

PHA Plans for the Coos-Curry Housing Authority Five-Year/Annual Plan for FYB 2025

Matthew Vorderstrasse, Executive Director

FYB January 1, 2025

FINAL DRAFT



Presented by:

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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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A PHA Information.

A.1 PHA Name: Coos-Curry Housing Authority
PHA Code: OR020
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2025
The Five-Year Period of the Plan (i.e., 2019-2023): 2025-2029
PHA Submission Type: 5-Year Plan Submission Revised 5-Year Plan Submission

Availability of Information. 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 on the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The following are the specific locations where the public may obtain copies of the 2025 5-Year PHA Plan:

- Administrative Office – 1700 Monroe Street, North Bend, OR 97459
- PHA Website: www.ccnbchas.org

PHA Consortia: (Check box if submitting a joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead HA:					

B	Plan Elements. Required for <u>all</u> PHAs completing this form
B.1	<p>Mission. State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.</p> <p>Our mission is to promote, preserve and provide residents of our community with safe, sanitary and affordable housing in good condition. NBC/CCHAs will assist in connecting residents with other resources which may enhance their quality of living. NBC/CCHAs will provide these services while treating the clients with dignity and respect.</p>
B.2	<p>Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <p>PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #1:</p> <ul style="list-style-type: none"> ▪ <i>Apply for additional rental vouchers</i> ▪ <i>Acquire or build units or developments</i> <p>PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #2:</p> <ul style="list-style-type: none"> ▪ <i>Increase customer satisfaction</i> ▪ <i>Concentrate on efforts to improve specific management functions (e.g., public housing finance; voucher unit inspections)</i> <p>PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES</p> <p>The PHA established the following objectives to strive in meeting goal #3</p> <ul style="list-style-type: none"> ▪ <i>Increase voucher payment standards</i> <p>PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT</p> <p>The PHA established the following objectives to strive in meeting goal #4</p> <ul style="list-style-type: none"> ▪ <i>Designate developments or buildings for particular resident groups (elderly, persons with disabilities) – 202 site and a PSH site (in development)</i> <p>PHA GOAL #5: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS</p> <p>The PHA established the following objectives to strive in meeting goal #5</p> <ul style="list-style-type: none"> ▪ <i>Provide or attract supportive services to improve assistance recipients’ employability</i>

<p>B.2</p>	<ul style="list-style-type: none"> ▪ <i>Provide or attract supportive services to increase independence for the elderly or families with disabilities</i> <p>PHA GOAL #6: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING</p> <p>The PHA established the following objectives to strive in meeting goal #6</p> <ul style="list-style-type: none"> ▪ <i>Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability</i> ▪ <i>Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status and disability</i> ▪ <i>Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required</i> <p>OTHER PHA GOALS AND OBJECTIVES (list below)</p> <ul style="list-style-type: none"> ▪ <i>Add Special Housing types to our HCV Program</i> ▪ <i>Effectively plan capital fund activities</i> ▪ <i>Take advantage of voucher expansion opportunities</i> ▪ <i>Allocate 100% of agency funding to efficiently operate and maintain Public Housing</i>
<p>B.3</p>	<p><u>Progress Statements.</u> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p><u>Mission</u></p> <p>Coos-Curry Housing Authority’s (CCHA) mission is to promote, preserve and provide residents of our community with safe, sanitary and affordable housing in good condition. CCHA will assist in connecting residents with other resources which may enhance their quality of life. CCHA will provide these services while treating the clients with dignity.</p> <p><u>Goals/Objectives</u></p> <p>PHA GOALS</p> <ul style="list-style-type: none"> - Effectively plan capital fund activities to ensure the physical structures in public housing are safe and sanitary for eligible households including remodeling accessible units to meet ADA standards. - CCHA will allocate 100% of agency funding each year to efficiently operate and maintain the Public Housing units. - Take advantage of voucher expansion opportunities by HUD to increase the availability of rental assistance in the PHA jurisdiction. - Explore options to partner with community developer to create additional affordable housing.

B.3	<p>- Review structure of CCHA and North Bend City Housing Authority to determine best course of action for consolidation/consortium/transfer of properties or programs/etc.</p> <p><u>Progress Statement:</u> <i>CCHA has made progress on all goals. We have acquired a new site to develop in Curry and we are in the midst of strategic planning to address the final goal.</i></p>
B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. <i>(See attachment or020b01)</i></p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p><u>Substantial Deviation/Significant Amendment/Modification</u></p> <p>In accordance with HUD regulations in 24 CFR 903.7(r) and 24 CFR 905.3, the Coos-Curry Housing Authority (CCHA) has defined the basic criteria that will be used for determining:</p> <ul style="list-style-type: none"> • Substantial deviation from its 5-Year PHA Plan; • Significant amendment or modification to the Capital Fund Program (CFP) 5-Year Action Plan. <p>Amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the NBHA will require formal approval from the Board of Commissioners. Prior to implementing changes that meet such criteria, the NBHA will submit for HUD’s approval a revised plan(s) that meets full public process requirements.</p> <p>Criteria for defining “Substantial Deviation” from the 5-Year PHA Plan</p> <ul style="list-style-type: none"> • A change in federal law takes effect and, in the opinion of NBHA, it creates substantial obligations or administrative burdens beyond the programs under administration, excluding changes made due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree. • All amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the NBHA. <p>Criteria for defining “Significant Amendment or Modification” to the CFP 5-Year Action Plans</p> <ul style="list-style-type: none"> • Proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposals will be considered significant amendments to the CFP 5-Year Action Plan. • Addition of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action plan that exceeds \$100,000.00.

C.1	<p>Exceptions</p> <ul style="list-style-type: none"> • Changes under the above definitions that are required due to HUD regulations, federal statutes, state or local laws/ordinances, or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification • Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification • Discretionary or administrative amendments consistent with the NBHA’s stated overall mission and objectives will not be considered substantial deviations or modifications
C.2	<p>Resident Advisory Board (RAB Comments).</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>(See attachment or020a01)</i></p>
C.3	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <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>
C.4	<p>Required Submission of HUD FO Review</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements. <i>N/a</i></p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<p>Affirmatively Furthering Fair Housing (AFFH). (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the</p>

D.1	<p>PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal:</p> <p><i>Goal: Annual Fair Housing Inservice for all PHA staff.</i></p> <p><i>Goal: Partnering with South Coast Health Equity Coalition to provide D.E. I. training to PHA staff and assist in Affirmative Marketing Efforts.</i></p> <p><i>Goal: Partnering with our tribal partners to market housing opportunities to the BIPOC community and also being cultural training to the PHA.</i></p>
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Streamlined Annual PHA Plan (Small PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Applicability. Form HUD-50075-SM is to be completed annually by **Small PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, HCV-Only PHA, or Qualified PHA do not need to submit this form.

Definitions.

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

A.	PHA Information.
A.1	PHA Name: <u>Coos-Curry Housing Authority</u> PHA Code: <u>OR020</u> PHA Type: <input checked="" type="checkbox"/> Small PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units: <u>52</u> Number of Housing Choice Vouchers (HCVs): <u>894</u> Total Combined: <u>946</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission

A.1 Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

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				PH	HCV
Lead PHA:					

B. Plan Elements Submitted with 5-Year PHA Plans. Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See Sub-Section below for required elements in all other years (Years 1-4).

