

<b>Streamlined Annual PHA Plan (HCV Only PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires 02/29/2016</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

**Definitions.**

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

A.	PHA Information.																														
A.1	<p> <b>PHA Name:</b> <u>Housing Authority of Snohomish County</u> <b>PHA Code:</b> <u>WA039</u>  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2021</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Housing Choice Vouchers (HCVs)</b> <u>4032</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. </p> <p> HASCO's Agency Plan is available on our website and mailed in hard copy format upon request. It was not posted in the lobby of our main office (12711 4th Ave W, Everett, WA 98204) as the office has been closed since March 16, 2020 due to COVID-19. </p> <p> HASCO invited the public to comment on our Agency Plan via invitation on HASCO's website, fliers posted on the door of our main office, and a call for participation via email to all HASCO Section 8 recipients. Please see the attached PUBLIC NOTICE OF OPPORTUNITY TO COMMENT ON THE DRAFT web notice/email content that our Agency Plan draft is available for review and feedback is requested. </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a joint Plan and complete table below) </p> <table border="1"> <thead> <tr> <th>Participating PHAs</th> <th>PHA Code</th> <th>Program(s) in the Consortia</th> <th>Program(s) not in the Consortia</th> <th>No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:																								
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<b>B.</b>	<b>Annual Plan.</b>				
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y   N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p><u><b>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</b></u> And</p> <p><u><b>Substantial Deviation.</b></u> And</p> <p><u><b>Significant Amendment/Modification.</b></u></p> <p>In alignment with a new award of Mainstream vouchers, HASCO expanded the local preference for waiting list selection to include a preference for individuals exiting permanent supportive housing. This set of preferences is capped at a total of 220 households.</p> <p><u><b>HASCO's Definition of Substantial deviation:</b></u></p> <p>The following actions would be considered a substantial deviation from the 5-year plan:</p> <ul style="list-style-type: none"> <li>• Change to the target population included in the adopted plan.</li> <li>• Decisions to change the process for accepting applications to the Rental Assistance Voucher Program</li> <li>• Decision to change Priority or Preference Criteria for the Rental Assistance Programs</li> </ul> <p>The following actions will not be considered a substantial deviation from the plan:</p> <ul style="list-style-type: none"> <li>• To choose another course of action not specifically spelled out in the plan to meet the established goals</li> <li>• To meet goals of the program to assist low- and moderate-income population in a manner not discussed in the adopted plan.</li> <li>• To increase or decrease the Payment Standard (PS) (within budget authority) based on, (1) in the case of an increase to the PS, unforeseen increases in rents or inability of tenants to rent units within the program rules or (2) in the case of decreases to the PS, reductions in the budget authority awarded by HUD.</li> <li>• To make modifications to the Administrative Plan which improve the access to the program by applicants and participants or clarification of new issues in order to provide a consistent implementation of the rules.</li> <li>• To incorporate new procedures brought about by new regulations or clarification of regulations by HUD.</li> <li>• To make changes to parts of the plan, which are found to be inconsistent with regulations.</li> <li>• To make changes required by statute or regulation that need to take place before a consultative process can take place.</li> <li>• Changes in the Standard Operating Procedures that do not involve policy decisions.</li> </ul> <p><u><b>HASCO's Definition of Significant change or modification:</b></u></p> <p>A significant change or modification is defined as a discretionary change in the plan or policies of the housing authority that fundamentally changes the mission, goals, or objectives of the plans of the agency which require the formal approval of the Board of Commissioners.</p>				

<b>B.2</b>	<p><b>New Activities</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y   N  <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p>(b) If this activity is planned for the current Fiscal Year, describe the activities. Provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.</p> <p>HASCO is project basing 10 VASH vouchers in FY21. Any additional requests for project basing will be reviewed according to section 17-II.B. OWNER PROPOSAL SELECTION PROCEDURES in the Administrative Plan.</p>
<b>B.3</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N   N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>B.4</b>	<p><b>Civil Rights Certification</b></p> <p><a href="#">Form HUD-50077</a>, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>B.5</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>B.6</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.</p> <p>See attached: CY2020-CY2024 Public Housing Agency Plan 5-Year Goals and Objectives, Progress 2020</p> <p>In addition, HASCO updated the Section 8 Administrative Plan to reflect current HUD regulations and agency policy. See attached: Administrative Plan Update Summary.</p>
<b>B.7</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(a) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>See attached: RAB Comments to CY2020-CY2024 Public Housing Agency Plan 1 Year Update</p> <p>No comments resulted in a change to the plan.</p>

## Instructions for Preparation of Form HUD-50075-HCV Annual PHA Plan for HCV Only PHAs

### A. PHA Information. All PHAs must complete this section. ([24 CFR §903.23\(4\)\(e\)](#))

- A.1** Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), Number of Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan.

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

**B. Annual Plan.** All PHAs must complete this section. ([24 CFR §903.11\(c\)\(3\)](#))

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

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

☐ **Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income families who reside in the PHA’s jurisdiction and other families who are on the Section 8 tenant-based waiting list. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(1\)](#) and [24 CFR §903.7\(a\)\(2\)\(i\)](#)). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. [24 CFR §903.7\(a\)\(2\)\(ii\)](#)

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. ([24 CFR §903.7\(b\)](#))

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

☐ **Rent Determination.** A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. ([24 CFR §903.7\(d\)](#))

☐ **Operation and Management.** A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. ([24 CFR §903.7\(e\)\(3\)\(4\)](#)).

