




# ANNUAL PLAN FOR FISCAL YEAR 2027

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 541-682-3755

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

 100 West 13th Avenue, Eugene, OR 97401

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# 1. ANNUAL PLAN 45 DAY NOTICE



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



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

Homes for Good Housing Agency is updating its PHA Annual Plan. This plan guides the planning and implementation of federal programs under the jurisdiction of the Department of Housing and Urban Development for the period beginning October 1, 2026. The federal programs related to housing and other needs for low-income persons covered by the Agency Plans include, but are not limited to, Capital Fund, Section 8 and Public Housing Admission policies, Self Sufficiency, and Resident participation.

The public examination and comment period begins April 27, 2026, and ends June 11, 2026. There will be a public hearing on June 11, 2026, at 3:00 PM at the Homes for Good Service Center first floor at 100 West 13<sup>th</sup> Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good PHA Annual Plan Public Hearing  
Time: June 11, 2026, at 03:00 PM Pacific Time (US and Canada)

### **Online:**

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

Meeting ID: 280 440 198 620 97

Passcode: Uz9Zf6fr

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

[+1 689-206-0388](tel:+16892060388), [697190500#](tel:+1697190500) United States, Orlando

Phone conference ID: 697 190 500#

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

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

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

## 2. MTW SUPPLEMENT 45 DAY NOTICE



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



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

Homes for Good Housing Agency is updating its Moving to Work (MTW) Supplement to the Public Housing Authority (PHA) Annual Plan (the "Supplement") for submission to HUD. The MTW program gives Homes for Good specific funding and programmatic flexibilities. The Supplement describes the ways in which Homes for Good plans to use its MTW flexibilities in the Fiscal Year starting October 1, 2026. Homes for Good also prepared a "reader-friendly" narrative that describes the waivers included in its plan. This narrative can be found on the MTW page on the Homes for Good website.

A separate public hearing is required for the Supplement because it includes a request to waive one or more of HUD's safe harbor waivers and an agency-specific waiver. The public examination and comment period of the Supplement begins April 27, 2026, and ends June 11, 2026. There will be a public hearing on June 11, 2026, at 3:45 PM at the Homes for Good Service Center first floor at 100 West 13<sup>th</sup> Avenue Eugene, OR 97401 and via Microsoft Teams.

Topic: Homes for Good MTW Supplement to the Annual Plan Public Hearing  
Time: June 11, 2026, at 3:45 PM Pacific Time (US and Canada)

**Online:**

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

Meeting ID: 298 326 082 530 100

Passcode: 3Y8HQ9VV

**Dial-in by phone:**

[+1 689-206-0388](tel:+16892060388), [820519378#](tel:+1820519378) United States, Orlando

Phone conference ID: 820 519 378#

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

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

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

### 3. STREAMLINED ANNUAL PHA PLAN FOR FY2027

<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires 09/30/2027</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form. PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

**Definitions.**

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

A.	PHA Information																										
A.1	<p>PHA Name: <u>Homes for Good Housing Agency</u> PHA Code: <u>OR006</u>                      PHA Type: <input checked="" type="checkbox"/> High Performer                      PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2026</u>                      PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)                      Number of Public Housing (PH) Units <u>595</u> Number of Housing Choice Vouchers (HCVs) <u>3,309</u>                      Total Combined <u>3,904</u>                      PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Public Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV																		
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		PH	HCV																								

<b>B.</b>	<b>Plan Elements</b>
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual PHA Plan</b> submission?</p> <p>Y N: No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:  <b>These are included in the sections that follow. Homes for Good's PHA Plan Elements are also restated in this document for clarity:</b></p> <ul style="list-style-type: none"> <li>• See Attachment B.1 Revision of PHA Plan Elements</li> <li>• See Attachment 1. Key Modifications ACOP FY26 <ul style="list-style-type: none"> <li>○ Pet Policy – page 26</li> </ul> </li> </ul> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<b>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Choice Neighborhoods Grants.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Program under Section 32, 9 or 8(Y)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
<b>B.3</b>	<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 Plan.</p> <p><b>See Attachment B.3 Progress Report</b></p>
<b>B.4.</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p><b>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 10/26/2022.</b></p> <p><b>New Capital Fund 5 Year Action Plan is in public comment period ending on 05/26/2026</b></p>

B.5	<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 checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p><u>2024-001 Financial Reporting- accounts not properly reconciled</u>  <u>2024-002 Eligibility- 4 of 40 files had errors in tenant documentation/calculation.</u>  <u>2024-03 Cash Management one drawdown was made and payment not made within 72 hrs.</u></p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan,</u> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><u>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</u> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> <p>Homes for Good will identify and add challenged elements that come up through public process, if any.</p>

## **Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs**

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

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

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

### **B. Plan Elements.**

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

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

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families; (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

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

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.** Describe the PHA's admissions policy for ~~deconcentration~~ of poverty and income mixing of lower-income families in public housing. The ~~Deconcentration~~ Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The ~~deconcentration~~ requirements apply to general occupancy and family public housing developments. Refer to 24 CFR 905.2(b)(2) for developments not subject to ~~deconcentration~~ of poverty and income mixing requirements 24 CFR 903.7(b). Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists 24 CFR 903.7(b). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV (24 CFR 903.7(b)). Describe the unit assignment policies for public housing 24 CFR 903.7(b).

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

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

**Homeownership Programs.** A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(v) of the 1937 Act (24 CFR 903.7(k) and 24 CFR 903.11(c)(1)).

**Safety and Crime Prevention.** A description of PHA's plan for safety and crime prevention. For High Performing PHAs, the information required by 24 CFR 903.7(m) must be included only to the extent this information is required for PHA's participation in the public housing drug elimination program and the PHA anticipates participating in this program in the applicable year (24 CFR 903.11(c)(1)).

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

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

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan (24 CFR 903.7(s)(2)(ii)). For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the "Sample PHA Plan Amendment" found in Notice PIH-2019-23(HA), successor RAD Implementation Notices, or other RAD Notices.

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

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

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

**Choice Neighborhoods Grants.** 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for Choice Neighborhoods Grants; and 2) A timetable for the submission of applications or proposals. The application and approval process for Choice Neighborhoods is a separate process. See guidance on HUD's website at: <https://www.hud.gov/cn> (Notice PIH 2011-47).

**Modernization or Development (Conventional & Mixed-Finance).** 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for modernization or development, and 2) A timetable for the submission of applications or proposals. The application and approval process for modernization or development is a separate process. See 24 CFR part 905 and guidance on HUD's website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4).

**Demolition and/or Disposition.** With respect to public housing only, describe (1) any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) a timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/centers/sac/demo\\_dispo/](https://www.hud.gov/program_offices/public_indian_housing/centers/sac/demo_dispo/) and 24 CFR 903.7(h).

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe (1) any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; (2) An analysis of the projects or buildings required to be converted under Section 33; and (3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at the Special Applications Center (SAC) (<https://www.hud.gov/sac>) and 24 CFR 903.7(j).

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program (including Faircloth to RAD).** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. Note that all PHAs shall be required to provide the information listed in Attachment 1D of Notice PIH 2019-23(HA) as a significant amendment or its successor notice. See additional guidance on HUD's website at: <https://www.hud.gov/RAD/library/notices>.

**Homeownership Programs.** A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(v) of the 1937 Act (24 CFR 903.7(k) and 24 CFR 903.11(c)(1)).

**Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and ~~deconcentration~~ standards, as stated in (24 CFR 983.55(b)(1)) and set forth in the PHA Plan statement of ~~deconcentration~~ and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations (including if PBV units are planned on any former or current public housing units or sites) and describe how project-basing would be consistent with the PHA Plan (24 CFR 903.7(b), 24 CFR 903.7(t)).

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

**Other Capital Grant Programs (i.e., Capital Fund Lead Based Paint, Housing Related Hazards, At Risk/Receivership/Substandard/Troubled Program, and/or Emergency Safety and Security Grants).** For all activities that the PHA plans to undertake in the applicable Fiscal Year, provide a description of the activity in the space provided.

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

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR 903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XXX/XX/XXXX."

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

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

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations (24 CFR 903.13(c), 24 CFR 903.19).

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

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of 24 CFR 5.150 et. seq., 903.7(o)(1), and 903.15(d).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public (24 CFR 903.23(b)).

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Public reporting burden for this information collection is estimated to average 5.26 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

## 4. ANNUAL PLAN FY2027 ATTACHMENTS

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

Revised 4/17/2026

Color codes: **Chapters** added language removed language

#### **Overview of Changes in the FY2027 - ACOP**

**Below is a summary of the changes contained in the March 2026 revision, organized by chapter.**

#### **Introduction**

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

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, reexaminations and more to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD delayed full compliance for HOTMA 102/104. *Compliance* with Sections 102 and 104 of HOTMA means not only applying HOTMA 102/104 regulations to affected programs but also submitting Form HUD-50058s with family information to HUD's electronic reporting system. Currently, PHAs remain unable to comply with HOTMA 102/104 because HUD's current/PIC system is unable to accept HOTMA-compliant Form HUD-50058s. However, HUD has determined that some HOTMA 102/104 policies are not dependent on transition systems and specified a PHA implementation date for these policies of July 1, 2025.

HOTMA 102/104 policies are provided in each affected area of the model policy. Some HOTMA policies that are "on hold" are indicated in the model policy as such. The provided appendix explicitly identifies all HOTMA elements that are on hold.

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

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

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

**No changes**

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

##### **2-I.B. NONDISCRIMINATION**

## **PHA Policy**

The PHA will adhere to all state and local protected classes unless they conflict with Federal Law or Regulation.

~~The PHA does not identify any additional protected classes.~~

## 2-I.C. DISCRIMINATION COMPLAINTS

· Complaints under the Equal Access Final Rule section has been removed (PIH 2014-20), and as such all policies related have been removed as well

**2. PART III** – major changes removing LEP (Limited English Proficiency) regulatory language and most related policies

## **PHA Policy**

PHA oral and written communications with families will generally be conducted in English. For applicants and participants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication.

~~The PHA will utilize a language line for telephone interpreter services.~~

~~When exercising the option to conduct remote hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice only interpretation.~~

~~Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing. The interpreter may be a family member or friend. If the interpreter chosen by the family is a minor, the PHA will not rely as on the minor to serve as the interpreter.~~

~~The PHA will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. "Reasonable steps" may not be reasonable where the costs imposed substantially exceed the benefits.~~

~~Where feasible and possible, the PHA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents.~~

## **Chapter 3 - ELIGIBILITY**

### 3-II.B. OCCUPANCY BY OVER-INCOME FAMILIES [24 CFR 960.503]

## **PHA Policy**

The PHA does not admit any non-income-eligible families.

### 3-III.B. REQUIRED DENIAL OF ADMISSION [24 CFR 960.204]

#### **PHA Policy**

In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A record of arrest(s) will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

### 3-III.D. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

#### **PHA Policy**

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 may be denied admission.

*Drug-related criminal activity*, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].

*Violent criminal activity*, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].

Criminal activity that may threaten the health, safety, or welfare of other tenants [24 CFR 960.203(c)(3)].

Criminal activity that may threaten the health or safety of PHA staff, contractors, subcontractors, or agents.

Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

Evidence of such criminal activity includes, but is not limited to:

Any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 3 years.

A record of arrest(s) will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity.

In making its decision to deny assistance, the PHA will consider the factors discussed in Sections 3-III.F and 3-III.G. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance

#### **PHA Policy**

The PHA may deny admission to an applicant family if the PHA determines that the family:

Has a pattern of eviction from housing or termination from residential programs within the past three years (considering relevant circumstances).

Owes rent or other amounts to any PHA in connection with Section 8, public housing, other public housing assistance under the 1937 Act, or other properties managed and/or owned by the PHA, unless the family repays the full amount of the debt, or is up-to-date on an active repayment plan, prior to being selected from the waiting list.

When denying admission due to family debts as shown in HUD's EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report.

If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family's claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.

Misrepresented or does not provide complete information related to eligibility, including income, award of preferences for admission, expenses, family composition or rent

Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program

Has engaged in or threatened violent or abusive behavior toward PHA personnel

*Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

*Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

### 3-III.E. SCREENING

#### **PHA Policy**

In order to determine the suitability of applicants the PHA will examine applicant history for the past three years. Such background checks may include:

#### *Past Performance in Meeting Financial Obligations, Especially Rent*

PHA and landlord references for the past three years, gathering information about past performance meeting rental obligations such as rent payment record, late payment record, whether the PHA/landlord ever began or completed lease termination for non-payment, and whether utilities were

ever disconnected in the unit. PHAs and landlords will be asked if they would rent to the applicant family again.

Utility company references covering the monthly amount of utilities, late payment, disconnection, return of a utility deposit and whether the applicant can get utilities turned on in their name. (Use of this inquiry will be reserved for applicants applying for units where there are tenant- paid utilities.)

*Disturbances of Neighbors, Destruction of Property or Living or Housekeeping Habits at Prior Residences that May Adversely Affect Health, Safety, or Welfare of Other Tenants, or Cause Damage to the Unit or the Development*

PHA and landlord references for the past three years, gathering information on whether the applicant kept a unit clean, safe and sanitary; whether they violated health or safety codes; whether any damage was done by the applicant to a current or previous unit or the development, and, if so, how much the repair of the damage cost; whether the applicant's housekeeping caused insect or rodent infestation; and whether the neighbors complained about the applicant or whether the police were ever called because of disturbances.

Police and court records within the past three years may be used to check for any evidence of disturbance of neighbors or destruction of property that might have resulted in arrest or conviction. A record of arrest(s) will not be used as the **sole** basis for the denial or proof that the applicant engaged in disqualifying activity.

### 3-III.F. CRITERIA FOR DECIDING TO DENY ADMISSION

#### **PHA Policy**

The PHA will consider the following facts and circumstances prior to making its decision:

The seriousness of the case, especially with respect to how it would affect other residents' safety or property

The effects that denial of admission may have on other members of the family who were not involved in the action or failure to act

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.F) a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking

The length of time since the violation occurred, including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future

**When there is a record of arrest, the PHA may obtain a copy of the police report associated with the arrest and consider the circumstances of the arrest, including:**

While a record of arrest(s) will not be used as the basis for denial, an arrest may trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:

Any statements made by witnesses or the applicant not included in the police report

Whether criminal charges were filed

Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal

Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property

Evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully

The PHA may require the applicant to submit evidence of the household member's successful completion of or active engagement in a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

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

### 4-II.C. OPENING AND CLOSING THE WAITING LIST

#### **PHA Policy**

The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The PHA will give public notice by publishing the relevant information in suitable media outlets to be determined at the time of waiting list opening. The selected outlets will include local newspapers of general circulation, minority media, and other suitable media outlets. The notice will comply with fair housing requirements.

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

***Local media publications***

***Homes for Good Website***

~~Centro-Latino-Americano~~

~~Senior and Disabled Services~~

~~Department of Human Services~~

#### 4-II.F. UPDATING THE WAITING LIST

##### **PHA Policy**

The waiting list will be updated as needed to ensure that all applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail and/or ~~electronic communication email~~ to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address and/or email that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list without further notice.

The family's response must be in writing and may be delivered in person, by mail, by email, ~~by portal~~ or by fax. Responses should be postmarked or received by the PHA not later than 30 business days from the date of the PHA letter.

If the family fails to respond within 30 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 30 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.

When a family is removed from the waiting list during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore, no informal hearing is required.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if the lack of response was due to PHA error, or to circumstances beyond the family's control, ~~as a result of a family member's disability, or as a direct result of status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including an adverse factor resulting~~

##### **PHA Policy**

If the PHA determines that the family is not eligible for admission (see Chapter 3) at any time while the family is on the waiting list the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the PHA's decision (see Chapter 14) [24 CFR 960.208(a)].

A family may be on a waitlist no more than once. If applicant family accepts subsidy they will be removed from said waitlist. Upon admission to any housing program administered by the PHA, including **public housing or project-based voucher (PBV) assistance**, the household will be removed from all other **PHA-administered public housing and PBV waiting lists** for which the household has applied. ~~The family will continue to remain on any other waitlists they had applied for and were placed on.~~ The Family will continue to remain on the tenant based voucher waitlist they had applied for and were placed on.