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Five-Year PHA Plan** submission?

Y N

Statement of Housing Needs and Strategy for Addressing Housing Needs

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

Financial Resources.

Rent Determination.

Homeownership Programs.

Substantial Deviation.

Significant Amendment/Modification

B.1 (b) The PHA must submit its Deconcentration Policy for Field Office Review

DECONCENTRATION OF POVERTY AND INCOME-MIXING [24 CFR 903.1 AND 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

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

PHA Policy

According to 24 CFR 903.2(b), the PHA is not subject to deconcentration and incoming mixing requirements.

12-IV.E. DECONCENTRATION

PHA Policy

If subject to deconcentration requirements, the PHA will consider its deconcentration goals when transfer units are offered. When feasible, families above the Established Income Range will be offered a unit in a development that is below the Established Income Range, and vice versa, to achieve the PHA's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

Statement of Housing Needs and Strategy for Addressing Housing Needs

Statement of Housing Needs:

Coos and Curry counties are in the midst of an affordable or even available housing crisis. On any given day less than 1% availability of rentals on the market.

B.1 Waiting List for Public Housing:

Total: 1340
Extremely Low Income: 1101-82%
Very Low Income: 161-12%
Low Income: 67-5%
Families with children: 408-30%
Elderly families: 281-21%
Families with Disabilities: 671-50%
White: 1084-81%
Black/African American: 70-5%
American Indian/Alaska Native: 79-6%
Asian: 19-1%
Native Hawaiian/Other Pacific Islander: 6-0.45%
Hispanic: 93-7%

Bedrooms:
2 BR: 1175-88%
3 BR: 165-12%

The waiting list is not closed.

Waiting List for Section 8:

Total: 900
Extremely Low Income: 722-80%
Very Low Income: 131-15%
Low Income: 43-5%
Families with children: 275-31%
Elderly families: 218-24%
Families with Disabilities: 450-50%
White: 619-69%
Black/African American: 35-4%
American Indian/Alaska Native: 46-5%
Asian: 18-2%
Native Hawaiian/Other Pacific Islander: 5-1%
Hispanic: 13-1%

The waiting is not closed.

Strategies for Addressing Housing Needs:

Need: Shortage of affordable housing for all eligible populations

PHA shall maximize the number of affordable units available to the PHA within its current resources by:

- *Employ effective maintenance and management policies to minimize the number of public housing units off-line*

B.1

- *Reduce turnover time for vacated public housing units*
- *Reduce time to renovate public housing units*
- *Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction*
- *Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required*
- *Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration*
- *Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program*
- *Participate in the Consolidated Plan development process to ensure coordination with broader community strategies*

PHA shall increase the number of affordable units available to the PHA within its current resources by:

- *Apply for additional Section 8 units should they become available*
- *Leverage affordable housing resources in the community through the creation of mixed-finance housing*
- *Pursue housing resources other than public housing or Section 8 tenant-based assistance*

Need: Specific Family Types: Families at or below 30% of median

PHA shall target available assistance to families at or below 30% of AMI by:

- *Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing*
- *Adopt rent policies to support and encourage work*

Need: Specific Family Types: Families at or below 50% of median

PHA shall target available assistance to families at or below 50% of AMI by:

- *Employ admissions preferences aimed at families who are working*
- *Adopt rent policies to support and encourage work*

Need: Specific Family Types: The Elderly

PHA shall target available assistance to the elderly by:

- *Seek designation of public housing for the elderly*
- *Apply for special-purpose vouchers targeted to the elderly, should they become available*

Need: Specific Family Types: Families with Disabilities

PHA shall target available assistance to Families with Disabilities by:

- *Apply for special-purpose vouchers targeted to families with disabilities, should they become available*

B.1

- *Affirmatively market to local non-profit agencies that assist families with disabilities*
- *Seek designation of public housing for families with disabilities*
- *Carry out modifications needed in public housing based on the section 504 Needs Assessment for Public Housing*
- *Affirmatively market to local non-profit agencies that assist families with disabilities*

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

PHA will conduct activities to affirmatively further fair housing by:

- *Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units*
- *Market the Section 8 program to owners outside areas of poverty/minority concentrations*

Reason for Selecting Strategies:

- *Funding constraints*
- *Staffing constraints*
- *Results of consultation with local or state government*
- *Results of consultation with residents and the Resident Advisory Board*

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Public Housing

Eligibility:

Equal Access

The term “family” includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) *A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or*
- (2) *A group of persons residing together and such group includes, but is not limited to:*
 - (i) *A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);*
 - (ii) *An elderly family;*
 - (iii) *A near-elderly family;*
 - (iv) *A disabled family;*
 - (v) *A displaced family; and*
 - (vi) *The remaining member of a tenant family.*

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

B.1 *Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.*

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

Deconcentration and Income Mixing:

The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results follow:

The PHA does have general occupancy public housing developments covered by the deconcentration rule.

None of the covered developments have an average income that falls above or below the Established Income Range.

Section 8

Eligibility:

Equal Access

The term “family” includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or*
- (2) A group of persons residing together and such group includes, but is not limited to:*
 - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);*
 - (ii) An elderly family;*
 - (iii) A near-elderly family;*
 - (iv) A disabled family;*
 - (v) A displaced family; and*
 - (vi) The remaining member of a tenant family.*

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

B.1	<p><i>Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.</i></p> <p><i>Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.</i></p> <p><i>Sexual orientation means homosexuality, heterosexuality or bisexuality.</i></p> <p><i>Gender identity means actual or perceived gender-related characteristics.</i></p> <p>The PHA conducts screening to the extent of:</p> <ul style="list-style-type: none"> ▪ <i>Criminal or Drug-related activity only to the extent required by law or regulation</i> <p>The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:</p> <ul style="list-style-type: none"> ▪ <i>Local law enforcement agencies</i> ▪ <i>National Crime Information Center (NCIC)</i> ▪ <i>National Sex Offender database</i> ▪ <i>Criminal background check through Online Rental Exchange</i> <p>The PHA shares the following information with prospective landlords:</p> <ul style="list-style-type: none"> ▪ <i>Current and former landlord name and address</i> ▪ <i>Name and address (if known) of previous owner</i> <p><u>Special Purpose Section 8 Assistance Programs:</u></p> <p>The policies governing eligibility, selection and admissions to any special-purpose Section 8 program administered by the PHA are contained in the following documents or other reference materials:</p> <ul style="list-style-type: none"> ▪ <i>The Section 8 Administrative Plan</i> ▪ <i>Briefing sessions and written materials</i> <p><i>The PHA announces the availability of any special-purpose Section 8 program to the public through published notices.</i></p>
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Financial Resources:		
Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2025 grants)		
a) Public Housing Operating Fund	132,527.00	
b) Public Housing Capital Fund	207,657.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	5,212,133.00	
f) Resident Opportunity and Self-Sufficiency Grants		
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
Mainstream	540,383.00	
Emergency Housing Voucher	402,524.00	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
2022 Capital Funds	32,893.78	Public housing capital improvements
2023 Capital Funds	202,464.10	Public housing capital improvements
3. Public Housing Dwelling Rental Income		
	124,164.50	Public housing operation
4. Other income (list below)		
Management fee (Woodland)	49,677.54	Public housing operation
Management fee (Powers)	15,385.77	Public housing operation
5. Non-federal sources (list below)		
Total resources	\$6,919,809.69	

Rent Determination

Public Housing

Rent Re-determinations:

Between annual income reexaminations, the tenant is required to report changes in income or family composition to the PHA such that the changes result in an adjustment to rent as follows:

- *Any time the family experiences an income increase*

- B.1**
- *Always for changes in family composition*

Flat Rents:

The PHA used the following sources of information in setting the market-based flat rents to establish comparability.

