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Clackamas County
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April 9, 2026

BCC Agenda Date/Item: _____

Housing Authority Board of Commissioners
 Clackamas County

Approval of a Resolution to adopt the 2026 Annual PHA Plan and Moving to Work Supplement. No County General Funds are involved.

Previous Board Action/Review	<ul style="list-style-type: none"> 2025 Annual Plan and Moving to Work Supplement approved by the Board, April 3, 2025, Agenda item 20250403 II.A 		
Performance Clackamas	<ul style="list-style-type: none"> Public Trust in Good Government Safe, Secure, and Livable Communities 		
Counsel Review	Yes - Andrew Naylor	Procurement Review	NA
Contact Person	Shannon Callahan	Contact Phone	971-480-0189

EXECUTIVE SUMMARY: The Housing Authority of Clackamas County (HACC), a component unit within the Housing and Community Development Division of the Health, Housing, and Human Services Department, is requesting board approval of a resolution for the 2026-27 Annual PHA Plan (Plan) and Moving to Work Supplement (MTW Supplement), including a Safe Harbor Waiver.

Each year, HUD requires Housing Authorities to complete a Plan to outline the Authorities' progress toward their 5-Year Plan goals and anticipated new activities. HACC can only carry out federally funded activities, as stated in the Plan. Any deviation in federally funded activity from what is stated in the Plan may require further HUD approval. Beginning in 2026, HACC will operate fewer than 250 public housing units and will therefore submit the Streamlined Annual PHA Plan as a "Small PHA" per HUD requirements.

Elements of the Streamlined PHA Annual Plan and MTW Supplement:

- General information regarding HACC
- New activities the agency intends to undertake in FY2026-27
- Public comment, including Resident Advisory Board engagement
- MTW Supplement, including waivers planned for implementation in FY2026-27
- Required certifications & forms

For Filing Use Only

RECOMMENDATION: Staff respectfully request that the Housing Authority Board approve the Resolution (No. 2003) and authorize Chair Roberts or his designee to sign on behalf of the Housing Authority.

Respectfully submitted,

Mary Rumbaugh

Mary Rumbaugh

Director of Health, Housing, and Human Services

ATTACHMENTS:

Draft HACC 2026-27 Annual PHA Plan and MTW Supplement

**BEFORE THE BOARD OF COMMISSIONERS
OF THE HOUSING AUTHORITY OF CLACKAMAS COUNTY, OREGON**

In the Matter of Approving the
Housing Authority of Clackamas
County's Annual Plan & MTW
Supplement



Resolution No. 2003
Page 1 of 2

Whereas, the Housing Authority of Clackamas County (“HACC”) is required to submit an Annual Plan, together with all attachments thereto, including the Moving to Work (“MTW”) Supplement to the US Department of Housing and Urban Development (“HUD”); and

Whereas, the Annual Plan was developed using the required HUD templates and instructions; and

Whereas, the Resident Advisory Board Meeting, Public Hearing and availability of the draft for comment was advertised in the Oregonian on January 23, 2026; and

Whereas, the Resident Advisory Board meeting, Public Hearing and availability of the draft for comment was advertised to residents through the Housing Authority Resident Services newsletter and by personal invitation to members; and

Whereas, the Annual Plan and its certifications and attachments including the MTW Supplement were informed by input and recommendations from an established Resident Advisory Board (“RAB”) at their meeting on February 11, 2026; and

Whereas, the Annual Plan and its attachments including the MTW Supplement drafts were made available for public review and comment from January 28, 2026 through March 15, 2026, online and in hard copy form at various locations listed in the plan; and

Whereas, the Annual Plan and its attachments were discussed, and testimony was taken and recorded at a public hearing in front of the Housing Authority Board of Commissioners on March 5, 2026; and

Whereas, HUD requires the Housing Authority Board of Commissioners to approve the Annual Plan and its attachments including the MTW Supplement by a board resolution before submission to HUD; and

Whereas, the Annual Plan and its related attachments including the MTW Supplement are to be submitted to HUD no later than April 17, 2026, at least 75 days prior to the effective date of July 1, 2026.

**BEFORE THE BOARD OF COMMISSIONERS
OF THE HOUSING AUTHORITY OF CLACKAMAS COUNTY, OREGON**

In the Matter of Approving the
Housing Authority of Clackamas
County's Annual Plan & MTW
Supplement



Resolution No. 2003
Page 2 of 2

NOW THEREFORE, IT IS HEREBY RESOLVED that the Board of Commissioners of the Housing Authority of Clackamas County reviewed HACC's Annual Plan, and all attachments thereto;

NOW THEREFORE, IT IS FURTHER RESOLVED that the Board of Commissioners of the Housing Authority of Clackamas County hereby approves the Annual Plan, and all attachments thereto;

NOW THEREFORE IT IS FURTHER RESOLVED that the Board of Commissioners of the Housing Authority of Clackamas County hereby authorizes Craig Roberts, Chair, to sign all documents on behalf of HACC as may be reasonably required to for submission of the Annual Plan to HUD, no later than April 17, 2026.

DATED this _____ day of _____, 2026.

**BOARD OF COMMISSIONERS OF THE
HOUSING AUTHORITY OF CLACKAMAS COUNTY, OREGON**

Chair

Recording Secretary

Certifications of Compliance with PHA Plan and Related Regulations (Small PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 09/30/2027
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**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or Annual PHA Plan, hereinafter referred to as "the Plan," of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 07/2026, in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the Resident Advisory Board or Boards (24 CFR § 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the way the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last

Annual PHA Plan (check all policies, programs, and components that have been changed):

- 903.7a Housing Needs
- 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
- 903.7c Financial Resources
- 903.7d Rent Determination Policies
- 903.7h Demolition and Disposition
- 903.7k Homeownership Programs
- 903.7r Additional Information
 - A. Progress in meeting 5-year mission and goals
 - B. Criteria for substantial deviation and significant amendments
 - C. Other information requested by HUD
 - (1) Resident Advisory Board consultation process
 - (2) Membership of Resident Advisory Board
 - (3) Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- i. The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - ii. The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - iii. The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours. Where possible, PHA's should make documents available electronically, for public inspection upon request.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment. The PHA ensured all notices and meetings provided effective communication with persons with disabilities and further provided meaningful language access for persons with Limited English Proficiency (LEP).

6. The PHA certifies that it will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, the Violence Against Women Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs.
7. The PHA will affirmatively further fair housing, in compliance with the Fair Housing Act, 24 CFR § 5.150 et seq., 24 CFR § 903.7(o), and 24 CFR § 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR § 5.151). Pursuant to 24 CFR § 903.15(c)(2), a PHA's policies should be designed to reduce the concentration of tenants and other assisted persons by race, national origin, and disability. PHA policies should include affirmative steps stated in 24 CFR § 903.15(c)(2)(i) and 24 CFR § 903.15(c)(2)(ii). Furthermore, under 24 CFR § 903.7(o), a PHA must submit a civil rights certification with its Annual and 5-year PHA Plans, except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document. The PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
8. For a PHA Plan that includes a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module and/or its successor system: the Housing Information Portal (HIP) in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with the Fair Housing Act, the PHA will not base a determination of eligibility for housing on marital status and will not otherwise discriminate because of sex.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, 'Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped' for people with physical disabilities.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety

Standards Act.