The PHA will remove an applicant from the waiting list upon **written** request by the applicant family. In such cases no informal hearing is required.

If the applicant does not provide, within the time stated on the PHA letter, required documentation necessary for the PHA to determine eligibility, and the PHA is therefore unable to determine eligibility, the applicant will be removed from the waiting list

#### 4-III.D. ELIGIBILITY DETERMINATION PROCESS

##### **PHA Policy**

Families selected from the waiting list are required to submit an application. Applications will be reviewed for completeness. Applicants with incomplete applications will be contacted via phone, mail, or email to complete the application.

Verification of information pertaining to adult members of the household will not begin until signed release forms are returned to the PHA.

The family must provide the required documentation to the PHA within 14 business days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails to provide the required documentation within 14 business days.

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for **180 days**. If not all household members have disclosed their SSNs (if applicable) at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.

Any required documents or information that the family is unable to provide must be provided within 14 business days of the family being notified of the missing documentation (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required

documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application.

Applications will be provided in English. For applicants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication. ~~For limited-English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.~~

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

### 5-II.D. REFUSALS OF UNIT OFFERS

#### **PHA Policy**

Applicants may refuse to accept a unit offer for "good cause." *Good cause* includes situations in which an applicant is willing to move but is unable to do so at the time of the unit offer, or the applicant demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the applicant's race, color, national origin, etc. [PH Occ GB, p. 104]. Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to the PHA's satisfaction that accepting the unit offer will require an adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities.

The family demonstrates to the PHA's satisfaction that accepting the unit offer would cause the family an undue hardship due to a lease breaking fee.

The family demonstrates to the PHA's satisfaction that accepting the offer will place a family member's life, health, or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders; other court orders; risk assessments related to witness protection from a law enforcement agency; or documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking in accordance with section 16-VII.D of this ACOP. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption.

A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (as listed on final application) or live-in aide necessary to the care of the head of household, spouse, or co-head.

The unit is inappropriate for the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30-day notice to move.

The unit has lead-based paint and the family includes children under the age of six.

In the case of a unit refusal for good cause the applicant will not be removed from the waiting list as described later in this section. The applicant will remain at the top of the waiting list until the family receives an offer for which they do not have good cause to refuse.

The PHA may require documentation of good cause for unit refusals.

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

- Earned Income Disallowance [24 CFR 5.617] has expired, and all related policies have been removed

### **6-I.G. PERIODIC PAYMENTS [Notice PIH 2023-27]**

**MTW Policy (does not apply to Public Housing)**

**The PHA will not adjust the subsidy retroactively for any delayed start of periodic payments received and reported during the period in which the PHA is processing an annual reexam.**

### **PHA Policy**

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

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

*Payments Being Received:* If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made.

*Lump Sum Payments:* At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income.

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

**If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been**

made for a period of less than 12 months, the PHA will average all payments that have been made.

At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income.

If the PHA determines and can appropriately verify that the family in all likelihood will not receive a similar payment, then the amount will not be considered when projecting annual income.

If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income.

#### 6-II.C. ASSET INCLUSIONS AND EXCLUSIONS

##### **PHA Policy**

Any lump-sum receipts are only counted as assets if they are retained by a family in a form recognizable as an asset. [RHIIP FAQs]. For example, if the family receives a \$10,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets.

#### 6-III.D. HEALTH AND MEDICAL CARE EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i)]

##### **PHA Policy**

Before placing health, medical, or disability expense bills and documentation in the tenant file, the PHA will redact all personally identifiable information.

If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will the PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].

#### 6-III.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

##### **PHA Policy**

Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of

service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.

## **Chapter 7 - VERIFICATION**

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259; 24 CFR 5.230; Notice PIH 2023-27; and HOTMAquestions@HUD.gov response 9/15/25]

### **PHA Policy**

At admission, the PHA will request that all adult family members (other than the head of household) sign consent forms stating that their EIV income information may be shared with the head of household. Adult family members with no such consent form on file will be requested to sign at annual reexamination.

If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member.

Refusal by an adult family member to sign a form granting permission to provide EIV information to the head of household is not grounds for denial or termination of assistance of either the individual or the family.

The executed form will remain effective until the family is denied assistance, the individual leaves the program, or the family member provides written notification to the PHA to revoke consent.

7-I.E. LEVEL 5 AND 6 VERIFICATIONS: UP-FRONT INCOME VERIFICATION (UIV)

### **PHA Policy**

Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine the family's annual income, the PHA will obtain an EIV Income Report for all annual reexaminations for **all families on a monthly basis. Reports will be generated** as part of the regular reexamination process. The PHA will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

Income reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV.

Income reports will be retained in resident files with the applicable annual **reexamination** documents or interim reexamination documents (if applicable) for the duration of tenancy.

When the PHA determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

#### 7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]

##### **PHA Policy**

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

The PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information. If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member.

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

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

#### 7-I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]

##### **PHA Policy**

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

#### 7-II.H. VERIFICATION OF PREFERENCE STATUS

## **PHA Policy**

*Permanent Housed Family Preference* - This preference will be verified through review of PHA's own records, including verifying that appropriate-sized housing stock is not available in the relevant program.

*Domestic Violence Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity, and review of the VAWA required documentation in accordance with Chapter 16.

*Transitional Homeless Family Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity.

*Continuum of Care Preference* - This preference will be verified through review of participants in Lane County's Continuum of Care program. Participants will 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. Preferences will be verified through review of the referral from a Homes for Good approved entity.

The PHA offers a preference for families in the HCV families whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher, described in Section 4-III.B.

The PHA will verify this preference through review of internal HCV program records.

## 7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

### **PHA Policy**

Business owners and self-employed persons will be required to provide:

Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.).

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

For self-employed individuals who claim they do not have to file tax returns, the PHA **will may** obtain a completed copy of IRS Form 4506-T to verify that no return has been filed.

For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), the PHA will provide a format for the individual to declare their income and expenses. The PHA will also review the printed statement of monthly income from the applicable app for all hours worked and pay received as well as Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations. At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

### 7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

#### **PHA Policy**

If an EIV income report must be provided to the family, the PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information.

## **Chapter 8 - LEASING AND INSPECTIONS**

### 8-I.C. EXECUTION OF LEASE

#### **PHA Policy**

The head of household, spouse or cohead, and all other adult members of the household will be required to sign the public housing lease when the tenant is notified by the PHA that the unit is ready for occupancy, the household must execute lease documents within **7 business days**, unless documented extenuating circumstances exist. ~~prior to admission. An appointment may be scheduled for the parties to execute the lease and all addenda.~~

Failure to execute the lease within the specified timeframe may result in withdrawal of the offer.

The head of household will be provided a copy of the executed lease and all addenda and the PHA will retain a copy in the resident's file.

Files for households that include a live-in aide will contain file documentation signed by the live-in aide, that the live-in aide is not a party to the lease and is not entitled to PHA assistance. The live-in aide is only approved to live in the unit while serving as the care attendant for the family member who requires the care.

### 8-II.B. PHA-CONDUCTED INSPECTIONS

#### **PHA Policy**

The PHA will notify the resident in writing at least 48 hours prior to any non-emergency inspection.

For regular PHA annual self-inspections, the family will receive at least seven calendar days written notice of the inspection to allow the family to prepare the unit for the inspection.

Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the PHA to enter the unit within seven days from the date of request.

Except for emergencies, management may choose not to enter the dwelling unit to perform inspections where an animal resides unless accompanied for the entire duration of the inspection by the animal owner or responsible person designated by the animal owner, or unless the pet is properly secured so that it does not make contact with management for the entire duration of the inspection or repair.

## **Chapter 9 - REEXAMINATIONS**

- minor language changes to distinguish “informal settlement discussion” from “informal hearing” (which is only used for Public Housing applicants)

## **Chapter 10 - PETS**

### 10-I.B. APPROVAL OF ASSISTANCE ANIMALS

#### **PHA Policy**

For an animal to be excluded from the pet policy and be considered a service animal, it must be a trained dog, and there must be a person with disabilities in the household who requires the dog’s services.

For an animal to be excluded from the pet policy and be considered an assistance animal, there must be a person with disabilities in the household, and the family must request and the PHA approve a reasonable accommodation in accordance with criteria outlined in Notice FHEO 2020-01 and the policies contained in Chapter 2.

If the individual is requesting to keep a unique animal not commonly kept in households, then the requestor has the substantial burden of demonstrating a disability-related therapeutic need for the specific animal or the specific type of animal. The PHA may require verification of the need for the specific animal or specific type of animal.

### 10-II.D. PET RULES

#### **PHA Policy**

Except for emergencies, management will not enter the dwelling unit for performance of repairs or inspections where a pet resides unless accompanied for the entire duration of the inspection or repair by the pet owner or responsible person designated by the pet owner, or unless the pet is properly secured so that it does not make contact with management for the entire duration of the inspection or repair. Any delays or interruptions suffered by management in the inspection, maintenance, and upkeep of the premises due to the presence of a pet may be cause for lease termination.

### 10-III.B. PET DEPOSITS

### **PHA Policy**

Pet owners are required to pay a pet deposit of \$200 per pet in addition to any other required deposits. The deposit may be paid in full or with a signed payment plan of \$50 down and \$10 per month before the pet is brought on the premises.

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

## 10-IV.B. PET DEPOSITS

### **PHA Policy**

Pet owners are required to pay a pet deposit of \$200 per pet in addition to any other required deposits. The deposit may be paid in full or with a signed payment plan of \$50 down and \$10 per month before the pet is brought on the premises.

## **Chapter 11 - COMMUNITY SERVICE**

**No changes**

## **Chapter 12 - TRANSFER POLICY**

## 12-I.B. EMERGENCY TRANSFERS

### **PHA Policy**

The following are considered emergency circumstance warranting an immediate transfer of the tenant or family:

Maintenance conditions in the resident's unit, building or at the site that pose an immediate, verifiable threat to the life, health, or safety of the resident or family members that cannot be repaired or abated within 24 hours. Examples of such unit or building conditions would include: a gas leak, no heat in the building during the winter, no water, toxic contamination, and serious water leaks.

A verified incident of domestic violence, dating violence, sexual assault, or stalking, or human trafficking. For instances of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the threat may be established through documentation outlined in section 16-VII.D. To request the emergency transfer, the requestor must submit an emergency transfer request form (HUD-5383) (Exhibit 16-4 of this ACOP), although, the PHA may waive this requirement in order to expedite the transfer process.

The PHA will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, stalking, or human trafficking once a full request is received and absent of any conflicting information. The PHA will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available, as applicable and without disclosing the victim's location. The PHA defines *immediately available* as a vacant unit, that

is ready for move-in within a reasonable period of time, not to exceed **60 calendar days**. If an internal transfer to a safe unit is not immediately available, the PHA will assist the resident in seeking an external emergency transfer either within or outside the PHA's programs.

The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan.

#### 12-I.D. COSTS OF TRANSFER

##### **PHA Policy**

The PHA will bear the reasonable costs of temporarily accommodating the tenant and of long term transfers, if any, due to emergency **maintenance** conditions.

The reasonable cost of transfers includes the cost of packing, moving, and unloading.

The PHA will establish a moving allowance based on the typical costs in the community of packing, moving, and unloading. To establish typical costs, the PHA will collect information from companies in the community that provide these services.

The PHA will pay the costs for the family's eligible moving expenses up to the PHA's established moving allowance.

#### 12-II.B. TYPES OF PHA-REQUIRED TRANSFERS

##### **PHA Policy**

The types of transfers that may be required by the PHA, include, but are not limited to, transfers to make an accessible unit available for a disabled family, transfers to comply with occupancy standards, transfers for demolition, disposition, revitalization, or rehabilitation, and emergency transfers as discussed in Part I of this chapter.

Transfers required by the PHA are mandatory for the tenant. The family will be given **15 calendar 30 calendar** days to vacate the unit after receipt of written notice.

#### 12-III.C. ELIGIBILITY FOR TRANSFER

##### **PHA Policy**

Except where reasonable accommodation or an emergency transfer under VAWA is being requested, the PHA will only consider transfer requests from residents that meet the following requirements:

Have no lease enforcement or termination of tenancy in progress

Have no current housekeeping lease violations or history of damaging property

**Have been in their current unit for at least 12 months**

A resident with housekeeping standards violations or lease enforcement or termination of tenancy in progress will be sent a transfer request denial letter until the resident passes a follow-up housekeeping inspection or all lease enforcement has been cured.

Exceptions to the good record requirement may be made with Division Director approval.

If a family requested to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines, the family will not be eligible to transfer to a larger size unit for a period of two years from the date of admission, unless they have a change in family size or composition, or it is needed as a reasonable accommodation.

#### 12-IV.D. GOOD CAUSE FOR UNIT REFUSAL

##### **PHA Policy**

Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to the PHA's satisfaction that accepting the unit offer will require an adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities.

The family demonstrates to the PHA's satisfaction that accepting the offer will place a family member's life, health, or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders, other court orders, risk assessments related to witness protection from a law enforcement agency, or documentation of domestic violence, dating violence, stalking, or human trafficking in accordance with section 16-VII.D of this ACOP. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption.

A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (as listed on **the lease final application**) or live-in aide necessary to the care of the principal household member.

The unit is inappropriate for the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30-day notice to move.

The unit has lead-based paint and the family includes children under the age of six.

The PHA will require documentation of good cause for unit refusals.

## **Chapter 13 - LEASE TERMINATIONS**

#### 13-III.B. MANDATORY LEASE PROVISIONS [24 CFR 966.4(I)(5)]

##### **PHA Policy**

The PHA may terminate the lease for drug-related criminal activity engaged in on or off the premises by any tenant, member of the tenant's household or guest, and any such activity engaged in on the premises by any other person under the tenant's control.

The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of covered persons related to the drug-related criminal activity.

A record of arrest(s) will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.

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

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

#### **PHA Policy**

The PHA may terminate the lease for the following reasons.

*Fugitive Felon or Parole Violator.* If a tenant is fleeing to avoid prosecution, or custody or confinement after conviction, for a crime, or attempt to commit a crime, that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or violating a condition of probation or parole imposed under federal or state law.

*Persons subject to sex offender registration requirement.* If any member of the household has, during their current public housing tenancy, become subject to a registration requirement under a state sex offender registration program.

Discovery of facts after admission to the program that would have made the tenant ineligible

Discovery of material false statements or fraud by the tenant in connection with an application for assistance or with a reexamination of income.

Failure to furnish such information and certifications regarding family composition and income as may be necessary for the PHA to make determinations with respect to rent, eligibility, and the appropriateness of the dwelling unit size.

Failure to transfer to an appropriate size dwelling unit based on family composition, upon appropriate notice by the PHA that such a dwelling unit is available.

Failure to permit access to the unit by the PHA after proper advance notification for the purpose of performing routine inspections and maintenance, for making improvements or repairs, or without advance notice if there is reasonable cause to believe that an emergency exists.

Failure to promptly inform the PHA of the birth, adoption or court-awarded custody of a child. In such a case, promptly means within 14 calendar days of the event.

Failure to abide by the provisions of the PHA pet policy.

If the family has breached the terms of a repayment agreement entered into with the PHA.

If a family member has violated federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.

Failure to comply with the PHA's rules regarding weapons of any kind, including, but not limited to, dart guns, air guns, BB guns, slingshots, hand-guns, rifles that could

cause harm to person or property by a resident, members of the resident's household, and/or resident's guest.

If a household member has engaged in or threatened violent or abusive behavior toward PHA personnel.

*Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

*Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

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

### 13-III.E. CRITERIA FOR DECIDING TO TERMINATE TENANCY

#### **PHA Policy**

The PHA will consider the following facts and circumstances before deciding whether to terminate the lease for any of the HUD required lease provisions or for any other reasons:

The seriousness of the offending action, especially with respect to how it would affect other residents' safety or property

The extent of participation or culpability of the leaseholder, or other household members, in the offending action, including whether the culpable member is a minor, a person with disabilities, or (as discussed further in section 13-III.F) a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking

The effects that the eviction will have on other family members who were not involved in the action or failure to act

The effect on the community of the termination, or of the PHA's failure to terminate the tenancy

The effect of the PHA's decision on the integrity of the public housing program

The extent to which the leaseholder has shown personal responsibility and whether they have taken all reasonable steps to prevent or mitigate the offending action

The length of time since the violation occurred, the family's recent history, and the likelihood of favorable conduct in the future

When there is a record of arrest, the PHA may obtain a copy of the police report associated with the arrest and consider the circumstances of the arrest, including:

While a record of arrest(s) will not be used as the basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:

Any statements made by witnesses or the participant not included in the police report

Whether criminal charges were filed

Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal

Any other evidence relevant to determining whether or not the participant engaged in disqualifying activity

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property.

