperature/pressure relief valve with a tag or other permanent markings that gives the pressure reading (125 psi or 150 psi) and the temperature reading (200F or 210F). The water heater must also have discharge pipe for the relief valve which is the same diameter or large, as the water intake pipe and which is made of material which can withstand the temperature and pressure listed above. The discharge pipe must be directed outside or toward the floor.	Language removed. HACSA will follow guidance in HUD regulations for HQS which state a hot water heater must have a temperature/pressure relief valve which will operate when either the temperature or the pressure in the tank is too high. The hot water heater must also have a discharge line directed to the floor or outside the living area.	No	Reduces restrictions on what defines a hot water heater allowing increased housing opportunities for applicants and tenants.

## Attachment B: Key Modifications to HACSA's Administrative Plan

Previous Policy	Proposed Policy	Required Change	Impact
HACSA verified excluded income.	HACSA will accept the family's self-certification as verification of fully excluded income sources. Additional verification may be required based on other policy or rule. HACSA will continue to verify the source and amount of partially excluded income.	No	Allow additional payment options for residents.
Life Threatening Conditions found at HQS Inspections. The HA may give a short extension (not more than 48 additional hours) whenever the responsible party cannot be notified or it is impossible to effect the repair within the 24 hr. period.	Language removed. The responsible party must correct life-threatening conditions within 24 hours of PHA notification.	Yes	No extensions will be given.
The PHA will not approve an initial lease term of less than one year.	The PHA will approve an initial lease term of less than one (1) year only where the PHA determines and can clearly document that: (i) Such shorter term would improve housing opportunities for the tenant; and (ii) Such shorter term is the prevailing local market practice.	No	Expands housing opportunities for applicants and tenants.
HACSA conducted annual verification of fixed income sources	HACSA will streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. Third party verification of fixed sources must still occur at intake and every three years thereafter.	No	Part of HUDs May Streamlining Rule. Fewer residents will be required to verify fixed income sources.
HAP Contract Execution. Owners who have not previously participated in the HCV program must attend a meeting with the PHA in which the terms of the Tenancy Addendum and the HAP contract will be explained.	Owners who have not previously participated in the HCV program will be invited to attend a meeting with the PHA in which the terms of the Tenancy Addendum and the HAP contract will be explained.	No	Streamlines the leasing up process.
For any family moving into its jurisdiction under portability, the PHA will conduct a new reexamination of family income and composition.	The PHA will rely upon the income information provided by the initial PHA and will not conduct a new reexamination of income and composition for incoming portable families.	No	Streamlines the portability in process.
Effective date for income changes. When a family requests an interim down all documentation of decreases in family income/family composition must be received no later than the 25 <sup>th</sup> of the month to take place at the first of the following month.	If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, the PHA will conduct an interim reexam. The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively. For example, an interim decrease is reported and all required documentation is provided to the PHA on April 30th, but the PHA was not able to verify the changes until May 15th, the interim change will be made retroactive to May 1st examination.	No	Provides applicants and tenants with a more timely rent change when the tenant's income decreases.
Expenditures from the Administrative fee reserve will be made in accordance with all applicable federal requirements. Expenditures will not exceed \$10,000 per occurrence without the prior approval of the PHA's Board of Commissioners.	Expenditures from the UNP account will be made in accordance with all applicable federal requirements. Expenditures will not exceed \$100,000 per occurrence without the prior approval of the PHA's Board of Commissioners.	No	Aligns with HACSA's procurement policy.

## SECTION 2

### Certification Forms

HUD-50077-ST-HVC-HP Certifications of Compliance with PHA Plan

HUD 50077-SL Certification by State or Local Official of PHA  
Plans Consistency with the Consolidated Plan or  
State Consolidated Plan

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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including  
Required Civil Rights Certifications**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning \_\_\_10/1/2016\_\_\_, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

HOUSING ANG COMMUNITY SERVICES AGENCY OF LANE COUNTY (HACSA)

OR006

PHA Name

PHA Number/HA Code

\_\_\_\_\_ Annual PHA Plan for Fiscal Year 2017\_\_

\_\_\_\_\_ 5-Year PHA Plan for Fiscal Years 2015\_\_ - 2019\_\_\_\_\_

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

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Name of Authorized Official  CHARENE REAVIS	Title  BOARD CHAIR
Signature TO BE SIGNED PRIOR SUBMISSION	Date

**Certification by State or Local  
 Official of PHA Plans Consistency  
 with the Consolidated Plan or  
 State Consolidated Plan  
 (All PHAs)**

U. S Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 2/29/2016

**Certification by State or Local Official of PHA Plans  
 Consistency with the Consolidated Plan or State Consolidated Plan**

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

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

\_\_\_\_\_ Housing and Community Services Agency of Lane County \_\_\_\_\_  
*PHA Name*

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of  
 Impediments (AI) to Fair Housing Choice of the

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

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State  
 Consolidated Plan and the AI.

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

Name of Authorized Official	Title
Signature TO BE SIGNED PRIOR SUBMISSION	Date