- 17. The PHA will keep records in accordance with 24 CFR 200.302 and facilitate an effective audit to determine compliance with program requirements.
- 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to always be available at all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA and, where possible, should be made available for public inspection in an electronic format.
- 22. The PHA certifies that it is following all applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of Clackamas County

OR001

PHA Name

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20__ - 20__

X Annual PHA Plan for Fiscal Year 2026

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802)

Name of Executive Director: MRS Shannon Callahan		Name of Board Chairman: Craig Roberts	
Signature:	Date:	Signature:	Date:

This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. 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.

Form identification: *OR001-Housing Authority of Clackamas County form HUD-50077-CRT-SM (Form ID -303) printed by Erin Fernald in HUD Secure Systems/Public Housing Portal at 03/04/26, 09:58 AM EST*

<p>Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)</p>	<p>U. S Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 09/30/2027</p>
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**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Craig Roberts, the Board Chair
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years **2026-2030** and/or Annual PHA Plan for fiscal year **2026** of the OR001 - Housing Authority of Clackamas County is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including any applicable fair housing goals or strategies to:

Clackamas County

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR Part 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The Housing Authority of Clackamas County's Annual Plan is consistent with the Clackamas County Consolidated Plan and Assessment of Fair Housing Plan in aiming to preserve affordable housing for all residents and especially low-income residents. The Housing Authority, situated as a component unit of the Housing and Community Development Division of Clackamas County, continues to collaborate with Clackamas County in all plans to address the housing needs of Clackamas County residents.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Name of Authorized Official: Craig Roberts	Title: Board Chair
Signature:	Date:

This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. 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.

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Form identification: OR001 - Housing Authority of Clackamas County form HUD-50077-SL (Form ID - 6519) printed by Erin Fernald in HUD Secure Systems/Public Housing Portal at 03/04/2026 09:55AM EST

Housing Authority of Clackamas County Annual PHA Plan & MTW Supplement

For Fiscal Year – July 1, 2026-June 30, 2027

Draft for public review and comment: Published January 28, 2026

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Housing Authority of Clackamas County Streamlined Annual PHA Plan (Small PHA)

For Fiscal Year – July 1, 2026-June 30, 2027

A. PHA Information

PHA Name: Housing Authority of Clackamas County

PHA Code: OR001

PHA Plan for Fiscal Year Beginning: July 2026

PHA Inventory – Public Housing Units: 225 Housing Choice Vouchers: 2,337

Total Combined: 2,562

PHA Plan Submission Type: Annual Submission

The Housing Authority of Clackamas County has copies of the proposed FY26-27 PHA Plan available to members of the public at the following locations:

A complete copy of the proposed plan can be viewed online at:

<https://www.clackamas.us/housingauthority/plansandreports.html>

Members of the public can request copies at the HACC office at this address:

13930 Gain Street, Oregon City, OR 97045

Or can request a copy by contacting:

Erin Fernald, Management Analyst Sr.

971-501-0966

efernald@clackamas.us

B. Plan Elements Submitted Years 1-4

B.1 New Activities

New activities the agency intends to undertake in the applicable Fiscal Year:

- Modernization or Development
- Demolition and/or Disposition
- Conversion of Public Housing to Tenant-Based Assistance
- Project Based Vouchers

Description of new activities:

Modernization or Development

In FY26-27, HACC intends to continue facilitating the phased redevelopment of the former 100 unit public housing community called Hillside Park (OR001003000).

In the first half of 2026, construction was completed on 275 new affordable units built in the first phase of redevelopment and are now leasing up. 140 units are supported with PBV rent assistance from HACC.

Relocation of residents located in the second phase of the Hillside Park redevelopment will be completed in the first half of 2026. Disposition and DOT removal will occur concurrent with the financial closing of the Phase 2 redevelopment which is scheduled to occur in the spring of 2026. Demolition of the remaining public housing units located Phase 2 and construction of the 164 new affordable units will continue through FY26-27.

In October 2025, HACC closed on the financing for the Clackamas Heights Redevelopment project which will replace 99 former public housing units with 200 new affordable units. Construction is underway and is expected to continue through FY26-27, concluding during the second half of 2027. Of the 200 new units, 112 units will be supported with PBV rent assistance from HACC.

Demolition and/or Disposition

HACC received disposition approval for **Hillside Park Phase 1** on June 26, 2023. Hillside Park (OR001003000) Phase 1 - DDA0012221 - includes 47 buildings containing 54 dwelling units and 7.76 acres of underlying land at a development known as Hillside Park, OR001003000 (Property).

HACC received disposition approval for **Hillside Park Phase 2** on April 21, 2025. Hillside Park (OR001003000) Phase 2 - DDA0013096 – Includes 39 buildings containing 46 dwelling units and 9.21 acres of underlying land at a development known as Hillside Park, OR001003000 (Property).

HACC received disposition approval for **Clackamas Heights** on October 31, 2024. Clackamas Heights (OR001001000) - DDA0012820 – Includes 65 buildings containing 99 dwelling units, 1 non-dwelling unit, and 16.43 acres of underlying land at a development known as Clackamas Heights, OR001001000 (Property).

HACC received disposition approval for **Oregon City View Manor** on October 31, 2024. Oregon City View Manor (OR001004000) - DDA0012820 - Includes 70 dwelling buildings containing 100 dwelling units and 22.20 acres of underlying land at a development known as Oregon City View Manor, OR001004000 (Property). In FY26-27, HACC intends to commence resident relocation at Oregon City View Manor (OR001002000) with the goal of completing resident relocation by the end of 2027.

HACC received disposition approval for its **contiguous Scattered Sites** on September 24, 2024. Scattered Sites (OR001002000) - DDA0012821 - Includes 121 dwelling buildings containing 131 dwelling units and 20.67 acres of underlying land at a development known as Clackamas County HA, OR001002000 (Property).

HACC received disposition approval for its **non-contiguous Scattered Sites** on April 4, 2025. Scattered Sites (OR001002000) - DDA0012822 - Includes 7 dwelling buildings containing 14 dwelling units and 1.61 acres of underlying land at a development known as Clackamas County HA, OR001002000 (Property). In FY26-27, HACC intends to continue the disposition of its Scattered Site properties (OR001002000) in accordance with disposition approvals DDA0012821 and DDA0012822.

Conversion of Public Housing to Tenant-Based Assistance

As part of HACC's demolition and/or disposition of the aging public housing inventory, HACC is converting units from traditional public housing to tenant-based rental assistance through the Section 8 Housing Choice Voucher program. Instead of residents living in public housing units owned and managed by HACC with assistance tied to the property, they can use their tenant protection voucher to rent a privately-owned unit of their choice within Clackamas County. Tenant-based assistance gives residents more flexibility and choice about where they live, compared with public housing which is tied to specific HACC properties.

Public housing residents affected by this conversion are also offered assistance in relocating to a new rental of their choice. HACC provides relocation support, including help finding housing, moving assistance, and coverage of relocation costs. Residents generally have the right to return to newly redeveloped or replacement housing once construction is complete, with moving costs covered.

HACC's first application to HUD to convert phase one of the Hillside Park property under Section 18 was submitted in 2023 and approved. Applications for HACC's Scattered Sites properties, Clackamas Heights, Oregon City View Manor and Hillside Park phase two were

submitted in 2024 and approved in 2024-2025, resulting in a total of 444 tenant protection vouchers being awarded to HACC.

Resident relocations under this plan began in early 2024 and are expected to continue into 2027.