In the case of program abuse, whether or not a false certification was signed by the family

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

- This chapter contains changes removing LEP (Limited English Proficiency) regulatory language from policies

### 14-I.B. INFORMAL HEARING PROCESS [24 CFR 960.208(a) and PH Occ GB, p. 58]

#### **PHA Policy**

Informal hearings will be conducted in English. For applicants who may require language assistance, the PHA will responsibly use artificial intelligence, a PHA staff person who can interpret, and/or machine translation to communicate. The PHA will also permit families to bring an advocate, family member, friend, or other adult representative to assist in communications.

~~As with in-person hearings, Limited English Proficiency (LEP) requirements also apply to remote informal hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal hearings.~~

### 14-III.G. REMOTE HEARINGS [Notice PIH 2020-32]

#### **PHA Policy**

Grievance hearings will be conducted in English. For participants who may require language assistance, the PHA will responsibly use artificial intelligence, a PHA staff person who can interpret, and/or machine translation to communicate. The PHA will also permit families to bring an advocate, family member, friend, or other adult representative to assist in communications.

As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote grievance hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote grievance hearings.

## **Chapter 15 - PROGRAM INTEGRITY**

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

## **Chapter 16 - PROGRAM ADMINISTRATION**

### 16-III.B. REPAYMENT POLICY

#### **PHA Policy**

The PHA has established the following thresholds for repayment of debts:

Amounts over \$3,000 must be repaid within 36 months.

Amounts between \$2,000 and \$2,999 must be repaid within 30 months.

Amounts between \$1,000 and \$1,999 must be repaid within 24 months.

Amounts under \$1,000 must be repaid within 12 months.

If a family can provide evidence satisfactory to the PHA that the threshold applicable to the family's debt would impose an undue hardship, the PHA may, in its sole discretion, determine that a lower monthly payment amount is reasonable. Any reduction in the required payment amount must be approved by the Portfolio Manager, and the maximum term to repay the debt must not exceed 36 months. In making its determination, the PHA will consider all relevant information, including the following:

The amount owed by the family to the PHA

The reason for the debt, including whether the debt was the result of family action/inaction or circumstances beyond the family's control

The family's current and potential income and expenses

The family's current family share, as calculated under 24 CFR 982.515

The family's history of meeting its financial responsibilities

If a family is paying less than 40 percent of its monthly adjusted income (MAI) in rent, the minimum monthly payment amount will be the greater of the following two amounts:

The difference between 40 percent of the family's MAI and the TTP at the time the agreement is executed or \$25

If a family can provide evidence satisfactory to the PHA that a monthly payment amount of \$25 would impose an undue hardship, the PHA may, in its sole discretion, require a lower monthly payment amount.

~~If the family's income increases or decreases during the term of a repayment agreement, either the PHA or the family may request that the monthly payment amount be adjusted accordingly.~~

### **PHA Policy**

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

## 16-VII.C. NOTIFICATION [24 CFR 5.2005(a)]

### **PHA Policy**

The PHA will post the following information regarding VAWA in its **main offices** and on its website. It will also make the information readily available to anyone who requests it.

A copy of Form HUD-5380, Notice of Occupancy Rights under VAWA to public housing program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)

A copy of Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking **and Alternate Documentation** (see Exhibit 16-2)

A copy of the PHA's emergency transfer plan (Exhibit 16-3)

A copy of Form HUD-5383, HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)

~~The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibit 16-1)~~

Contact information for local victim advocacy groups or service providers.

### **PHA Policy**

Whenever the PHA has reason to suspect that providing information about VAWA to a public housing tenant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary **and as indicated by the victim on form HUD-5382 or the emergency transfer request form.** For example, the PHA may, **based on victim information, determine** **decide** not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

## Glossary

**Affiliated person.** The tenant's spouse, parent, sibling, or child; or any individual, tenant, or lawful occupant living in the tenant's household; or anyone for whom the tenant acts as parent/guardian **individual.** ~~With respect to an individual, a spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in loco parentis (in the position or place of a parent), or any individual, tenant, or lawful occupant living in the household~~ of the a victim of domestic violence, dating violence, sexual assault, or stalking.

**Victim.** Any victim of VAWA violence/abuse, regardless of actual or perceived sexual orientation, gender identity, sex, or marital status.

## Appendix

PHAs may, but are not required to:

- Stop using the EIV Income Report during interim reexams.
- Use Safe Harbor income determinations from means-tested federal assistance programs to verify a family's income and assets.

Finally, in FAQs dated 2/22/24, HUD also stated PHAs may, but are not required to:

- Accept third-party verification dated within 120 days of the date received by the PHA (rather than 60 days of the reexam/PHA request date);
- Accept a statement dated within the appropriate benefit year for fixed income sources like Social Security; and
- Accept a self-certification of SSNs along with a third-party document as a last resort if an individual is not able to provide documentation of SSN.

More details about each of the above provisions can be found in Notice [PIH 2024-38](#). All other provisions of HOTMA 102/104 remain on hold. This means PHAs may not yet implement certain provisions of HOTMA. These include:

- All asset provisions, including the asset limitation;
- All adjusted income provisions, with the exception of the definition of health and medical care expenses;
- Inflationary adjustments (although PHAs may choose to use the HUD-determined passbook rate instead of a PHA-determined passbook rate);
- The new verification hierarchy, which allows for EIV + self-certification and for policy allowing the PHA to not use either third-party

verification form or oral third-party verification before proceeding to accepting self-certifications;

- Annual reexaminations using the previous 12-month period income;
- Interim reexamination requirements; and
- Non-interim reexamination transactions.

PHAs may not implement the above provisions because HUD's current IMS/PIC system is unable to accept HOTMA-compliant Form HUD-50058s. PHAs should await further guidance from HUD on when these will be applicable.

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

**Effective 10/01/2026**

**Public and Multifamily Housing Programs**

**Emergency Transfers**

Homes for Good is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Homes for Good allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. VAWA protections are not limited to women and are available regardless of age or actual or perceived sexual orientation, gender identity, sex, or marital status. Victims cannot be discriminated against on the basis of any protected characteristic, including race, color, national origin, religion, sex (including perceived or actual sexual orientation or gender identity), familial status, disability, or age. HUD-assisted and HUD-insured housing must also be made available to all otherwise eligible individuals and families regardless of age, or actual or perceived gender identity, sexual orientation, or marital status.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the federal agency that oversees that the **public housing and housing choice voucher (HCV) programs** are in compliance with VAWA.

**Definitions**

- **External emergency transfer** refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is, the tenant must undergo an application process in order to reside in the new unit. Examples of External transfers can be found on page X of this plan.

- **Internal emergency transfer** refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process. Examples of Internal transfers can be found on page X of this plan for Public Housing, and page X of this plan for Assisted Housing.
- **Safe unit** refers to a unit that the victim of VAWA violence/abuse believes is safe.
- **VAWA violence/abuse** means an incident or incidents of domestic violence, dating violence, sexual assault, or stalking, as those terms are defined in 24 CFR 5.2003 and "Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking" (Form HUD-5382).

### **Eligibility for Emergency Transfers**

A tenant may seek an emergency transfer to another unit if they or their household member is a victim of VAWA violence/abuse, as outlined in the "Notice of Occupancy Rights Under the Violence Against Women Act," Form HUD-5380. This emergency transfer plan provides further information on emergency transfers, and Homes for Good must provide a copy if requested. Homes for Good may ask for submission of a written request for an emergency transfer, such as form HUD-5383, to certify eligibility for the emergency transfer.

### **A Tenant is eligible for an emergency transfer if:**

1. The tenant (or their household member) is a victim of VAWA violence/abuse;
2. The tenant expressly requests the emergency transfer; **AND**
3. **EITHER**
  - a. The tenant reasonably believes that there is a threat of imminent harm from further violence, including trauma, if they or (their household member) stays in the same dwelling unit; OR
  - b. If the tenant (or their household member) is a victim of sexual assault, either the tenant reasonably believes that there is a threat of imminent harm from further violence, including trauma, if the tenant (or their household member) were to stay in the unit, or the sexual assault occurred on the premises and the tenant requested an emergency transfer within 90 days (including holidays and weekend days) of when that assault occurred.

Homes for Good, in response to an emergency transfer request, should not evaluate whether the tenant is in good standing as part of the assessment or provision of an emergency transfer. Whether or not a tenant is in good standing does not impact their ability to request an emergency transfer under VAWA.

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

## **Emergency Transfers: Public Housing (PH) Program**

### **Internal transfers when a safe unit is immediately available:**

If you are a public housing resident and request an emergency transfer as described in this plan, once a full request is received and absent of any conflicting or missing information, Homes for Good will attempt to assist you in moving to a safe unit quickly. Homes for Good will make exceptions as required to policies restricting moves. Emergency transfers for which you are not required to apply for assistance include the following:

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

These options will be provided as applicable, and without disclosing your location.

Priority will be given relative to other tenants seeking transfers as outlined in the Priority for Transfers section below.

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

### **Internal transfers when a safe unit is not immediately available:**

If an internal transfer to a safe unit is not immediately available, Homes for Good will assist you in seeking an external emergency transfer either within or outside Homes for Good's programs.

### **External transfers:**

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

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

For the external transfers listed above, there are preferences in place that will result in a higher placement on the waiting list than would be available for other applicants.

If eligible for an external transfer, Homes for Good will provide information about unit availability, and will help you in applying for assistance with these other programs. At your request, Homes for Good will refer you to organizations that may be able to further assist you.

VAWA provisions do not supersede eligibility or other occupancy requirements that may apply under a covered housing program. Homes for Good may be unable to transfer a tenant to a particular unit if the tenant cannot establish eligibility for that unit.

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

### **Internal transfers when a safe unit is immediately available:**

If you are a resident and request an emergency transfer as described in this plan, Homes for Good will assist you in finding a safe unit quickly. Homes for Good will make exceptions as needed to policies restricting moves.

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

- Unit in the same development, if you determine that the unit is safe. Emergency transfer requests (including VAWA) will be placed at the top of the transfer list.

**Internal transfers when a safe unit is not immediately available:**

If an internal transfer to a safe unit is not immediately available, Homes for Good will assist you in seeking an external emergency transfer either within or outside Homes for Good’s programs.

**External transfers:**

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

- Assisted Housing unit in a different development
- Public housing program
- HCV tenant-based program
- HCV project-based assistance

For the external transfers listed above, there are preferences in place that will result in a higher placement on the waiting list than would be available for other applicants. If eligible for an external transfer, Homes for Good will provide information about unit availability, and will help you in applying for assistance with these other programs. At your request, Homes for Good will refer you to organizations that may be able to further assist you.

**Emergency Transfer Request Documentation**

To request an emergency transfer, the tenant shall notify Homes for Good’s management office and submit a written request for a transfer to **any PHA office**. If Homes for Good does not already have documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking, Homes for Good may ask for this documentation in accordance with 24 CFR 5.2007. Unless Homes for Good receives documentation that contains conflicting information, as described in 24 CFR 5.2007(b)(2), Homes for Good cannot require third-party documentation to determine status as a VAWA victim for emergency transfer eligibility. Homes for Good will provide reasonable accommodations to this policy for individuals with disabilities. The tenant’s written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence, including trauma, if the tenant (or household member) were to remain in the same dwelling unit; OR
2. In the case of a tenant (or household member) who is a victim of sexual assault, **either** a statement that the tenant reasonably believes there is a threat of imminent harm from further violence or trauma if the tenant (or household member stays in the same dwelling unit), **or** a statement that the sexual assault occurred on the premises and the tenant requested an emergency transfer within 90 days (including holidays and weekend days) of when the assault occurred.

Form HUD-5383 may be used for making a written request for an emergency transfer.

Any request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking will be based on the preferred communication method indicated. If no documentation is received to be able to process the request, Homes for Good will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

Homes for Good may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, Homes for Good will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to address health or safety issues. Any extension granted by Homes for Good will be in writing.

Once the victim provides documentation, Homes for Good will acknowledge receipt of the documentation within 10 business days.

Homes for Good has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

If Homes for Good accepts an individual's statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault, stalking, or human trafficking, Homes for Good will document acceptance of the statement or evidence in the individual's file.

### **Priority for Transfers**

Tenants who qualify for an emergency transfer under VAWA will be given priority over other categories of tenants seeking transfers and individuals seeking placement on waiting lists.

Homes for Good will maintain a centralized transfer list to ensure that transfers are processed in the correct order and that procedures are uniform across all properties. Emergency transfers will not automatically go on the transfer list. Instead emergency transfers will be handled immediately, on a case-by-case basis. If the emergency cannot be resolved by a temporary accommodation, and the resident requires a permanent transfer, the family will be placed at the top of the transfer list.

Transfers will be processed in the following order:

1. Emergency transfers (VAWA, hazardous maintenance conditions)

2. High-priority transfers (verified medical condition, threat of harm or criminal activity, and reasonable accommodation)
3. Transfers to make accessible units available
4. Demolition, renovation, etc.
5. Occupancy standards
6. Other PHA-required transfers
7. Other resident-requested transfers

### **Confidentiality**

If a tenant inquires about or requests any VAWA protections or represents that they or a household member are a victim of VAWA violence/abuse entitled to VAWA protections, Homes for Good must keep any information they provide concerning the VAWA violence/abuse, their request for an emergency transfer, and their or a household member's status as a victim strictly confidential. This information should be securely and separately kept from tenant files. All the information provided by or on behalf of the tenant to support an emergency transfer request, including information on the Certification Form (HUD-5382) and the Emergency Transfer Request Form (HUD-5383) (collectively referred to as "Confidential Information") may only be accessed by PHA employees or contractors if explicitly authorized by Homes for Good for reasons that specifically call for those individuals to have access to that information under applicable federal, State, or local law.

Confidential information must not be entered into any shared database or disclosed to any other entity or individual, except if:

- Written permission by the victim in a time-limited release;
- Required for use in an eviction proceeding or hearing regarding termination of assistance; or
- Otherwise required by applicable law.

In addition, HUD's VAWA regulations require emergency transfer plans to provide strict confidentiality measures to ensure that the location of the victim's dwelling unit is never disclosed to a person who committed or threatened to commit the VAWA violence/abuse. Accordingly, Homes for Good has dedicated a confidential section in their digital filing system that is only accessible by authorized PHA employees.

### **Emergency Transfer Procedure**

Homes for Good cannot specify how long it will take from the time a transfer request is approved until the tenant can be placed in a new, safe unit. Homes for Good will, however, act as quickly as possible to assist a tenant who qualifies for an emergency transfer. If Homes for Good identifies an available unit and the tenant believes that unit would not be safe, the tenant may request a transfer to a different unit. Homes for Good may be unable to transfer a tenant and their household to a particular unit if the tenant and their household has not established or cannot establish eligibility for that unit.

If Homes for Good does not have any safe and available units for which the tenant is eligible, Homes for Good will assist the tenant in identifying other covered housing providers who may have safe and available units to which the tenant could move. At the tenant's request, Homes for Good will also assist the tenant in contacting the local organizations offering assistance to victims of VAWA violence/abuse.

### **Making the Emergency Transfer Plan Available**

Homes for Good will post a copy of the Emergency Transfer Plan in its main office and on its website. It will also make the information readily available to anyone who requests it.

All materials will ensure effective communication with individuals with disabilities, including making materials available in alternative accessible formats, as well as providing reasonable accommodations.

### **Safety and Security of Tenants**

When Homes for Good receives any inquiry or request regarding an emergency transfer, Homes for Good will encourage the person making the inquiry or request to take all reasonable precautions to be safe, including seeking guidance and assistance from a victim service provider. However, tenants are not required to receive guidance or assistance from a victim service provider.