☐ **Informal Review and Hearing Procedures.** A description of the informal hearing and review procedures that the PHA makes available to its applicants. ([24 CFR §903.7\(f\)](#))

☐ **Homeownership Programs.** A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

☐ **Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.** A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA’s partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA’s partnerships with other entities, and activities under section 3 of the Housing and Community Development Act of 1968 and under requirements for the Family Self-Sufficiency Program and others. Include the program’s size (including required and actual size of the FSS program) and means of allocating assistance to households. ([24 CFR §903.7\(l\)\(i\)](#)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)\(iii\)](#)).

☐ **Substantial Deviation.** PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; or b) any change with regard to homeownership programs. See guidance on HUD’s website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

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

**B.2 New Activity.** If the PHA intends to undertake new activity using Housing Choice Vouchers (HCVs) for new Project-Based Vouchers (PBVs) in the current Fiscal Year, mark “yes” for this element, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake this activity, mark “no.” ([24 CFR §983.57\(b\)\(1\)](#) and Section 8(13)(C) of the United States Housing Act of 1937.

☐ **Project-Based Vouchers (PBV).** Describe any plans to use HCVs for new project-based vouchers. If using PBVs, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

**B.3 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.11\(c\)\(3\)](#), [24 CFR §903.7\(p\)](#))

**B.4 Civil Rights Certification.** Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#))

- B.5 Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, including the manner in which the applicable plan contents are consistent with the Consolidated Plans, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#))
- B.6 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.11\(c\)\(3\)](#), [24 CFR §903.7\(r\)\(1\)](#))
- B.7 Resident Advisory Board (RAB) comments.** If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

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

Public reporting burden for this information collection is estimated to average 4.5 hour 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. 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 Act 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

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

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

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or ☒ Annual PHA Plan for the PHA fiscal year beginning 7/1/2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

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

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

Housing Authority of Snohomish County

PHA Name

WA039

PHA Number/HA Code

☒ Annual PHA Plan for Fiscal Year 2022

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

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

Name of Authorized Official

Duane Leonard

Title

Executive Director

Signature

Duane Leonard

Digitally signed by Duane Leonard  
DN: cn=Duane Leonard, o=Housing Authority of  
Snohomish County, ou=Executive Director,  
email=dleonard@hasco.org, c=US  
Date: 2021.03.23 08:10:14 -07'00'

Date

3/23/21



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

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

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

I, Mary Jane Brell Vujovic, the Snohomish County Human Services Director  
*Official's Name* *Official's Title*

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

Housing Authority of Snohomish County

*PHA Name*

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

Snohomish County Urban County Consortium

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91.

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

The 2020-2024 Consolidated Plan - Rental Housing Goal #1: preserve, maintain, and increase affordable  
rental units and provide accessibility, Section AP-60 by addressing the needs of public housing and public  
housing residents, and the AI to Fair Housing Choice #2 by increasing the stock of affordable housing and  
affordable housing options, especially subsidized units.

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

Name of Authorized Official

Mary Jane Brell Vujovic

Signature



Title

Snohomish County Human Services  
Director

Date

3/31/2021



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

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 2/29/2016

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

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

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

\_\_\_\_\_  
*PHA Name*

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

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

pursuant to 24 CFR Part 91.

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

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

Name of Authorized Official

Title

Signature

*Allan Giffen*

Date

HOUSING AUTHORITY OF SNOHOMISH COUNTY  
CY2020-CY2024  
PUBLIC HOUSING AGENCY PLAN  
5-YEAR GOALS AND OBJECTIVES  
Progress as of December 2020

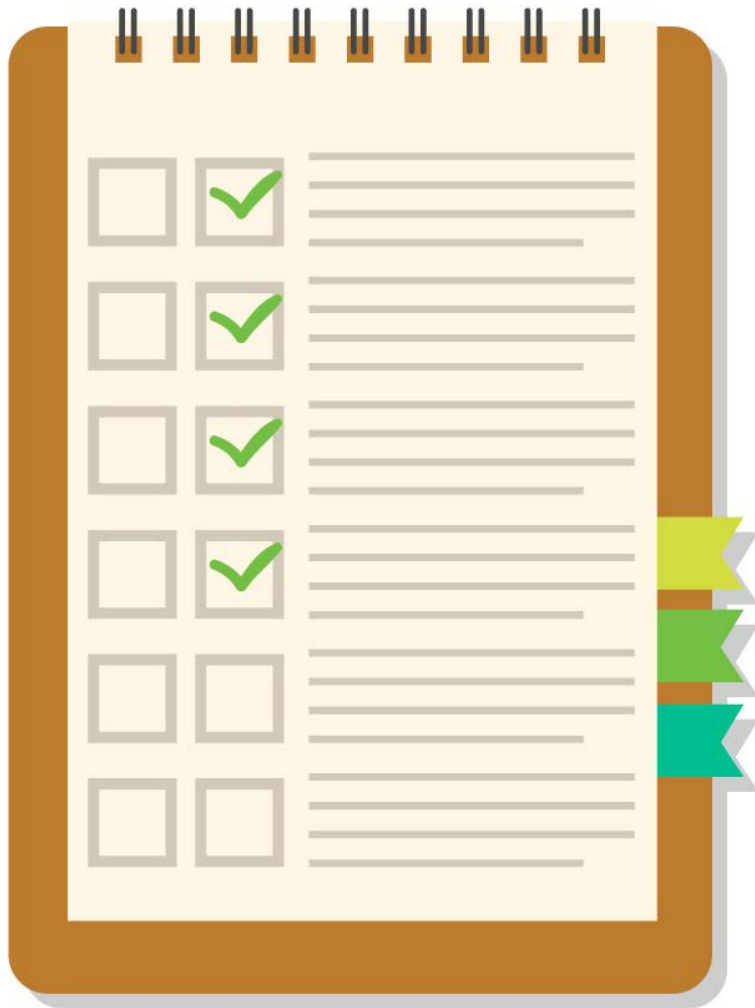
PHA Goal	Objective	Progress																
Increase HASCO’s pool of housing vouchers	Work with HUD and the VA to receive additional Veterans Administration Supportive Housing (VASH) vouchers over the next 5 years	<b>2020:</b> HASCO received 20 additional VASH vouchers that became effective in May 2020. HASCO applied for 5 additional VASH vouchers in October 2020 and anticipate receiving them early in 2021.																
	Continue to explore opportunities to obtain new vouchers as they are made available	<b>2020:</b> HASCO applied for, but was not awarded, additional FUP vouchers. HASCO received 100 additional Mainstream vouchers effective June 2020; another 45 effective October 2020; and another 75 effective March 2021.																
Ensure housing opportunities promote stability, strengthen community, and affirmatively further fair housing	Maintain a high voucher utilization rate across all programs	<b>2020:</b> There were 201 more vouchers in use at the end of 2020 compared to the end of 2019. Overall utilization rate across all programs decreased 0.34% due to the increase in available vouchers over the year.																
		<table><tr><td></td><td>2020</td><td>2019</td><td>Difference</td></tr><tr><td>Vouchers Available</td><td>4043</td><td>3820</td><td>223</td></tr><tr><td>Vouchers Used</td><td>3878</td><td>3677</td><td>201</td></tr><tr><td>Utilization rate</td><td>95.92%</td><td>96.26%</td><td>-0.34%</td></tr></table>		2020	2019	Difference	Vouchers Available	4043	3820	223	Vouchers Used	3878	3677	201	Utilization rate	95.92%	96.26%	-0.34%
			2020	2019	Difference													
		Vouchers Available	4043	3820	223													
	Vouchers Used	3878	3677	201														
Utilization rate	95.92%	96.26%	-0.34%															
Analyze PBV utilization on an ongoing basis and reallocate underutilized PBVs back to HCVs	<b>2020:</b> PBV utilization is monitored monthly. No PBVs were determined to be under-utilized and none were reallocated back to HCV.																	