Project-Based Vouchers (PBVs)

	HCV	VASH	Mainstream	Total
Chez Ami Apartments	20			20
Town Center Courtyards	21			21
Rosewood Station	15	5		20
Walsh Commons	8			8
Clayton Mohr Commons	2	22		24
Hillside Manor - RAD	70			70
Hillside Manor - TPV/Enhanced PBV	25			25
Hillside Manor - PBV Deminis	5			5
Tukwila Springs	48			48
Fuller Commons	25		5	30
Las Flores	62	8		70
Good Shepherd Village	15	15	5	35
Blossom & Community Apartments	100			100
Parkside Heights East	6		6	12
Parkside Heights West	14		14	28
Bear Creek / Molalla Apts			8	8
Totals	436	50	38	524

Project-basing vouchers advance HACC's core objectives of expanding and preserving affordable housing, responding to documented local housing needs, and improving housing stability for low-income households. PBVs allow HACC to secure long-term affordability in specific developments, and have supported the creation, preservation and redevelopment of housing that serves priority populations, such as extremely low-income families, and households at risk of homelessness. By ensuring a reliable source of rental assistance, PBVs help stabilize vulnerable residents who may otherwise struggle to access or maintain housing in Clackamas County’s competitive rental market.

Project-based vouchers have been used to support mixed-income developments and housing located near employment, transportation, and services, in an effort to promote access to opportunity and avoid concentrations of poverty. Additionally, project-basing voucher have enabled HACC to leverage other funding sources, such as Low-Income

Housing Tax Credits and local or state resources, maximizing the impact of limited federal funds.

HACC anticipates having 436 regular PBVs, 50 VASH PBVs and 38 Mainstream PBVs, located in mostly urban areas such as Oregon City, Milwaukie, Gladstone, Happy Valley and Wilsonville under HAP contract by the end of 2026.

Deconcentration Policy

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2] HACC's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of HACC's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)]. HACC's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c) (5)].

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

Steps for Implementation [24 CFR 903.2(c) (1)]: To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, HACC must comply with the following steps:

Step 1. HACC must determine the average income of all families residing in all HACC's covered developments. HACC may use the median income, instead of average income, provided that HACC includes a written explanation in its annual plan justifying the use of median income. **HACC Policy - HACC will determine the average income of all families in all covered developments on an annual basis.**

Step 2. HACC must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In

determining average income for each development, HACC has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD. **HACC Policy - HACC will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.**

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

Preference: HACC has added a preference for the Family Self Sufficiency program for work ready families living in our covered family developments.

Capital Improvements:

See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 12/15/2025.

Housing Authority of Clackamas County

MTW Supplement to the Annual Plan

For Fiscal Year FY26-27 – July 1, 2026-June 30, 2027

PHA Name: Housing Authority of Clackamas County
PHA Code: OR001
Fiscal Year Beginning: 07/01/2026
PHA Program Type: Combined
MTW Cohort Number: Asset Building
Submission Type: Annual Submission

MTW Waivers: Implementation planned in Submission Year

- Alternative Asset Inclusions/Exclusions (1v, 1w)
 - Safe Harbor Waiver
- Interim Re-examination Policies (3a, 3b)
- Pre-Qualifying Inspections (5a)

MTW Waivers: Previously approved

- Cohort Specific Waiver – Matched Savings Homeownership Account
- Rent Reasonableness – Third Party Requirement (2d)
- Triennial Reviews for Households on Fixed Incomes (3a, 3b)
- Inspections – Third Party Requirement (5c)
- Increase PBV Program and Project Caps (9a, 9b)
- Limit Choice Mobility for PBV Units (9h)

MTW Supplement Narrative

The Housing Authority of Clackamas County (HACC) uses its MTW flexibility to better address the needs of our local community and residents, aligned with the three objectives:

- 1) Better utilize funding and transform operations;
- 2) Support families in reaching self-sufficiency and stabilization; and
- 3) Increase housing choice and opportunity in our community.

HACC focuses on three intentions as we develop and implement waivers:

- Use efficiencies to redirect staff toward high value activities, such as building trusting relationships, connecting clients to resources and educating clients on the impact of financial decisions.
- Give priority to activities to seek a balance between reduced staff time and benefit HACC's clientele in order for HACC to serve more families and provide its services more equitably.
- Seek to impact the homelessness crisis in Clackamas County, through eviction and termination prevention measures as well as other innovative programmatic approaches to housing barriers.

FY26-27 will be HACC's third year of MTW flexibility. Our first years focused on establishing our asset building cohort activities. This year we are implementing three more activities to ease administrative burden for both our staff and our households:

- Alternative Asset Inclusion/Exclusion (under Waiver 1v, 1w) – HACC will implement alternative requirements for including and verifying income from household assets. While large assets (like savings or retirement accounts) were once more common among families living in housing authorities, they are now relatively rare. Further, the income from assets typically impacts the family's rent calculation by less than \$1/month. With this activity, HACC will disregard all assets under \$100,000.
- Interim Re-examination Policies (under Waiver 3a, 3b) – The Housing Opportunity Through Modernization Act (HOTMA) presents many updates to our processes that offer efficiencies and reduced burden on our households. However, implementation at the federal level has been complicated because of technology barriers. HACC will pre-emptively implement changes to interim reexamination policies that have been proposed and published as part of HOTMA, limiting interim adjustments to situations that have a meaningful impact on the household.

- Pre-Qualifying Unit Inspections (under Waiver 5a) – This waiver will allow HACC to conduct inspections up to 90 days before the participant occupies the unit. This will ease scheduling burden for staff and can expedite the lease-up process for households.

MTW Waivers: Implementation planned in Submission Year

1.v./1.w. Alternative Income Inclusions/Exclusions + Safe Harbor waiver

The calculation of asset income and how it affects a household's rent is often confusing. Of approximately 2,250 households in our voucher and public housing programs, only 60 households currently report assets. The staff time required to collect, verify and calculate asset information is of significantly more cost than the average impact to rent.

HACC will implement a change to the inclusion of assets in determining rent. Asset information will still be collected and verified at initial eligibility. However, HACC will disregard all assets when total assets for the household are less than \$100,000. HACC will not include assets or asset income in the rent calculation, or enter the information into Yardi, if total assets are less than \$100,000 as indicated in the Self-Certification of Assets form. If assets are \$100,000 or more, HACC will continue to process assets and calculate the impact on rent as usual.

Only 10 households had assets of \$100,000 or more in 2025. No longer including income from assets below \$100,000 will cost the agency approximately \$2,500 per year. Continuing to include assets of \$100,000 or more will ensure that households with significant asset income use a portion of that income toward their rent.

This activity applies to all new and existing HCV households included in MTW flexibility. HACC is requesting a safe harbor waiver to include elderly and disabled individuals, as this is a direct benefit to those households.

Safe Harbor waiver requested:

- i. Agency must exempt elderly and disabled individuals from this rent determination policy.

See Appendix A for additional waiver information.

See Appendix B for Safe Harbor Waiver.

3.a./3.b. Alternative Reexamination Schedule for Households

HACC will implement changes to interim reexamination policies that have been proposed and published as part of HOTMA, but do not yet have an official implementation date. This waiver will apply to all new admissions and existing households in the public housing and Housing Choice Voucher programs.