For additional information on VAWA and to find help in your area, visit <https://www.hud.gov/vawa>.

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

- Lane County District Attorney's Office, Victim Services Division ([www.lanecounty.org](http://www.lanecounty.org))
- Sexual Assault Task Force (SATF) – Referral services for victims of violence ([www.oregonsatf.org](http://www.oregonsatf.org))
- Sexual Assault Support Services (SASS) – Support survivors of sexual assault ([www.sass-lane.org](http://www.sass-lane.org))
- Hope & Safety Alliance – Housing for victims of domestic violence (<https://www.hopesafetyalliance.org/>)
- Kids 'FIRST – Advocates for abused children ([www.kidsfirstcenter.net](http://www.kidsfirstcenter.net))
- Court Appointed Special Advocates (CASA) – Help for abused children ([www.casa-lane.org](http://www.casa-lane.org))
- Relief Nursery – Child abuse and neglect prevention agency ([www.reliefnursery.org](http://www.reliefnursery.org))

## 4.2. ATTACHMENT 2 REVISIONS TO HOMES FOR GOOD'S ADMINISTRATIVE PLAN **Overview of Changes in the FY2027 – Admin Plan**

Color codes: **Chapters**

added language

removed language

revised 4/15/2025

**Below is a summary of the changes contained in the February 2026 revision, organized by chapter.**

### **Introduction**

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

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, reexaminations and more to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD delayed full compliance for HOTMA 102/104. *Compliance* with Sections 102 and 104 of HOTMA means not only applying HOTMA 102/104 regulations to affected programs but also submitting Form HUD-50058s with family information to HUD's electronic reporting system. Currently, PHAs remain unable to comply with HOTMA 102/104 because HUD's current/PIC system is unable to accept HOTMA-compliant Form HUD-50058s. However, HUD has determined that some HOTMA 102/104 policies are not dependent on transition systems and specified a PHA implementation date for these policies of July 1, 2025.

HOTMA 102/104 policies are provided in each affected area of the model policy. Some HOTMA policies that are "on hold" are indicated in the model policy as such. The provided appendix explicitly identifies all HOTMA elements that are on hold.

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

The compliance date for NSPIRE-V was to be no later than October 1, 2025. However, in September 2025, HUD extended the NSPIRE-V compliance date to January 31, 2027, at which point the HQS inspection standard will sunset. PHAs may, however, implement NSPIRE-V prior to January 31, 2027, provided they do so in accordance with HUD requirements. Because the definition of *housing quality standards (HQS)* at 24 CFR 982.4 means the minimum quality standards in accordance with 24 CFR 5.703 for the HCV program including any variations approved by HUD, regulations at 24 CFR Part 982 and 983 governing the HCV and PBV programs continue to and will continue to use the terms *HQS* and *housing quality standards* rather than *NSPIRE*. The model policy therefore uses the term *housing quality standards* whenever used by applicable regulations use this term.

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

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

## No changes

### Chapter 2 – FAIR HOUSING AND EQUAL OPPORTUNITY

#### 2-I.A. OVERVIEW

##### **PHA Policy**

The PHA will adhere to all state and local protected classes unless they conflict with Federal Law or Regulation.

~~In addition to Federal law, the State of Oregon recognizes Sexual orientation, marital status, and source of income as additional protected classes. Furthermore City of Eugene adds Ethnicity and domestic partnership status.~~

#### 2-I.B. NONDISCRIMINATION

##### **PHA Policy**

The PHA will adhere to all state and local protected classes unless they conflict with Federal Law or Regulation.

~~The PHA will not discriminate on the basis of perceived sexual orientation, gender identity, or marital status.~~

#### 2-I.C. DISCRIMINATION COMPLAINTS

- Complaint under the Equal Access Final Rule section has been removed (PIH 2014-20), and as such all policies related have been removed as well

##### **PHA Policy**

Applicants or **tenant participants families** who wish to file a VAWA complaint against the PHA may notify the PHA either orally or in writing.

The PHA will advise the family of their right to file a VAWA complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The PHA will inform the family that not later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO's online complaint form via mail, email, or telephone.

The PHA will attempt to remedy complaints made against the PHA and will conduct an investigation into all allegations of discrimination.

The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

**2. PART III** – major changes removing LEP (Limited English Proficiency) regulatory language and most related policies

2-III.A. OVERVIEW [OAG Memo 7/14/25 and Executive Order 14224]

### **PHA Policy**

PHA oral and written communications with families will generally be conducted in English. For applicants and participants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication.

~~The PHA will utilize a language line for telephone interpreter services.~~

~~When exercising the option to conduct remote hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice-only interpretation.~~

~~Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing. The interpreter may be a family member or friend. If the interpreter chosen by the family is a minor, the PHA will not rely as on the minor to serve as the interpreter.~~

~~The PHA will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. "Reasonable steps" may not be reasonable where the costs imposed substantially exceed the benefits.~~

~~Where feasible and possible, the PHA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents.~~

### **Chapter 3- ELIGIBILITY**

3-III.D. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

### **PHA Policy**

The PHA may deny assistance to an applicant family if:

The family does not provide information that the PHA or HUD determines is necessary in the administration of the program.

The family does not provide complete and true information to the PHA.

Any family member has been evicted from federally assisted housing in the last three

years.

Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

The family owes rent or other amounts to any PHA in connection with Section 8, public housing, other public housing assistance under the 1937 Act, **or other properties managed and/or owned by the PHA,** unless the family repays the full amount of the debt, **or is up-to-date on an active repayment plan, enters into a repayment agreement when** prior to being selected from the waiting list.

If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt or enters into a repayment agreement when selected from the waiting list.

The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement or enters into a repayment agreement when selected from the waiting list.

When denying admission due to family debts as shown in HUD's EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report.

If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family's claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.

A family member has engaged in or threatened violent or abusive behavior toward PHA personnel

*Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

*Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

### 3-III.F. CRITERIA FOR DECIDING TO DENY ADMISSION

#### **PHA Policy**

The PHA will consider the following facts and circumstances prior to making its decision:

The seriousness of the case, especially with respect to how it would affect other residents' safety or property

The effects that denial of admission may have on other members of the family who were not involved in the action or failure to act

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.F) a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking

The length of time since the violation occurred, including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future

When there is a record of arrest, the PHA may obtain a copy of the police report associated with the arrest and consider the circumstances of the arrest, including:

~~While a record of arrest(s) will not be used as the basis for denial, an arrest may trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:~~

Any statements made by witnesses or the applicant not included in the police report

Whether criminal charges were filed

Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal

Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully

The PHA may require the applicant to submit evidence of the household member's successful completion of or active engagement in a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

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

- Addition of "and/or electronically" or "or electronically" throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

### 4-II.C. OPENING AND CLOSING THE WAITING LIST

#### **PHA Policy**

The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for

certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The PHA will give public notice by publishing the relevant information in suitable media outlets to be determined at the time of waiting list opening. The selected outlets will include local newspapers of general circulation, minority media, and other suitable media outlets. The notice will comply with fair housing requirements.

~~The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:~~

~~*Local media publications*~~

~~*Homes for Good Website*~~

~~*Centro Latino Americano*~~

~~*Senior and Disabled Services*~~

~~*Department of Human Services*~~

#### 4-II.F. UPDATING THE WAITING LIST

##### **PHA Policy**

The waiting list will be updated as needed to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail and/or **email electronic communication** to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address and/or email that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list without further notice.

The family's response must be in writing and may be delivered in person, by mail, by email, by **portal** or by fax. Responses should be postmarked or received by the PHA not later than 30 business days from the date of the PHA letter.

If the family fails to respond within 30 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 30 business days to respond from the date the

letter was re-sent. If the family fails to respond within this time frames, the family will be removed from the waiting list without further notice.

When a family is removed from the waiting list during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore, no informal hearing is required.

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.

### **PHA Policy**

If at any time an applicant family is on the waiting list, the PHA determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for assistance, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA's decision (see Chapter 16) [24 CFR 982.201(f)].

~~Applicant families may be on a program specific tenant-based or project-based voucher waitlist no more than once. If applicant family accepts subsidy they will be removed from said waitlist.~~ Upon admission to any housing program administered by the PHA, including **public housing or project-based voucher (PBV) assistance**, the household will be removed from all other **PHA-administered public housing and PBV waiting lists** for which the household has applied. ~~The family will continue to remain on any other waitlists they had applied for and were placed on.~~

The family will continue to remain ~~on any~~ the ~~other~~ tenant- based ~~or project-based~~ voucher waitlists they had applied for and were placed on.

The PHA will remove an applicant from the waiting list upon written request by the applicant family. In such cases no informal hearing is required.

If the applicant does not provide, within the time stated on the PHA letter, required documentation necessary for the PHA to determine eligibility, and the PHA is therefore unable to determine eligibility, the applicant will be removed from the waiting list

- Emergency Housing Vouchers (EHV) is sunseting, and all mentions of EHV in policies have been removed
- All-in Re-Housing Preference (limited duration) has expired and has been removed from preferences list

#### 4-III.E. ELIGIBILITY DETERMINATION PROCESS

##### **PHA Policy**

Families selected from the waiting list are required to submit an application. Applications will be reviewed for completeness. Applicants with incomplete applications will be contacted via phone, mail, ~~or~~ email, or electronically to complete the application.

Verification of information pertaining to adult members of the household will not begin until signed release forms are returned to the PHA.

The family must provide the required documentation to the PHA within 14 business days of an otherwise complete application. The PHA will send a notice of outstanding documentation if the family fails to provide the required documentation within 14 business days.

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for **180 days**. If not all household members have disclosed their SSNs (if applicable) at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, and must complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the **project-based** family is unable to provide must be provided within 14 business days of the family being notified of the missing documentation (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

~~Tenant based voucher families will be provided additional 14 business days to submit missing documentation if the family has provided a partially complete application before the current deadline. Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).~~

An advocate, interpreter, or other assistant may assist the family with the application.

Applications will be provided in English. For applicants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence

technology, and/or machine translation to assist families with communication. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

#### 4-III.F. COMPLETING THE APPLICATION PROCESS

##### **PHA Policy**

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 14 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review (Chapter 16).

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g., claimed preference, targeted funding, extremely low-income), the family will be returned to the correct its original position on the waiting list. The PHA will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

If the PHA determines that the family is eligible to receive assistance, the PHA will invite the family to attend a briefing in accordance with the policies in Chapter 5.

##### **Chapter 5 – BRIEFINGS**

- Addition of "and/or electronically" or "or electronically" throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.
- Due to removal of LEP (Limited English Proficiency) regulatory obligation, language regarding this has been removed from policies

#### 5-I.B. BRIEFING [24 CFR 982.301]

##### **PHA Policy**

In-person briefings will generally be conducted in group meetings. At the family's written or oral request, the PHA may provide an individual briefing.

Generally, the head of household is required to attend the briefing. If the head of household is unable to attend, the PHA may approve another adult family member to attend the briefing.

Families that attend group briefings and still need individual assistance will be referred to an appropriate PHA staff person.

Briefings will be conducted in English. For applicants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication. For limited

English proficient (LEP) applicants, the PHA will provide interpretation services in accordance with the PHA's LEP plan (See Chapter 2).

#### 5-II.B. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]

##### **PHA Policy**

The head of household, including the spouse or co-head, will be allocated one bedroom.

All other household members will be based on two (2) persons per bedroom, without regard to gender or age.

Live-in aides will be allocated a separate bedroom. Family members of a live-in aide will not be considered when determining family unit size.

Single person families will be allocated one bedroom.

A foster child or foster adult may be allowed to reside in the unit if their presence would not result in overcrowding of the existing unit. If the authorized placement agency (e.g., public child welfare agency) requires that the foster child have a separate bedroom, the PHA will provide the subsidy standard for one additional bedroom.

#### **Chapter 6 – INCOME**

- Earned Income Disallowance [24 CFR 5.617] has expired, and all related policies have been removed

#### 6-I.F. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27]

- Regulation regarding calculations for student financial assistance have changed and been adjusted in the relevant policies

#### 6-I.G. PERIODIC PAYMENTS

##### **PHA Policy**

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

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

*Payments Being Received:* If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made.

*Lump Sum Payments:* At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income.

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

If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period of less than 12 months, the PHA will average all payments that have been made.

At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income.

If the PHA determines and can appropriately verify that the family in all likelihood will not receive a similar payment, then the amount will not be considered when projecting annual income.

If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income.

## 6-II.C. ASSET INCLUSIONS AND EXCLUSIONS

### **PHA Policy**

Any lump-sum receipts are only counted as assets if they are retained by a family in a form recognizable as an asset. [RHIIP FAQs]. For example, if the family receives a \$10,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets.

## 6-III.D. HEALTH AND MEDICAL CARE EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i)]

### **PHA Policy**

Before placing health, medical, or disability expense bills and documentation in the tenant file, the PHA will redact all personally identifiable information.

If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will the PHA include

an applicant's or resident's medical records in the file [Notice PIH 2010-26].

6-III.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

### **PHA Policy**

Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.

## **Chapter 7 – VERIFICATION**

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259; 24 CFR 5.230; Notice PIH 2023-27; and HOTMAquestions@HUD.gov response 9/15/25]

### **PHA Policy**

At admission, the PHA will request that all adult family members (other than the head of household) sign consent forms stating that their EIV income information may be shared with the head of household. Adult family members with no such consent form on file will be requested to sign at annual reexamination.

If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member.

Refusal by an adult family member to sign a form granting permission to provide EIV information to the head of household is not grounds for denial or termination of assistance of either the individual or the family.

The executed form will remain effective until the family is denied assistance, the individual leaves the program, or the family member provides written notification to the PHA to revoke consent.

7-I.E. LEVEL 5 AND 6 VERIFICATIONS: UP-FRONT INCOME VERIFICATION (UIV)

### **PHA Policy**

Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine the family's annual income, the PHA will obtain an EIV Income Report for all annual reexaminations for **all** families **on a monthly basis**, as part of the regular

reexamination process. The PHA will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

Income reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV.

Income reports will be retained in resident files with the applicable annual **reexamination** documents or interim reexamination documents (if applicable) for the duration of tenancy.

When the PHA determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

#### 7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]

##### **PHA Policy**

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

The PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information. If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member.

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

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

#### 7-I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]

##### **PHA Policy**

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

## 7-II.H. VERIFICATION OF PREFERENCE STATUS

### **PHA Policy**

The PHA will verify preference as follows:

*Homeless Family Preference* - This preference applies to homeless families who have been referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).

*Homeless Veteran Family Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity.

*Transitional Homeless Family Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity.

*Displaced Family Preference (Fire)* - This preference will be verified through review of the referral from a Homes for Good approved entity, and that the referral was received within 45 days of the displacement.

*Elderly or Disabled Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity.

*Domestic Violence Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity, and review of the VAWA required documentation in accordance with Chapter 16.

*Continuum of Care Preference* - This preference will be verified through review of participants in Lane County's Continuum of Care program. Participants will 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.

*Disabled Homeless Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity.

*Permanent Housed Family Preference* - This preference will be verified through review of PHA's own records, including verifying that appropriate-sized housing stock is not available in the relevant program.

*Non-Elderly Person with Disabilities Preference* - This preference will be verified through review of the referral from a Homes for Good approved entity, and for applicants who are transitioning out of institutional and other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless.

*Non-Elderly Person with Disabilities Preference (limited to 181 issued Mainstream Vouchers)* - This preference applies to non-elderly persons with disabilities who are on the Homes for Good tenant-based voucher waitlist.

~~*All In Re-housing Preference*—This limited duration preference applies to current Housing Choice Voucher waitlist applicants who self-identified as homeless at time of waitlist application, and who are referred by a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). This preference will be expire on December 1, 2023. Homes for Good reserves the right to extend or rescind the preference dependent upon ALL IN Funding from the Governor of Oregon.~~

## 7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

### **PHA Policy**

Business owners and self-employed persons will be required to provide:

Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.).

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

For self-employed individuals who claim they do not have to file tax returns, The PHA **will-may** obtain a completed copy of IRS Form 4506-T to verify that no return has been filed.

