

HADCO STRATEGY FOR ADDESSING HOUSING NEEDS

Annual Plan 2010

The preliminary strategy is to develop new construction on current public housing land. The projects have vacant land that has the density to build more units. The funding will come from other sources such as Rural Development, competitive tax credits and non competitive tax credits. By tapping into the Rural Development funds, it would provide subsidy to assist with rental payments.

The availability of housing for single, couples or elderly is little to none. HADCO's waiting list for one and two bedrooms housing is closed. There is little turnover in our housing for those type of units. We have 184 (combined Public Housing and Section 8) elderly households waiting for housing. Building one bedroom units would be the priority and two bedrooms are secondary.

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HADCO Housing Needs of Families on the PHA's Waiting Lists 2010 Fiscal Year

Waiting list type: (select one)

- Section 8 tenant-based assistance
- Public Housing
- Combined Section 8 and Public Housing
- Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/sub jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	1011		14
Extremely low income <=30% AMI	729	72%	
Very low income (>30% but <=50% AMI)	237	23%	
Low income (>50% but <80% AMI)	45	4%	
Families with children	666	66%	
Elderly families	99	9%	
Families with Disabilities	246	25%	
Race/ethnicity - White	887	87%	
Race/ethnicity - Black	6	.1%	
Race/ethnicity - Amer. / Ind.	11	1%	
Race/ethnicity - Hispanic	0	0%	

Characteristics by Bedroom
Size (Public Housing Only)

1BR (closed)	451	42.5%	2
2 BR (closed)	425	42.5%	4
3 BR	122	13.1%	3
4 BR	13	1.9%	1
5 BR			
5+ BR			

Is the waiting list closed (select one)? No Yes One and Two bedrooms

If yes:

How long has it been closed (# of months)? 7

Does the PHA expect to reopen the list in the PHA Plan year? No Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?

No Yes

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HADCO Housing Needs of Families on the Section 8 Waiting Lists 2010 Fiscal Year

Waiting list type: (select one)

- Section 8 tenant-based assistance
- Public Housing
- Combined Section 8 and Public Housing
- Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/sub jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	1232		
Extremely low income <=30% AMI	1012	82%	
Very low income (>30% but <=50% AMI)	154	12.5%	
Low income (>50% but <80% AMI)	27	%	
Families with children	968	78.6%	
Elderly families	85	6.8%	
Families with Disabilities	179	14.5%	
Race/ethnicity - White	1033	83.8%	
Race/ethnicity - Black	6	.5%	
Race/ethnicity - Amer. / Ind.	18	1.5%	
Race/ethnicity - Hispanic	0	0%	

Characteristics by Bedroom
Size (Public Housing Only)

1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			

Is the waiting list closed (select one)? No Yes One and Two bedrooms

If yes:

How long has it been closed (# of months)?

Does the PHA expect to reopen the list in the PHA Plan year? No Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?

No Yes

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U.S. Census Bureau

American FactFinder

FACT SHEET

Douglas County, Oregon

2006-2008 American Community Survey 3-Year Estimates - what's this?

Data Profile Highlights:

NOTE: Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

	Estimate	Percent	U.S.	Margin of Error	
Social Characteristics - show more >>					
Average household size	2.44	(X)	2.61	+/-0.04	map
Average family size	2.90	(X)	3.20	+/-0.07	
Population 25 years and over	74,595			+/-226	
High school graduate or higher	(X)	86.2	84.5%	(X)	map
Bachelor's degree or higher	(X)	14.1	27.4%	(X)	map
Civilian veterans (civilian population 18 years and over)	14,438	17.5	10.1%	+/-822	map
With a Disability	(X)	(X)	(X)	(X)	
Foreign born	2,632	2.5	12.5%	+/-481	map
Male, Now married, except separated (population 15 years and over)	23,368	55.9	52.2%	+/-1,005	
Female, Now married, except separated (population 15 years and over)	24,366	54.2	48.2%	+/-1,082	
Speak a language other than English at home (population 5 years and over)	3,900	4.0	19.6%	+/-653	map
Household population	102,569			+/-900	
Group quarters population	(X)	(X)	(X)	(X)	
Economic Characteristics - show more >>					
In labor force (population 16 years and over)	48,038	56.3	65.2%	+/-1,304	map
Mean travel time to work in minutes (workers 16 years and over)	20.0	(X)	25.3	+/-1.2	map
Median household income (in 2008 inflation-adjusted dollars)	40,212	(X)	52,175	+/-1,570	map
Median family income (in 2008 inflation-adjusted dollars)	48,349	(X)	63,211	+/-2,065	map
Per capita income (in 2008 inflation-adjusted dollars)	21,106	(X)	27,466	+/-783	
Families below poverty level	(X)	9.2	9.6%	(X)	
Individuals below poverty level	(X)	14.0	13.2%	(X)	map
Housing Characteristics - show more >>					
Total housing units	46,037			+/-373	
Occupied housing units	41,953	91.1	88.0%	+/-688	
Owner-occupied housing units	29,066	69.3	67.1%	+/-846	
Renter-occupied housing units	12,887	30.7	32.9%	+/-814	
Vacant housing units	4,084	8.9	12.0%	+/-603	
Owner-occupied homes	29,066			+/-846	map
Median value (dollars)	189,700	(X)	192,400	+/-7,545	map
Median of selected monthly owner costs					
With a mortgage (dollars)	1,157	(X)	1,508	+/-39	map
Not mortgaged (dollars)	331	(X)	425	+/-11	
ACS Demographic Estimates - show more >>					
Total population	103,945			*****	

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Male	50,415	48.5	49.3%	+/-247	
Female	53,530	51.5	50.7%	+/-247	
Median age (years)	43.8	(X)	36.7	+/-0.4	map
Under 5 years	5,637	5.4	6.9%	+/-156	
18 years and over	82,407	79.3	75.5%	+/-91	
65 years and over	20,854	20.1	12.6%	+/-123	
One race	101,100	97.3	97.8%	+/-441	
White	96,975	93.3	74.3%	+/-469	map
Black or African American	334	0.3	12.3%	+/-136	map
American Indian and Alaska Native	1,519	1.5	0.8%	+/-284	map
Asian	1,054	1.0	4.4%	+/-170	map
Native Hawaiian and Other Pacific Islander	76	0.1	0.1%	+/-113	map
Some other race	1,142	1.1	5.8%	+/-465	map
Two or more races	2,845	2.7	2.2%	+/-441	map
Hispanic or Latino (of any race)	4,218	4.1	15.1%	*****	

Source: U.S. Census Bureau, 2006-2008 American Community Survey

Explanation of Symbols:

**** - The median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.

***** - The estimate is controlled. A statistical test for sampling variability is not appropriate.

'N' - Data for this geographic area cannot be displayed because the number of sample cases is too small.

'(X)' - The value is not applicable or not available.

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U.S. Census Bureau

American FactFinder



Douglas County, Oregon

Selected Social Characteristics in the United States: 2008

Data Set: 2008 American Community Survey 1-Year Estimates

Survey: American Community Survey

NOTE. Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For more information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

Selected Social Characteristics in the United States	Estimate	Margin of Error	Percent	Margin of Error
HOUSEHOLDS BY TYPE				
Total households	40,993	+/-1,485	40,993	(X)
Family households (families)	27,102	+/-1,697	66.1%	+/-3.4
With own children under 18 years	8,796	+/-1,301	21.5%	+/-3.0
Married-couple family	21,588	+/-1,567	52.7%	+/-3.5
With own children under 18 years	5,695	+/-1,061	13.9%	+/-2.5
Male householder, no wife present, family	1,246	+/-559	3.0%	+/-1.3
With own children under 18 years	621	+/-406	1.5%	+/-1.0
Female householder, no husband present, family	4,268	+/-931	10.4%	+/-2.2
With own children under 18 years	2,480	+/-778	6.0%	+/-1.9
Nonfamily households	13,891	+/-1,481	33.9%	+/-3.4
Householder living alone	11,486	+/-1,439	28.0%	+/-3.4
65 years and over	5,452	+/-879	13.3%	+/-2.1
Households with one or more people under 18 years	10,015	+/-1,355	24.4%	+/-3.1
Households with one or more people 65 years and over	14,598	+/-883	35.6%	+/-1.9
Average household size	2.52	+/-0.09	(X)	(X)
Average family size	3.04	+/-0.14	(X)	(X)
RELATIONSHIP				
Population in households	103,326	+/-913	103,326	(X)
Householder	40,993	+/-1,485	39.7%	+/-1.4
Spouse	21,928	+/-1,471	21.2%	+/-1.4
Child	26,383	+/-1,666	25.5%	+/-1.6
Other relatives	6,866	+/-1,704	6.6%	+/-1.7
Nonrelatives	7,156	+/-1,542	6.9%	+/-1.5
Unmarried partner	2,238	+/-780	2.2%	+/-0.8
MARITAL STATUS				
Males 15 years and over	42,071	+/-613	42,071	(X)
Never married	11,597	+/-1,409	27.6%	+/-3.3
Now married, except separated	22,011	+/-1,798	52.3%	+/-4.2
Separated	1,179	+/-898	2.8%	+/-2.1
Widowed	1,451	+/-483	3.4%	+/-1.1
Divorced	5,833	+/-1,236	13.9%	+/-3.0
Females 15 years and over	45,218	+/-491	45,218	(X)