- *Guidelines found in the 2015 Appropriations Act in determining the Public Housing Flat Rent schedule. The PHA will establish a flat rent for each public housing unit that is no less than 80% of the applicable Fair Market Rent (FMR)*

Section 8

Payment Standards:

The PHA's payment standard is:

- *100% of FMR – 110% of FMR*

The PHA reevaluates the payment standards for adequacy annually and considers the following factors in its assessment of the adequacy:

- *Success rates of assisted families*
- *Rent burdens of assisted families*

Minimum Rent:

The PHA's minimum rent is \$50.00.

The PHA has adopted the following discretionary minimum rent hardship exemption policies.

1. *The minimum rent requirement may be waived under certain circumstances. Financial hardship status is to be granted immediately for ninety (90) days in the event of the following:*
 - a. *The family has lost eligibility or is awaiting an eligibility determination to receive federal, state or local assistance, including a family having a non-citizen household member lawfully admitted for permanent residence and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996;*
 - b. *The family income has decreased due to changed circumstances such as separation, divorce, and abandonment;*
 - c. *One or more family members have lost employment;*
 - d. *The family would be evicted as a result of imposing the minimum rent requirement;*
 - e. *There has been a death in the family; or*
 - f. *There are other hardship situations determined by the PHA on a case-by-case basis, i.e., alimony, child support, etc.*

B.1

Financial hardship exemption only applies to payment of minimum rent - not to rent based on the statutory formula for determining the Total Tenant Payment (TTP).

2. *If tenant initiates a request for a hardship exemption that the PHA determines is temporary in nature:
 - a. *If the hardship is determined to be temporary, minimum rent may be suspended; during the ninety (90) day period beginning on the day the request is made. At the end of the ninety (90) day period, the minimum rent is reinstated retroactively to the date of suspension and the HAP is again adjusted.*
 - b. *In the case of a temporary hardship, the PHA will allow the family a maximum of six (6) months to make payment of any delinquent minimum rent payments accrued during the suspension period. However, the family must execute a Repayment Agreement.*
 - c. *If the hardship is subsequently determined to be long-term, the PHA will retroactively exempt residents from the minimum rent requirement for the ninety (90)-day period.*
 - d. *Note that the PHA can only suspend the minimum rent contribution. If the family is residing in a unit whose Gross Rent exceeds the Payment Standard, the family will be responsible for the excess rent.**
3. *Hardship determinations are subject to the PHA's Informal Hearing Process and families are exempt from any escrow deposit that may be required under regulations governing the hearing process for other determinations.*

Substantial Deviation/Significant Amendment or Modification

In accordance with HUD regulations in 24 CFR 903.7(r) and 24 CFR 905.3, the Coos-Curry Housing Authority (CCHA) has defined the basic criteria that will be used for determining:

- Substantial deviation from its 5-Year PHA Plan;
- Significant amendment or modification to the Capital Fund Program (CFP) 5-Year Action Plan.

Amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the NBHA will require formal approval from the Board of Commissioners. Prior to implementing changes that meet such criteria, the NBHA will submit for HUD's approval a revised plan(s) that meets full public process requirements.

Criteria for defining "Substantial Deviation" from the 5-Year PHA Plan

- A change in federal law takes effect and, in the opinion of NBHA, it creates substantial obligations or administrative burdens beyond the programs under administration, excluding changes made due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree.
- All amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the NBHA.

B.1 Criteria for defining “Significant Amendment or Modification” to the CFP 5-Year Action Plans

- Proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposals will be considered significant amendments to the CFP 5-Year Action Plan.
- Addition of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action plan that exceeds \$100,000.00.

Exceptions

- Changes under the above definitions that are required due to HUD regulations, federal statutes, state or local laws/ordinances, or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification
- Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification
- Discretionary or administrative amendments consistent with the NBHA’s stated overall mission and objectives will not be considered substantial deviations or modifications

B.2 **New Activities.**

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

Y N

Hope VI or Choice Neighborhoods.

Mixed Finance Modernization or Development.

Demolition and/or Disposition.

Conversion of Public Housing to Tenant-Based Assistance.

Conversion of Public Housing to Project-Based Assistance under RAD.

Project-Based Vouchers.

Units with Approved Vacancies for Modernization.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA

Project-Based Vouchers

The PHA is intending to project-base up to 75 Housing Choice Vouchers in projects located in the PHAs jurisdiction (Coos and Curry counties). The vouchers will most likely be placed

B.2	in the higher populated areas such as North Bend or Coos Bay. Project basing vouchers is consistent with the PHA Plan to increase the availability of affordable housing stock for voucher holders to access.
B.3	<p>Progress Report. Provide a description of the PHA’s progress in meeting its Mission and Goals described in its most recent 5-Year PHA Plan.</p> <p><u>Mission</u></p> <p>Coos-Curry Housing Authority’s (CCHA) mission is to promote, preserve and provide residents of our community with safe, sanitary and affordable housing in good condition. CCHA will assist in connecting residents with other resources which may enhance their quality of life. CCHA will provide these services while treating the clients with dignity.</p> <p><u>Goals/Objectives</u></p> <p>PHA GOALS</p> <ul style="list-style-type: none"> - Effectively plan capital fund activities to ensure the physical structures in public housing are safe and sanitary for eligible households including remodeling accessible units to meet ADA standards. - CCHA will allocate 100% of agency funding each year to efficiently operate and maintain the Public Housing units. - Take advantage of voucher expansion opportunities by HUD to increase the availability of rental assistance in the PHA jurisdiction. - Explore options to partner with community developer to create additional affordable housing. - Review structure of CCHA and North Bend City Housing Authority to determine best course of action for consolidation/consortium/transfer of properties or programs/etc. <p><u>Progress Statement:</u> <i>CCHA has made progress on all goals. We have acquired a new site to develop in Curry and we are in the midst of strategic planning to address the final goal.</i></p>
B.4	<p>Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> <p>1) Capital Improvements. Include a reference here to the most recent HUD approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p><i>See Capital Fund 5 Year Action Plan in EPIC approved by HUD on <u>07/29/2024</u></i></p>

B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If, yes, please describe: <i>N/A</i></p>
<p>Plan Elements Submitted All Other Years (Years 1-4). Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.</p>	
B.1	<p>New Activities <i>Not Required – PHA is preparing Five-Year PHA Plan</i></p>
B.2	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) in EPIC and the date that it was approved. <i>Not Required – PHA is preparing Five-Year PHA Plan</i></p>
C.	<p>Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</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>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. <i>(See attachment or020a01)</i></p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <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>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p>Form 50077-SM, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Regulations – Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements. <i>N/A</i></p>
D	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal:</p> <p><i>Goal: Annual Fair Housing Inservice for all PHA staff.</i></p> <p><i>Goal: Partnering with South Coast Health Equity Coalition to provide D.E. I. training to PHA staff and assist in Affirmative Marketing Efforts.</i></p> <p><i>Goal: Partnering with our tribal partners to market housing opportunities to the BIPOC community and also being cultural training to the PHA.</i></p>