For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), the PHA will provide a format for the individual to declare their income and expenses, and or utilize the Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations. At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

## 7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

### **PHA Policy**

If an EIV income report must be provided to the family, the PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information.

### **Chapter 8 – HQS**

- Addition of "**and/or electronically**" or "**or electronically**" throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

## 8-II.D. INTERIM INSPECTIONS [24 CFR 982.405(d)]

### **PHA Policy**

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

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

## **Chapter 9 – LEASING**

- Addition of “and/or electronically” or “or electronically” throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

### 9-I.E. PHA LEASING ASSISTANCE FOR FAMILIES (Notice PIH 2022-18)

#### **PHA Policy**

The PHA will not utilize UNP or ongoing administrative fees to pay security deposits, utility deposits, assist with application or similar fees, or holding fees

## **Chapter 10 – MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY**

- Addition of “and/or electronically” or “or electronically” throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

### 10-I.A. ALLOWABLE MOVES

#### **PHA Policy**

If a family requests permission to move with continued assistance or for an external transfer to another covered housing program operated by the PHA based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, stalking or human trafficking, the PHA will request that the resident request the emergency transfer using form HUD-5383, and the PHA will request documentation in accordance with section 16-IX.D of this plan.

The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family’s file.

The PHA may choose to provide a voucher to facilitate an emergency transfer of the victim without first terminating the assistance of the perpetrator.

Before granting an emergency transfer, the PHA will ensure the victim is eligible to receive continued assistance based on the citizenship or immigration status of the victim.

The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan, and discusses external transfers to other covered housing programs.

## **Chapter 11 – REEXAMINATIONS UNDER HOTMA 102/104**

- Addition of “and/or electronically” or “or electronically” throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

### 11-I.C. CONDUCTING ANNUAL REEXAMINATIONS

#### **PHA Policy**

Families will be asked to return the annual reexamination packet and submit verification

documentation by the deadline provided in the notice provided.

Required information will include the family declaration form, as well as supporting documents or forms related to the family's income, expenses, and family composition.

The PHA will notify the family in writing if any required documentation or information is missing. The missing information or documentation must be provided within 14 business days of the date the PHA notifies the family. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family requests an in-person interview, families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment.

~~Families will be asked to provide all required information (as described in the reexamination notice) to complete the reexamination process. The required information will include a PHA-designated reexamination form, as well as supporting documents or forms related to the family's income, expenses, and family composition.~~

~~If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.~~

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be offered an opportunity to attend a coaching session. Failure to respond or provide the required documents or information will result in the initial ineligibility process. If the family does not provide the required documents or materials during the ineligibility process, then the family will be sent a notice of termination (See Chapter 12).

Coaching Sessions are defined as an opportunity for the family and PHA to meet when the family may not be in compliance with program regulations or policies, to offer additional support to successfully navigate the program. Coaching sessions are not applicable during HUD Mandatory Termination of Assistance (See Chapter 12).

## 11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

### **PHA Policy**

Families must request PHA approval to add a new family member (other than due to birth, adoption, or court-awarded custody), live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 14 consecutive days or 30 cumulative days within a 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.

The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

The PHA will not approve the addition of a foster child or foster adult if it would result in overcrowding of the existing unit. If the authorized placement agency (e.g., public child welfare agency) requires that the foster child have a separate bedroom, the PHA will provide the subsidy standard for one additional bedroom, in accordance with 5-II.B.

~~The PHA will not approve the addition of a foster child or foster adult if it will cause a violation~~

of space standards.

If the PHA determines an individual meets the PHA's eligibility criteria and documentation requirements, the PHA will provide written approval to the family. If the approval of a new family member or live-in aide will cause overcrowding according to space standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

If the PHA determines that an individual does not meet the PHA's eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

The PHA will make its determination within 14 business days of receiving all information required to verify the individual's eligibility.

## **Chapter 12 – TERMINATION OF ASSISTANCE AND TENANCY**

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

#### **PHA Policy**

The PHA may terminate a family's assistance if:

The family has failed to comply with any family obligations under the program. See Exhibit 12-1 for a listing of family obligations and related PHA policies.

Any family member has been evicted from federally assisted housing in the last five years.

Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

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

The family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.

The family has breached the terms of a repayment agreement entered into with the PHA.

A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

*Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

*Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

The family was evicted for repeated violation(s) of the lease.

*Repeated lease violations* will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that

cause damage to the unit or premises, and criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

#### 12-II.D. CRITERIA FOR DECIDING TO TERMINATE ASSISTANCE

##### **PHA Policy**

The PHA will consider the following facts and circumstances when making its decision to terminate assistance:

The seriousness of the case, especially with respect to how it would affect other residents' safety or property.

The effects that termination of assistance may have on other members of the family who were not involved in the action or failure to act

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities or (as discussed further in section 12-II.E) a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking.

The length of time since the violation occurred, including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future

~~While a record or records of arrest will not be used as the sole basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:~~

When there is a record of arrest, the PHA may obtain a copy of the police report associated with the arrest and consider the circumstances of the arrest, including:

Any statements made by witnesses or the participant not included in the police report

Whether criminal charges were filed

Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal

Any other evidence relevant to determining whether or not the participant engaged in disqualifying activity

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully. The PHA will require the

participant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

In the case of program abuse, the dollar amount of the overpaid assistance and whether or not a false certification was signed by the family (See Chapter 16-IV.B. Repayment Policy, Criminal Prosecution for Program Fraud/Abuse).

### **Chapter 13 – OWNERS**

- Addition of "and/or electronically" or "or electronically" throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

### **Chapter 14 – PROGRAM INTEGRITY**

**No changes**

### **Chapter 15 – SPECIAL HOUSING TYPES**

**No changes**

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

- Addition of "and/or electronically" or "or electronically" throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.
- Due to removal of LEP (Limited English Proficiency) regulatory obligation, language regarding this has been removed from policies

#### 16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555]

##### **PHA Policy**

Hearings may be attended by a hearing officer and the following applicable persons:

A PHA representative(s) and any witnesses for the PHA

The participant and any witnesses for the participant

The participant's counsel or other representative

Any other person approved by the PHA as a reasonable accommodation for a person with a disability

An advocate, family, friend, or other adult representative to assist with communications for individuals who need language assistance

A language interpreter

#### 16-III.D. HEARING AND APPEAL PROVISIONS FOR NONCITIZENS [24 CFR 5.514]

## **PHA Policy**

The PHA will not provide a transcript of ~~an audio-taped~~ a recorded hearing.

### 16-IV.B. REPAYMENT POLICY

## **PHA Policy**

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

### 16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]

## **PHA Policy**

The PHA will post the following information regarding VAWA in its ~~main~~ offices and on its website. It will also make the information readily available to anyone who requests it.

A copy of Form HUD-5380, Notice of Occupancy Rights under VAWA to housing choice voucher program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Exhibit 16-1)

A copy of Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking ~~and Alternate Documentation~~ (Exhibit 16-2)

A copy of the PHA's emergency transfer plan (Exhibit 16-3)

A copy of Form HUD-5383, HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, (Exhibit 16-4)

~~The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibits 16-1 and 16-2)~~

Contact information for local victim advocacy groups or service providers

## **PHA Policy**

Whenever the PHA has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary ~~and as indicated by the victim on Form HUD-5382 or the emergency transfer request form~~. For example, the PHA may, ~~based on victim information, determine~~ ~~decide~~ not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

## **Chapter 17 –PROJECT-BASED VOUCHERS**

- Addition of “and/or electronically” or “or electronically” throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

### 17-I.A. OVERVIEW [24 CFR 983.5]

#### **PHA Policy**

The PHA has PBV units under the Rental Assistance Demonstration (RAD) program. For these units, applicable policies are found in Chapter 18. Policies in Chapter 17 do not apply to RAD PBV units.

### 17-V.C. TERMINATION OF THE HAP CONTRACT

#### **PHA Policy**

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

The PHA will abate payments only for those contract units that do not meet housing quality standards.

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

### 17-VI.F. OFFER OF PBV ASSISTANCE OR OWNER'S REJECTION

#### **PHA Policy**

Once families have accepted the PHA's unit offer, they will be informed of their requirement to participate in a PBV program briefing. Briefings will be conducted prior to the execution of the family's lease. Briefings will typically be conducted individually and may be conducted in person or remotely. Remote briefings will follow the requirements of Notice PIH 2020-32.

Briefings will be conducted in English. For applicants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication.

## **Chapter 18 –PROJECT-BASED VOUCHERS (PBV) UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM**

- Addition of “and/or electronically” or “or electronically” throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

### 18-V.F. OFFER OF PBV ASSISTANCE

#### **PHA Policy**

Once families have accepted the PHA's unit offer, they will be informed of their requirement to participate in a PBV program briefing. Briefings will be conducted prior to the execution of the family's lease. Briefings will typically be conducted individually and may be conducted in person or remotely. Remote briefings will follow the requirements of Notice PIH 2020-32.

Briefings will be conducted in English. For applicants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication.

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

- Addition of "and/or electronically" or "or electronically" throughout many Homes for Good policies to allow both families and Homes for Good additional options for communicating.

19-II.E. REFERRALS AND WAITING LIST MANAGEMENT [Notice PIH 2023-04; FYI Updates and Partnering Opportunities Webinar FYI FAQs]

### **PHA Policy**

The PHA will not apply separate preferences to FUP and FYI applicants.

19-II.G. LEASE UP [FR Notice 1/24/22]

### **PHA Policy**

All FYI vouchers will have an initial term of 120 calendar days. The PHA will notify the applicant in writing via mail and/or electronically and/or through a phone call at least 30 days prior to the expiration of the initial term of the voucher and inquire if the applicant is in need of assistance with their housing search. The PHA will also remind the applicant of the housing search assistance that is available to them as set forth in the PHA's partnership agreements.

Upon written or oral request of the applicant (either through an email, phone call, or through a written form), the PHA will automatically approve one 90-day extension to the initial voucher term as long as the request is made prior to the expiration date of the initial voucher term. Subsequent requests for extensions will follow PHA policies on voucher extensions found in Chapter 5. This includes granting additional extensions as needed as a reasonable accommodation.

The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension.

## **TPS – EMERGENCY HOUSING VOUCHERS (EHVs)**

- Emergency Housing Vouchers (EHV) is sunsetting, and some mentions of EHV in policies have been removed

## **Glossary**

**Affiliated person.** *The tenant's spouse, parent, sibling, or child; or any individual, tenant, or lawful occupant living in the tenant's household; or anyone for whom the tenant acts as parent/guardian individual. With respect to an individual, a spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in loco parentis (in the position or place of a parent), or any individual, tenant, or lawful occupant living in the household of the a victim of domestic violence, dating violence, sexual assault, or stalking.*

**Victim.** Any victim of VAWA violence/abuse, regardless of actual or perceived sexual orientation, gender identity, sex, or marital status.

## Appendix

PHAs may, but are not required to:

- Stop using the EIV Income Report during interim reexams.
- Use Safe Harbor income determinations from means-tested federal assistance programs to verify a family's income and assets.

Finally, in FAQs dated 2/22/24, HUD also stated PHAs may, but are not required to:

- Accept third-party verification dated within 120 days of the date received by the PHA (rather than 60 days of the reexam/PHA request date);
- Accept a statement dated within the appropriate benefit year for fixed income sources like Social Security; and
- Accept a self-certification of SSNs along with a third-party document as a last resort if an individual is not able to provide documentation of SSN.

More details about each of the above provisions can be found in Notice PIH 2024-38.

All other provisions of HOTMA 102/104 remain on hold. This means PHAs may not yet implement certain provisions of HOTMA. These include:

- All asset provisions, including the asset limitation;
- All adjusted income provisions, with the exception of the definition of health and medical care expenses;
- Inflationary adjustments (although PHAs may choose to use the HUD-determined passbook rate instead of a PHA-determined passbook rate);
- The new verification hierarchy, which allows for EIV + self-certification and for policy allowing the PHA to not use either third-party verification form or oral third-party verification before proceeding to accepting self-certifications;
- Annual reexaminations using the previous 12-month period income;
- Interim reexamination requirements; and
- Non-interim reexamination transactions.

PHAs may not implement the above provisions because HUD's current IMS/PIC system is unable to accept HOTMA-compliant Form HUD-50058s. PHAs should await further guidance from HUD on when these will be applicable.

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

**Effective 10/01/2026**

**Housing Choice Voucher Program**

**Emergency Transfers**

Homes for Good is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Homes for Good allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. VAWA protections are not limited to women and are available regardless of age or actual or perceived sexual orientation, gender identity, sex, or marital status. Victims cannot be discriminated against on the basis of any protected characteristic, including race, color, national origin, religion, sex (including perceived or actual sexual orientation or gender identity), familial status, disability, or age. HUD-assisted and HUD-insured housing must also be made available to all otherwise eligible individuals and families regardless of age, or actual or perceived gender identity, sexual orientation, or marital status.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the federal agency that oversees that the **public housing and housing choice voucher (HCV) programs** are in compliance with VAWA.

**Definitions**

- **External emergency transfer** refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is, the tenant must undergo an application process in order to reside in the new unit. Examples of External transfers can be found on page X of this plan.
- **Internal emergency transfer** refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process. Examples of Internal transfers can be found on page X of this plan.
- **Safe unit** refers to a unit that the victim of VAWA violence/abuse believes is safe.
- **VAWA violence/abuse** means an incident or incidents of domestic violence, dating violence, sexual assault, or stalking, as those terms are

defined in 24 CFR 5.2003 and “Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking” (Form HUD-5382).

### **Eligibility for Emergency Transfers**

A tenant may seek an emergency transfer to another unit if they or their household member is a victim of VAWA violence/abuse, as outlined in the “Notice of Occupancy Rights Under the Violence Against Women Act,” Form HUD-5380. This emergency transfer plan provides further information on emergency transfers, and Homes for Good must provide a copy if requested. Homes for Good may ask for submission of a written request for an emergency transfer, such as form HUD-5383, to certify eligibility for the emergency transfer.

#### **A Tenant is eligible for an emergency transfer if:**

4. The tenant (or their household member) is a victim of VAWA violence/abuse;
5. The tenant expressly requests the emergency transfer; **AND**
6. **EITHER**
  - a. The tenant reasonably believes that there is a threat of imminent harm from further violence, including trauma, if they or (their household member) stays in the same dwelling unit; OR
  - b. If the tenant (or their household member) is a victim of sexual assault, either the tenant reasonably believes that there is a threat of imminent harm from further violence, including trauma, if the tenant (or their household member) were to stay in the unit, or the sexual assault occurred on the premises and the tenant requested an emergency transfer within 90 days (including holidays and weekend days) of when that assault occurred.

Homes for Good, in response to an emergency transfer request, should not evaluate whether the tenant is in good standing as part of the assessment or provision of an emergency transfer. Whether or not a tenant is in good standing does not impact their ability to request an emergency transfer under VAWA.

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

### **Emergency Transfers: Housing Choice Voucher (HCV) Program**

#### **Internal transfers:**

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

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

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

- Tenant-based voucher, if available

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

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

**External transfers:**

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

- Public housing program
- PBV assistance in another development not owned by the PHA
- Any other PHA owned property such as LIHTC

Emergency transfers will not take priority over waiting list admissions for these programs.

While you must be placed on the waiting list for these programs, a VAWA admissions preference may be applied depending on whether the external program allows this. At your request, the PHA will refer you to organizations that may be able to further assist you. VAWA provisions do not supersede eligibility or other occupancy requirements that may apply under a covered housing program. The PHA may be unable to transfer a tenant to a particular unit if the tenant cannot establish eligibility for that unit.