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Selected Social Characteristics in the United States	Estimate	Margin of Error	Percent	Margin of Error
Never married	9,001	+/-1,137	19.9%	+/-2.5
Now married, except separated	23,419	+/-1,646	51.8%	+/-3.7
Separated	1,395	+/-869	3.1%	+/-1.9
Widowed	6,217	+/-1,012	13.7%	+/-2.2
Divorced	5,186	+/-1,014	11.5%	+/-2.2
FERTILITY				
Number of women 15 to 50 years old who had a birth in the past 12 months	1,632	+/-757	1,632	(X)
Unmarried women (widowed, divorced, and never married)	778	+/-646	47.7%	+/-26.1
Per 1,000 unmarried women	67	+/-56	(X)	(X)
Per 1,000 women 15 to 50 years old	73	+/-34	(X)	(X)
Per 1,000 women 15 to 19 years old	33	+/-54	(X)	(X)
Per 1,000 women 20 to 34 years old	168	+/-84	(X)	(X)
Per 1,000 women 35 to 50 years old	2	+/-3	(X)	(X)
GRANDPARENTS				
Number of grandparents living with own grandchildren under 18 years	1,622	+/-745	1,622	(X)
Responsible for grandchildren	756	+/-546	46.6%	+/-22.8
Years responsible for grandchildren				
Less than 1 year	71	+/-86	4.4%	+/-5.6
1 or 2 years	321	+/-273	19.8%	+/-16.4
3 or 4 years	279	+/-460	17.2%	+/-25.1
5 or more years	85	+/-85	5.2%	+/-5.9
Number of grandparents responsible for own grandchildren under 18 years	756	+/-546	756	(X)
Who are female	N	N	N	N
Who are married	413	+/-478	54.6%	+/-36.7
SCHOOL ENROLLMENT				
Population 3 years and over enrolled in school	20,837	+/-1,439	20,837	(X)
Nursery school, preschool	954	+/-376	4.6%	+/-1.8
Kindergarten	1,205	+/-537	5.8%	+/-2.6
Elementary school (grades 1-8)	9,042	+/-836	43.4%	+/-4.2
High school (grades 9-12)	5,337	+/-653	25.6%	+/-3.2
College or graduate school	4,299	+/-1,195	20.6%	+/-4.7
EDUCATIONAL ATTAINMENT				
Population 25 years and over	74,970	+/-639	74,970	(X)
Less than 9th grade	3,704	+/-1,164	4.9%	+/-1.6
9th to 12th grade, no diploma	6,429	+/-1,488	8.6%	+/-2.0
High school graduate (includes equivalency)	26,972	+/-2,146	36.0%	+/-2.9
Some college, no degree	21,606	+/-1,991	28.8%	+/-2.6
Associate's degree	7,515	+/-1,311	10.0%	+/-1.7
Bachelor's degree	5,446	+/-1,129	7.3%	+/-1.5
Graduate or professional degree	3,298	+/-704	4.4%	+/-0.9
Percent high school graduate or higher	86.5%	+/-2.4	(X)	(X)
Percent bachelor's degree or higher	11.7%	+/-1.8	(X)	(X)
VETERAN STATUS				
Civilian population 18 years and over	82,909	+/-427	82,909	(X)
Civilian veterans	14,737	+/-1,374	17.8%	+/-1.7
DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION				
Total Civilian Noninstitutionalized Population	104,059	+/-275	104,059	(X)
With a disability	22,726	+/-2,185	21.8%	+/-2.1
Under 18 years	21,150	+/-427	21,150	(X)
With a disability	1,385	+/-615	6.5%	+/-2.9
18 to 64 years	61,216	+/-384	61,216	(X)

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Selected Social Characteristics in the United States	Estimate	Margin of Error	Percent	Margin of Error
With a disability	11,598	+/-1,880	18.9%	+/-3.1
65 years and over	21,693	+/-473	21,693	(X)
With a disability	9,743	+/-1,112	44.9%	+/-4.9
RESIDENCE 1 YEAR AGO				
Population 1 year and over	103,234	+/-354	103,234	(X)
Same house	84,099	+/-3,682	81.5%	+/-3.6
Different house in the U.S.	18,994	+/-3,695	18.4%	+/-3.6
Same county	14,846	+/-3,260	14.4%	+/-3.1
Different county	4,148	+/-1,391	4.0%	+/-1.3
Same state	1,781	+/-917	1.7%	+/-0.9
Different state	2,367	+/-959	2.3%	+/-0.9
Abroad	141	+/-158	0.1%	+/-0.2
PLACE OF BIRTH				
Total population	104,059	*****	104,059	(X)
Native	102,109	+/-588	98.1%	+/-0.6
Born in United States	101,507	+/-730	97.5%	+/-0.7
State of residence	51,082	+/-2,816	49.1%	+/-2.7
Different state	50,425	+/-2,689	48.5%	+/-2.6
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	602	+/-346	0.6%	+/-0.3
Foreign born	1,950	+/-588	1.9%	+/-0.6
U.S. CITIZENSHIP STATUS				
Foreign-born population	1,950	+/-588	1,950	(X)
Naturalized U.S. citizen	1,081	+/-527	55.4%	+/-18.1
Not a U.S. citizen	869	+/-386	44.6%	+/-18.1
YEAR OF ENTRY				
Population born outside the United States	2,552	+/-730	2,552	(X)
Native	N	N	N	(X)
Entered 2000 or later	N	N	N	N
Entered before 2000	N	N	N	N
Foreign born	N	N	N	(X)
Entered 2000 or later	N	N	N	N
Entered before 2000	N	N	N	N
WORLD REGION OF BIRTH OF FOREIGN BORN				
Foreign-born population, excluding population born at sea	N	N	N	(X)
Europe	N	N	N	N
Asia	N	N	N	N
Africa	N	N	N	N
Oceania	N	N	N	N
Latin America	N	N	N	N
Northern America	N	N	N	N
LANGUAGE SPOKEN AT HOME				
Population 5 years and over	N	N	N	(X)
English only	N	N	N	N
Language other than English	N	N	N	N
Speak English less than "very well"	N	N	N	N
Spanish	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other Indo-European languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Asian and Pacific Islander languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other languages	N	N	N	N
Speak English less than "very well"	N	N	N	N

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Selected Social Characteristics in the United States	Estimate	Margin of Error	Percent	Margin of Error
ANCESTRY				
Total population	104,059	*****	104,059	(X)
American	6,730	+/-1,675	6.5%	+/-1.6
Arab	38	+/-64	0.0%	+/-0.1
Czech	353	+/-310	0.3%	+/-0.3
Danish	750	+/-447	0.7%	+/-0.4
Dutch	2,746	+/-1,034	2.6%	+/-1.0
English	18,011	+/-3,027	17.3%	+/-2.9
French (except Basque)	5,546	+/-1,411	5.3%	+/-1.4
French Canadian	626	+/-379	0.6%	+/-0.4
German	29,234	+/-3,185	28.1%	+/-3.1
Greek	205	+/-212	0.2%	+/-0.2
Hungarian	259	+/-256	0.2%	+/-0.2
Irish	17,744	+/-3,158	17.1%	+/-3.0
Italian	7,319	+/-2,273	7.0%	+/-2.2
Lithuanian	66	+/-94	0.1%	+/-0.1
Norwegian	2,737	+/-964	2.6%	+/-0.9
Polish	2,267	+/-1,586	2.2%	+/-1.5
Portuguese	790	+/-454	0.8%	+/-0.4
Russian	606	+/-392	0.6%	+/-0.4
Scotch-Irish	3,115	+/-1,456	3.0%	+/-1.4
Scottish	4,604	+/-1,193	4.4%	+/-1.1
Slovak	51	+/-90	0.0%	+/-0.1
Subsaharan African	57	+/-102	0.1%	+/-0.1
Swedish	3,020	+/-833	2.9%	+/-0.8
Swiss	841	+/-621	0.8%	+/-0.6
Ukrainian	46	+/-77	0.0%	+/-0.1
Welsh	1,459	+/-664	1.4%	+/-0.6
West Indian (excluding Hispanic origin groups)	527	+/-420	0.5%	+/-0.4

Source: U.S. Census Bureau, 2008 American Community Survey

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Notes:

·Ancestry listed in this table refers to the total number of people who responded with a particular ancestry; for example, the estimate given for Russian represents the number of people who listed Russian as either their first or second ancestry. This table lists only the largest ancestry groups; see the Detailed Tables for more categories. Race and Hispanic origin groups are not included in this table because official data for those groups come from the Race and Hispanic origin questions rather than the ancestry question (see Demographic Table).