Attachment: or020a01
Coos-Curry Housing Authority
Resident Advisory Board Consultation Process and Comments – FYB 2025

1. Resident notification of appointment to the Advisory Board

At beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board
July 17, 2024

2. Resident Advisory Board Selection

Selection made from resident/participant response

3. Meeting Organization

Schedule date to meet with Resident Advisory Board for input to PHA Plan

Hold Resident Advisory Board meeting **August 14, 2024**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad **July 26, 2024**

Hold Public Hearing meeting **September 10, 2024**

5. Documentation of resident recommendations and PHA's response to recommendations

**Coos-Curry Housing Authority
RAB Meeting
2025 5 Year and Annual Plan
Minutes
8-14-2024
11:30am**

PHA Staff Present:

Matthew Vorderstrasse, Executive Director
Karen Dubisar, Deputy Executive Director
Danielle Cleary, Finance Manager
Jennifer Brady, Voucher Programs Manager

Residents attending:

Heather Page- No contact info
Ashlyn Bodlin- 541-531-5596
Rosa Ballard – 541-412-1352
Jim Shcroeder- 541-290-9097
Philip Steffens-541-251-0513
Russ Schmidt- 541-808-2630

Bill Delong- 541-391-2587
Helen Goche- 503-729-4013
Donna Castella-541-404-2287
Mack Schricker- 458-253-1266
Beverly Nordquist- 541-756-7308
Cassie Rider- 541-366-1225

Meeting Minutes:

- Matthew Vorderstrasse presented the 5 Year Plan and Annual Plan for North Bend City Housing Authority.
- Questions were asked about the Ellensburg Development in Gold Beach that the Coos-Curry Housing Authority was going to be building. RAB members asked if PBV's would be part of this and how long the development will take.
- Matt explained that Ellensburg will begin construction in about 2 years as North Bend Family Housing gets completed in Curry County.
- A Community Member that accompanied a RAB member to the meeting asked about Fair Housing protections for her current living situation.
- Matt connected her to Fair Housing.
- Tenants expressed concerns about large projects that just warehouse people. Hopes to see the PHA incorporate more supportive services into our housing programs.
- Other RAB members expressed concerns about their personal issues with private landlords. PHA staff connected with them after the RAB to help address their concerns.

No other comments were discussed during the RAB meeting.

Coos-Curry Housing Authority

RAB Sign in Sheet

8/14/2024

Name

Contact Info

✓	Heather Page	
✓	Ahlyu Bodhi	541-531-5596
✓	Rosa Ballard	541-412-1352
✓	Jim Schneider	541-290-9097
✓	Philip Steffens	541-25-0513
✓	Russ Schmitt	541-808-2630
✓	Bill DeLong	541-391-2587
✓	Helen Goché	503.729.4013

Coos-Curry Housing Authority

RAB Sign in Sheet

8/14/2024

Name

Contact Info

T T Donna Castells	(541) 404-2287
T Mark Schrickler	458-253-1266
T Beverly Nordquist	541-756-7308
Cassie Rider	541-3666-1225

Legal and Public Notice

NOTICE OF PUBLIC COMMENT PERIOD HEARING DATE CORRECTION

The purpose of the hearing is to obtain input from Coos and Curry County residents in reference to the Five-Year/Annual Agency Plan to be submitted to U.S. Department of Housing and Urban Development for Fiscal Year beginning January 1, 2025. Coos-Curry Housing Authority operates the Public Housing and manages a Section 8 Housing Choice Voucher Program. The Public Housing funds being allocated for this year are estimated at \$132,527 for Operations Funds and \$207,657 for Capital Funds. Community members are encouraged to attend this hearing on **September 10th, 2024** at 2:30 pm at 1700 Monroe Street, North Bend OR 97459.

A Copy of the Five-Year/Annual Agency Plan will be available for review from 9:00 am to 4:00 pm Monday – Thursday (except Holidays) at the address below. Persons can also submit written comments prior to the Public Hearing to:

Coos-Curry Housing Authority
1700 Monroe Street
North Bend, OR 97459

For further information please contact Matt Vorderstrasse, Executive Director at (541) 751-2042.

Published: August 21, 2024
in the Myrtle Point Herald, Myrtle Point, Coos County, Oregon.

Affidavit of Publication

STATE OF OREGON

COUNTY OF COOS } ss

I, Ruby Wagner

being first duly sworn, depose and say that I am the *Publisher*

of the Myrtle Point Herald, a newspaper of general circulation, as defined by sections 193.010 and 193.020 O.R.S.; and published at Myrtle Point in the aforesaid county and state;

Legal and Public Notice: Public Comment Period Coos-Curry Housing Authority Five Year/Annual Agency Plan beginning January 1, 2025 Hearing date correction

a copy of which is here annexed, was published in the entire issue of said newspaper for one (1) successive and consecutive weeks in the following issues:

August 21, 2024

Signed *Ruby Wagner*

By Ruby Wagner Publisher's Assistant

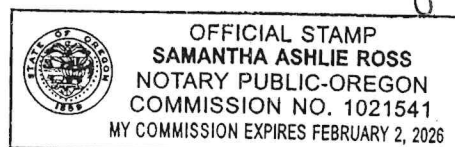
Subscribed and sworn to before me this

21st day of August, 2024

[Signature]

Notary Public of Oregon

(My Commission expires February 2, 2026)



Legal and Public Notice

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Affidavit of Publication

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Legal and Public Notice: of Public Comment Period Coos-
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August 21, 2024

Signed *Ruby Wagner*
By Ruby Wagner: Publisher's Assistant

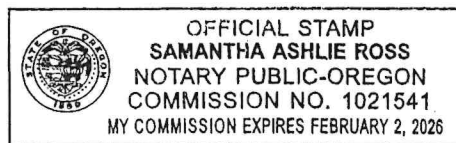
Subscribed and sworn to before me this

21st day of August, 2024

Samantha Ashlie Ross

Notary Public of Oregon

(My Commission expires February 2, 2026)



Legal and Public Notice

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1700 Monroe Street
North Bend, OR 97459

For further information please contact Matt Vorderstrasse, Executive Director at (541) 751-2042.

Published: July 31, 2024

in the Myrtle Point Herald, Myrtle Point, Coos County, Oregon.

Affidavit of Publication

STATE OF OREGON

COUNTY OF COOS } ss

I, Ruby Wagner

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Legal and Public Notice: Public Comment Period
Coos-Curry Housing Authority Five Year/Annual
Agency Plan beginning January 1, 2025

a copy of which is here annexed, was published in the entire issue of said newspaper for one (1) successive and consecutive weeks in the following issues:

July 31, 2024

Signed Ruby Wagner

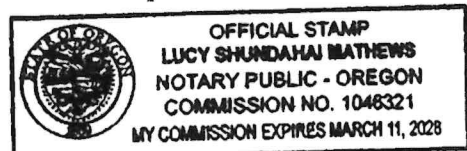
By Ruby Wagner Publisher's Assistant

Subscribed and sworn to before me this

31st day of July, 2024

Lucy Shundahai Mathews
Notary Public of Oregon

(My Commission expires 3-11-28)



Affidavit of Publication

State of Oregon, County of Coos, -ss.