PHA Goal	Objective	Progress
	Continue to implement recommendations of the Fair Housing Analysis of Impediments and future analyses including policies that enable people with Limited English Proficiency (LEP) to participate in HASCO programs	<b>2020:</b> HASCO formed a cross-departmental Fair Housing Committee to monitor fair housing practices at HASCO including language access. An updated Language Access Policy was approved by the Board of Commissioners in October 2020. The committee is currently updating HASCO's language access plan.
	Continue using a formal process to review reasonable accommodation and Violence Against Women Act (VAWA) requests, including those from HCV program participants	<b>2020:</b> HASCO continued using a formal process to review 62 RA and 12 VAWA requests.
Empower HCV participants to increase self-sufficiency and asset development	Make program referrals and provide supportive services programs for HCV program participants when appropriate	<b>2020:</b> HASCO staff provide service referrals for HCV participants as requested. Staff also provide supportive services for Mainstream clients and at one PBV project. Prior to COVID in-person restrictions, HASCO staff was also in the lobby one day a week for service referrals and provided children's books to participant households at inspections.
Work with the local community to determine needs and solutions	Support community efforts to prevent and end homelessness with strategic investment of voucher program resources	<b>2020:</b> HASCO worked with the VA and Snohomish County Veterans Homeless Committee to identify homeless veterans for the VASH program. HASCO coordinated with Snohomish County to implement a new local preference for individuals exiting a Snohomish County Permanent Supportive Housing (PSH) program to free up some high services PSH slots for homeless families.
	Collaborate with partner agencies to administer Mainstream and Family Unification Program vouchers	<b>2020:</b> HASCO partnered with DCYF, YWCA, Snohomish County, and Building Changes to identify and implement solutions for increasing racial equity in Family Unification Program referrals through the Keeping Families Together program. HASCO continues to partner with a variety of social service agencies throughout the county to support Mainstream applicants in obtaining verifications and completing paperwork, finding funding for moving expenses and deposits, and navigating the housing search process.

PHA Goal	Objective	Progress
Reduce the HCV program's environmental impact	Continue to explore and implement ways to reduce paper usage including online applicant, waiting list, and annual recertification portals	<b>2020:</b> In June 2020, HASCO began using an online subsidized housing application for the HCV waiting list lottery.
Provide service aligned with HASCO's Core Values	Measure HCV program outcomes including internal auditing of the HCV program	<b>2020:</b> HASCO implemented a new auditing program for HCV certifications. 8% of all certifications are audited each month and each specialist has a performance goal to meet a minimum accuracy level.
	Establish staff goals that include focus on diversity, integrity, service, stewardship, and team work	<b>2020:</b> HASCO has a performance measurement program that includes annual review of staff alignment with HASCO's Core Values. In addition, housing specialists participated in at least 3 workshops to improve diversity, integrity, and service including at least one racial equity workshop, one rent calculation workshop, and one other training of their choice related to their work.
	Analyze and improve client facing policies through a racial equity lens	<b>2020:</b> HASCO provided one mandatory racial equity workshop for all employees and multiple opportunities for optional racial equity workshops. The TBA department reviewed the agency's Administrative Plan to identify and eliminate denial and termination policies that might have a disparate impact on people of color. Updated policies were approved by the Board of Commissioners and the updated Administrative Plan was published in November.