·Starting in 2008, the Scotch-Irish category does not include Irish-Scotch.

·The Census Bureau introduced a new set of disability questions in the 2008 ACS questionnaire. Accordingly, comparisons of disability data from 2008 or later with data from prior years are not recommended. For more information on these questions and their evaluation in the 2006 ACS Content Test, see the Evaluation Report Covering Disability.

·Data for year of entry of the native population reflect the year of entry into the U.S. by people who were born in Puerto Rico, U.S. Island Areas or born outside the U.S. to a U.S. citizen parent and who subsequently moved to the U.S.

·Due to a reduction in the Failed Edit Follow-up (FEFU) operation for 4-months in 2008, there was an increase in the amount of missing data and an increase in item allocation rates. For more information see the ACS User Notes.

·While the 2008 American Community Survey (ACS) data generally reflect the November 2007 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities. The 2008 Puerto Rico Community Survey (PRCS) data generally reflect the November 2007 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in PRCS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

·Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Explanation of Symbols:

1. An "*" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An "-" entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or

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upper interval of an open-ended distribution.

3. An 'l' following a median estimate means the median falls in the lowest interval of an open-ended distribution.

4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.

5. An '****' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.

6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.

7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.

8. An '(X)' means that the estimate is not applicable or not available.

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Conflict of Interest

Neither HADCO nor any of its contractors or subcontractors may enter into any contract or arrangement in connection with the tenant-based programs in which any of the following classes of persons has any interest, direct or indirect, during tenure or for one year thereafter:

1. Any present or former member or officer of HADCO (except a participating commissioner).
2. Any employee of HADCO, or any contractor, subcontractor or agent of HADCO, who formulates policy or who influences decisions with respect to the programs;
3. Any public official member of a governing body, or State or local legislator, who exercises functions or responsibilities with respect to the programs; or
4. Any member of the Congress of the United States.
5. Any member of the classes above must disclose their interest or prospective interest to HADCO and HUD.
6. The conflict of interest prohibition under this section may be waived by the HUD field office for good cause.

Solicitation or Acceptance of Gifts

Acceptance of other tips or gratitude's for work rendered, doing business with, or for organizations or participants of HADCO is expressly forbidden

Violation of Conflict of Interest

Disciplinary remedies for violations of HADCO's code of conduct will be processed in accordance with HADCO's Personnel Policy.

Violence Against Women and Department of Justice Reauthorization Act of 2005

Definitions

HADCO will use the applicable definitions set forth in Public Law 109-162 Section 3 "Universal Definitions and Grant Provisions".

Purpose

HADCO will not deny admission to any applicant or terminate assistance to any participant on the basis the applicant/participant is or has been the victim of domestic violence, dating violence, or stalking if the applicant otherwise qualifies for assistance or admission. HADCO will follow all guidelines set forth in in the Violence against Women and Department of Justice Reauthorization Act of 2005.

Verification

HADCO will require an individual to certify via a HUD approved certification form that the individual is a victim of domestic violence, dating violence, or stalking and that the incident(s) in question are bona fide incidents of such actual or threatened abuse and meet the requirements set

Violence Against Women Act of 2005 (VAWA)

The Housing Authority of Douglas County provides information regarding VAWA to all participants and applicants of the Public Housing and Section 8 Programs. The Housing Authority networks with Battered Person's Advocacy, Roseburg Rescue Mission and Woman's Shelter.

ITEM 2

Attachment 10.0 (b)

Definition of Substantial Deviation /Modification and Significant Amendment

It is the intent of the Housing Authority of Douglas County PHA Plan to adhere to the mission, goals and objective outlined in the Five-year Annual Plan. The plan, however, will be modified and re-submitted to HUD should a substantial deviation from program goals and objectives occur.

The Housing Authority of Douglas County defines substantial deviations as:

- Any change in the planned or actual use of federal funds for activities that would prohibit or redirect the Housing Authority's strategic goals of increasing availability of safe, decent and affordable housing for the citizens of Douglas County, Oregon.
- A need to respond immediately to an act beyond the control of the Housing Authority, such as floods, earthquakes or other unforeseen significant event.
- A mandate from the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.

A substantial deviation does not include any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein.

A Significant Amendment or Modification to the Annual Plan and Five- Year Plan is defined as:

- Changes of a significant nature to the rent or admissions policies, or the organization of the waiting list not required by federal regulatory requirements as to effect a change in the Section 8 Administrative Plan or the Public Housing Admissions and Continued Occupancy Policy (ACOP).
- A change in the planned or use of replacement reserve funds under the Capital Fund Program.

Public Comments for 2010 Annual Plan

I have attached the public comments. These comments have been addressed in the past, since 2008-2009 annual plan process.

For the 2009 – 2010 fiscal year, the RAB, which included some of the same people, met with the Executive Director, Dolly Newman, and were satisfied with the policy changes.

For the 2010 – 2011 fiscal year the RAB had no comments, however, HADCO received public comments on policy. There were no comments on the plan itself.

The comments were essentially the same comments presented at the 2008 – 2009 annual plan process, just about word for word.

The HADCO board tried to resolve the comments through public hearings. There were 2 heated public hearings that each lasted 4 – 5 hours, with one board member resigning due to the stress.

HADCO was without a board for a few months. In March of 2010, HADCO had all seats filled on the board. During the March meeting, the board recommended 2 staff and 2 public members meet with Neighbor to Neighbor as mediator to try to resolve the public concerns. HADCO set up a date with Neighbor to Neighbor, notified the public commenters one by one, and received the attached email from one of the commenters. To date (May 12, 2010) the group of citizens has not chosen the 2 members that will represent them.

A chart of concerns and responses is attached. This has been given to the public commenters and the HADCO board addressing each of the public commenters' concerns.

ITEM 4

Kristy Carroll

From: J MAYORGA [granny509@msn.com]
Sent: Friday, April 16, 2010 11:12 AM
To: Kristy Carroll
Subject: RE: Neighbor to Neighbor meeting

The group has decided that Monday is not going to work out for the meeting. It appears that the meeting will not work out for this week. Sorry. Joy

2010 Policy Discussion

Comments	Notes:	Housing Authority	Public
1 *Eliminate Interim Reporting of Income		not an administrative burden; will cause a financial hardship;	Federal law requires increase reporting annual; 10 day reporting of an increase in income is unnecessary; adjusting the rent at \$200 or more creates an administrative burden
2 *Household Occupancy		2 per sleeping room on a case by case basis; financial impact; changed at annual time; used to determine dollar amount of voucher	Respect the right to privacy ensure that residents of the opposite sex do not have to share a bedroom unless they choose to; hearing reports that families are being told that two people have to share a bedroom; asking that information be given that is clear to insure that people understand; give clear information so that people are not required to sign up on specific waitlist
3 *Eliminate six months bank statements		4350.3 exhibit 5-2	Does federal law require 6 months of bank statements; obtaining them does nothing to prevent fraud; unnecessary intrusion into how residents spend their money; costs the tax payers more money it requires more staff to implement and monitor; checking assets at time of reapplication is sufficient for HUD purposes
4 *No Zero Income Reporting of Expenses		PIH 2009-44 cost saving measures 30day expense or quarterly annual reexamination	Zero income families should not be required to explain any of their living expense for 6 months after they have been placed on a zero income; a resident that has exempt income should not be required to explain any of their living expenses
5 *Drug related bar for life		Manufacturing not selling in ACOPI; selling would be 5 year ineligibility to PH	Object to families being barred from Public Housing for selling methamphetamine when they did not live in Public Housing; this does more harm then good for families and communities
6 *Report income by the 23rd for reduction of rent		the 15th of the month plus a grace period if the 15th falls on a weekend day; HADCO took into consideration that the tenant would receive pay through the end of the month if they lost their job after the 15th	Current policy is a deadline of the 15th of the month; changing the date better serves the needs of the residents; Keeping HADCO a customer centered program.