I, Carol Hungerford, being first duly sworn, depose and say that I am a Clerk of The World, 172 Anderson Ave., Coos Bay, OR 97420 a Newspaper of general circulation as defined by ORS 193.010 and 193.020 state; that I know from my personal knowledge that the,

CBW24- 3019 The purpose of the hearing is to obtain input from the city/county residents in reference to the Five-Year/Annual Agency Plan to be submitted to U.S. Department of Housing and Urban Development for Fiscal Year beginning January 1, 2025. Coos-Curry Housing Authority operates the Public Housing, manages a Section 8 Housing Choice Voucher...

a printed copy of which is hereto affixed, was published in the entire issue of said newspaper for 2 week(s) in the following issue:

July 30, 2024

August 2, 2024

Carol Hungerford Clerk's Name
Carol Hungerford

Subscribed and Sworn before me this

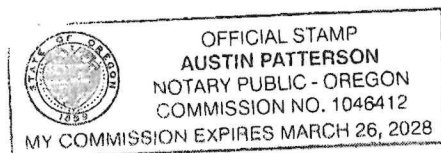
05 day of August, 2024.

County: Marion

AP Austin Patterson

Notary Public for the State of Oregon
My Commission Expires 03-26-28

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Published: July 31, 2024 *Coquille Valley Sentinel*
in the ~~Myrtle Point Herald~~, ~~Myrtle Point~~, Coos County, Oregon. *Coquille*

Affidavit of Publication

STATE OF OREGON

COUNTY OF COOS } ss

I, Ruby Wagner.....being first duly sworn, depose and say that I am the *Publisher* of the Coquille Valley Sentinel News, Newspaper of general circulation, as defined by sections 193.010 and 193.020 O.R.S.; and published at Coquille in the aforesaid county and state;

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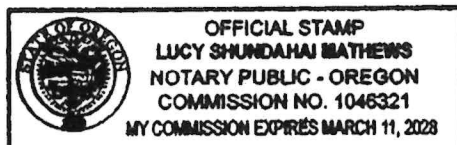
By Ruby Wagner: Publisher's Assistant

Subscribed and sworn to before me this

31st day of July, 2024.....

Lucy Shundahai Mathew
Notary Public of Oregon

(My Commission expires 3-11-28.)



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Advertising Docket

BY: 

NORTH BEND CITY/COOS-CURRY HOUSING AUTH.
 1700 Monroe Ave
 North Bend, OR
 97459

Cust# : 41382
 Tel # : (541) 751-2058
 Ad # : 397161
 Date : 08/02/24
 Classification : PUBLIC NOTICES
 Salesperson : House

Edition	Insertion Date	Amount
The Coos Bay World -TF	07/30/24 <i>712703</i>	91.33
The World ONLINE	07/30/24	0.00
The Coos Bay World -TF	08/02/24	91.33
The World ONLINE	08/02/24	0.00
Sub Total		182.66
		0.00
		0.00
Grand Total		182.66

Ad Text

CBW24- 3019 The purpose of the hearing is to obtain input from the city/county residents in reference to the Five-Year/Annual Agency Plan to be submitted to U.S. Department of Housing and Urban Development for Fiscal Year beginning January 1, 2025. Coos-Curry Housing Authority operates the Public Housing, manages a Section 8 Housing Choice Voucher Program. The Public Housing funds being allocated for this year are estimates at \$132,527 for Operations Funds and \$207,657 for Capital Funds. All resident are encouraged to attend this hearing on August 14th, 2024 at 11:00 am at 1700 Monroe Street, North Bend OR 97459. A Copy of the Five-Year/Annual Agency Plan will be available for review from 9:00 am to 4:00 pm Monday – Thursday (except Holidays) at the address below Persons can also submit written comments prior to the Public Hearing to: Coos-Curry Housing Authority, 1700 Monroe Street, North Bend, OR 97459. For further information please contact Matt Vorderstrasse, Executive Director at (541) 751-2042.

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AUG 1 8 2024

49239

**Public Housing Agency (PHA) Plan
Public Hearing Report Form**

PHA Name: Coos-Curry Housing Authority

Date of Public Hearing: 9/10/2024

Time of Public Hearing: 3:00 PM

Location of Public Hearing: 1700 Monroe Ave. North Bend, OR 97459

1. Purpose of the Public Hearing

The purpose of this public hearing is to gather public input regarding the [Year] Annual PHA Plan/5-Year PHA Plan. The PHA Plan outlines the agency's strategies for serving the needs of low-income families, improving housing opportunities, and providing safe, sanitary, and affordable housing options.

2. Attendance

- **Number of Attendees: 3**
 - **List of Attendees:**
(List the names or indicate "sign-in sheet available" if applicable)
 - Danielle Cleary, Finance Manager
 - Jen Brady, Vouchers Program Manager
 - Matthew Vorderstrasse, Executive Director
-

3. Summary of Public Comments/Concerns

The following is a summary of the comments, concerns, and suggestions received during the public hearing:

- **Comment 1:**
We received 5 letters of support from organizations and residents of Curry County in support of adding Shared Housing into the HCV Program.
- Please see the attached letters that were sent in for Public Comment. All comments that were submitted were in support of adding Shared Housing into the HCV Program.

PHA Response:

Thanked them for their support and partnership in this work.

(Add additional comments/concerns as necessary)

4. Issues Raised by the Public and PHA's Response

The PHA acknowledges the following issues were raised during the public hearing and outlines its responses:

- **Issue 1:**
None were provided
- **PHA Response/Action:**
N/A

(Add additional issues and responses as necessary)

5. Changes to the PHA Plan Based on Public Comments

After reviewing the public comments, the following changes were made to the PHA Plan:

- **Change 1:**
None
 - *(Add additional changes as necessary)*
-

6. Certification of Compliance with Requirements of Public Hearing

This is to certify that a public hearing was held in accordance with the PHA's policies and applicable regulatory requirements, and that public comments have been duly considered in the final version of the PHA Plan.

PHA Representative

Name: Matthew Vorderstrasse

Title: Executive Director

Date: 9/10/2024

Brookings CORE Response
PO Box 4160
97900 Shopping Center Ave. #31
Brookings, Oregon 97415
Ph: (541) 251-0825
EIN: 87-1608300



"Increasing community resilience
and reducing harm to marginalized people
through housing, healthcare, and system navigation"

September 10, 2024

Matt Vorderstrasse
Coos-Curry North Bend Housing Authority
Email: mvorderstrasse@ccnbchas.org

Dear Matt,

On behalf of Brookings CORE Response, I am writing to express our strong support for the addition of "shared housing" as an allowable special housing type within the Housing Choice Voucher program for Coos and Curry Counties. This initiative has the potential to significantly expand housing options for vulnerable populations in our community, particularly those we serve through our organization.