**Emergency Transfer Request Documentation**

To request an emergency transfer, the tenant shall notify Homes for Good’s management office and submit a written request for a transfer to **any Homes for Good office**. If Homes for Good does not already have documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking, Homes for Good may ask for this documentation in accordance with 24 CFR 5.2007. Unless Homes for Good receives documentation that contains conflicting information, as described in 24 CFR 5.2007(b)(2), Homes for Good cannot require third-party documentation to determine status as a VAWA victim for emergency transfer eligibility. Homes for Good will provide reasonable accommodations to this policy for individuals with disabilities. The tenant’s written request for an emergency transfer should include either:

3. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence, including trauma, if the tenant (or household member) were to remain in the same dwelling unit; OR
4. In the case of a tenant (or household member) who is a victim of sexual assault, **either** a statement that the tenant reasonably believes there is a threat of imminent harm from further violence or trauma if the tenant (or household member stays in the same dwelling unit), **or** a statement that the sexual assault occurred on the premises and the tenant requested an emergency transfer within 90 days (including holidays and weekend days) of when the assault occurred.

Form HUD-5383 may be used for making a written request for an emergency transfer.

Any request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking will be based on the preferred communication method indicated. If no documentation is received to be able to process the request, Homes for Good will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

Homes for Good may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, Homes for Good will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to address health or safety issues. Any extension granted by Homes for Good will be in writing.

Once the victim provides documentation, Homes for Good will acknowledge receipt of the documentation within 10 business days.

Homes for Good has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

If Homes for Good accepts an individual's statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault, stalking, or human trafficking, Homes for Good will document acceptance of the statement or evidence in the individual's file.

#### **Priority for Transfers**

Tenants who qualify for an emergency transfer under VAWA will be given priority over other categories of tenants seeking transfers and individuals seeking placement on waiting lists. Homes for Good will maintain a centralized transfer list to ensure that transfers are processed in the correct order and that procedures are uniform across all properties.

Emergency transfers will not automatically go on the transfer list. Instead emergency transfers will be handled immediately, on a case-by-case basis. If the emergency cannot be resolved by a temporary accommodation, and the resident requires a permanent transfer, the family will be placed at the top of the transfer list.

Transfers will be processed in the following order:

8. Emergency transfers (VAWA, hazardous maintenance conditions)
9. High-priority transfers (verified medical condition, threat of harm or criminal activity, and reasonable accommodation)
10. Transfers to make accessible units available
11. Demolition, renovation, etc.
12. Occupancy standards

13. Other PHA-required transfers
14. Other resident-requested transfers

### **Confidentiality**

If a tenant inquires about or requests any VAWA protections or represents that they or a household member are a victim of VAWA violence/abuse entitled to VAWA protections, Homes for Good must keep any information they provide concerning the VAWA violence/abuse, their request for an emergency transfer, and their or a household member's status as a victim strictly confidential. This information should be securely and separately kept from tenant files. All the information provided by or on behalf of the tenant to support an emergency transfer request, including information on the Certification Form (HUD-5382) and the Emergency Transfer Request Form (HUD-5383) (collectively referred to as "Confidential Information") may only be accessed by PHA employees or contractors if explicitly authorized by Homes for Good for reasons that specifically call for those individuals to have access to that information under applicable federal, State, or local law.

Confidential information must not be entered into any shared database or disclosed to any other entity or individual, except if:

- Written permission by the victim in a time-limited release;
- Required for use in an eviction proceeding or hearing regarding termination of assistance; or
- Otherwise required by applicable law.

In addition, HUD's VAWA regulations require emergency transfer plans to provide strict confidentiality measures to ensure that the location of the victim's dwelling unit is never disclosed to a person who committed or threatened to commit the VAWA violence/abuse. Accordingly, Homes for Good has dedicated a confidential section in their digital filing system that is only accessible by authorized PHA employees.

### **Emergency Transfer Procedure**

Homes for Good cannot specify how long it will take from the time a transfer request is approved until the tenant can be placed in a new, safe unit. Homes for Good will, however, act as quickly as possible to assist a tenant who qualifies for an emergency transfer. If Homes for Good identifies an available unit and the tenant believes that unit would not be safe, the tenant may request a transfer to a different unit. Homes for Good may be unable to transfer a tenant and their household to a particular unit if the tenant and their household has not established or cannot establish eligibility for that unit.

If Homes for Good does not have any safe and available units for which the tenant is eligible, Homes for Good will assist the tenant in identifying other covered housing providers who may have safe and available units to which the tenant could move. At the tenant's request, Homes for Good will also assist the tenant in contacting the local organizations offering assistance to victims of VAWA violence/abuse.

### **Making the Emergency Transfer Plan Available**

Homes for Good will post a copy of the Emergency Transfer Plan in its main office and on its website. It will also make the information readily available to anyone who requests it.

All materials will ensure effective communication with individuals with disabilities, including making materials available in alternative accessible formats, as well as providing reasonable accommodations.

### **Safety and Security of Tenants**

When Homes for Good receives any inquiry or request regarding an emergency transfer, Homes for Good will encourage the person making the inquiry or request to take all reasonable precautions to be safe, including seeking guidance and assistance from a victim service provider. However, tenants are not required to receive guidance or assistance from a victim service provider.

For additional information on VAWA and to find help in your area, visit <https://www.hud.gov/vawa>.

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

- Lane County District Attorney's Office, Victim Services Division ([www.lanecounty.org](http://www.lanecounty.org))
- Sexual Assault Task Force (SATF) – Referral services for victims of violence ([www.oregonsatf.org](http://www.oregonsatf.org))
- Sexual Assault Support Services (SASS) – Support survivors of sexual assault ([www.sass-lane.org](http://www.sass-lane.org))
- Hope & Safety Alliance – Housing for victims of domestic violence (<https://www.hopesafetyalliance.org/>)
- Kids 'FIRST – Advocates for abused children ([www.kidsfirstcenter.net](http://www.kidsfirstcenter.net))
- Court Appointed Special Advocates (CASA) – Help for abused children ([www.casa-lane.org](http://www.casa-lane.org))
- Relief Nursery – Child abuse and neglect prevention agency ([www.reliefnursery.org](http://www.reliefnursery.org))

#### 4.3. ATTACHMENT B.1 REVISION OF PHA PLAN ELEMENTS

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

The assessment of the impediments to fair housing and fair housing plan strategies was developed with input from the City of Eugene and the City of Springfield Draft Consolidated plan 2025.

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

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

Unless otherwise noted, all information below is from the Draft 2025 Eugene-Springfield Consolidated Plan. Of the 71,735 households in Eugene, 47% have low- and moderate income (less than 80% of the area median income). In Springfield, 50% of the 25,215 households are considered low- and moderate income. HUD provided numbers in the Consolidated plan indicated that 16.7% of total households were identified as extremely low income (less than 30% AMI) and 14.4% as low income (between 30 and 50% AMI). More households with children under age 6 (55%) and households with people over age 75 (54%) have low incomes.

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

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

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

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

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

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

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

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

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

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

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

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

### **Affordability and supply**

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

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

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

- New Construction
- Preservation
- Development Pipeline

### **New Construction**

3 New Construction Projects are projected to be completed through 2026, totaling 168 units.

<b>Project</b>	<b>Description</b>
Lazy Days	Homes for Good purchased a mobile home park up the McKenzie River that was destroyed in the Holiday Farm fire. The park will provide 30 units of housing including for homeownership. It began construction in June 2023. Phase 1 of construction with 20 modular homes was completed in March of 2025, and Phase 2 with 10 additional Park Model units was completed in June 2025.
Ollie Court (under construction)	Homes for Good is partnering with Head Start of Lane County and Early Childhood CARES to develop an innovative model for housing that will include 81 units of new Affordable Housing with an Early Learning Center to address the need for affordable housing and early childhood education in our community. The site is comprised of two buildings, and residential units are a mix of one, two, and three-bedroom units. Construction is being completed in a phased process with the South Building achieving temporary certificate of occupancy in February 2026 and the full site anticipated to be completed in April 2026.
Bridges on Broadway	Homes for Good converted a former 50-room Red Lion Hotel into a 56-unit Permanent Supportive Housing (PSH) apartment community serving people experiencing chronic homelessness. This project was completed in 2025 and is at full occupancy.

### **Preservation**

Project	Description
Future RAD Conversions	<p>Homes for Good is looking at future phases of converting the remaining public housing through the RAD process.</p> <p>Preservation of Federal Subsidies in Lane County – Homes for Good is looking at several developments that may need preservation work to preserve ongoing federal subsidies.</p>

**Development Pipeline**

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

**Impediments to Fair Housing**

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

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

1. Limited awareness of Fair Housing policies in the broader community
2. Cultural differences and language barriers which inhibit access to Fair Housing

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

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

**Impediment: Limited awareness of fair housing policies in the broader community.**

Strategies to address this impediment include:

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

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

Strategies to address this impediment include:

- As part of an agency centralized list, identify culturally specific organizations, and organizations serving the historically marginalized members in the community that we currently work with, and want to partner with in the future. In the centralized agency list, we will identify organizational interest for the partnership, including who key leaders are, main points of contact, the organization's capacity, benefits for both organizations, and a description of the current partnership.

- Create and implement a plan for a mix of pre-created and organic content for social media channels, including the capacity to find and share content from the historically marginalized community, culturally specific organizations, and people with disabilities.
- Monitor and evaluate content shared to ensure no group is disproportionately represented to not present the appearance that one group of people disproportionately utilizes our services.
- Create opportunities for clients to share their experiences, balancing the needs of client privacy and the personal nature of housing.
- Determine whether to implement Local Preference partnership(s) with community organizations that are culturally specific or who have programmatic specialization in supporting people from historically marginalized communities and people with disabilities.
- Conduct targeted recruitments for bilingual employees. At the present time there are 20 English-Spanish bilingual employees. Homes for Good also has 1 staff member fluent in Polish, and 1 staff member fluent in both Dutch and Italian.
- Homes for Good has implemented a Language Access Plan, which provides access to interpretation and translation services as needed for participants.

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

Strategies to address this impediment include:

- Accessibility survey of all Homes for Good owned units has been conducted. The results of this will be used to accurately advertise what accessibility features are available in units and guide future capital improvements to improve accessibility.
- For new construction apartment communities, work with architects to hold focus group with people with disabilities and review design for common areas and Accessible units.
- Working closely with residents to ensure reasonable accommodations are approved when appropriate.
- Homes for Good, in partnership with Lane County, is working to expand the Housing First movement for people with disabilities or other barriers to housing.
- In addition to these specific strategies Homes for Good has made a strong commitment to promoting Fair Housing rights and Fair Housing choice by providing

information regarding Fair Housing and Fair Housing choice to applicants, residents and staff. The following is a list of actions that Homes for Good has taken:

- The Fair Housing logo “Equal Housing Opportunity” is prominently displayed on location signs at Homes for Good administrative offices and at its various housing complexes
- The Fair housing logo is prominently displayed on signs/banners at various Homes for Good locations, announcing the availability of low-income rental units
- The Fair Housing logo is on Homes for Good letterhead and business cards
- The Agency’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed in the lobbies of its administrative office and in public areas at its various housing communities
- The Agency’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed on the website: [www.HomesforGood.org](http://www.HomesforGood.org)
- HUD Form 928.1 (“We Do Business in Accordance with the Federal Fair Housing Law” poster) is prominently displayed in English and Spanish in Homes for Good’s administrative office and in public areas at the various housing communities
- HUD Form 1686-FHEO (\*Fair Housing – It’s Your Right\* Pamphlet) is available in English and Spanish in Homes for Good administrative offices
- \*Filing a Housing ‘Discrimination Complaint\* - a pamphlet created by Consumer Action with funding from the U.S Department of Housing and Urban Development (HUD) is available in English and Spanish at Homes for Good administrative offices
- Applicants or residents with questions about Fair Housing issues are referred, or directed via website link, to the Fair Housing Council of Oregon, Legal Aid Services of Oregon (LSAO) or Lane County Law & Advocacy Center (LCLAC), the Oregon Advocacy Center (OAC), the Lane Independent Living Alliance (LILA), the Oregon Bureau of Labor and Industries (BOLI), and/or to the US Department of Housing & Urban Development (HUDF) / Office of Fair Housing and Equal Opportunity (FHEO)
- Homes for Good has a long-standing Policy on Reasonable Accommodation, which is recognized in the Pacific Northwest among public Housing Authorities and by the regional HUD office as being comprehensive, well-written, and well-implemented.
- Homes for Good’s Policy on Reasonable Accommodation is prominently displayed in administrative office and in public areas of its various housing complexes. It is available to any applicant or resident and is included in the Admin Plan and

Admissions and Continued Occupancy Policies. It is also posted on Homes for Good's website at [www.HomesforGood.org](http://www.HomesforGood.org)

- Applicants for, and recipients of, housing assistance from Homes for Good are advised of their right to request reasonable accommodation for their disability. Information regarding reasonable accommodations is provided on the pre-application for assistance, in initial determination of ineligibility, in the public housing and assisted housing lease agreements, in notices of eviction, in periodic resident newsletters, and discussed during the intake process during any informal settlement discussions and during other discussions with applicants and residents when inquiries are made about accommodating disabilities.
- Under the terms of a voluntary compliance agreement between the U.S. Department of HUD/FHEO and Homes for Good's pre-application for housing assistance requests information from applicants, which is not used in determining their eligibility for housing regarding their ethnicity, race, and disability status. This information is recorded, retained, and available to HUD upon request.
- Homes for Good has completed outreach presentations to agencies representing youth, seniors/elderly, people with physical and/or mental disabilities, and minorities, to help assure that a broad base of the community has access to information about the availability of housing. This outreach effort is ongoing and representatives from a number of those social service and advocacy agencies serve on Homes for Good's family self-sufficiency advisory board.
- Homes for Good has also worked to increase the ability of low-income community members to access housing by developing an innovative program in cooperation with community lending-works, the lending arm of DevNW (neighborhood economic development corporation), to assist applicants to its agency- owned housing programs, in obtaining loans to cover the cost of their security deposits, as they lease up with Homes for Good. Homes for Good indemnifies the loans, guaranteeing payment to DevNW, should the applicant default

## Financial Resources

### Financial Resources- Homes For Good

Federal/State Grants	FYE 2024	FYE 2025	FYE 2026
Move to Work Housing Choice Vouchers	\$28,831,661	\$38,002,570	\$38,177,888
Move to Work Capital Fund	\$1,451,528	\$2,590,166	\$2,664,943
Move to Work Public Housing	\$2,402,058	\$2,178,445	\$2,187,652
Housing Choice Voucher	\$2,345,016	\$2,649,723	\$3,157,966
Emergency Housing Voucher	\$2,339,773	\$2,418,922	\$2,525,984
Mainstream Vouchers	\$2,038,949	\$1,604,096	\$1,526,290
Shelter Care	\$810,666	\$874,359	\$964,393
Family Self Sufficiency Program	\$236,671	\$247,592	\$249,102
Resident Opportunity and Support Services	\$83,476	\$83,690	\$88,250
Interest Reduction	\$383,589	\$529,090	\$534,897
Section 8 New Construction & Substantial Reno	\$324,578	\$334,520	\$468,947
Continuum of Care- Lane County	\$671,838	\$387,048	\$840,000
U.S Department of Agriculture	\$2,241,624	\$2,119,065	\$2,122,880
U.S Department of Veterans Affairs	\$145,973	\$108,742	\$104,000
U.S Department of Energy/Weatherization	\$1,204,538	\$2,054,219	\$2,405,584
U.S Department of Health and Human Services	\$878,351	\$2,102,702	\$2,350,983
Total Federal/State Grants	\$46,390,289	\$58,284,949	\$60,369,760
Non- Federal Sources			
Dwelling Rents	\$7,096,583	\$6,105,020	\$4,251,089
Other Operating income	\$12,977,803	\$21,993,113	\$22,000,000
Total Non-Federal Sources	\$20,074,386	\$28,098,133	\$26,251,089
Total Resources	\$66,464,675	\$86,383,082	\$86,620,848

## **Significant Amendment or Modification**

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

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

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

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

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

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

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

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

4.4. ATTACHMENT B.2 NEW ACTIVITIES

**Project Based Vouchers**

Homes for Good’s PHA plan goal #1 is to increase the number of affordable housing units in the County. One of the ways that the agency continues to do this is through the use of Project-Based Vouchers. The following Project Based Voucher developments were completed in FY2026. Both are located in Eugene. We are exploring opportunities for new projects for FY2027.