When a household reports an income increase or decrease to HACC:

- If an estimate shows that the income decrease is 10% or more of adjusted income, HACC will conduct an interim reexamination;
- If the estimate shows that the income increase is 10% or more of adjusted income, HACC will conduct an interim reexamination
- If the estimate shows that the income increase or decrease is less than 10%, HACC will not conduct an interim reexamination.
 - Exception: HACC will perform an interim reexamination for a decrease in adjusted income of any amount when there is a decrease in family size due to death or a family member permanently moving out.

The effective dates for rent increases or decreases as the result of an interim reexamination are as follows:

- If the family reported the changes within the 7-business day timeline stated in HACC's Admin & ACOP Plan:
 - Rent decreases are effective on the first day of the month after the date of the reported change.
 - Rent increases are effective on the first of the month after the end of the 30-day advance notice period.
- If the family did not report the change within the 7-business day timeline stated in HACC's Admin & ACOP Plan:
 - Rent decreases are effective on the first of the month following HACC's completion of the interim reexamination.
 - Rent increases are effective on the first of the month following the date of the reported change.

Note: At this time, HACC will not implement the use of retrospective income calculation for interim reexaminations. This will be implemented with HUD's HOTMA timeline.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. The agency must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.
- iii. Agency must implement an impact analysis.
- iv. Agency must include a hardship policy.

See Appendix A for additional waiver information.

5.a. Pre-Qualifying Unit Inspections

HACC will implement an option to allow pre-qualifying unit inspections, within 90 days of the participant occupying the unit. This option may be utilized at HACC's discretion, primarily for project-based units. Allowing pre-qualifying inspections streamlines the process and allows households to move through occupancy more quickly.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The pre-inspection must have been conducted within 90 days of the participant occupying the unit.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards must not be altered as found at 24 CFR 982.401.

See Appendix A for additional waiver information.

MTW Waivers: Previously Approved

2.d. Rent Reasonableness – Third Party Requirement

Originally approved in FY2024 PHA Plan. No additional waiver requested.

HACC waives certain provisions of 24 CFR 982.352(b) and 983.303, eliminating the requirement that the PHA use a third-party entity to perform rent-reasonableness determinations and assisting the family in negotiating the rent to owner for units and properties the agency owns, manages, and/or controls.

Procuring and overseeing a third-party contractor for rent reasonableness is costly and time-consuming for the agency. Instead, HACC applies 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.

Per the MTW Operations Notice, this activity operates within the following Safe Harbors:

- i. The agency shall establish and make available a quality assurance method to ensure impartiality.
- ii. The agency shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area.
- iii: At the Department's request, the agency must obtain the services of a third-party entity to determine rent reasonableness for PHA-owned units.

This activity does not require an impact analysis or hardship policy.

Implementation update: HACC implemented this waiver in July 2024. Foregoing third-party contracting for rent reasonableness verification on units HACC owns and/or manages has saved staff time and money. There have been no changes to the activity or policy since implementation.

See Appendix A for additional waiver information.

3.a./3.b. Triennial Reviews for Households on Fixed Incomes

Originally approved in FY2024 PHA Plan. No additional waiver requested.

HACC is waiving certain provisions of the following policies:

- i. Sections 3(a)(1) and 3(a)(2)(E) of the 1937 Act
- ii. 24 CFR Parts 960.257(a)-(b),

Waiving these provisions allows HACC to implement a triennial recertification policy for all elderly and disabled households on fixed incomes in its public housing and housing choice voucher programs. This benefits the client and the agency by reducing the burden of the regular review cycle. Under this waiver, the impacted households will have a reexamination once every three (3) years.

As part of this policy change, the following policy decisions were made:

- i. If a utility allowance or flat rent adjustment is made, HACC may process the change without reviewing the household's income.

- ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability.
- iii. If a family moves into a new unit, HACC will process the change without reviewing the household's income.
- iv. An interim with a review of the household's income will be conducted if a household is reporting a decrease of 10% or more in the household's gross income.
- v. HACC will limit the number of interims conducted to 2 per year. If additional interims beyond the 2 per year are requested, HACC will request the household file for a Hardship exemption from this MTW activity.
- vi. Although all income changes are still to be reported to HACC by households in accordance with the Public Housing Admissions and Continued Occupancy Policies (ACOP) and Admin Plan, interims will not be conducted for increases in earned or unearned income. Increases in income will only be reviewed every three years.
- vii. Households may file a Hardship exemption for this MTW activity in accordance with the agency's MTW hardship policy at any time.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- v. Reexaminations must occur at least every three years.
- vi. 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.
- vii. Agency must implement an impact analysis.
- viii. Agency must include a hardship policy.

Implementation update: HACC has further defined eligibility for triennial reviews as 1) a household with a head, co-head or spouse who is 60+ years and/or disabled; and 2) has a fixed income source. HACC began implementation of triennial reviews in the first quarter of 2026.

See Appendix A for additional waiver information.

5.c. Inspections – Third Party Requirement

Originally approved in FY2024 PHA Plan. No additional waiver requested.

HACC is waiving certain provisions of Section 8(o)(11) of the 1937 Act, 24 CFR Part 982.352(b)(iv), and 24 CFR Part 983.103(f).

Waiving these provisions allows HACC to eliminate the requirement that the PHA use a third-party entity to perform Housing Quality Standard (HQS) inspections on units and properties the agency owns, manages, and/or controls. Procuring and overseeing a third-party contractor for HQS inspections services is costly and time-consuming for the agency.

Instead, HACC utilizes 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 HACC are uniform and fair, and that the process is transparent and auditable.

In order to further ensure quality control, participants may request an interim inspection, in writing in accordance with the HACC Administrative Plan.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. The agency shall establish and make available a quality assurance method to ensure an objective analysis.
- ii. The participant must be able to request an interim inspection.
- iii. HQS inspection standards must not be altered as found at 24 CFR 982.401.
- iv. At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS.

*This activity does not require an impact analysis or hardship policy.

Implementation update: HACC implemented this waiver in July 2024. Foregoing third-party contracting for inspections on units that HACC owns and/or manages has saved staff time and money. There have been no changes to the activity or policy since implementation.

See Appendix A for additional waiver information.

9.a. Increase PBV Program Cap

Originally approved in FY2024 PHA Plan. No additional waiver requested.

HACC is waiving certain provisions of section 8(o)(13)(B) of the 1937 Act and 24 C.F.R. 983.6(a)-(b), as superseded by the Housing Opportunity through Modernization Act of 2016 (HOTMA) Implementation Notices at 82 FR 5458 and 82 FR 32461. Waiving these provisions

allows HACC to increase the Project Based Voucher program cap to 50% of the lower of either HACC's total authorized units or HACC's annual budget authority.

Project-based vouchers (PBVs) are an important resource in the community and increasing the program cap allows the agency to coordinate with local property owners, developers, service coordinators, and jurisdictional partners to provide housing for targeted populations.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

i. The agency must not project-base more than 50% of the lower of either the total authorized units or annual budget authority.

*This activity does not require an impact analysis or hardship policy.

Implementation update: HACC implemented this waiver in July 2024. Project-based vouchers currently account for approximately 18% of the total Housing Choice Voucher authorized units (ACC).

See Appendix A for additional waiver information.

9.b. Increase PBV Project Cap

Originally approved in FY2024 PHA Plan. No additional waiver requested.

HACC is waiving certain provisions of section 8(o)(13)(D) of the 1937 Act and 24 C.F.R. 983.56(a)-(b), as superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461. Waiving these provisions allows HACC to increase the Project Based Voucher project cap in a given development to 100%. This will allow HACC to project base 100% of the units in future housing developments.