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* comments submitted by both residents and CEA.

7	Reject proposal to use student grants and loans as income		we don't count loans only grants; new student rule	federal law prohibits the counting of student financial aid and loans as income
8	*Disability Policy Reasonable accommodation		approved by the board; reviewed by the attorney	object the proposed forms; HADCO is not the last person to say who is disabled and what an appropriate accommodation is; that should be left up to the health care professional; these required forms put an unfair burden on the disabled family
9	Fire Policy (Public Housing)		approved by the board; reviewed by the attorney	undue hardship that an accidental fire may cause the family; define accidental and negligent need to be defined; first time offense due to the financial circumstance of the residents the resident should not have to pay if the fire was not intentionally set; If the resident is charged the following is a guide the Payment amount is no higher than the deductible, the payment is no higher than 5% of the monthly rent, there should be a maximum monthly amount. there should be a list of hardship
10	Public Housing Lock outs		current policy 1st time no charge; dead bolt locks were installed in 2008 to help eliminate this issue	no charge for first offense; no charge if the offense doesn't occur in a 6 month time frame; never charge a person with a disability
11	Community service requirement		the current policy already exempts for this request	Family member caring for a family member with a disability is exempt from performing community service
12	Pet Policy (public housing)		if the animal is in distress call animal control and let them decide what action to take	24 hour unattended animal is unreasonable for HADCO to enter the unit; call emergency personnel if the animal is in distress
13	Pet Deposit		no deposit is charged; no longer charge the Fee; charge cost incurred at move out	refund the pet deposit in 6 months after HADCO was notify that the pet is not in the unit; HADCO provide receipts of the cost of the fumigation and refund the difference
14	Tenant transfers		there is no involuntary transfer the lease that is signed states the policy of transfer if over housed; The lease is clear on when a transfer would occur; tenants are noticed when a unit that they qualify for is on notice	only transfer within the same complex; balance between transfers and pulling from the waitlist 4:1; clear written procedures for determination of who qualifies for an involuntary transfer
15	Waitlist		Pre-application process separated for PH and S/8; PH pre-application with locations clear will need to complete for each waitlist that they would like to be placed on	be clear to applicants that they can sign up for as many locations as they want; location is a reason to reject the offer of housing; applicant to be on any list that their family qualify for based on occupancy; allow the family to reject the first housing offer

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* comments submitted by both residents and CEA.

1/5/10

Dear HADCO Commissioners:

Several residents met recently to review HADCO's Annual Plan and to make recommendations to improve our local public housing program. Three of these residents had signed up to be part of this year's Residents' Advisory Board (RAB), which was not able to get together this year to review the Plan before it went out for public comment. All three of these HADCO residents, along with other residents, met to ensure that this year's Plan had some input from HADCO residents.

The residents referenced above, of the Housing Authority of Douglas County Oregon, make the following recommendations for our annual PHA plan:

- **Eliminate Interim Reporting of Income:**

HUD and federal law only require that residents provide information about increases in income annually. HADCO requires unnecessary reporting when a resident's income increases by any amount. Although, they do not adjust the rent until the income is \$200 or more, this reporting still creates unnecessary administrative burdens and expenses for the program. We recommend that HADCO eliminate interim reporting of income, except, of course in case of a reduction in income to the resident's household.

- **Household Occupancy:**

HADCO must respect the right to privacy and the cultural norms of those in our society and ensure that residents of opposite sex do not have to share a bedroom unless they are related by marriage or chose to do so.

Although HADCO changed the language last year, we have been hearing reports that HADCO is still making families believe that it is two people to a bedroom regardless of age, sex or familial status. We ask that information given to the residents make the current policy clear and that it is implemented to ensure that people are not being required to sign up on specific waiting lists or being forced to take housing that have less bedrooms than they are otherwise eligible to occupy.

- **Eliminate 6 months Bank Statements:**

As an income based program, unless required by law, HADCO should not be entitled to 6 months worth of bank statements from the residents. This does nothing to prevent fraud and is an unnecessary intrusion into how we spend our money. There are other ways to verify income than this and checking the asset at the time of reapplication is sufficient for HUD purposes.

This practice costs the taxpayer money because more staff is needed to implement and monitor the program and more unnecessary paperwork is being required of residents.

- **No Zero Income Reporting of Expenses:**

Those who have suffered an event resulting in having no income do not need further burdens from HADCO. Unless the law requires that we do so, we recommend that Zero income residents no longer have to fill out any form or provide information to explain how they pay for their living expenses for 6 months from the time they initially report Zero income.

We do not believe it should be the role of our local public housing authority to put more pressures on residents who lose all their income. However, we also recognize that families cannot live for very long without any source of income at all, so we recommend that people be given a certain period of time to get back on their feet before being forced to provide this information to HADCO.

Also, we continue to object to this section being used for when a resident has exempt income that HADCO knows about. When HADCO knows how people are making their living expenses, why do they also need to know how you are spending your money? This would include adult students getting federal financial aid for school.

- **Drug Related Bar for Life:**

We object to people being barred from public housing for life because they were convicted of selling methamphetamine when they did not live in public housing at the time of their conviction. We believe programs, such as public housing, exist, at least in part, to give people second chances. Rules that are more restrictive than what is required by the CFR's on drug convictions just do more harm to families and communities than good.

- **Report Income by 23rd for Reduction:**

Currently families must report reductions in income by the 15th to get a rent reduction the following month, which use to be the 23rd. We request the date be returned to the 23rd to better serve the needs of the residents.

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The later date is in keeping with HADCO being a customer centered program.

- **Reject Proposal to Use Student Grants & Loans as Income:**

Federal law prohibits housing authorities from counting student financial aid as income. It also prohibits loans of any kind from being counted as income. So, we oppose this change being made.

- **Fire Policy:**

We like the fact that the proposed fire policy has educational information that can help a family understand the caution they need to use when dealing with things that might pose a fire risk.

We are concerned about the undue hardship that an "accidental" fire might have on a family even if it is determined that a member's actions or inactions might be the cause. We do not believe on a first time offensive, given the financial circumstances of our residents, that a resident should have to pay if the fire was not intentionally set by an adult household member. The terms accidental and negligent need to be specifically defined as they apply to the residents. It seems that the fire department has it's own situation applied definitions of those words. Apparently, a person is negligent if the fire occurred in anyway that the person could have foreseen it happening. That is to say a fire that was electrical, within the walls, etc would not be considered negligence on the part of the occupant but would be negligence on the part of the owner. We need definitions and examples of those definitions as apply specifically to HADCO and the residents.

However, when HADCO does chose to charge residents, we set out below what we would like to happen in those circumstances.

The amount owed should not be higher than HADCO's deductible for it's insurance. The payment amount should be no more than 5% of the persons contracted net monthly rent with exemptions for hardship when needed. There should be a maximum monthly amount on payments due. There should also be a list of things that constitute a hardship.

Some examples of this might include-

1. Medical bills- including over the counter medication purchases
2. Car repairs
3. Medical emergency either the persons or a family members
4. Expenses related to kids such as back to school
5. A reduction in income for any month wherein payments are due.

We would also like to see some stronger language about HADCO's obligations to residents that have been involved in a fire. Something that might be included in this is housing and emergency needs being provided to the family immediately following a fire. This policy should clearly state what HADCO will do from the time they get the call that there has been a fire in one of their units.

- **Changes to Public Housing Plan:**
-

Under charges for certain services, we would like this to be changed to allow one free lockout per six-month period. So there is no charge first time plus no charge if it has been longer than six-months since the last time the resident needed this help. Also ensure that charges are not required if the lock-out is related to a person's disability.

Pg 11, Make sure that community service requirement has an exemption to care for disabled family member.

Pg 12 ---entered premises between 8 – 5 (add after required notice.)

Pet policy section: unattended animal pet policy. It is reasonable that a pet could be safely left unattended for a 24 hour period. Unless there is a specific reason to believe a pet is in distress, the animal should be left alone. It would be a wise thing on the part of a resident to notify the office that the resident has made arrangements for the animals care. In the event the animal's safety and well being seems to be a great concern, then the Humane Society should be contacted regarding the problem. Unless it is a true emergency, a 24 hour notice is required

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from HADCO before they can enter the premises. A dog or cat making noises does not mean they are in danger and need help. On the contrary, in most cases it means they are fine and are bored with being alone.