# 2020-2024 Public Housing Agency Plan Year 1 Update

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# HOUSEKEEPING

- Background noise
- Record Keeping

# AGENDA

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- Overview of the plan and the housing program
- Understanding RAB
- Review updates to the current goal
- Special Programs







# PLAN OVERVIEW

- ✓ HUD requirement for housing authorities
- ✓ New plan every 5 years, updated annually
- ✓ Guide for our policies, programs, goals
- ✓ Opportunity to share plans with participants and public

# PLAN UPDATE SCHEDULE

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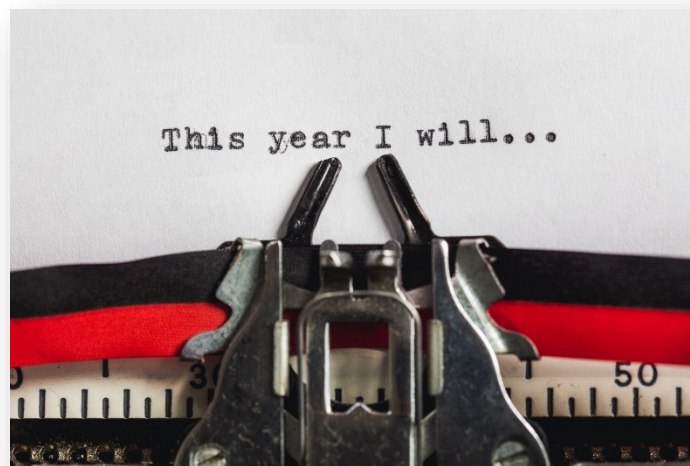
- Dec. 2<sup>nd</sup> 2020
  - Resident Advisory meetings
- Dec. 15<sup>th</sup> 2020
  - HASCO Board approves draft plan
- Jan. 21<sup>st</sup> 2021
  - Start 45 days of resident and public comment
- Mar. 15<sup>th</sup> 2021
  - HASCO Board approves final plan



# WHAT'S IN THE PLAN

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- Goals and objectives  
(developed every 5-years, updated annually)
- Update on changes in policies in the past year
- Plans for future updates to voucher program policies





# HOUSING PROGRAM OVERVIEW

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- House over 4,032 families throughout Snohomish County
- Special programs:
  - Homeless families
  - Homeless veterans
  - Elderly
  - People with disabilities
  - Family unification
  - Youth aging out of foster care

# RESIDENT ADVISORY BOARD (RAB)

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- Interested Program Participants
- RAB's role:
  - Review draft plan
  - Provide input and feedback
  - Learn more about HASCO



# KEY GOAL UPDATES IN 2020

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- Increase HASCO's pool of housing vouchers
  - 20 more VASH
  - 145 more Mainstream
    - +75 coming in the spring!

# KEY GOAL UPDATES IN 2020

---

- Ensure housing opportunities promote stability, strengthen community, and affirmatively further fair housing
  - Created a cross-departmental Fair Housing Committee
  - Updated Language Access Policy
  - Reviewed 62 RA and 12 VAWA requests



# KEY GOAL UPDATES IN 2020

---

- Empower HCV participants to increase self-sufficiency and asset development
  - Service referrals for all participants upon request
  - Supportive services for Mainstream Clients
  - Supportive services at one PBV property

# KEY GOAL UPDATES IN 2020

---

- Work with the local community to determine needs and solutions
  - Monthly meetings with Veterans Homeless Committee
  - New local preference for individuals exiting Permanent Supportive Housing
  - Identifying and implementing solutions to increase racial equity

# KEY GOAL UPDATES IN 2020

---

- Reduce the HCV program's environmental impact
  - Launched online subsidized housing application for the HCV waiting list lottery

# KEY GOAL UPDATES IN 2020

---

- Provide service in alignment with HASCO's Core Values
  - New auditing program: 8% of each specialist's work every month
  - Performance goals include file accuracy, calculation training and racial equity workshop
  - Reviewed Admin Plan for policies that are not equitable and updated any that were HASCO controlled





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# SPECIAL PROGRAMS





# PROJECT-BASED VOUCHERS (PBVs)

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- Vouchers that HASCO designates to specific units at properties
- Participants are eligible for an HCV after their first 12-month lease



# VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH) VOUCHERS

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- Serving homeless veterans and their families
- Clare's Place (5 PBV VASH)
- HopeWorks Station II (15 PBV VASH)
- Received 20 new vouchers  
& applied for 5 more



# FAMILY UNIFICATION PROGRAM VOUCHERS

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- 50 vouchers:
  - 46 for child welfare-involved families
  - 4 for youths aging out of foster care, referred by DSHS



# MAINSTREAM VOUCHERS

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- 50 vouchers in 2019, 145 vouchers in 2020, 75 in 2021
  - Family includes a non-elderly adult with a disability  
AND
  - Meets one of the following additional criteria:
    - Transitioning out of an institution or other segregated setting
    - At serious risk of institutionalization
    - Homeless
    - At risk of becoming homeless
    - Exiting Permanent Supportive Housing





## NEXT STEPS

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- ☐ HASCO's Board approves draft plan
- ☐ 45 days of public and resident comment period
- ☐ Board approves final plan
- ☐ Final plan submitted to HUD
- ☐ Effective date July 1, 2021



QUESTIONS



DISCUSSION

**2021 Resident Advisory Board Meetings**

HASCO is looking for Section 8 participants to serve on our 2021 Resident Advisory Board (RAB). RAB members give important input on housing assistance in our community. We use your input to determine HASCO's priorities for the coming year—your feedback is important!

**The RAB will meet via Zoom on Wednesday, December 2, 2020 from 12:00 pm to 2:00 pm.**

If you are interested in serving or would like more information, please contact HASCO's TBA Administrative Specialist, April Nielsen, **by November 24<sup>th</sup>** at 425-290-8499, x 600 or [anielsen@hasco.org](mailto:anielsen@hasco.org).