Project-based vouchers (PBVs) are an important resource in the community and having the ability to project base all of the units in a project will help HACC and its partners secure additional financing and leverage its resources to better meet the needs of the local community.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

i. The agency is subject to Notice PIH 2013-27 where applicable, or successor.

*This activity does not require an impact analysis or hardship policy.

Implementation update:

HACC project-based 100% of the units at the newly developed, 100-unit LIHTC property called Blossom & Community Apartments located in the Hillside Park Redevelopment. Increasing the PBV project cap gives HACC the ability to provide housing that will be affordable to any of the 100 former public housing households who were displaced due to the disposition of Hillside Park, who want to live in Blossom & Community Apartments.

HACC will project-base 112 units (56%) at the new 200-unit LIHTC property being developed on the former Clackamas Heights public housing property. Increasing the PBV project cap will give HACC the ability to provide housing that will be affordable to any of the 99 former public housing households who were displaced due to the disposition of Clackamas Heights who want to live at the new development once it is complete.

See Appendix A for additional waiver information.

9.h. Limit Choice Mobility for PBV Units

Originally approved in FY2024 PHA Plan. No additional waiver requested.

HACC is waiving certain provisions of Section 8(o)(13)(E) of the 1937 Act and 24 C.F.R. Part 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461.

These waivers allow HACC to waive the requirement that PHA's provide a tenant-based voucher to project-based households after being on a project-based voucher for twelve (12) months. Instead, HACC proposes to require twenty-four (24) months in a project-based voucher unit before the household can request a tenant-based voucher.

Waiving the 12-month requirement will:

- i. Lower the cost of turning units for households moving to a tenant-based voucher.
- ii. Improve the cash flow of PBV projects by continuing to assist the household.
- iii. Decrease the administrative burden associated with program unit transfers.
- iv. Ensure that households on HACC waitlists, some of whom are currently unhoused and have been waiting their chance for a voucher, are offered a tenant-based voucher first.

HACC requires a tenant to live in a PBV unit for 24 months before requesting to transfer to a tenant-based voucher. HACC will only make an exception to the 24-month requirement for those requesting a move due to VAWA or other reasonable accommodation. All such requests must be submitted in writing to the housing authority and will be reviewed by the Program Manager. All households in program compliance who have requested a move to a tenant-based voucher will be added to the bottom of the tenant-based voucher waitlist. The household will be offered a tenant-based voucher when their name reaches the top of the waitlist, and a voucher becomes available. The household will not receive priority based on being part of the project-based program. If a request to transition to a tenant-based voucher is denied, the household would have the right to an informal review through the hearing process.

Per the MTW Operations Notice, this activity will operate within the following Safe Harbors:

- i. Portability under this activity must not be restricted for more than 24 months.
- ii. 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.
- iii. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.

*This activity does not require an impact analysis or hardship policy.

Implementation update: This waiver was implemented in July 2024. There have been no changes to the activity or policy since implementation.

See Appendix A for additional waiver information.

Cohort Specific Waiver – Matched Savings Homeownership Account

Originally approved in FY2024 PHA Plan. No additional waiver requested.

As an MTW-designee under the Asset Building Cohort, HACC has elected to implement a PHA-designed asset building activity (option 3) to encourage the growth of savings and aim to build credit for assisted households. There are two elements to this activity: the Home Savings Homeownership Program and expansion of our existing Rent Reporting for Credit Building program.

Home Savings Homeownership Program

In 2021, HACC started the environmental review process required to dispose of its 145 scattered sites. HACC's scattered site portfolio consists of 2-, 3-, and 4-bedroom units in

single-family homes, duplexes, triplexes, and 4-plexes throughout the County. HACC is disposing/selling a portion of the single-family scattered sites as affordable homes under a Community Land Trust (CLT) model, making homeownership more affordable and accessible to families with lower incomes.

The Home \$avings Homeownership Program enables families enrolled in the program to create a savings account towards the purchase of a home. Pairing the program with scattered site disposition and the community land trust model greatly increases the opportunities our households have to become homeowners.

Each household enrolled in the Home \$avings Program will have the opportunity to participate for up to 24 months. During participation, HACC will deposit \$350 per month into an account that HACC owns and manages. These funds can be used toward the purchase of a home, including closing costs, earnest money, down payment, inspection etc. HACC is partnering with Proud Ground, DevNW and Habitat for Humanity to provide homeownership education and assistance as well as navigation through the Community Land Trust model.

Rent Reporting for Credit Building

HACC also plans to expand our existing Rent Reporting for Credit Building program. HACC currently reports rent payments for credit building purposes for households living in public housing properties. The expansion will focus on voucher participants living in properties where HACC has ownership or management interest.

HACC will measure the success of our PHA-designed asset building activity using the following factors:

- Difference in credit score between initial baseline and current actual
- Difference in delinquent debt between initial baseline and current actual
- Percent of program participants who successfully purchased a home

Per HUD PIH Notice 2022-11, the “opt-out” aspect of this savings account program will require HACC to waive certain provisions of the following regulations: sections 23(b)-(f), and (n)(1) of the 1937 Act and 24 CFR 984.101-105, 984.201-204, 984.301-306 and 984.401.

PIH Notice 2022-11 also lists the Safe Harbors required for the opt-out savings account, which include:

- i. The PHA must continue to follow all requirements of 2 CFR part 200.

- ii. 24 CFR 984.305(a) on accounting and reporting must be retained.
- iii. The PHA must contribute at least \$10 per month for the benefit of each assisted household participating in the savings program.
- iv. The PHA must not contribute more per month for the benefit of each assisted household participating in the savings program than the applicable fair market rent of the unit in which they reside.
- v. The PHA must provide an opportunity for households to opt-out of this activity.

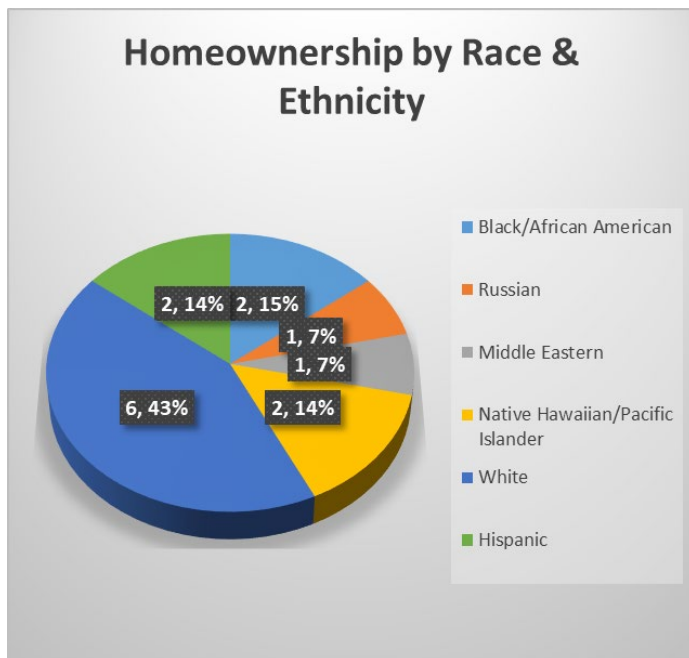
Implementation update:

Home Savings Homeownership Program

Since the launch of the Home Savings Program, fourteen families have successfully purchased homes, with more households in process of purchasing, reflecting strong engagement and positive outcomes from the program.