Residents now pay a \$50 pet deposit which is to cover fumigation costs when the resident moves out. If the resident no longer has a pet but remains in the unit, the deposit should be returned to the resident within six months of the resident notifying HADCO that the pet no longer lives in the unit. When a resident moves out, HADCO should supply the resident with receipts for the actual cost of the fumigation process. If the total amount of the deposit is not spent, the unused balance should be sent to the resident.

Pg 16 housekeeping standards: Can't have heavy pans under the sink. Given the lack of storage space in the kitchens, this requirement seems unrealistic. If there is a problem in that area that maintenance needs to work on, the resident can move the pots and pans out of the way.

Page 16 uncovered trash cans. It appears that HADCO is saying the resident cannot have any open trash cans in the house. This would be an unreasonable requirement.

Applying for place on transfer they should be restricted within the same complex cannot remove you available in the same complex unless the tenant agrees otherwise.

Transfers category - four new people for every transfer. Closed waiting list balance, administrative transfers.

Waiting list, have opportunity, when signing up site-based. Location is reason allowed to reject and not go to the bottom of the list. Should be allowed to be on two sub lists (room size they qualify for).

With regard to HADCO's responsibilities – HADCO should make sure all sidewalks and ramps are safe year round. Also, that there is a regular spraying program both indoors and outdoors with regard to insects, spiders, etc. Also rodent control.

Can a resident who is not the primary custodial parent of hers/his children have a unit with sufficient rooms for the children when they come for the residents custodial time?

Any reason should be okay if someone wants to reject the first offer.

Are you trying to put in cameras?

Explain the information.

Residents have to notify if going to be out of house for 7 days.

Is it true that resident cannot leave for more than two weeks? (told Bill was told, could not leave for a month).
Abandoned language.

Once a month.

It sometimes appears that HADCO instates policies that have not been passed by the Board of Commissioners.

What is the procedure for determining the order for choosing who will be selected for an involuntary transfer?

- **Disability Policy:**

We object to the proposed forms as they imply that they are required. The law does not allow specific forms to be required of either the person requesting the accommodation or the professional who provides the documentation of disability. We object to any policy that puts an inappropriate and unfair burden on the person with a disability and his/her efforts to get reasonable accommodations.

REASONABLE ACCOMMODATION POLICY

1. Page 3, #3 -- "Permitting rent payments and required communications to be mailed rather than delivered in person."

Are non-disabled persons allowed to mail in their rent payments and required communications?

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2. Page 4, "Types of activities that would be considered to be a fundamental alteration to the program include but are not limited to: #4. Actions that substantially impair HADCO's ability to meet its essential obligations as a landlord, ... under the Lease Agreement include management, administration, *maintenance*, or other services required for the operation of the program or upkeep of the property."

It is our understanding that current maintenance policy is to provide the upkeep of the yard of persons who are disabled and/or elderly. Is this true? If so, will it still be HADCO's policy when this Annual Plan is approved?

3. Page 4 "Notification to Applicants/Residents Regarding Reasonable Accommodation Request" "If an applicant/resident *cannot* use a form ..." Please add the words "or **chooses not** to use HADCO's forms," ...HADCO will still respond ..."

4. Page 4 "Making a Request for a Reasonable Accommodation" "is the applicant applicant/resident is *unable* to use the form, ..." Please have read as unable or **or chooses not to use** the form, the request will still be granted.

5. Page 4 "Making a Request for a Reasonable Accommodation" "1. All applicants ... The Request for Reasonable Accommodation form is provided upon request." Please add words "form will be provided but not required."

6. Page 4 same area as #5 and anywhere else the forms are discussed. Please add language to the affect that the forms are not mandatory and letters from qualified persons, i.e., doctors, social workers, etc. are acceptable for establishing applicant/resident's disability and need for specific accommodation.

7. Page 5 continued from page 4, #3. "All responses to the Request Forms will be in writing,..." Change to read "**All**" responses to the accommodation request will be...

8. Page 5 "Determining Whether to Make the Accommodation" "1. Does the applicant/resident meet..."through the certification of disability, using Verification of Disability Status for Use When Requesting a Reasonable Accommodation form..." Please add to that sentence the words "or letter of verification from a Doctor," etc.

9. Page 5 1. c. "If more information is needed,...request the additional information using the standard Notification of Additional Information per Reasonable Accommodation Request form, ..." Please add language stating as above, that HADCO forms are not required. Please add this language to place in the policy that makes reference to the use of forms. Or, since requiring the use of special or specific forms is illegal, just do away with them.

10. Page 6 "4. Does the requested accommodation constitute a fundamental ..." Change to read: Does the requested accommodation constitute an **unreasonable** fundamental...

11. Page 6 "Discontinuation of Reasonable Accommodation" Not sure if this is legally allowed.

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12. Page 8, paragraph 5, "HADCO will make the final decision on the adequacy and credibility of any and all documentation...HADCO may request that the applicant sign additional releases and/or contact other sources of information. ...in an effort to obtain objective, verifiable documentation regarding reasonable accommodation requests. "

It is just this sort of illegal policy that has gotten HADCO in trouble with HUD and created legal problems for HADCO.

13. Page 9, "HADCO retains the right to be the final judge of what constitutes adequate and credible documentation.

Same argument as in #11 above.

14. Page 9, #2 b., Again, language should be added, as above, that no HADCO forms are required and that letters from Doctors, etc. are fine.

15. Page 9, Reasonable Accommodation Request Relating to Animals 1. d, "The presence of the animal would fundamentally alter the nature of HADCO's operations.

In what way could the animal alter the nature of HADCO's operations?

16. There does not seem to be any references to the last Board of Commissioner's decision stating that Service Animals are not Pets and that a Resident with a Service Animal may **also** have a pet in addition to their Service Animal.

Also, HADCO does not have the legal right to keep visitors Service Animals off of HADCO property.

17. If the Service Animal leaves urine spots on the grass, is this grounds for eviction?

18. Forms; Certification of Disability.

This form is to be filled out by the Doctor or other qualifying authority. It confirms the disability of the Resident and the need for the accommodation. HADCO does not need to consult with or obtain any further information from any source. The other forms should be discarded. Even this form should be presented as an option to the applicant/resident. A letter from the Doctor, etc. should be sufficient enough documentation to verify the disability and the need for the requested accommodation.

LEASE AGREEMENT

p.4; c Installation charges air conditioners. There should not be any charge for the first time installation, or, the resident should be allowed to install the air conditioner without HADCO's assistance.

p. 4; d Late Charges .. If there is a late charge it should be due the following month.

p. 6 "This lease will not be revised to permit a change of family composition... adult children" Adult children

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(ages 18 and up) should be allowed to return home to their parent's unit.

p. 7 Transfers #5 Tenants should be given the legal 30 day notice to move out. During or at the end of the 30 days the tenant should be allowed to move into the unit they are transferred to.

p. 10 q 'refrain from storing or keeping highly volatile or flammable materials ...' what about candles, lamp oil, paint thinner, charcoal lighter, etc.?

p. 13 Notice Procedures c "unopened, cancelled...sufficient evidence that notice was given" The Board of Commissioners had discussed this and it was felt that staff should check up further to be sure resident was available to receive and understand notice.

p. 13 Termination of the Lease #3 Failure to pay utilities. Failure to pay should be considered not paid when the utilities are shut off, not when notices are sent by the companies.

p. 13 Define "offensive weapons".

p. 13/14 define carelessness or unattended cooking. Perhaps add words "that causes damage" to the sentence "Any fire on HADCO..."

p. 14 c, #5 Please explain

p. 14 e criminal activity Charged and convicted? What if charges are dropped?

p. 15 Housekeeping Standards a "will reschedule a second inspection." If the resident fails an inspection, the notice of this failure should state the specific things that caused the failure. The second inspection should only consider whether or not those specific items were correctly taken care of. The second inspection should not go beyond those listed items.

Residents should be given at least two weeks notice of inspections. Maintenance personnel should not use their being in the unit for repair purposes as an opportunity to inspect the unit for housekeeping standards. The only violations of such standards that they should report are of those violations that cause **imminent, serious** health or safety concerns.

p. 16 kitchen #7 "Trash/garbage: should be stored in a covered container until removed to the disposal area." Please explain.

p. 7 F. Change to within three years instead of five years.

LOW RENT PUBLIC HOUSING TENANT CHARGES...

Labor, What is the rate of \$28/hr based on. What is the actual pay rate range for maintenance personnel?