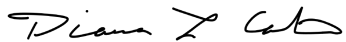
As one of the lead housing agencies in Curry County for people experiencing homelessness, Brookings CORE Response regularly sees the urgent need for more flexible housing options. We currently provide Transitional Shelter, operate a Rapid Rehousing program, and are preparing to launch a low-income veterans housing project as well as an eviction prevention program. Despite these efforts and the efforts of our community partners, the demand for affordable, stable housing consistently exceeds supply, and many of our clients struggle to find housing that fits within the current voucher program limits.

Allowing shared housing would offer a much-needed solution for many individuals and families we serve. We have witnessed firsthand how challenging it is for single adults, families, and veterans to secure housing that is both affordable and meets the voucher requirements. By expanding the program to include shared housing, we can prevent more people from losing their vouchers and enable them to access safe, supportive living environments. This type of arrangement could be especially beneficial for individuals needing companionship or shared resources during critical times in their lives.

We fully support incorporating shared housing into the Five-Year Plan and the Administrative Plan for the Housing Choice Voucher program. This change would help meet the increasing demand for affordable housing in Coos and Curry Counties and better serve the diverse needs of the populations we assist.

Thank you for considering this important proposal.

Sincerely,

A handwritten signature in black ink that reads "Diana Carter". The signature is written in a cursive style with a large initial "D" and "C".

Diana Carter, *Executive Director*

Diana@brookingscoreresponse.org

(541) 251-0825 x20



Via email to mvorderstrasse@ccnbchas.org

September 7, 2024

Executive Director Matthew Vorderstrasse
Coos-Curry Housing Authority
1700 Monroe Ave
North Bend, OR 97459

Re: Support for Five Year Plan for FY 2025

Dear Executive Director and Board of Directors for Coos-Curry Housing Authority, On behalf of the Legal Advocacy Ministry at St. Timothy Episcopal Church, I write in **strong support** of the Housing Authority's plan to add **special housing types** to the Housing Choice Voucher Program (PHA Goal 6, Other Objectives: "Add Special Housing types to our HCV Program" found in Five Year Plan, B.2 Plan Elements, Goals and Objectives).

Perspective

The Legal Advocacy Ministry at St. Timothy's is located in Brookings, Curry County on Oregon's south coast. Our project serves people living without adequate shelter in southern Curry County, especially those who are subject to (or at risk of) the criminalization of poverty for the basic human activities of sleeping, resting, owning possessions, eating, or lacking means to pay snowballing fines and fees. We work with people who are older adults, veterans, former foster youth, survivors of domestic violence, and parents of young children. Nearly every household includes someone affected by a disability enduring extreme housing insecurity.

We know that the Housing Authority's proposal to add special housing types to the Housing Choice Voucher program will benefit our community because in our professional capacity we have a front-row look at the struggles households have in attempting to utilize Housing Choice Vouchers in Curry County, and of the unbalanced housing stock dynamics that confront renters in Curry County. Over 48% of Curry County's renters are cost-burdened or extremely cost-burdened.¹ Listings reveal an overstock of luxury-end, single-family homes of large size for sale, and a dramatic deficit of affordable housing for rent where need outpaces total occupied units several times over.² Statewide, the available vacancy

¹ Oregon Housing and Community Services, County Profiles 2023 - Oregon Housing, "Shortage of Affordable and Available Rental Units by Income Levels for Curry County" *available at* https://public.tableau.com/shared/ZRXFN742Y?:display_count=n&origin=viz_share_link last accessed Sept. 7, 2024.

² Oregon Housing and Community Services, County Profiles 2023 - Oregon Housing, "Shortage of Affordable and Available Rental Units by Income Levels for Curry County" *available at* https://public.tableau.com/shared/ZRXFN742Y?:display_count=n&origin=viz_share_link last accessed Sept. 7, 2024.

rate at any price, meaning the number of units available to rent at any time regardless of affordability, is in the unhealthy low single digits.³

The decades of federal disinvestment from public and affordable housing that led to today's housing crisis is not unique to Curry County. However, Curry County has some particular challenges that put households looking for affordable housing at a distinct disadvantage compared to elsewhere in the state. Most housing in Brookings-Harbor is single family homes, including manufactured/mobile homes. Until 2024, Curry County has received no investment in public housing. According to county permit records, we have had no multifamily units added since 2014. Yet since that time, we see new demands on housing driven both by people seeking refuge from fires and smoke from dryer parts of Oregon and California, and by the "booming" number of retirees who have found the Oregon coast to be a beautiful place to relocate for the golden third of life.⁴ Even as early as 2018, before the region's wildfires, the housing unit shortfall for Coos, Curry, and Douglas counties was estimated at 5,450 too few units for households earning 50% of Area Median Income or less.⁵ This deficit, coupled with extremely low vacancy rate and loss of smaller/older housing stock to short-term tourism rentals along the coast, means that **most of the clients I work with have no option to move into housing, even if they have income from employment, retirement, or disability.**

Background: HUD Encourages Use of Its Shared Housing Option

Shared housing is one of six "special housing types" authorized by HUD.⁶ Shared housing means a single housing unit occupied by an assisted household and another resident(s). It is a local Public Housing Authority's option to include special housing types like shared housing in its Administrative Plan for the Housing Choice Voucher (HCV) program. HUD highlights shared housing as a "permissible and viable option" for a Public Housing Authority (PHA) to address the housing needs of HCV participants in its service area. In 2021 HUD published a notice, PIH

³ Tillamook Headlight Herald, "Oregon has some of the lowest home vacancy rates in the US", March 5, 2023, *available at*

https://www.tillamookheadlightherald.com/news/oregon-has-some-of-the-lowest-home-vacancy-rates-in-the-us/article_a358b9f2-b99f-11ed-b1b4-dfebfc514ea.html

⁴ The median age of Harbor, Oregon is now 69.4 years old, (shooting Harbor into the rank of the second-oldest population in Oregon after retirement resort Sunriver, OR (median age: 70.2), compared to the median age in Oregon of 39.9. Data from U.S. Census accessed at

https://datacommons.org/ranking/Median_Age_Person/City

⁵ Curry Coastal Pilot, "Affordable Housing Shortage Continues to Plague Curry County" published July 17, 2020 (using data from 2018), *available at*:

https://www.currypilot.com/news/affordable-housing-shortage-continues-to-plague-curry-county/article_09c16a6e-c695-11ea-9a05-a7faae8f11b6.html

⁶ The other special housing types authorized are: single room occupancy (SRO) housing; congregate housing; group home; manufactured home (when the family owns the manufactured home and leases the space); and cooperative housing (when the family is a member of the cooperative). U.S. Dept. of Housing and Urban Development, *Housing Choice Voucher Guidebook*, "Special Housing Types", updated November 2020. *Available at*

https://www.hud.gov/sites/dfiles/PIH/documents/Special_Housing_Types_Updated_November%202020.pdf

2021-05, specifically to promote Shared Housing amongst the nation’s PHAs.⁷ **Coos-Curry Housing Authority is entirely in line with HUD program goals in proposing to incorporate special housing types** to meet our regional housing needs for the HCV program.