## **Housing Authority of Snohomish County Resident Advisory Board Meeting**

The meeting began at 12:05 pm via Zoom on Wednesday, December 2, 2020.

One participant had registered but did not attend. Six members of the TBA team and Sarah Max from the Executive Department attended.

- No participants called in for the meeting; work with Jodie, Christine to figure out how we can circulate presentation to participants
- TBA is currently housing 4,032+ families through the HCV program! 145 more Mainstream, 20 more VASH, and an additional 75 Mainstream coming in Spring!
- TBA currently does not anticipate a need for increased staff to facilitate the additional voucher awards
- TBA is looking for ways to increase self-sufficiency and asset development for participants → Primary method is referral for services which promote education and skill building to increase income. TBA has already taken steps to amend policies wherever possible to delay any increased payments coming from participants after an increase in income is reported.
- Focus on e-portal for submitting paperwork. Still researching vendors to find one who can provide a way for annuals and interim submissions electronically. But Waitlist and Housing applications are now fully electronic!
- Auditing is revealing no particular trends in file errors; however 100% of file reviews are occurring and corrections are happening BEFORE communications go out to participants.
- Consider asking participants for feedback on how to make policies/procedures more equitable with respect to race and disparity.
- HASCO has hosted mandatory and optional racial equity workshops to increase staff knowledge and awareness.
- VASH AMI increased to 60% limit to serve more veterans who fall into the chronically homeless category.
- Planning on re-opening WL to Mainstream applicants in late winter/early spring.

TBA will work with IT to record and distribute a video of the RAB presentation to increase RAB participation and engagement prior to the opening of the public comment period.





## PUBLIC NOTICE OF OPPORTUNITY TO COMMENT ON THE DRAFT 2021-2022 PUBLIC HOUSING AGENCY PLAN UPDATE

HASCO is currently seeking public comment on its draft Public Housing Agency Plan 1-Year Update, which will be effective July 1, 2021 through June 30, 2022.

The public review and comment period runs from January 21, 2021 through March 8, 2021. The Agency Plan is available online: <https://hasco.org/about-hasco/policies-and-reports/>.

To be considered for incorporation into the plan, written comments must be submitted **no later than 4:30 PM on March 8, 2021** to April Nielsen via email at [anielsen@hasco.org](mailto:anielsen@hasco.org) or via mail to HASCO, Attn: April Nielsen, 12711 4<sup>th</sup> Ave W, Everett, WA 98204.

A Public Hearing on the Agency Plan will be held on Teams on March 15, 2021 at 12:00 PM. Contact April Nielsen for registration information.

*Ways Home. Paths Forward.*

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(425) 290-8499 Phone • (425) 290-5618 Fax  
[www.hasco.org](http://www.hasco.org) • 12711 4th Ave West • Everett, WA 98204



The Public Hearing of the Board of Commissioners was convened at 12:02 pm on Tuesday, March 16, 2021 at the Housing Authority of Snohomish County.

**Present:** Commissioner Alonzo  
Commissioner Matsumoto Wright  
Commissioner Metzger-Utt  
Commissioner Rusko

**Absent and Excused:** Commissioner Wallace  
Commissioner Weikel

**Staff:** Duane Leonard, Executive Director  
Pam Frost, Director of Finance  
Jenisa Story, Director of HR and Administrative Services  
Jodie Halsne, Director of Tenant Based Assistance  
Steve Kehler, Director of Asset Management  
Liz Dewey, HR & Administrative Services Supervisor

**Counsel:** Faith Pettis, Pacifica Law Group

### **PUBLIC HEARING ON PUBLIC HOUSING AGENCY PLAN UPDATE**

The Board opened the floor for comments from the public on the draft Public Housing Agency Plan Update.

No one from the public attended the meeting to comment and no written comments were received.

Commissioner Rusko closed the public hearing at 12:04 pm.

**HOUSING AUTHORITY OF SNOHOMISH COUNTY  
RESOLUTION NO. 2395**

**ADOPTING THE 2021-2022 PUBLIC HOUSING AGENCY PLAN UPDATE**

**WHEREAS**, the Department of Housing and Urban Development (HUD) requires the adoption of a 5-year and 1-year Public Housing Agency Plan by HASCO; and,

**WHEREAS**, this year, HASCO was required to prepare a 1-year updated, and staff has worked with a committee comprised of residents and community-based organizations to draft the Agency Plan; and,

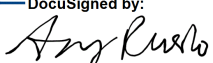
**WHEREAS**, the Agency Plan has been prepared in accordance with HUD instructions, the required 45-day public comment period has passed, and the required Public Hearing has been held; and,

**WHEREAS**, the Board of Commissioners has considered public comments and testimony, if any, prior to adoption the Plan;

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF SNOHOMISH COUNTY** hereby adopts the Plan and directs staff to submit the Plan to the Department of Housing and Urban Development (HUD) by the required due date.

**DATED, this 16th day of March, 2021.**

The Chairperson thereupon declared said motion carried and said Resolution adopted.

DocuSigned by:  
  
9E871BA34EE9434...  
Amy Rusko, Chairperson

**SEAL**

**ATTEST**

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B22A15C94F6445C...  
Secretary

### **ACTION ITEM**

**TO:** Board of Commissioners

**FROM:** Jodie Halsne

**SUBJECT:** **ADOPTING THE 2021-2022 PUBLIC HOUSING AGENCY PLAN UPDATE**

**DATE:** March 16, 2021

### **AT ISSUE**

2021-2022 Public Housing Agency Plan update and submittal of the Plan to HUD

### **RECOMMENDED ACTION**

Approval of Resolution No. 2395 adopting the final 1-Year Public Housing Agency Plan and authorizing staff to submit the Plan to HUD.