HADCO ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)

p. 12 Notice and Opportunity for a Review b Add "A "no charge" copy shall also be given to the applicant.

P. 22 "Visitors of more than twenty-four hours and less... and authorized by the manager." Approval should not be needed.

p. 22 "Residents will not be given permission to allow a former resident of HADCO who has been evicted to occupy the unit for any period of time." Adult children of resident should be allowed visits. If disabled/ill resident needs someone to stay for a short time a formally evicted member of the family should be allowed to stay. At least put a time limit on the length of time from the eviction to the visit. Perhaps 12 months. Visitors who can prove they have a residence of their own should be allowed – especially if they are family.

p. 23 Security Deposits The amount down seems to be really high and a difficult amount for a low income family to come up with.

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p. 29 Reexamination Procedures e "Residents with a history of employment whose reexamination occurs when they are not employed will have income anticipated based on past and anticipated employment...." Does not seem right to charge based on past history unless there is a reasonably good chance of quick employment at historic rate of pay.

Fire Policy needs much discussion

p. 41 Lease Termination Procedures, Notice Requirements Should read: Notices of lease termination **shall** be mailed first class, **or** served personally, **and also** posted on the apartment door.

p. 41 Re-Payment Agreements Terms for repayment seem very harsh for low income families.

P43 Utilities Need a clear explanation of Excess Utility Charges

P 43 Utilities – Residents with disabilities should be notified that they may be entitled to higher than normal utility allowances, etc.

Recognition of Residents' Rights:

The rights of the people to exercise their constitutional rights or their states rights including privileges in their homes shall not be denied or infringed upon. Therefore, one may not be terminated as a resident or evicted from their home, regardless of whether renting it or buying it, for exercising those rights whether written or not.

We request that the HADCO Board of Commissioners incorporate and adopt the above as part of this year's annual plan.

Thank you,

Residents of HADCO

Brenda May

Jamie Sanchez

William Cantwell

Joy Mayorga

Richard Hunt

Arthur Perry

ITEM 4

CEA Public Testimony Written Comments
HADCO Annual Plan 2010
Hearing: 1/05/10
Comments submitted via email: 1/04/10

Dear HADCO Commissioners:

Citizens Education and Advocacy (CEA) is an association of individuals who support the development and maintenance of affordable housing for all Douglas County residents. We believe that housing is a right that each individual has. As a right, policies, rules and their implementing procedures should be operated in the least restrictive way that fulfills the obligation to the residents as well as the intent and purpose of the public housing program. We make these recommendations based upon this view of how our local public housing authority (PHA) should operate.

CEA had the opportunity to review various HADCO documents, as well as recommendations made by a group of residents, which I understand is also being submitted to you today. We did research to ensure that our recommendations were consistent with federal and state law and policy regarding operating a PHA in Oregon.

We strongly support the following recommendations as well as those provided by the residents. However, if only a few changes happen at a time, we recommend the following be passed by you at the public hearing tomorrow. None of this is new information. Each of these recommendations has been provided to HADCO by us at other times, except for the Disability Policy comments, which are new and in response to recent issues that have arisen regarding disability rights.

→ **Eliminate Interim Reporting of Income:**

CEA has recommended this every year since we started participating in this process. HUD and federal law only require annual reporting. HADCO requires that their residents report any changes in income within 10 days. They will start to make adjustments to the residents' rent when the income is over \$200. However, federal law does not require either of these things.

This reporting creates unnecessary administrative burdens and expenses for the program. And in fact accounts for the majority of hearings being conducted and paid for by HADCO, which demonstrates the administrative burden and expense this unnecessary policy imposes.

CEA recommends HADCO eliminate interim reporting of income and follow federal law, which requires annual reporting only.

→ **Household Occupancy:**

HADCO assured those who have objected to residents of opposite sex having to share a bedroom unless they are related by marriage or wanted to.

Although HADCO changed the language last year about opposite sex residents who were not married sharing a bedroom, we continue to hear reports that families are being informed that two people must share a bedroom, without exception. We ask that information given to the residents make the current policy clear that adults are not required to share bedrooms with children and that children of the opposite sex even if related are not required to share a bedroom.

Also we encourage information you provide be clear to insure that people are not being required to sign up on specific waiting lists or being forced to take housing that have less bedrooms than they are otherwise eligible to occupy.

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☛ **Eliminate 6 months Bank Statements:**

As an income based program, unless required by law, HADCO should not be entitled to 6 months worth of bank statements from the residents. This does nothing to prevent fraud and is an unnecessary intrusion into how we spend our money. There are other ways to verify income than this and checking the asset at the time of reapplication is sufficient for HUD purposes.

This practice costs the taxpayer money because more staff is needed to implement and monitor the program and more unnecessary paperwork is being required of residents.

☛ **No Zero Income Reporting of Expenses:**

Those who have suffered an event resulting in having no income do not need further burdens from HADCO. Unless the law requires that we do so, we recommend that Zero income residents no longer have to fill out any form or provide information to explain how they pay for their living expenses for 6 months from the time they initially report Zero income. Residents should never be required to explain how they spend their money.

We do not believe it should be the role of our local public housing authority to put more pressures on residents who lose all their income. However, we also recognize that families cannot live for very long without any source of income at all, so we recommend that people be given a certain period of time to get back on their feet before being forced to provide this information to HADCO.

Also, we continue to object to this section being used for when a resident has exempt income that HADCO knows about. When HADCO knows how people are making their living expenses, why do they also need to know how you are spending your money?

☛ **Drug Related Bar for Life:**

We object to people being barred from public housing for life because they were convicted of selling methamphetamine when they did not live in public housing at the time of their conviction. We believe programs, such as public housing, exist, at least in part, to give people second chances. Rules that are more restrictive than what is required by the CFR's on drug convictions just do more harm to families and communities than good.

☛ **Report Income by 23rd for Reduction:**

Currently families must report reductions in income by the 15th to get a rent reduction the following month, which use to be the 23rd. We request the date be returned to the 23rd to better serve the needs of the residents.

The later date is in keeping with HADCO being a customer centered program.

☛ **Disability Policy:**

CEA strongly encourages HADCO to follow the guidelines for updating their disability policy provided by HUD and the U.S. Department of Justice. These rules clearly indicate that no special form is required nor is the health care professional who certifies the disability required to provide alternative accommodations or additional information that is not directly related to establishing the disabling condition. HADCO is not the last say on who is disabled and what an appropriate accommodation is. That should be left up to the experts, who include the disabled resident and his/her health care provider.

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CEA also supports the language developed by residents regarding "Recognition of Residents' Rights". The fact that the residents feel the need to add this language demonstrates that the Board and Staff of HADCO still have a way to go to make residents of the program feel as if they are an equal part of the program. Although HUD encourages having residents take an active part in PHA, historically when groups of HADCO residents have independently come together to do so, they have not been welcomed. We are hopeful that the adoption of this year's Plan can signal a change in that.

Until recently none of the suggestions have been taken seriously and there is an atmosphere of fear that some folks have that has affected whether residents participate in processes such as these. CEA trusts that a new direction from this Board will demonstrate that they having nothing to fear by participating and that they views are welcome and appreciated.

CEA requests that the HADCO Board of Commissioners incorporate and adopt all of the above as part of this year's annual plan. CEA also supports the other recommendations made by residents and hope that they too can be incorporated into the plan this year. However, if timing makes it difficult to implement all the residents' recommendations for this year or address all of their concerns now, CEA believes all of the above will go a long way in addressing their concerns as well as ours. Since our information and recommendations are not new and have been given to previous HADCO Boards and Staff, you should be able to pass of them today. We ask that you do.

Thank you for your consideration,

Betsy Cunningham
Community Advocate
Citizens Education & Advocacy (CEA)
1464 E. Central Ave.
Sutherlin, OR 97479
Telephone: (541) 459-4077

ITEM 4

1/5/09

HADCO response to RAB comments:

1. Page 2 of 40

Display locations – Notice of Annual Plan was advertised in the News Review prior to 45 day comment period listing Admin Office, Roseburg and Family Resource Center, Reedsport.

Supporting documents – Supporting documents were included in the Annual Plan binders that were on display. The PHA Compliance and Certification of Consistency is signed and attached after the 45 day comment period.

Mailing copies of proposed policy changes- HADCO does mail copies of proposed changes at the request of the tenant/participant. The letter that was mailed out to all tenants and participants on September 1, 2008 inviting them to join the RAB did include this information.

Informing tenants/participants of policy changes- HADCO does mail a copy of all Policy changes to all tenants and participants.