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

4.5. ATTACHMENT B.3 PROGRESS REPORT

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

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

Indicator	FY25 Progress	FY26 Progress
Create 300 new affordable housing units.	Construction is nearing completion of Lazy Days phase 1 (20 units) are complete, phase 2 (10 units are scheduled to be complete by Spring). Construction is in progress at Bridges on Broadway with completion scheduled for Summer 2025 (56 units), and Ollie Court with completion scheduled for Winter 2025 (81 units). In addition, there are approximately 400-450 additional units in pre-construction. These include the Field on Quince, The Coleman, Glenwood Place, Parcel 2 and International Way.	Lazy Days is almost at full occupancy, Bridges on Broadway completed full lease up in February 2026 and Ollie Court is began leasing up in March 2026. These projects added a total of 167 units with an additional 300-400 units in planning phases including Parcel 2, Field on Quince, The Coleman and others.
Increase number of permanent supporting housing units. (Featured projects: The Keystone, The Nel, Bridges on Broadway)	The Keystone (15 PSH units), The Commons on MLK (51 PSH units), and the Nel (45 PSH units) are complete. Bridges of Broadway (57 PSH units) will lease up in Fall 2025.	Completed full occupancy of Bridges on Broadway in 2025, bringing the total PSH units in the Homes for Good portfolio to 167 homes.
Maintain public housing vacancies at 3% or less.	Public Housing continues to maintain an average occupancy of above 97% (98% FY25 YTD).	Public Housing continues to maintain strong occupancy above 97%.
Award of 33 mainstream vouchers that serve disabled and homeless or at risk of homelessness persons.	As of March 1, 2025 Homes for Good continues to have 181 Mainstream Vouchers. Utilization for CY24 was over 100%	Homes for Good continues to have 181 Mainstream Vouchers. Utilization for CY25 was at 96.7%
Collaborative community initiative to provide technical support funding to ensure 100% utilization of all 236 VASH vouchers in Lane County.	As of March 2025, Homes for Good continues with 319 VASH vouchers, of which 282 are under lease.	Homes for Good continues with a mix of 319 VASH and VASH Project Based vouchers, which are all under lease. An application was submitted for an additional 21 VASH vouchers in September 2025.

## Goal 2: Continue to receive high performer status

Indicator	FY25 Progress	FY26 Progress
Homes for Good received high performer status for FY18 SEMAP.	As a Moving to Work agency, Homes for Good is not required to submit either SEMAP or PHAS until HUD updates these systems with ones that are specific to MTW agencies. However, Homes for Good continues to monitor many of the same metrics that are reported under SEMAP and PHAS in order to ensure effective operation of its programs.	As a Moving to Work agency, Homes for Good is not required to submit either SEMAP or PHAS until HUD updates these systems with ones that are specific to MTW agencies. However, Homes for Good continues to monitor many of the same metrics that are reported under SEMAP and PHAS in order to ensure effective operation of its programs.
Obligate all capital funds within 24 months of grant award.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.	Homes for Good has met all capital fund awarding requirements as well as financial submission requirements.
Expend all capital funds within 48 months of grant award.		
Comply with the financial reporting requirements of asset management.		
Comply with the new PHAS requirements (when published) to continue to receive high performer status.		
Submit all PHAS reports within required timelines.		
Meeting all capital fund, financial reporting, and PHAS reporting requirements.		

## Goal 3: Improve community quality of life and economic vitality

Indicator	FY25 Progress	FY26 Progress
Creation of a Housing Liaison position that will provide education and advocacy to persons searching for housing. Once housed, the Housing Liaison's continued education	Homes for Good is part of the Landlord Incentive cohort of the MTW program. As part of this cohort, Homes for Good implemented a number of waivers geared	Homes for Good is part of the Landlord Incentive cohort of the MTW program. As part of this cohort, Homes for Good implemented a number of waivers geared

Indicator	FY25 Progress	FY26 Progress
and advocacy supports will increase housing stability.	toward easing the burden on landlords. In addition, Homes for Good hired a Landlord Educator in place of the Housing Liaison. The Landlord Educator will work with tenants and landlords to address their housing concerns.	toward easing the burden on landlords. In addition, Homes for Good continues to maintain a Landlord Educator in place of the Housing Liaison. The Landlord Educator works with tenants and landlords to address their housing concerns.
Continue to encourage and promote resident involvement in the Resident Advisory Board by maintaining and expanding the number of representatives from public and assisted housing, as well as the Section 8 program.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs including new participants from the HCV and PBV programs.	The Resident Advisory Board (RAB) continues to be actively engaged in the annual plan process and includes members from all PHA subsidy programs as well as members from other Homes for Good housing communities.
Enhance the customer service experience across agency programs by simplifying and aligning processes, providing access to services staff and by connecting participants to needed resources in the community.	Homes for Good continues to implement additional features in the new portals, providing addition opportunities for various self-service functions for applicants, voucher holders, housing residents, and landlords.	Homes for Good utilized feedback from our 2023 Resident Survey to improve access to technology/internet, increased security features and improved on-site accessibility of staff based on the feedback received. We have also continued to implement new features in our resident portal to allow streamlined access to our programs and services.
Enhance resident and agency communication through Resident Newsletters, improved website access, email communication and social media.	All communities continue to receive a monthly or quarterly residential newsletter as well as more frequent resident updates related to Agency operations which are posted and emailed to all residents.	All communities continue to receive a monthly or quarterly residential newsletter which include Agency updates, celebrates community successes and includes a section for Resident information sharing.
Annually monitor income levels by development and provide targeted support to deconcentrate poverty. Bring higher income PH households into lower income developments and vice versa, if necessary.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.	Homes for Good continues to monitor deconcentration strategies and use of preferences to meet deconcentration goals.

Indicator	FY25 Progress	FY26 Progress
Continue giving preferences to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units).	Continue giving preferences to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units).	Continue giving preferences to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units).

**Goal 4: Promote self-sufficiency and asset development of households served through public and assisted housing as well as the Section 8 homeownership program**

Indicator	FY25 Progress	FY26 Progress
Expand access to the Family Self-Sufficiency (FSS) program to reach enrollment of 200 households or more.	Enrollment has increased to approximately 124 households. Exploring outreach strategies to reach the 200-household goal, including, improving accessibility, more focus on promotion and targeted engagement with eligible families.	Enrollment has grown to approximately 136 households. While ongoing graduations have affected the program’s ability to reach the 200-household goal, efforts to expand participation continue. Current strategies include a pilot of assertive offering at Ollie Court, with more intentional promotion, on-site office hours, collaboration with Resident Services programming and incorporating digital information sessions to improve accessibility, which will inform future approaches to increase participation.
Maintain a minimum representation of 15 community services agencies on the Family Self-Sufficiency Advisory Board.	The FSS Advisory Board continues to grow with new organizations joining each year. Currently there are over 18 community partners engaged with this board. Developed materials to educate LP partners on the benefits of the program and have identified key stakeholders to add to the board.	The Advisory Board now includes 19 community service partners. Staff conducted a survey of FSS Advisory Board members to ensure partners are aware of their roles, meetings are productive, and the board is responsive to program and community needs; insights from this survey continue to inform FSS Advisory Board operations.

Indicator	FY25 Progress	FY26 Progress
Continue promotion of the FSS program through annual mailings of FSS informational brochures to all Section 8 and Public Housing residents.	FSS information is included in all HCV and PH intake processes, as well as annual mailings with the annual packet. FSS video added to website.	FSS program information continues to be incorporated into all Housing Choice Voucher (HCV) and Public Housing (PH) intake processes, as well as included in annual resident mailings through the annual packet. Additional efforts to expand visibility include adding an FSS informational video, and more directly accessible Microsoft forms info session request pathway on the agency website.
Assist a minimum of two FSS participants a year in purchasing a home.	FSS assisted 1 participant in purchasing a home during 2024 and had 1 additional participant start the home buying process.	FSS assisted 1 client in purchasing a home in November 2025 and is currently supporting a 2 <sup>nd</sup> through the home-buying process in 2026. Staff continue to provide guidance and resources to help participants achieve homeownership goals.
Assist a minimum of ten FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.	FSS is currently supporting 14 participants with IDA's after funding reductions but was able to add 3 new participants this year.	FSS is currently supporting 13 participants with IDAs despite funding reductions and was able to add 3 new participants this year. Homes for Good has a limited number of IDA slots based on program funding, and we aim to utilize the maximum available to support eligible participants.

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

Indicator	FY25 Progress	FY26 Progress
Complete the Rent Assistance Demonstration construction and sale of scattered site homes.	Homes for Good will complete scattered site sales in 2024.	Homes for Good has completed the sale of the last RAD home in 2025.

Indicator	FY25 Progress	FY26 Progress
Focus preservation efforts communicating with local, state and national funders to help preserve affordable housing opportunities.	There is one Preservation project (Bridges on Broadway) actively under construction consisting of 57 units.	Bridges on Broadway preservation project to convert an old hotel to Permanent Supportive Housing was completed in September 2025.
The Landlord Liaison continues with community engagement, providing routine educational seminars for landlords and supportive service organizations. Expansion of classes include courses specifically focused on housing quality standard guidelines, thus giving landlords the education and tools needed to prepare for successful housing inspections under HUD requirements.	The Housing and Community Relations Specialist continues to provide educational seminars to landlords and local preference partners. From October 2024 to March 2025, 12 seminars were provided with an average attendance rate of 19 per event.	New recurring classes have rolled out focusing on the more robust Portal supported by Yardi software. Inspection standards will be transitioning from HQS to NSPIRE-V and implementation has been postponed by HUD multiple times (now expected 2/2027). Inspection focused classes are paused during this time with direct support available.
Partnered with NEDCO to provide zero interest loans for security deposits to Section 8 and VASH families.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher holders. For FY24: 16 applications were received, 7 approved, 9 cancelled and/or denied, 4 were paid off, 2 were past due and 1 is currently paying. From 10.01.24 to March 2025, 2 applications were submitted, 1 approved, 1 denied, and 1 is pending.	Homes for Good continues its partnership with DevNW in administering zero interest loans to tenant based voucher holders. For FY25: 10 applications were received, 8 approved, 2 cancelled and/or denied, 5 were paid off, 1 were past due, and 2 is currently paying. From 10.01.25 to March 2026, 10 applications were submitted, 5 approved, 5 cancelled, and/or denied.

**Goal 6: To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families**

Indicator	FY25 Progress	FY26 Progress
Increase success of Section 8 participants, particularly those coming out of homelessness or transitioning from permanent supportive or transitional housing through engagement with the	As of March 2025, local preference partnerships have grown to 50. Governor Kotek's Emergency Declaration on Homelessness created a pathway for Homes for Good to be one of three Public Housing	As of April 2026, we have 38 local preference providers. Additionally, Homes for Good continues to partner with Lane County to administer the Long-Term Rental Assistance Program (LTRA). As the Program

Indicator	FY25 Progress	FY26 Progress
<p data-bbox="191 228 762 266">Housing Liaison</p> <p data-bbox="191 266 762 410">Grow the Landlord Liaison offerings of support for landlords through continuous communication, trainings and sharing resources</p> <p data-bbox="191 410 762 621">Awarded funding to provide monetary incentives to landlords who agree to rent to persons with high housing barriers</p>	<p data-bbox="762 228 1335 621">Agencies in Oregon to administer the Long-Term Rental Assistance Program (LTRA). As the Program Administrator for LTRA Homes for Good is responsible for the distribution of 1.6 million dollars to eligible households in Lane County. HUD has reduced the allocation of Emergency Housing Vouchers to Public Housing Agencies across the nation. Homes for Good's allocation has been reduced by 22 vouchers.</p>	<p data-bbox="1335 228 1906 621">Administrator for LTRA Homes for Good is responsible for the distribution of 1.6 million dollars to eligible households in Lane County. HUD has continued to reduce the allocation of Emergency Housing Vouchers to Public Housing Agencies across the nation, limiting new admissions to the program and scheduled to sunset the program at the end of the calendar year of 2026. HUD has granted Homes for Good additional 21 VASH vouchers, bringing the total to 340 vouchers.</p>
<p data-bbox="191 621 762 873">Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program</p>	<p data-bbox="762 621 1335 873">The Housing and Community Relations Specialist continues to provide educational seminars to landlords and local preference partners. From October 2024 to March 2025, 12 seminars were provided with an average attendance rate of 19 per event.</p>	<p data-bbox="1335 621 1906 873">The Housing and Community Relations Specialist continues to provide educational seminars to landlords and local preference partners.</p>
<p data-bbox="191 873 762 1421">Monitor the payment standards and area rents on the private market to keep Section 8 families' portion of rent affordable and allow the Agency to serve the same number of families as in previous years.</p>	<p data-bbox="762 873 1335 1421">For CY25 , the Payment Standards remained at 90% of Fair Market Rent (FMR) and were raised to 96% of FMR for 4 bed units. VASH and Emergency Housing Vouchers remain at 120% of FMR. The 4 bed units were increased because 44.2% of families living in 4 bed units were paying more than 30% of their adjusted gross income towards rent. HUD requires PS to be increased if more than 40% of families for a given voucher size are paying more than the 30% out of pocket for rent. Success rate for voucher usage is approximately 86%. Meaning for 100 vouchers issued, 86 are able to secure housing. Overall voucher usage for CY24 was 99.9%</p>	<p data-bbox="1335 873 1906 1421">For CY26 , the Payment Standards remained at 90% of Fair Market Rent (FMR) for all voucher sizes. VASH and Emergency Housing Vouchers remain at 120% of FMR. The number of actual leased units remained relatively stable throughout the year, with a peak in January 2025 (3,286 units). Success rate for voucher usage is approximately 88%. Meaning for 100 vouchers issued, 88 are able to secure housing. Overall voucher usage for CY25 was 99.6%. This suggests a consistent demand for leased units as well as PS that allow the family to secure housing. The trend also shows an increase in per unit costs (PUC),</p>

Indicator	FY25 Progress	FY26 Progress
		reflecting rising expenses. PUC for CY22 was \$587.94, for CY23 was \$677.41, for CY24 was \$743.62, and for CY25 is \$794.67.
A Homes for Good staff member serves on the board for the local Rental Owners association	The Rent Assistance Division Director, Beth Ochs continues to serve on the board of the Rental Owner’s Association (ROA). The Landlord and Community Relations Specialist position attends general membership meetings and continues to contribute articles to the ROA’s monthly newsletter which is distributed to over 1200 members representing over 20,000 rental units.	During FY 2025, Rent Assistance Division Director Beth Ochs resigned from her position in early September. Following her departure, Aleksa Bruns joined Homes for Good as the new Rent Assistance Division Director. While Homes for Good does not currently have a representative serving on the Rental Owners Association (ROA) board, a representative is attending meetings and may rejoin the board in the future.

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

*Will be added when signed*

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

*Will be added when signed*



## 5. MTW Supplement

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

**PHA Code :** OR006

**MTW Supplement for PHA Fiscal Year Beginning:** 10/1/2026

**PHA Program Type:** Combined

**MTW Cohort Number:** Landlord Incentives

**MTW Supplement Submission Type:** Annual Submission

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

Homes for Good has demonstrated a strong commitment and proven track record of delivering collaborative, innovative projects that benefit the community. Its initial MTW Supplement was designed to align the needs of residents and the broader community with the three MTW statutory objectives, with a focus on transforming operations, promoting self-sufficiency, and maximizing the effective use of available funding.

Since implementing its most recent MTW Supplement, Homes for Good has reduced the time required for households to locate and lease suitable housing. Additionally, through the use of an Exception Payment Standard (EPS), the organization has helped 16 households secure accessible housing with reasonable accommodations by reducing barriers to entry. Collectively, these MTW activities have resulted in approximately \$104,484 in administrative cost savings.

**Cost Effectiveness:** Homes for Good is committed to leveraging MTW flexibilities to enhance operational efficiency, including the implementation of triennial reviews, the elimination of certain deductions, and modifications to the HQS inspection schedule. Most cost-effectiveness-related waivers have already been implemented. These waivers enable Homes for Good to reallocate staff time and resources toward higher-value activities that more directly benefit participants and the broader community.

**Self-Sufficiency:** Homes for Good continues to educate and encourage households to participate in its Self-Sufficiency Program at the time of program entry. Although this year's MTW Supplement does not include modifications to the FSS program, Homes for Good plans to engage in internal planning efforts to refine the program design and identify appropriate waivers for future implementation.