### **BACKGROUND**

At the December meeting, the Board authorized staff to begin the required 45-day period for public review of the Agency Plan, which will be effective July 1, 2021 through June 30, 2022.

#### **Resident and Public Comments**

The RAB meeting was held on Wednesday, December 2, 2020. Due to COVID-19 restrictions, the RAB was held virtually. While residents were notified via email and notice was placed on the HASCO website, no residents attended. HASCO staff reviewed the goals and objectives in the plan. The required 45-day public comment period was held from January 21, 2021 to March 8, 2021. A public hearing on the Plan will be held at the opening of the March Board meeting.

Attached is a summary of comments on the plan, which will be included in the submittal to HUD.

#### **Submittal of Plan to HUD**

Staff requests that the Board adopt Resolution 2395 adopting the 2021-2022 Public Housing Agency Plan and directing Staff to submit the Plan to HUD by the required due date.

Housing Authority of Snohomish County  
FY 2021 Public Housing Agency Plan  
Summary of Resident and Public Participation and Comments

**Resident Advisory Board Meeting on December 2, 2020**

RAB Attendees:

Linda Bond, Jenna Christiansen, Brittany Conners, Cecilia Forbes, Lida Khoshal, Zhanna Yermakovych, Sarah Max

Discussion and comments at the meeting centered on the following items:

- The status of the voucher program
  - TBA is currently housing 4,032+ families through the HCV program! 145 more Mainstream, 20 more VASH, and an additional 75 Mainstream coming in Spring!
  - VASH AMI increased to 60% limit to serve more veterans who fall into the chronically homeless category.
  - Planning on re-opening WL to Mainstream applicants in late winter/early spring.
- Audits
  - Auditing is revealing no particular trends in file errors; however 100% of file reviews are occurring and corrections are happening BEFORE communications go out to participants.
- Self-Sufficiency
  - TBA is looking for ways to increase self-sufficiency and asset development for participants. Primary method is referral for services which promote education and skill building to increase income.
  - TBA has already taken steps to amend policies wherever possible to delay any increased payments coming from participants after an increase in income is reported.
- Going Paperless
  - Focus on e-portal for submitting paperwork. Still researching vendors to find one who can provide a way for annuals and interim submissions electronically. But Waitlist and Housing applications are now fully electronic!
- Racial Equity
  - Consider asking participants for feedback on how to make policies/procedures more equitable with respect to race and disparity.
  - HASCO has hosted mandatory and optional racial equity workshops to increase staff knowledge and awareness.

**Public Comment Period and Public Hearing**

The public hearing will be held at the start of the March board meeting and any comments received at that time will be considered by the Board for adoption before taking action on the resolution adopting the Agency Plan.

## Fall 2020 Revisions to HASCO Administrative Plan

This summary document highlights the updated content in HASCO's Administrative Plan, to be presented to the Board of Commissioners for approval on November 17, 2020.

### Content Changes

#### Throughout

- Minor technical editing to improve readability.

#### Chapter 1: Introduction

- 1-II.C. THE HCV PARTNERSHIPS
  - **What Does the Owner Do?:** Removed examples of things owners should screen for; replaced with the owner should use their standard screening criteria to determine suitability for tenancy.

#### Chapter 3: Eligibility

- Throughout
  - Added clarification that records of arrest will not be used as the sole basis of determining reasonable cause for denial and that a conviction will be given more weight than an arrest.
- Introduction
  - Removed “(e.g. criminal activity)” as the sole example of an applicant’s past or current conduct.
- 3-I.F. DEPENDENT [24 CFR 5.603]
  - **Joint Custody of Dependents: HASCO Policy:** updated language regarding how HASCO will decide which family can claim a dependent when more than one family has claimed the same dependent
- 3-II.A. INCOME ELIGIBILITY AND TARGETING
  - Using Income Limits for Eligibility [24 CFR 982.201]: Updated HASCO Policy: “VASH applicants must be a family whose annual income does not exceed 60 percent of the median income for the area, adjusted for family size.”
- 3-III.A. OVERVIEW
  - Added clarification language regarding use of arrest and criminal records when determining eligibility
- 3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(A)]
  - Adjusted establishing “current” illegal drug use as use in the past three months (down from one year)
- 3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE
  - **Criminal Activity [24 CFR 982.553]:** changed HASCO Policy to: “HASCO will only deny assistance based on criminal activity for HUD Mandatory reasons as listed in section 3-III.B.”

- **Previous Behavior in Assisted Housing [24 CFR 982.552(c)]:** Removed “Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program” from list of denial reasons.
- 3-III.D. SCREENING
  - **Screening for Eligibility:** Added clarification that HASCO may not use criminal conviction records to check for criminal and illegal drug activity by participants and removed reference to ACRA net as the source of background checks
- 3-III.E. CRITERIA FOR DECIDING TO DENY ASSISTANCE
  - **Consideration of Circumstances [24 CFR 982.552(c)(2)]:** Removed information about HASCO investigating reports of arrest. Rephrased that “Criminal conviction will be considered if it indicates a demonstrable risk to safety and/or property”

## Chapter 5: Briefings and Voucher Issuance

- 5-I.C. FAMILY OBLIGATIONS
  - Changed the required reporting period for absences to 30 days to align with the Family Obligations forms signed by participants.
- 5-II.E. VOUCHER TERM, AND EXTENSIONS
  - **Expiration of Voucher Term: HASCO Policy:** Added that HASCO will notify participants within 10 business days after the expiration of the voucher term or extension that the voucher term has expired.