Section 8 Landlord training- HADCO has a FAQ for all new landlords and new Landlords are invited and encouraged to attend a briefing.

Special Presentations - HADCO gives special presentations to UCAN's Second Chance Renters Program, Senior Services and Rotary.

2. Page 3 of 40

PHA Mission Statement – HADCO has revised our current Mission Statement to adopt the RAB's suggested Mission Statement.

Goals –
HADCO does research grant opportunities. HADCO's current budget would not support a grant consultant.

Page 10 of 40

HADCO is pursuing all resources available to increase the number of affordable housing as stated in the Annual Plan.

ITEM 4

4. Page 15 of 40

HADCO has adopted the RABS suggestion and amended their policy to allow for refusal of one unit and then if the applicant has not accepted the second unit offered, they will be removed from the wait list or dropped to the bottom.

Page 17 of 40

Reference materials for occupancy rules: While HADCO is waiting to receive direction from the Resident Council a survey was conducted in November 2008. These comments will be shared with the Resident Council.

Page 29 of 40

Deadbolts- Goal #4

HADCO is currently working on installing the rest of the deadbolts in Roseburg and Oakland.

6. Meter bases are required for the necessary waterline improvements. All items on the CFP list and costs have been verified by cost analysis.

Window shutters in Oakland and Riddle are decorative, however, the current ones need replaced and modifying the unit once they are removed is more costly then replacing them.

Cost of the two maintenance vehicles listed twice has been corrected to one listing.

General Comments

1. Family Composition: All Housing Authorities must establish guidelines when family composition is determined. The parent who has custody or children who are subject to joint custody but live with one parent at least 51% of the time will be considered members of the family. CFR 5.603
2. Annual Plan Preparation: HADCO and the RAB agreed to start the Annual Plan process on September 1, 2009.
3. Policy Committee: Since HADCO addresses all policy changes once a year during the Annual Plan process HADCO will work with the RAB committee on policy changes.

Low Rent Public Housing Comments

Low Rent Public Housing Tenant Charges

1. Labor- The labor charge is the actual cost it takes HADCO to repair the item. HADCO can not afford to replace items damaged by tenants either accidentally or intentionally.

ITEM 4

The two hour minimum is only for after hour emergencies caused by the tenant. This is to cover the cost and inconvenience to staff for having to come and repair a tenant damaged item after hours.

The examples cited by the RAB would be tenant charges.

The cost of the labor charges is determined by taking the average cost of the maintenance staff salaries. The after hour calls are based on time and half, because we have to pay overtime.

Inventory- Damaged beyond normal wear and tear is the responsibility of the tenant. Replacement of used items are taken into consideration. Used door is less than a new door. The prices were determined by the cost it has taken HADCO to purchase the item. If the tenant wanted to purchase their own item approved by HADCO, this is allowed.

Repayment agreements are permitted with tenants in good standing.

Pet Policy

The use of the word "or" was being added for clarification, the policy has always been for one animal. The RAB comments requesting additional animals will allow for an aquarium or small animals like hamster in addition to the dog or cat has been approved and will be amended.

III. Companion and Service animals

The Pet Policy already explains the rights for individuals requesting a companion or service animal. HADCO does not solicit medical deduction as HADCO has no way of knowing what item the tenants need for the disability. The tenants are responsible for determining what medical expenses they need for their disability.

IV. Pre- conditions

1. The fumigation fee is required because some insect eggs such as flea eggs can stay dormant for long periods of time, (longer than a year). Removing an animal from the environment does not prevent re-infestation of the unit.
2. HADCO will adopt the suggestion to allow for thirty days for tenants to gather the necessary paperwork for their animal once they have brought it home.
4. One person for emergency contact is already allowed.

V.

1. Reports of intimidating or aggressive animals are reviewed on a case by case basis. Any adverse action is based on evidence provided in the reports.

ITEM 4

2. The tenant is responsible for the actions of their animal.
3. HADCO agrees.
4. Tenants need to clean up after their animals soon after the incident.
6. HADCO agrees, however, the note on the door is helpful. If there is an emergency it is a good reminder there is an animal inside. The note is supposed to be there at all times, not just when the tenant is gone.
7. Visitors should not bring animals onto HADCO property. A service animal is permitted.

VI.

1. Tenants have the right to request a review of charges billed to them for damages caused by an animal.
3. Nuisance and threatening behaviors are determined case by case based on reports and evidence.
4. HADCO will contact animal control to remove abandoned animals left unattended for 48 hours.
5. Tenants have a right to the grievance process if they disagree with any action HADCO is/has taken with their animal.

Things RAB still objects to from last year:

1. Ten day reporting: HADCO administers Family Choice Vouchers. When contacting other Housing Authorities that administer the same type of vouchers the industry standard is the 10 day reporting timeline. HADCO has proposed changing income reporting requirements from \$50.00 monthly increase to \$200.00 monthly increase.
- 2.
3. HUD requires all Housing Authorities to obtain a 6 month average.
4. HADCO has proposed a change in reporting requirements to exempt students and exempt income status from having to complete monthly income statements.
5. HADCO denies for manufacturing or selling.

ITEM 4

Fiscal Year 2008

Public Housing

SUMMARY OF ANNUAL PLAN RECOMMENDATIONS FROM HADCO AND RAB

Annual Plan Page #	TOPIC	RAB RECOMMENDATION Please see RAB letter for exact wording.	HADCO RECOMMENDATION	SUPPORTING DOCUMENTATION
2 of 35	Public Access to Information	Would like copies of the annual plan be available at the Myers Center.	HADCO provided copies of the annual plan to the entire RAB. One copy of the binder located at the library and the office can be made available at the Myers Center as long as it is not removed from the building.	There are financial restrictions with making copies of every supporting document to every person requesting the entire binder of supporting information. It is the interested parties responsibilities to seek the available copies, i.e., library, office, etc.
2 of 35	PHA Plan Supporting Documentation	Would like information in a timely manner.	HADCO starts the annual plan in October allowing for a 45 day comment period. Next year HADCO will be back on schedule.	
3 of 35	PHA's Mission Statement	Would like to add to the mission statement. Please see their wording.	This wording is too subjective and open to opinion.	
3 of 35	PHA Goal "Improve the quality of assisted housing."	Would like selected the "renovate or modernize public housing units."	HADCO already does this through the capital fund program.	
4 of 35	PHA Goal "Increase assisted housing vouchers."	Would like selected "increase voucher payment standard"	The HADCO Section 8 Program can not afford an increase voucher payment standard. Any increases over the HUD rent payment standard must be paid for by HADCO.	See budget.
9 of 35		Would like HADCO to develop a more in depth program for recruiting Section 8 landlords....	HADCO has selected strategies to improve Section 8 Landlord participation and has been steadily improving the participation of landlords.	

ITEM 4

SUMMARY OF ANNUAL PLAN RECOMMENDATIONS FROM HADCO AND RAB

Master CFP List	Budget for Operation Use (portion of CFP budget)	Would like curbing for flowerbeds removed and playgrounds added.	Money placed into operations has full fungibility and can be used at the Housing Authorities discretion. Once the budget is determined for FYE 2009 the use of operations money will be finalized.	
Master CFP List	Winston Fencing costs	Would like fencing purchased from Heartwood Resources or another non profit supply place.	HADCO either advertises RFB or prices the most economical means to purchase supplies.	HUD reviews purchases for compliance during management reviews.
Master CFP List	Attic access	Would like Attic access be moved up for security reasons	There is currently no attic access from both sides of the building in some areas. There is no need for tenants to have attic access. This was being done for maintenance benefit so they do not have to enter a different unit to fix a leak.	

ITEM 4

PA SECTION 8 FISCAL YEAR 2008

HADCO Original Proposed Changes

Chapter 12 Page 2

Add: Six months bank statements for checking and savings accounts

RAB Recommendations Chapter 12 Page 2

The RAB rejects HADCO proposed change for checking accounts but accepts change for savings account.

HADCO Original Proposed Changes

Chapter 12 Page 5

Change required reporting from the 23rd of the month to the 15th of the month.

RAB Recommendations Chapter 12 Page 5

The RAB rejects HADCO's proposed change.

The RAB recommends eliminating the 10 day reporting requirement.

HADCO's Recommendations/Comments

Chapter 12 Page 2

HUD requires a six month average on checking accounts. Participants can either provide their bank statements or HADCO can request a verification from the financial institution. Most financial institutions do charge for this verification that is why HADCO received approval from HUD to accept bank statements from the participant.