The fourteen families who have moved to homeownership account for 49 individuals, including nineteen youth, highlighting the program’s reach across multiple generations. The average annual household income among families is \$82,536.

The diversity of families is notable: two families are led by a head of household with a disability and four are single-parent households, underscoring the importance of tailored support services. Additionally, ten families are led by women.



Of the families who have purchased homes, the racial and ethnic composition reflects a diverse community. Among the heads of households, six reported as White, two Black/African American, two Native Hawaiian/Pacific Islander, two Hispanic, one Russian and one Middle Eastern.

The diversity highlights the program’s outreach efforts while supporting equitable access to housing opportunities across multiple racial and ethnic backgrounds. Continued efforts to address barriers and provide culturally

responsive resources will be essential to maintain inclusivity and success in future homeownership programs.

Rent Reporting for Credit Building Program:

Despite our commitment to expanding our existing rent reporting for credit building program to our properties that are third party managed, we were unable to expand into the project-based voucher buildings. The primary barriers include:

- Staff turnover of key staff at the property
- Lack of consistency in property managers and regular presence at the property made it hard to implement, as buy in and engagement of the property management company is key
- Esusu, the organization who reports rents to the three (3) credit bureau's had staff turnover, causing inconsistent communication. When we connected, they presented significant changes to how rent is reported to the credit bureaus

We remain committed to the rent reporting program. The team will need to pivot and adjust to the changes within Esusu. The changes will also allow us to open up the program to all Housing Choice Voucher holders, not just project based.

See Appendix A for additional waiver information.

Additional Reporting

Public Housing Operating Subsidy Grant Reporting

Federal Fiscal Year	Total Operating Subsidy Authorized Amount	PHA Disbursed by 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2026	\$636,662.00	\$636,662.00	\$0	2033-09-30
2025	\$2,251,070.00	\$2,251,070.00	\$0	2033-09-30
2024	\$2,446,668.00	\$2,446,668.00	\$0	2032-09-30

Local, Non-Traditional – 75% Very Low Income

HACC has not implemented any local, non-traditional programming.

Income Level	Number of local, non-traditional households admitted
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	0

- Total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year: 0 unit months
- Total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year: 0 unit months
- Occupied number of local, non-traditional units by household size: 0 households

Establishing Reasonable Rent Policy

HACC has not yet implemented any rent reform policy.

Evaluations

No known evaluations

Public Comment

The 45-day public comment period will run from January 28, 2026 through March 15, 2026. A draft of the PHA Plan and MTW Supplement has been made available for review on the Housing Authority website. Notice of the public comment period and the following meetings was published in The Oregonian on January 23, 2025.

Resident Advisory Board

A resident meeting to review the PHA Plan and MTW Supplement including the Safe Harbor Waiver was held on February 11, 2026 on Zoom. The following consolidates questions asked live or via chat during the meeting and the responses provided.

- Q: How would the new asset rule affect me if I have ~\$1,000 in a savings account and seasonal income from bell-ringing? A: Income from employment is still counted as usual. The asset policy change simply ignores asset-derived income (e.g., interest) unless total assets exceed \$100,000; your seasonal earnings remain part of income calculation, but minimal interest on small savings would no longer be counted toward rent.
- Q: What is a Safe Harbor Waiver? A: HUD pre-defines certain MTW waivers but attaches “safe harbor” parameters, especially to protect seniors and persons with disabilities. Applying a waiver to those groups often requires additional justification and community engagement, ensuring it does not impose undue burdens; HACC is seeking this for the asset policy change.
- Q: For residents who are in the midst of relocation and have income changes, how should we report changes and what supports exist? A : Report income changes to your occupancy specialist now and after July 1 (once MTW changes take effect) so they can determine if the 10% threshold is met for an interim; hardship review is available for meaningful impacts under 10%. For relocation status/supports and timing (end of March for Hillside Phase 2), contact the relocation coordinator and Resident Services for case-specific assistance.
- Q: When do the proposed changes start? A: Earliest on July 1, 2026, pending HUD approval; practical start may be later if HUD delays approval. HACC will communicate implementation details to households.
- Q: Section 8/HCV and PBV waitlists—how do drawings work, and do people need to re-apply? A: The recent waitlist opening was for project-based vouchers (PBV). Application was opened for about one week in July 2025, then names were drawn and placed on PBV waitlists. If someone’s name was drawn and they were told they were added to the waitlist, then they remain on the list until a suitable unit becomes available—no re-application needed. HCV/Section 8 waitlist is not currently

planned to open because there are no vouchers available to issue. Residents can call HACC to check their waitlist status.

- Q: In new developments, how many units are wheelchair accessible and one-story?
A: All projects include accessible and adaptable units; detailed counts will be provided by project. Clackamas Heights will have cottage-cluster homes (no one living above you except within same household); ~17 fully ADA units planned; most other units designed to be accessible/adaptable with enhanced sound attenuation.
- Q: Apartment living can be difficult for families with children on the autism spectrum—are there options that reduce noise conflicts?
A: Townhome-style clusters at Clackamas Heights eliminate upstairs neighbors from different households; enhanced insulation and sound control address noise concerns raised by residents during outreach.
- Q: Is the plan still to include commercial businesses along in the Hillside Park redevelopment?
A: No. Due to BOLI prevailing wage risks that could reclassify the entire site and add millions in costs, HACC replaced storefronts with community-serving ground-floor spaces (after-school program rooms, community rooms, on-site offices) to activate the street without triggering commercial designation.
- Q: Can we get renderings for Hillside Phase 2 and clarity on the open space behind the Manor?
A: A comprehensive plat and renderings will be circulated in the coming weeks/months. The green space will remain; an accessible ramp + stair will connect Phase 2 to the open space. HACC is pursuing small Metro grant-funded improvements (path, exercise equipment, off-leash dog area), with community input guiding features.
- Q: How can HACC help residents going through relocation who have additional needs, such as medical accommodations or language barriers?
A: Households can coordinate with the relocation specialist to review options; HACC will provide translation services as needed.
- Q: When should I enroll in FSS if I'm currently on SSDI and training (JAWS) to get a job? Is there a time limit to get employed?
A: Enroll now—escrow growth is maximized when income rises after enrollment. FSS term is 5 years; employment timing is tied to graduation readiness, not immediate post-enrollment.
- Q: What if I lose my job midway through FSS participation? Can I keep saving or contribute small amounts (e.g., \$20) to keep momentum?
A: Resident-made deposits aren't part of FSS escrow; escrow is based on rent differential from verified income changes. Escrow deposits pause during months without earned income; once employed again, deposits resume. Resident services can help explore skills upgrades and connect to job resources.

Public Hearing for Safe Harbor Waivers

The public hearing for Safe Harbor Waivers will be held on March 5, 2026. This section will be updated with any comments after the meeting.

Public Hearing for Agency Specific Waivers

HACC is not proposing any Agency Specific Waivers.

Public Hearing

The Housing Authority of Clackamas County Board of Commissioners will hold a public hearing on March 5, 2026. This section will be updated after the meeting.

Appendix A: Additional Waiver Information

1.v. / 1.w. Alternative Income Inclusions/Exclusions (PH & HCV)

Statutory objective	Cost effectiveness
Cost implications	Neutral (no cost implications)
Applies to: Household types	All assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	All family types
Applies to: PH/HCV type	All applicable public housing, HCV and PBV households
Safe Harbor waiver	Yes – See Appendix B
Hardship Policy	No
Impact Analysis	No
What Inclusions or exclusions will be eliminated, modified, or added?	Asset income: HACC will disregard asset income when total assets for the household assets are less than \$100,000.