HUD regulations on Shared Housing can be found in 24 CFR § 982.615 through 24 CFR § 982.618. How it works is that the shared unit consists of both common space for use by the occupants of the unit (usually living and cooking areas) and separate private space for each assisted family (usually a number of bedrooms). The unit may be a house or an apartment. There is a separate Housing Assistance Payment (HAP) contract and lease for each assisted family.

HUD states that voucher participants find the shared housing option “to be a useful alternative form of housing depending on their personal situation, local housing market conditions, and the unit location. Shared Housing can be a viable option for families seeking economical housing under various market conditions. Families in markets with tight rental conditions or with a prevalence of single-family housing,” both of which describe conditions in Curry County, “may determine a shared housing living arrangement to be a useful way to secure affordable housing.”⁸

Many PHAs incorporate shared housing as a special housing type. Examples of Shared Housing in Admin Plans include the housing authorities for Lane County, OR (called Homes for Good); Multnomah County, OR; Clackamas County, OR; Shasta County, CA. Each includes shared housing as a special housing type in their respective admin plans, viewable online.⁹

Shared Housing Addresses Curry County’s Deficit of Multifamily Housing & Affordable Housing
According to one analysis, Curry County lacks 605 housing units affordable to people with up to 50% Area Median Income (designated Extremely and Very Low Income households).¹⁰

⁷ U.S. Dept. of Housing and Urban Development, Notice PIH 2021-05, “Use of Shared Housing in the Housing Choice Voucher (HCV) Program”, January 15, 2021. *Available at* <https://www.hud.gov/sites/dfiles/PIH/documents/pih2021-05.pdf>

⁸ *Id.*

⁹ Homes for Good (Lane County, Oregon) (starting page 15-11):

<https://www.homesforgood.org/documents/files/plans-reports-policies/annual/HFG-FY2024-Admin-Plan-Updated-2.8.2024.pdf>

Multnomah County, Oregon (starting page 15-9):

https://www.homeforward.org/wp-content/uploads/2023/04/Sc8-Administrative-Plan_February-2023.pdf

Clackamas County, Oregon (starting page 15-8):

<https://dochub.clackamas.us/documents/drupal/8ee6f7d1-0c36-48e4-9677-336b95fb9858>

Shasta County, CA (starting page 15-9):

<https://www.shastacounty.gov/housing-community-action-programs/page/shasta-county-housing-authority-administrative-plan>

¹⁰ Oregon Housing and Community Services, County Profiles 2023 - Oregon Housing, “Shortage of Affordable and Available Rental Units by Income Levels for Curry County” *available at* https://public.tableau.com/shared/ZRXFN742Y?:display_count=n&:origin=viz_share_link last accessed Sept. 7, 2024

No – that’s right, zero– multifamily housing (2+ units) received new construction permits in Curry County since 2013-14, the only time any multifamily units permits issued in the county within the past fifteen years.

One way to immediately increase the number of available units eligible for Housing Choice Voucher participants to use is by adding shared housing as a special housing type under the Administrative Plan, as Coos-Curry proposes to do. Such a move opens up smaller, affordable dwelling areas to function effectively, in the HCV program, as multifamily dwellings, without requiring the delay and expense of new construction, and it achieves this, instantly, upon the Admin Plan amendments taking effect. Homes with a market rate rent that exceeds the payment standard under current rules, would become eligible by renting a portion of the home, for example the primary bedroom/bathroom suite, and sharing the cooking and living areas with another resident.

The Shared Housing Special Housing Type Works Well for Seniors and Others With A Fixed Income

Shared Housing works to open up meaningful access to HCV for seniors and others with a fixed income. The median age in Harbor, Oregon is 69 years of age. Most people of this age receiving Social Security retirement income or Social Security Supplemental Security Income (SSI) have a set monthly benefit amount on which to live, without any prospect of an income increase for the rest of their days. Retirees from the hospitality industry or homemaking, who received no/low wages or cash tips during their working years, are especially likely to be living on the SSI maximum benefit, currently set at \$943 per month.¹¹ This is the same maximum monthly benefit for people under age 65 who have a permanent disability that prevents them from working. If an individual receiving no more than \$943 monthly income has been able to find housing, it likely is shared housing and/or they are rent burdened in paying up to 100% of their monthly benefit on housing costs. For these people, participating in the HCV program can be life-changing and health-supporting.

The Shared Housing Special Housing Type Is An Attractive Option to People Who Need A Helping Hand due to Family Status or Age & Disability

Many people would prefer to live in a shared housing arrangement, particularly if they need a helping hand from time to time due to parenting or caregiving responsibilities or a disability. Among the foreseeable households who may prefer a shared housing arrangement include a parent of a young child, who would welcome living with their godmother who could attend to their child while bathing or cooking; a person with limited mobility or another disability, for whom a roommate arrangement could help around the house to reach for objects, carry heavy items, or help with household tasks like vacuuming, etc. Without the PHA opting into special housing types, the HCV participant would face a choice between using a voucher to reduce their rent burden, and the benefit of a shared living arrangement.

¹¹ Social Security Administration, “SSI Federal Payment Amounts For 2024” available at <https://www.ssa.gov/oact/cola/SSI.html>

The Shared Housing Special Housing Type Can Offer Greater Security For Overhoused Empty-Nesters

Our focus thus far has been on the benefit of shared housing for the HCV participant. Another form of community good extends to the new HAP contract holder-resident homeowner who, also, may benefit from the PHA adopting shared housing. A homeowner who participates in the HAP contract receives a reliable and timely form of supplemental income through the rent paid by the Housing Assistance Payment plus the Tenant Portion. The shared housing HAP arrangement may mean they will be able to pay off a mortgage, or offset rising grocery prices for someone on a fixed income. The shared housing arrangement may give the resident homeowner and their extended family peace of mind that someone will be nearby in case of a fall or accident. HomeShare Oregon cites these and other reasons as benefits for home sharing (a homeowner, usually an over-housed, cost-burdened older adult, who rents a spare bedroom to a community member seeking housing).¹² However, to date, homeowners in Curry County have not been able to offer their extra rooms through HomeShare Oregon to a HCV participant because the Coos-Curry Housing Authority has not opted into the special housing type.

Shared Housing: A Solution to Prevent Loss of Subsidy Due to Reduction in Household Size

The shared housing option is an antidote to a far too common cause of displacement or homelessness: the case of the over-housed participant. This occurs when a stable tenant who has been renting their home using HCV experiences a reduction in household size for any number of reasons ranging from a child graduating to a death in the family. Once the number of approved family members drops below the threshold for the number of bedrooms in the unit, the family is “overhoused” and the payment standard for the housing voucher drops, leaving the family to pay a sometimes substantially higher share of the cost of housing without the benefit of any subsidy. Because of the low vacancy rate in Curry County (and Oregon), it is technically but rarely practically possible for the family to transfer the voucher to a right-sized house. The sensible solution is to find another person to rent the extra bedroom(s), for example, a family friend. Unless the local housing authority has opted into shared housing, however, this arrangement is not permissible under HCV, and the family faces being overhoused and rent-burdened, losing their longtime home, or losing their voucher.