Chapter 12 Page 5

HADCO has received numerous landlord complaints about not receiving their rent checks at the first of the month. By changing the reporting cut off from the 23rd to the 15th will allow HADCO to process the verification and complete rent changes before the first of the month so landlords are paid on time.

The industry standard is 10 days as reported at the November and December board meetings. Changing the current 10 day reporting requirement to an annual reporting would create a financial burden on HADCO. HADCO would need to reduce the number of families currently assisted because of the potential increase in required HAP for each family.

ITEM 4

**SUMMARY OF SECTION 8 ADMINISTRATIVE PLAN PROPOSED CHANGES
RECOMMENDATIONS/COMMENTS FROM HADCO REGARDING RAB COMMENTS**

HADCO's Original Proposed Changes

Chapter 5 Page 1

One bedroom will be assigned for each two family members regardless of sex, age, or relationship. Exceptions may be made for medical reasons and in cases of live in aids.

HADCO's Recommendations / Comments

Chapter 5 Page 1

Starting in calendar year 2005 HUD exercised its option not to maintain an Annual Contributions Contract (ACC) reserve account for the Section 8 Voucher Program. 24 CFR 982.154. All Housing Authorities were given fixed annual budgets. With this change HUD implemented the Consolidated Appropriations Act in 2005 to provide administrative guidance to Housing Authorities on actions they may take to reduce costs in the Voucher Program. HADCO's proposed change to one bedroom for each two family members is the least invasive action to families on the Section 8 Program. HADCO must make a change in the current policy to ensure managing the Voucher Program within the amounts budgeted for our fiscal year.

RAB Recommendations Chapter 5 Page 1

All of RAB's proposed changes will prevent HADCO from changing the voucher issuance size to two persons per sleeping room.

ITEM 4

HADCO's Original Proposed Change

Chapter 6 Page 1

Childcare Expenses: Deducted for the care of children under 13 when childcare is necessary to allow an adult member to work, attend school, or actively seek employment. Childcare expenses cannot exceed the family's monthly co-pay amount if the family receives childcare subsidy from grants, state or federal subsidies.

HADCO's Recommendations / Comments

Chapter 6 Page 1

This proposed change adds clarification to the current Section 8 Administrative Plan. HADCO can not allow a deduction for child care greater than the co-pay amount if the family receives subsidy for childcare.

RAB Recommendations Chapter 6 Page 1

The RAB rejects HADCO proposed change and makes a comment regarding their current understanding of child care deductions.

HADCO is not proposing to change anything that is not already being done. HADCO wants to add clarification to a current policy.

ITEM 4

HADCO's Original Proposed Changes

Chapter 6 Page 5

The family member removed will be ineligible to be added back into the household for twelve months.

RAB Recommendations Chapter 6 Page 5

The RAB rejects HADCO's proposed change and makes comments regarding a hardship on the family if the family member is a child.

HADCO's Recommendations / Comments

Chapter 6 Page 5

After reviewing RAB's comment HADCO suggests revising the proposed change to read: The adult family member removed will not be eligible to be added back into the household for 12 months.

HADCO agrees that this proposed change should not apply to children.

ITEM 4

HADCO's Original Proposed Changes

Chapter 6 Page 6

A monthly notarized statement is required from the person(s) contributing to the household. If the monthly contribution is the same amount every month, one notarized statement is acceptable as long as the statement includes the timeframe in which the monthly contributions are received.

Recommendations / Comments

Chapter 6 Page 6

HUD strongly encourages Housing Authorities to demonstrate their ability to effectively manage and account for government funds appropriated for low income housing programs. Implementation of the use of notarized statements for verification procedures is an important step towards demonstrating HADCO's ability to establish management controls geared to reducing overpayment errors with HAP subsidy.

RAB Recommendations Chapter 6 Page 6

The RAB rejects HADCO's proposed change and makes comments regarding no authority over control of third party contributions.

After reviewing RAB's comments HADCO suggest revising the proposed change to read: The monthly notarized statement is required from the person(s) contributing to the household. If the monthly contribution is the same amount every month, one notarized statement will be accepted as long as the statement includes the timeframe in which the monthly contributions are received. If the person(s) contributing to the household refuses to provide a notarized statement the participant may submit a notarized statement of reported income. This verification method should be used as a last resort when all other verification methods are not possible.

ITEM 4

HADCO'S Original Proposed Changes

Chapter 6 Page 8

Childcare expenses can not exceed the family's monthly co-pay amount if the family receives childcare subsidy from grants, state or federal subsidies.

Chapter 6 Page 8

Childcare expenses are referenced in two chapters in the Section 8 Administrative Plan. HADCO is not proposing to change anything that is not currently being done. HADCO is adding clarification to the plan.

RAB Recommendations Chapter 6 Page 8

The RAB rejects HADCO's proposed change.

The RAB also had a comment regarding an adult member capable of caring for a child.

In response to RAB's comment regarding an adult member capable of caring for a child. Our current plan states those adult members who would be unable to care for the child include: A person with disabilities or older person unable to take care of a small child as verified by a reliable knowledgeable source.

ITEM 4

HADCO's Original Proposed Changes

Chapter 7 Page 7- Notarized Statement

The family must furnish a self certification along with a notarized statement from the person(s) contributing to the household. If the monthly contribution is the same amount every month, one notarized which the monthly contributions are received.

RAB Recommendations Chapter 7 Page 7

The RAB rejects HADCO's proposed change.

HADCO's Recommendations/Comments

Chapter 7 Page 7

The notarized statement is referenced in two chapters in the Section 8 Administrative Plan. HADCO suggests revising the proposed change to read the same as Chapter 6 Page 6.

ITEM 4

HADCO's Original Proposed Changes

Chapter 7 Page 7 – Zero or Less TTP

Families with a TTP of zero or less will be required to execute verification forms to determine that forms of income such as unemployment benefits, TANF, SSI etc are not being received by the household. To report this information a Survival Statement will need to be completed on a monthly basis.

This paragraph is currently in our plan the only change is the shaded language.

RAB Recommendations Chapter 7 Page 7

The RAB rejects HADCO's proposed change.

HADCO's Recommendations/Comments

Chapter 7 Page 7 – Zero or Less TTP

HUD requires Housing Authorities to implement procedures to ensure compliance with verification of family income. Families reporting total household income of zero need to report on a monthly basis. Other Housing Authorities have been contacted as to their reporting requirements. The industry standard is monthly reporting for families reporting zero income.

ITEM 4

HADCO's Original Proposed Changes

Chapter 8 Page 2

Add: Families porting into HADCO's jurisdiction will be required to attend a briefing before receiving their voucher.

HADCO's Recommendations/Comments

Chapter 8 Page 2

Each Housing Authority has its own Administrative Plan. Families moving into HADCO's jurisdiction need to attend a briefing to have a good understanding of the current policies to be successful in the Voucher Program.

RAB Comment Chapter 8 Page 2

The RAB accepts HADCO's proposed change with a comment that HADCO's policy already states families will not receive a voucher unless they attend a briefing.

In response to RAB's comment. The current Administrative Plan does address requirements for new applicants to attend a briefing before receiving their voucher. However, the current plan does not address participants with a voucher from another housing authority attending a briefing.

ITEM 4

HADCO's Original Proposed Changes

Chapter 9 Page 1

Remove: A copy of the proposed lease, including the prescribed tenancy addendum.

RAB Recommendation Chapter 9 Page 1

The RAB rejects HADCO's proposed change with comments regarding the family not having protection against the landlord changing a verbal lease.

HADCO's Recommendations / Comments

Chapter 9 Page 1

HADCO still requires a copy of the participants lease but not at the time the request for approval of tenancy is received by HADCO.

HADCO advises all applicants and participants not to move into a unit without HADCO completing a rent reasonable study and house inspection which is required by HUD. HADCO contacts the landlord once the request for tenancy is received by HADCO to discuss required paperwork.

ITEM 4

HADCO's Original Proposed Changes

Chapter 10 Page 4

Add: Non working refrigerator to 24 hour fail.

RAB Recommendations Chapter 10 Page 4

The RAB accepts HADCO's proposed change with comments if owned by the participant and funds were not available to replace.

The RAB suggests that gas leaks be added to the list of 24 hour fails

HADCO's Recommendations /Comments

Chapter 10 Page 4

HADCO feels a non-working refrigerator should be a 24 hour fail.

HADCO doesn't agree making the landlord responsible and not the tenant. The tenant receives \$3.00 per month credit from HADCO

Natural gas leak or flumes are in our current Administrative Plan under 24 hour fail.

ITEM 4