2.d. Rent Reasonableness – Third Party Requirement (HCV)

Statutory objective	Cost effectiveness
Cost implications	Decreased expenditures
Applies to: Household types	Applies to subset of assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	All family types
Applies to: HCV type	Specific tenant-based units and properties with project-based vouchers – HACC will apply this waiver to units in all properties it owns, manages and/or controls
Implementation updates	HACC implemented this waiver in July 2024. Foregoing third-party contracting for rent reasonableness verification on units HACC owns and/or manages has saved staff time and money. There have been no changes to the activity or policy since implementation.
Safe Harbor waiver	No
Hardship Policy	No
Impact Analysis	No
Quality Assurance	HACC uses Nelrod’s EZRRD software to compile, analyze, and validate its rent comparisons for rent reasonableness. Using a third-party system for objective market analysis adds an element of quality control into HACC’s process. In addition, HACC will follow the SEMAP guidelines (SEMAP Indicator 2) for reviewing rent reasonableness determinations.

Rent Reasonableness	HACC relies on the Rent Reasonable Nelrod EZRRD Model, which offers a third-party database of rents to determine rent reasonableness of all County units. This analysis is based on the unit amenities, age, location, and other factors. 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.
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3.a./3.b. Alternative Reexamination Schedule for Households (PH & HCV)

Statutory objective	Cost effectiveness
Cost implications	Decreased expenditures
Applies to: Household types	Applies to subset of assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	Specifically defined target populations – Triennial reviews will apply to elderly and/or disabled households with a fixed income; Alternative Interim policies will apply to all households
Applies to: PH/HCV type	All applicable public housing, HCV and PBV households
Implementation updates	HACC has further defined eligibility for triennial reviews as 1) a household with a head, co-head or spouse who is 60+ years and/or disabled; and 2) has a fixed income source. HACC began implementation of triennial reviews in the first quarter of 2026.
Safe Harbor waiver	No
Hardship Policy	Yes – See Appendix D
Impact Analysis	Yes – See Appendix C
Recertification schedule	Every three years
Interims per year	2 or more
Changes in circumstance	<ul style="list-style-type: none"> i. If a utility allowance or flat rent adjustment is made, HACC may process the change without reviewing the household’s income. ii. HACC will not conduct an interim reexamination for the entire household when a new household member is added, regardless of work/income status, age, or disability. iii. If a family moves into a new unit, HACC will process the change without reviewing the household’s income.

	<ul style="list-style-type: none"> iv. An interim with a review of the household's income will be conducted if a household is reporting a decrease of 10% or more in the household's gross income. v. HACC will limit the number of interims conducted to 2 per year. If additional interims beyond the 2 per year are requested, HACC will request the household file for a Hardship exemption from this MTW activity. vi. Although all income changes are still to be reported to HACC by households in accordance with the Public Housing Admissions and Continued Occupancy Policies (ACOP), interims will not be conducted for increases in earned or unearned income. Increases in income will only be reviewed every three years. vii. Households may file a Hardship exemption for this MTW activity in accordance with the agency's MTW hardship policy at any time.
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5.a. Pre-Qualifying Unit Inspections (HCV)

Statutory objective	Cost effectiveness
Cost implications	Neutral (no cost implications)
Applies to: Household types	All assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	All family types
Applies to: HCV type	All HCV and PBV households, at the discretion of the agency
Safe Harbor waiver	No
Hardship Policy	No
Impact Analysis	No
How long is the pre-inspection valid for?	90

5.c. Inspections – Third Party Requirement (HCV)

Statutory objective	Cost effectiveness
Cost implications	Decreased expenditures
Applies to: Household types	Applies to subset of assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	All family types

Applies to: HCV type	Specific tenant-based units and properties with project-based vouchers – HACC will apply this waiver to units in all properties it owns, manages and/or controls
Implementation updates	HACC implemented this waiver in July 2024. Foregoing third-party contracting for inspections on units that HACC owns and/or manages has saved staff time and money. There have been no changes to the activity or policy since implementation.
Safe Harbor waiver	No
Hardship Policy	No
Impact Analysis	No
Quality Assurance	HACC will apply the SEMAP standards and methods (SEMAP Indicator 5) to select inspections performed during the year by HACC staff. HACC will conduct Quality Assurance inspections on the selected units to ensure consistency and transparency.

9.a. Increase PBV Program Cap

Statutory objective	Cost effectiveness
Cost implications	Neutral (no cost implications)
Applies to: Household types	Applies to subset of assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	All family types
Applies to: HCV type	All properties with project-based vouchers
Implementation updates	HACC implemented this waiver in July 2024. Project-based vouchers currently account for approximately 18% of the total Housing Choice Voucher authorized units (ACC).
Safe Harbor waiver	No
Hardship Policy	No
Impact Analysis	No
% of ACC authorized for PBV	50%

9.b. Increase PBV Project Cap

Statutory objective	Cost effectiveness
Cost implications	Increased revenue
Applies to: Household types	Applies to subset of assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	All family types
Applies to: HCV type	All properties with project-based vouchers

Implementation updates	<p>HACC project-based 100% of the units at the newly developed, 100-unit LIHTC property called Blossom & Community Apartments located in the Hillside Park Redevelopment. Increasing the PBV project cap gives HACC the ability to provide housing that will be affordable to any of the 100 former public housing households who were displaced due to the disposition of Hillside Park, who want to live in Blossom & Community Apartments.</p> <p>HACC will project-base 112 units (56%) at the new 200-unit LIHTC property being developed on the former Clackamas Heights public housing property. Increasing the PBV project cap will give HACC the ability to provide housing that will be affordable to any of the 99 former public housing households who were displaced due to the disposition of Clackamas Heights who want to live at the new development once it is complete.</p>
Safe Harbor waiver	No
Hardship Policy	No
Impact Analysis	No

9.h. Limit Choice Mobility for PBV Units

Statutory objective	Cost effectiveness
Cost implications	Increased revenue; decreased expenditures
Applies to: Household types	Applies to subset of assisted households
Applies to: Admission types	New admissions and currently assisted households
Applies to: Family types	All family types
Applies to: HCV type	All properties with project-based vouchers
Implementation updates	This waiver was implemented in July 2024. There have been no changes to the activity or policy since implementation.
Safe Harbor waiver	No
Hardship Policy	No
Impact Analysis	No

Cohort Specific Waiver – Matched Savings Homeownership Account

Statutory objective	Cost effectiveness; Self-sufficiency
Population/Households	HACC will use the following selection criteria to prioritize households interested in the savings account program:

	<ul style="list-style-type: none"> • Interest in homeownership in general • Currently participating in the IDA homeownership matched savings program • Household income above \$30,000/year • Debt less than \$40,000 • Credit Score of 700 or more, or actively working on getting it above 700 • Completion of Financial Foundations and Homebuying workshops offered through DevNW • Completion of Proud Ground land trust orientation • In addition, HACC is able to refer residents to DevNW financial education programs and cover the cost through a partnership with Clackamas County Social Services
Cost implications	HACC estimates that this program will cost \$210,000 over two (2) years. These funds will come from HACC’s HCV Housing Assistance Payment reserves.
Implementation timeline	HACC began enrolling families on January 1, 2024.
Impact analysis	<p>Agency finances – No projected impact to agency finances; funds will come from HUD-held agency HAP reserves</p> <p>Affordability of housing costs – No projected impact</p> <p>Agency waitlist – No projected impact</p> <p>Termination rate – No projected impact</p> <p>Occupancy / Utilization – No projected impact</p> <p>MTW Statutory Goals – This activity will help families become self-sufficient</p> <p>Statutory Requirements – No projected impact</p> <p>Hardship requests – No projected impact</p> <p>Protected classes / Disparate impact – No project impact</p>
Safe Harbor waiver	No
Hardship Policy	No

Appendix B: Safe Harbor Waiver

Approval requested FY2026-27

1.v. / 1.w. Alternative Income Inclusions/Exclusions (PH & HCV)

HACC will disregard all assets when total assets for the household are less than \$100,000.