## Chapter 6: Income and Subsidy Determinations

- 6-I.E. EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES [24 CFR 5.617]
  - **Calculation Method: Initial 12-Month Exclusion:** Updated policy to state that the initial exclusion period is 12 consecutive months
  - **Calculation Method: Second 12-Month Exclusion and Phase-In:** Updated policy to state that the second exclusion and phase-in period is 12 consecutive months
  - **Calculation Method: Lifetime Limitation:** Updated policy to state that EID has a two-year (24-month) lifetime maximum
- 6-I.G. ASSETS [24 CFR 5.609(B)(3); AND 24 CFR 5.603(B)]
  - **General Policies: Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PIH 2012-29]: HASCO Policy:** Clarified that HASCO will initially set the imputed asset passbook rate at the national rate. Changed the effective date of change as “will be determined at the time of review” rather than January 1
  - **Types of Assets: Equity in Real Property or Other Capital Investments:** Updated formula to subtract the loan balance and expenses from the market value of the loan to convert it to a cash equivalence for imputed income
- 6-II.F. CHILD CARE EXPENSE DEDUCTION
  - **Eligible Child Care Expenses: Necessary and Reasonable Costs: HASCO Policy:** updated the source of child care cost schedule to “a qualified local entity that either subsidizes child care costs or licenses child care providers”

## Chapter 7: Verification

- 7-II.A. VERIFICATION OF LEGAL IDENTITY
  - **HASCO Policy:** clarified that employer ID card as an option for verifying legal identity must be a government employer ID card with a picture
  - **HASCO Policy:** Added Government Issued ID as an acceptable proof of identity for children
- 7-III.J. STUDENT FINANCIAL ASSISTANCE [NOTICE PIH 2015-21]
  - Added reference to Notice PIH 2015-21
  - Added “fees and other required charges” to the list of items excluded from financial assistance when calculating income

## Chapter 8: Housing Quality Standards and Rent Reasonableness

- Throughout: Changed “annual” to “biennial” for all inspections to allow greater flexibility in scheduling
- 8-II.A. OVERVIEW [24 CFR 982.405]
  - **Owner and Family Inspection Attendance:** Clarified that an “authorized” adult must be present if a minor is present during the inspection
- 8-II.C. ANNUAL/BIENNIAL HQS INSPECTIONS [24 CFR 982.405 AND 982.406; NOTICE PIH 2016 05]
  - Rephrased HASCO Policy to allow all units to be on a biennial inspection schedule while units that fail or have serious comments may be scheduled for their next inspection in one year.

## Chapter 10: Moving With Continued Assistance and Portability

- 10-I.A. ALLOWABLE MOVES
  - HASCO Policy: Clarified that the emergency transfer plan discusses external transfers to other covered housing programs

## Chapter 11: Reexaminations

- 11-I.B. STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 982.516(B)]
  - Clarified that HASCO may streamline the verification of fixed income but is not required to verify non-fixed income amounts
- 11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION
  - **Departure of a Family or Household Member:** Removed “If a live in aide, foster child, or foster adult ceases to reside in the unit, the family must inform HASCO in writing within 10 business days” because it is already stated for household members and those individuals are household members.
- 11-III.C. NOTIFICATION OF NEW FAMILY SHARE AND HAP AMOUNT
  - **HASCO Policy:** removed “The notice will also state the procedures for requesting a file review” and added “The notice will state the family has the right to request an explanation of how the assistance was calculated and if the family disagrees, they have the right to informal hearing. The notice will include the procedures for requesting an informal hearing.”



## Chapter 12: Termination of Assistance and Tenancy

- Throughout
  - Added clarification that records of arrest will not be used as the sole basis for termination
- 12-I.E. MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS
  - Mandatory Policies [24 CFR 982.553(b) and 982.551(l)]
    - **Use of Illegal Drugs and Alcohol Abuse: HASCO Policy:** Reduced timeframe in the definition of currently engaged in illegal drug use to three months
    - **Drug-Related and Violent Criminal Activity [24 CFR 5.100]:** Removed reference to evidence types and records of request. Ended first sentence to clarify that criminal convictions would be the evidence used to terminate based on drug-related or violent criminal activity during participation in the program.
    - **Other Authorized Reasons for Termination of Assistance [24 CFR 982.552(c), 24 CFR 5.2005(c)]: HASCO Policy:** removed “Any PHA has terminated assistance under the program for any member of the family in the last three years.” as a reason for termination
- 12-II.D. CRITERIA FOR DECIDING TO TERMINATE ASSISTANCE
  - **NEW SECTION ADDED: Use of Criminal Conviction Records after Admission [24 CFR 5.903]:** discusses a PHA’s access to and use of criminal conviction records obtained from a “law enforcement agency”
  - **Consideration of Circumstances [24 CFR 982.552(c)(2)(i)]:** Removed information about HASCO investigating reports of arrest. Rephrased that “Criminal conviction will be considered if it indicates a demonstratable risk to safety and/or property”
- 12-III.B. GROUNDS FOR OWNER TERMINATION OF TENANCY [24 CFR 982.310, 24 CFR 5.2005(C), AND FORM HUD-52641-A, TENANCY ADDENDUM]
  - **Other Good Cause:** Added conditions for terminating a lease due to property foreclosure
- EXHIBIT 12-1: STATEMENT OF FAMILY OBLIGATIONS
  - Removed opening paragraph in the HASCO Policy because it is already covered in other sections of the plan.