**Housing Choice:** Homes for Good is committed to exploring mortgage assistance initiatives and expanding homeownership opportunities. The organization recognizes homeownership as a critical pathway to building long-term stability and helping to break cycles of generational poverty.

Homes for Good is also focused on increasing the utilization of project-based vouchers (PBVs). In FY2026, the agency expanded its PBV portfolio by adding two new properties—Bridges on Broadway and Ollie Court. These efforts, supported by MTW flexibilities, are expected to streamline the process for adding additional PBV units in the future.

The Bridges on Broadway development represents Homes for Good's first PBV rehabilitation project, resulting in the addition of 56 PBV units. In contrast, Ollie Court is a new construction development that contributed 80 PBV units to the agency's portfolio.

As a participant in the Landlord Incentives cohort of the Moving to Work (MTW) program, Homes for Good implemented Pre-Qualifying Unit Inspections and an Alternate Inspection Schedule, which are described in greater detail in Section C of the MTW Supplement.

Homes for Good prioritized its activities in alignment with the following three objectives:

1. Reallocate resources to reduce administrative burden and refocus staff efforts on housing navigation and homelessness prevention;
2. Serve the greatest number of households possible by expanding affordable housing and delivering housing services that support individuals and strengthen communities; and
3. Advance the goals of Homes for Good's Access and Opportunity Plan (formerly the Strategic Equity Plan) by creating pathways to self-sufficiency and fostering ethical leadership and organizational growth.

All activities included in the FY2027 MTW Supplement have been implemented. However, Homes for Good has elected to defer implementation of Waiver 3.a for Public Housing until HUD enables MTW agencies to submit triennial-compliant Form HUD-50058 records through its electronic system.

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

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

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

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

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

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

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

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

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

Housing choice

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

Increased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

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

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

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

The MTW activity applies to all tenant-based units

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

A total of 78 households with Reasonable Accommodations (RAs) were housed using the Exception Payment Standards (EPS) method from October 1, 2025, to March 24, 2026. Of those 78 RA's, 16 families had an EPS over 120% of FMR. This streamlined process saved families and Homes for Good staff approximately 128 hours with Homes for Good using its MTW flexibility to approve these EPS over 120% of Fair Market Rent (FMR).

<p><b>Does this MTW activity require a hardship policy?</b> Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b> Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b> 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b> No</p>
<p><b>How many hardship requests have been received associated with this activity in the past year?</b> No hardship were requested in the most recent fiscal year.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> Yes</p>
<p><b>What is the status of the Safe Harbor Waiver request?</b> The waiver was previously approved.</p>
<p><b>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</b> Waiver was not utilized within the last year.</p>
<p><b>Does the MTW activity require an impact analysis?</b> Provided Already</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b> No</p>
<p><b>Please explain the payment standards by FMR:</b> EPS's are those that are above 120% and currently require approval of the HUD field office. Homes for Good proposes using its MTW flexibility to allow it to self-certify EPS's (up to 150% of FMR) in the case of a reasonable accommodation.</p>

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

<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> Homes for Good will use this waiver to eliminate the requirement that the PHA use a third-party entity to perform rent-reasonableness determinations for units and properties the agency owns, manages, or controls.</p> <p>Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency.</p> <p>Instead, Homes for Good will apply its current rent reasonableness process for non-owned/managed units to units it owns and manages. This process has adequate controls in place to ensure uniformity, auditability, transparency, and fairness of the determination.</p>
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<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness</p>
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**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

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

The MTW activity applies to all assisted households

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

The cost saved by performing rent reasonableness internally for units owned or managed by Homes for Good has gone from \$4,375 in FY25 to \$3,010 during the first part of FY26 (10/1/25-3/31/26).

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

No

**Please explain or upload a description of the quality assurance method.**

Quality assurance is built into Homes for Goods process because the agency uses a third-party app that bases its results on objective measures. The comparables provided to establish rent reasonableness are documented within each tenant file.

No document is attached.

**Please explain or upload a description of the rent reasonableness determination method.**

Homes for Good will continue to use Nelrod's EZ Reasonable Rent Determinations (EZRRD) software to perform rent reasonableness determinations. EZRRD uses its five-method analysis system to compare multiple features per unit for a more in-depth analysis, and automatically identifies the three best comparables based on the system's objective market analysis.

No document is attached.

### **3.a. - Alternative Reexamination Schedule for Households (PH)**

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

Homes for Good is holding off on implementing waiver 3.a for Public Housing. Once HUD's electronic system can accept triennial compliant Form HUD-50058s Homes for Good will begin implementing this waiver for Public Housing.

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

Cost effectiveness

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

Decreased expenditures

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

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

<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies only to selected family types</p>
<p><b>Please select the family types subject to this MTW activity.</b></p> <p>Elderly families; Disabled families; Other – another specifically defined target population or populations.</p>
<p><b>If Other Selected in Previous Question: Please describe this target population in the text box.</b></p> <p>Elderly and/or disabled families on fixed income</p>
<p><b>Does the MTW activity apply to all public housing developments?</b></p> <p>The MTW activity applies to all developments</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>Currently on-hold due to inability to send tri-recert data to PIC.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Provided Already</p>
<p><b>What is the recertification schedule?</b></p> <p>Other; Currently PH is on an annual basis and will move to a tri schedule to mirror the HCV once we can send data to HUD via an electronic system again.</p>
<p><b>How many interim recertifications per year may a household request?</b></p> <p>2 or more</p>
<p><b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b></p> <p>Homes for Good interim policies are as follows:</p> <ul style="list-style-type: none"> <li>• Homes for Good will allow households to request an interim if the household's income decreases.</li> <li>• Homes for Goodwill require a household to report changes in family composition. When a household reports an increase in income between reexaminations HFG will not conduct an Interim Reexamination.</li> </ul>

**3.b. - Alternative Reexamination Schedule for Households (HCV)**

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

Homes for Good has implemented a triennial recertification policy for elderly and disabled households in its Housing Choice Voucher programs. This will benefit the client and the PHA by reducing the burden of the regular review cycle.

This will benefit the client and the PHA by reducing the burden of the regular review cycle.

To address changes in household circumstances, Homes for Good will continue to allow interims for households per its interim policies described at the end of the waiver.

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

Reexaminations must occur at least every three years.

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

Agency already submitted an impact analysis.

Agency must include a hardship policy.

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

Cost effectiveness

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

Decreased expenditures

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

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

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

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

Elderly families; Disabled families; Other – another specifically defined target population or populations.

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

Elderly and/or disabled families on fixed income

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

MTW activity applies to specific tenant-based units and/or properties with project-based vouchers, with the exception of Foster Youth Initiative (FYI) and Homeownership (HO)

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

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

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

Since implementation of triennial re-exams for the Housing Choice Voucher Program the administrative cost savings have been approximately \$148,715 (FY25 at \$66,410.43 & FY26 at \$82,304.12)

**Does this MTW activity require a hardship policy?**

Provided Already

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

No

**Does the MTW activity require an impact analysis?**

Provided Already

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

2 or more

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

Homes for Good interim policies are as follows:

- Homes for Good will allow households to request an interim if the household's income decreases.
- Homes for Good will require a household to report changes in family composition. When a household reports an increase in income between reexaminations HFG will not conduct an Interim Reexamination.
- Homes for Good will apply the most recent payment standard during the interim for households on a triennial reexamination schedule, reducing the likelihood that a rent increase negatively impacts the rent burden of the household.

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

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

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

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

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

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

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

HFG does not request waiving any of the safe harbors for this activity, which are listed below:  
The pre-inspection must have been conducted within 90 days of the participant occupying the unit.  
The participant must be able to request an interim inspection.

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

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

Housing choice

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

Increased expenditures

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

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

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

To both New admissions and currently assisted households utilizing the transfer process.

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

The MTW activity applies to all family types

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

The MTW activity applies to all tenant-based units

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

The number of pre-qualifying unit inspections approved in FY2025 was 4 and is currently at 14 pre-qualifying unit inspections for the first part of FY26 (10/1/25-3/31/26).

The average time to approve a Request for Tenancy Approval (RTA) unit for pre-inspection was 4.5 days compared to 6 days average for regular inspection. Thus far the FY26 current average for pre-inspection is 6.25 days compared to 14 days average for regular inspections.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**  
No

**How long is the pre-inspection valid for?**  
The pre-inspection is valid for 90 days.

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

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**  
Homes for Good will eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, or controls.  
  
Procuring and overseeing a third-party contractor for HQS inspections services is costly and time-consuming for the agency. Instead, Homes for Good will utilize its in-house HQS inspection team and the policies and procedures governing HQS inspections for the Housing Choice Voucher program. The HQS inspection process has built-in quality control measures in place that will help to ensure the inspections performed at properties owned or managed by Homes for Good are uniform fair and that the process is transparent and audit able. We conduct monitoring inspections to verify that the units comply with the required HQS and/or NSPIRE standards. These inspections are carried out by PHA staff who were not involved in the initial inspection. This practice ensures a high level of quality control by providing an independent review of the units.  
  
Homes for Good does not request to waive any of the safe harbors related to this waiver and will operate within the following safe harbors:  
  
The agency shall establish and make available a quality assurance method to ensure an objective analysis.  
The participant must be able to request an interim inspection.  
HQS inspection standards must not be altered as found at 24 C.F.R. 982.401.  
At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA owned units pass HQS.

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

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

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

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

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

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

The MTW activity applies to all properties with project-based vouchers

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

The cost savings by performing inspections has gone from \$15,890 (10/1/24 - 4/3/2025) to \$19,170 during the first part of FY26 (10/1/25 - 3/30/26). This includes inspections conducted for new PBV sites: Bridges on Broadway and Ollie Court (South Building). Please note cost varies per unit size, location, and whether a reinspection (RI) is needed for estimation).

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

No

**Please explain or upload the description of the quality assurance method:**

Following will explain the quality assurance method

In conducting quality control, PHA supervisory staff will use a random selection process to determine which units will be inspected for compliance with HQS and/or NSPIRE standards, as applicable.

The review of these randomly selected units will be performed by PHA staff who were not involved in the initial inspection, ensuring a high level of quality assurance through independent evaluation.

Additionally, upon request from HUD, PHA will provide further oversight by engaging a third-party inspector who is not a PHA staff member.

No document is attached.

**5.d. - Alternative Inspection Schedule (HCV)**

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

As part of the requirements of the Landlord Incentive cohort, Homes for Good (HFG) selected two (2) MTW activities related to landlord incentives in its initial plan year. One of the activities HFG selected is Waiver 5.d, Alternative Inspection Schedule.

Implementing an alternative schedule for Housing Quality Standard (HQS) inspections has increased inspector bandwidth for performing pre-inspections, re-inspections, and responding timeline to special inspection requests. HFG estimates that the increased bandwidth would allow inspectors to complete HQS inspections within 1-2 business days of the landlord contacting HFG.

This activity will allow HFG to inspect its HCV units every three (3) years instead of annually or biennially. In lieu of the regular annual or biennial inspection, HFG hired a full-time Landlord & Community Relations Specialist to

- 1) Provide community education around program processes and MTW flexibilities.
- 2) Publish a monthly rental listing for housing opportunities within Lane County, benefiting both landlord and tenants.
- 3) Work with landlords to address concerns and understand the housing standards each unit must meet.

With a Landlord & Community Relations Specialist on staff, HFG is confident that HQS concerns and/or questions that may arise between inspections will be addressed through landlord and tenant outreach or special inspections, as both tenants and landlords have a dedicated communication channel to voice concerns.

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

Cost effectiveness

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

The reduction in the amount of time it takes to approve a unit for move-ins has continued to improve with Homes for Good's average of 38 days from the time a family submits a Request for Tenancy Approval (RTA) to when Homes for Good releases the Housing Assistance Payment to the Landlord.

The number of special inspections conducted in FY25 was 11, and thus far for FY26 is currently 4 (10/1/25-3/31/26).

The Homes for Good Landlord & Community Relations Specialist has completed three meeting/training events thus far for Fiscal Year 2026. As well as completed a combined 458 interactions such as phone calls, emails, and one in person landlord drop-in meeting between October 1, 2025 thru March 31, 2026

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

No

**9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)**

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

Homes for Good implemented this waiver to allow Homes for Good to award project-based vouchers to non-Public Housing properties it owns without a selection process and without engaging in an initiative to improve, develop, or replace a Public Housing property or site. This waiver does not apply to other HUD-required selection requirements and the agency will ensure that the process to award vouchers is uniform and transparent.

Homes for Good will operate within the following safe harbors:

A subsidy layering review must be conducted.

The agency must complete site selection requirements.

HQS inspections must be performed by an independent entity according to 24 C.F.R. 983.59(b) or 24 C.F.R. 983.103(f) unless MTW 5.c is implemented.

The agency is subject to Notice PIH 2013-27 where applicable, or successor.

Property must be owned by a single-asset entity of the agency, see Notice PIH 2017-21.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

There were no non-Public Housing properties owned by Homes for Good that were selected for project-based vouchers without a competitive process in FY26

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

No

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

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

Homes for Good was approved to waive a safe harbor requirement under MTW Waiver 9.h., Limit Portability for PBV Unit. Under the activity Homes for Good will waive the requirement of providing a tenant-based voucher at 12 months when requested by a PBV household. As a safe harbor to the activity, portability cannot be restricted for more than 24 months. Homes for Good is seeking to waive this safe harbor and restrict mobility for its Permanent Supportive Housing PBV households with respect to a household's readiness to move. Homes for Good intends to offer portability to PSH PBV via a local preference based on scoring under Homes for Good's Move On assessment tool. Under this framework the overall time-frame for access to the tenant-based voucher (TBV) is amended to allow for TBVs to be provided before or after 12 months to 24 months. A move-on assessment is not required after 36 months.

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

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

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

Cost effectiveness

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

Increased revenue; Decreased expenditures

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

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

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

Currently assisted households only

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

The MTW activity applies only to selected family types

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

Other – another specifically defined target population or populations.

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

Families living in Permanent Supportive Housing Project Based Voucher Units

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

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

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

Only applies to families living in Permanent Supportive Housing Project Based Voucher Units

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

During FY26, no families moved out of a Permanent Supportive Housing (PSH) PBV project with a Housing Choice Voucher (HCV). PSH PBV Projects consist of Keystone, The Nel, Commons on MLK, and Bridges on Broadway (BoB). Currently eight families are on the Choice Mobility waitlist, since Homes for Good does not have a tenant-based voucher to issue these families at this time.

A total of 11 families have expressed interest in moving out of Homes for Good PSH PBV projects, participated in a Move on Assessment, and were determined to be "Move on Ready". Their referrals have been sent to the Homes for Good Team to exercise portability.

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

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

Homes for Good requests to waive the following safe harbor. Detailed information related to this safe harbor waiver request are included in Section D of the MTW Supplement to the PHA Plan.

i. Portability under this activity must not be restricted for more than 24 months.

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

i. The agency must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households.

ii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b> No Safe Harbor Waivers are being requested.

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

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

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
2022	\$2,213,544	\$2,108,395	\$105,149	2030-09-30
2023	\$2,282,728	\$2,282,728	\$0	2031-09-30
2024	\$2,398,647	\$2,398,647	\$0	2032-09-30
2025	\$2,135,721	\$2,135,721	\$0	2033-09-30
2026 in progress	\$982,682	\$747,456	\$235,226	2034-09-30

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

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

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b>	
Yes	

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

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

PROPERTY NAME/ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6 + BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

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

<b>H.</b>	<b>Public Comment</b>
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Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

Please see attached for an additional public hearing held for Agency-Specific Waiver and/or Safe Harbor Waiver

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

## 6. MTW Supplement Attachments

### 6.1. Form HUD-50075-MTW Certifications of Compliance

*Will be added when signed*

## 6.2. Homes for Good Hardship Policy

# Homes for Good Hardship Policy

April 22, 2024

## Purpose

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

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

## Households Eligible for Hardship Exemption

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

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

## Submission of a Hardship Exemption

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

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

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

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

## Process for Agency Review and Determination

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

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

## Family Notification

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

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

## Grievance Procedure

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