Safe harbor waiver requested:

- i. Agency must exempt elderly and disabled individuals from this rent determination policy.

HACC is requesting a safe harbor waiver to apply the policy to elderly and disabled households.

Impact Analysis

Impact on agency finances:

HACC anticipates that no longer including income from assets below \$100,000 will cost the agency approximately \$2,500 per year.

Impact on affordability of housing costs for affected families:

Sixty households currently report assets, and 50 of those households have assets totaling less than \$100,000. No family will have a higher rent burden because of this policy.

Households who currently have asset income included in their rent calculation may see a small decrease in their monthly rent burden. The average change to the household portion of rent is \$4/month.

Impact on agency's waitlists:

No anticipated impact.

Impact on agency's termination rate of families:

No anticipated impact.

Impact on occupancy levels / utilization rates:

No anticipated impact.

Impact on meeting MTW statutory goals:

HACC anticipates an increase in administrative efficiency and cost effectiveness. Staff time required to collect, verify and calculate asset information is of significantly more cost than the average impact to rent.

Impact on MTW statutory requirements:

No anticipated impact.

Impact on rate of hardship requests and number granted/denied:

No anticipated impact.

Impact on protected classes:

No anticipated impact.

Hardship Policy

HACC anticipates this waiver to have an overall positive impact for households. In the case of an unforeseen consequence, households have access to the Housing Authority of Clackamas County MTW Hardship Policy to request relief.

Public Hearing Comments

This section will be updated with any relevant comments or questions after the Resident Advisory Board meeting, scheduled for February 11, 2026, and the public hearing, scheduled for March 2026.

Appendix C: Impact Analysis

Approval requested FY2026-27

This impact analysis applies to the following waivers:

3.a./3.b. Alternative Reexamination Schedule for Households (PH & HCV)

Triennial Reviews: HACC will implement a triennial recertification policy for all elderly and disabled households who have a source of fixed income. There are approximately 900 households who would qualify for triennial reviews and be impacted by this policy. The original impact analysis for this policy was included in the 2025 MTW Supplement.

Interim Reexamination Policy: HACC will conduct interim reexaminations when a household reports an income increase or decrease that is 10% or more of adjusted income. If an estimate shows that the income increase or decrease is less than 10%, HACC will not conduct an interim reexamination except for a decrease in adjusted income of any amount when there is a decrease in family size due to death or a family member permanently moving out. In 2025 there were 1,394 interim reexamination requests across HCV and public housing.

HACC does not anticipate this waiver to have a negative impact on specific households.

Impact on agency finances:

In previous impact analysis, HACC anticipated an annual expense of approximately \$64,500 due to household income increases that would not be captured between triennial reviews. This cost would be offset by an estimated \$28,000 in staff time savings. HACC is not anticipated an impact on agency finances due to the interim reexamination policy.

Impact on affordability of housing costs for affected families:

Triennial reviews are anticipated to impact affordability for affecting families, providing more time to capture savings between reviews.

No anticipated impact due to interim reexamination policy. If a household experiences an income decrease of less than 10% that significantly impacts their affordability, the household can request a hardship consideration.

Impact on agency's waitlists:

No anticipated impact.

Impact on agency's termination rate of families:

No anticipated impact.

Impact on occupancy levels / utilization rates:

No anticipated impact.

Impact on meeting MTW statutory goals:

HACC anticipates an increase in administrative efficiency and cost effectiveness.

Impact on MTW statutory requirements:

No anticipated impact.

Impact on rate of hardship requests and number granted/denied:

No anticipated impact.

Impact on protected classes:

No anticipated impact.

Appendix D: Hardship Policy

Housing Authority of Clackamas County (OR001)

MTW HARDSHIP POLICY

(Previously approved)

PURPOSE OF HARDSHIP POLICY

As a Moving to Work (MTW) housing authority, the Housing Authority of Clackamas County (HACC) may request to waive certain HUD policies. Some of the policies that HACC could request require a hardship policy be provided in order to mitigate possible unintended negative impacts on specific households.

HACC anticipates the waivers being implemented will overall have positive impacts for client households. In the case of unforeseen significant negative consequences to specific households, HACC is adopting the following hardship policy to allow 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. HACC is choosing to implement this hardship policy for all MTW activities. However, HACC may implement additional hardship policies or revise this policy in the future.

This policy currently applies:

3.a./3.b. Alternative Reexamination Schedule for Households (PH & HCV)

ELIGIBILITY FOR A HARDSHIP EXEMPTION

A family qualifies for a financial hardship exemption if a significant increase in expenses, a significant decrease in earned or unearned income or other circumstance result in their total family share exceeding 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, if applicable.

A family may also request consideration for a hardship if:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;

- The family has experienced an increase in expenses, because of changed circumstances, medical costs, childcare, transportation, education, or similar items.

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 in writing 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.

Once the Hardship exemption request has been received by HACC. HACC staff will request any applicable documentation needed to determine if the hardship is due to the MTW activity and that the request for exemption meets the criteria of a financial hardship outlined above.

PROCESS FOR AGENCY REVIEW AND DETERMINATION

The program manager will review the request and determine if the request meets the eligibility requirements for a hardship exemption and is due to the MTW activity.

- If the request does not meet the hardship eligibility or is not due to the MTW waiver activity, there will not be any adjustments made.
- If the request does meet the hardship eligibility or is determined due to MTW waiver activities, the agency will conduct an examination even if beyond the limit and will assign the family to an annual reexamination schedule moving forward.

HOUSEHOLD NOTIFICATION

HACC will take the following actions in order to promote this policy among its applicants and program participants:

- Include a copy of the hardship policy on their website
- Notify applicants of this hardship policy at intake
- Review this hardship policy with families at recertifications including those who will be assigned to the alternate reexamination schedule.
- Consider if a family qualifies for a hardship exemption when assistance is to be terminated due to an MTW activity.

GRIEVANCE PROCEDURE

If HACC denies a hardship request, the family may file a grievance according to the grievance policies found in HACC's ACOP and Administrative Plan.

RECORDS RETENTION

HACC will preserve all records of hardship requests, determinations and appeals for the duration of its MTW participation and will comply with all other applicable records retention regulations.

MTW CERTIFICATIONS OF COMPLIANCE***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies for the MTW PHA's jurisdiction and a description of the way the MTW Supplement is consistent with the applicable Consolidated Plan (24 CFR 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. 24 CFR 5.151. The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, 'Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped' for people with physical disabilities.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA and should be made available electronically, upon request.

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

** Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*