## Chapter 13: Owners

- 13-I.A. OWNER RECRUITMENT AND RETENTION [HCV GB; HCV LANDLORD STRATEGY GUIDEBOOK FOR PHAS]
  - Added HCV Landlord Strategy Guidebook for PHAs to references
  - **Recruitment:** Added requirement to ensure that outreach materials are accessible for individuals with communications-related disabilities and those with limited English proficiency
  - **HASCO Policy:** Added apartment associations and industry investor groups to the list of groups to engage. Added “To the extent practical, partnering with and attending events hosted by other area agencies to deliver information about the HCV program”
- 13-I.D. OWNER QUALIFICATIONS
  - **Owner Actions That May Result in Disapproval of a Tenancy Request [24 CFR 982.306(c)]:** Removed two items that were redundant because they are also included in the list of violations of obligations under the HAP contract.

- 13-II.C. HAP CONTRACT PAYMENTS
  - Added that “HAP payments are considered to be paid on time if they are paid or deposited by the 5th of the month.”
- **NEW SECTION: 13-II.G. FORECLOSURE [NOTICE PIH 2010-49]**
  - Discusses tenant protections under the Protecting Tenants at Foreclosure Act and HASCO’s role in transferring ownership information and informing the tenant of their continued responsibilities if they stay at the property

## Chapter 16: Program Administration

- 16-II.B. PAYMENT STANDARDS [24 CFR 982.503; HCV GB]
  - **Updating Payment Standards: HASCO Policy:** Changed the statement that HASCO “will” review the quality of units selected by the participants when determining tenant’s portion of rent to “may” review. Changed requirement for effective date of updated payment standards to “determined at the time of update”
  - **Exception Payment Standards [24 CFR 982.503(c)(5), Notice PIH 2018-01]:** added reference to Notice PIH 2018-01, updated the language regarding ability to establish small area fair market rents, and indicated in HASCO Policy that HASCO is not adopting exception payment standards.
- 16-III.B. INFORMAL REVIEWS
  - **Decisions Subject to Informal Review [24 CFR 982.554(a) and (c)]:** Added reference to 24 CFR 982.554(a) and (c). Removed suspension of a voucher as an item that informal reviews are not required for.
  - **NEW SECTION: Remote Informal Reviews:** identifies policies and processes for remote informal reviews including when they will be used
  - **NEW SECTION: Conducting Remote Informal Reviews:** identifies that HASCO must ensure the applicant has the right to hear and be heard and discusses how remote informal reviews will be conducted.
- 16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555]
  - **NEW SECTION: Remote Informal Hearings:** identifies policies and processes for remote informal hearings including when they will be used
  - **NEW SECTION: Conducting Informal Hearings Remotely:** Identifies that HASCO will ensure due process and provide full access to remote hearings
  - **Informal Hearing Procedures: Notice to the Family [24 CFR 982.555(c)]: HASCO Policy:** Added notifying the family that they may request a remote informal hearing to the list of items to include when notifying the family of an informal hearing.
  - **Informal Hearing Procedures: Notice to the Family [24 CFR 982.555(c)]: Scheduling an Informal Hearing [24 CFR 982.555(d)]:** changed the grace period for late arrival to 20 minutes and added “If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, HASCO’s decision will stand.”
  - **Informal Hearing Procedures: Notice to the Family [24 CFR 982.555(c)]: Pre-Hearing Right to Discovery [24 CFR 982.555(e)]:** Added information for evidence discovery for remote hearings and that HASCO will not require pre-hearing discovery of family documents for in-person hearings

## Chapter 17: Project-Based Vouchers

- 17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(B)]
  - **Units Selected Non-Competitively [FR Notice 1/18/17 ; Notice PIH 2017-21; 24 CFR 983.51(b)]** : Added reference to 24 CFR 983.51(b). Added information about HASCO's responsibilities if we choose to attach PBVs to projects owned by HASCO.
  - **HASCO-Owned Units [24 CFR 983.51(e), 983.59, FR Notice 1/18/17, and Notice PIH 2017-21]**: Clarified that the policies here also apply to non-competitive selections and that if HASCO selects a proposal for housing that is owned or controlled by HASCO, HASCO must identify the entity that will review HASCO's proposal selection process and perform specific functions with respect to the term of the HAP contract.
- 17-II.E. SUBSIDY LAYERING REQUIREMENTS
  - Changed references to "[24 CFR 983.55, NOTICE PIH 2013-11, AND FR NOTICE 2/28/20]" and updated guidance in alignment with the updated Nan McKay template.
- 17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT
  - **Promoting Partially Assisted Projects [24 CFR 983.56(c)]**: Clarified that the per-project cap has to be less than 25 units or 25 percent of units.
- 17-III.D. INSPECTING UNITS
  - **Pre-HAP Contract Inspections [24 CFR 983.103(b) and Turnover Inspections [24 CFR 983.103(c)]**: Moved reference to FR Notice 1/18/17, and Notice PIH 2017-20 from Turnover Inspections to Pre-HAP Contract Inspections as well as the language that HASCO may adopt a policy to enter into contracts for units that have not yet fully passed HQS and added a HASCO Policy section stating that HASCO will not be providing assistance before a passed HQS inspection.
- 17-VI.G. TENANT SCREENING [24 CFR 983.255]
  - **Owner Responsibility**: Removed specific examples of screening criteria; replaced with "The owner should use their standard screening criteria to determine suitability for tenancy, and observe all requirements in this area as directed in the signed HAP contract."

## Glossary

- **NEW DEFINITION: Exiting a Permanent Supportive Housing (PSH) Program**
  - Added a definition for the purposes of determining eligibility for the local preference