The Shared Housing Special Housing Type Promotes Community, Social Bonds, and Mental Health

The Shared Housing special housing type addresses a detrimental but growing obstacle to well-being, head-on: by its very essence shared housing is an antidote to the modern phenomena of social isolation and loneliness. We know that loneliness and social isolation have a detrimental effect on health and quality of life. Nationally, 24% of Americans age 65 and over are socially isolated, and 43% of adults age 60 and over report loneliness.¹³ These conditions are associated with \$6.7 billion excess annual health care costs for Medicare and a 50% higher risk

¹² HomeShare Oregon <https://homeshareoregon.org/why-homeshare/>

¹³ National Academies of Sciences, Engineering, and Medicine, “Social Isolation And Loneliness In Older Adults: Opportunities For The Health Care System” 2020 <https://doi.org/10.17226/25663>.

of early mortality.¹⁴ For both HCV participants and non-assisted residents in the home, shared housing chosen by the residents builds community, strengthens social bonds, and promotes mental and physical health outcomes. Exercising agency in the form of having a choice in selecting the resident/participant pairing also boosts well-being. The very act of preserving or gaining housing (for the homeowner with precarious finances or for the new HCV participant, respectively) creates hope.

Shared Housing Adds “Choice” to the Housing Choice Voucher Program

Currently, Curry County residents seeking to use a Housing Choice Voucher do not have a meaningful choice in the private market to use the voucher: a household selected from the waitlist is lucky to find *any* eligible housing for rent that meets the payment standard. Adding additional housing units via shared housing will promote the value of “choice” underlying the Section 8 HCV program.

Suggestion: Don’t Limit Chapter 15 to Shared Housing; Include Manufactured Housing as a Special Housing Type

At the same time that Coos-Curry Housing Authority goes through the process to add shared housing to Chapter 15, Special Housing Types in its Administrative Plan, it should also include Manufactured Housing along with Shared Housing as a special housing type. Historically, the de-facto affordable housing of Brookings-Harbor has been manufactured and mobile home housing. Far more units of manufactured/mobile home housing exist in southern Curry than multifamily units. HUD allows these types of special housing types so that a PHA can accommodate the cultural and economic realities of the communities it serves.¹⁵

Conclusion: Strong Support for Special Housing Types and Shared Housing

For all of these reasons, the Legal Advocacy Ministry supports Coos-Curry Housing Authority adopting special housing types into the Administrative Plan. Thank you for considering these comments. I would be happy to assist the Coos-Curry Housing Authority in any way I can to incorporate special housing types into its Administrative Plan.

Sincerely,



Sister Cora Rose, Esq.

Legal Advocacy Ministry at St. Timothy’s

¹⁴ Oregon Health Authority, “Addressing Loneliness and Isolation Among Older Adults” 2022 (citing Commonwealth Fund 2021 report), *available at* https://oregonbhi.org/wp-content/uploads/2022/05/Loneliness-and-Social-Isolation-FactSheet_Final.pdf

¹⁵ See footnote 9, *supra*, for links to the following Admin Plans that include Manufactured Housing as a Special Housing Type: Clackamas (p. 15-13); Lane (p. 15-17); Multnomah (p. 15-13); Shasta (p. 15-12).



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention of:
Office Directors of Public Housing;
Regional Directors; Public Housing
Agencies.

Notice PIH 2021-05

Issued: January 15, 2021

Expires: This notice remains in effect until
amended, superseded or rescinded

Subject: Use of Shared Housing in the Housing Choice Voucher (HCV) Program

- 1. Applicability.** This notice applies to public housing agencies (PHAs) that administer Housing Choice Voucher (HCV) programs.¹
- 2. Purpose.** The Office of Public and Indian Housing (PIH) is issuing this notice in order to:
 - Remind PHAs that Shared Housing remains a permissible and viable option that may be made available to HCV participants.
 - Remind PHAs of the specific programmatic requirements related to Shared Housing for the HCV program.
- 3. Background.** HUD regulations on Shared Housing can be found in 24 CFR § 982.615 through 24 CFR § 982.618. Shared Housing is a single housing unit occupied by an assisted family and another resident or residents. The shared unit consists of both common space for use by the occupants of the unit and separate private space for each assisted family. The unit may be a house or an apartment. There is a separate Housing Assistance Payment (HAP) contract and lease for each assisted family.
- 4. Shared Housing as a Viable Housing Option.** HCV participants may find this type of housing to be a useful alternative form of housing depending on their personal situation, local housing market conditions, and the unit location. Shared Housing can be a viable option for families seeking economical housing under various market conditions. Families in markets with tight rental conditions or with a prevalence of single-family housing, for example, may determine a shared housing living arrangement to be a useful way to secure affordable housing.

Shared housing can be offered in a variety of ways, including:

¹ The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

- **For-profit co-living** (such as a boarding house, single bedroom with common living room/kitchen/dining room) run by a private company.

If offered as a housing option, PHAs are encouraged to consider ways in which families may be assisted in finding shared housing, including:

- **For-profit shared housing matching** (such as roommates or single-family homes) and online sites which charge a fee for their matching services.
- **Non-profit shared housing** matching services.

If the PHA and the local community offer shared housing as an option for families with vouchers, the PHA is encouraged to include information about this housing possibility in the family's voucher briefing.

5. **PHA Plan Requirements.** The PHA's administrative plan must cover the PHA's policies on special housing types such as Shared Housing. PHAs may permit a family to use special housing types such as shared housing in accordance with requirements of the program under 24 CFR § 982.601(b)(1). PHAs are required to permit the use of any special housing types such as shared housing if needed as a reasonable accommodation so that the program is readily accessible and usable by persons with disabilities. 24 CFR § 982.601(b)(3).
6. **Local Considerations in Encouraging Shared Housing.** While shared housing can be a useful option for PHAs to encourage their HCV participants to consider, PHAs should be cognizant of potential local legal barriers to HCV participants using shared housing. Municipalities may have occupancy limits for the number of unrelated persons who may share a housing unit. Similarly, some local zoning codes for single family housing restrict occupancy in certain zoned areas to households whose family members are related by blood. These restrictions can create additional obstacles for shared housing. PHAs should be aware of the legal requirements in their service areas and work with their local jurisdictions to find solutions that encourage affordable housing and are consistent with the Fair Housing Act, Title VI, and other federal, state, and local fair housing laws. PHAs should inform HUD if they encounter barriers to shared housing that may conflict with fair housing laws.
7. **Occupancy Requirements.** Assisted families can share a unit with either HCV assisted persons or unassisted persons. The owner of the property may reside in the unit, but housing assistance may not be paid on their behalf. Additionally, under program regulations a resident owner cannot be related by blood or marriage to the assisted family. However, a PHA must grant exceptions in program policies where such exceptions are needed as a reasonable accommodation for a person with a disability. See Section 12 of this notice for more information on waiving this program regulation when it may be necessary as a reasonable accommodation. If approved by the PHA, a live-in aide may reside with the family to care for a person with disabilities. The PHA must (per 24 CFR § 982.615((b)(1))) approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with

disabilities in accordance with 24 CFR part 8. For more requirements on the approval or rejection of a live-in aide, see CFR § 982.316.

8. Housing Quality Standards (HQS). PHAs may not give approval to reside in Shared Housing unless the entire unit, including the portion of the unit available for use by the assisted family under its lease, meets HQS. HQS requirements found in 24 CFR § 982.401 for the HCV program apply to shared housing, with additional requirements for facility standards, as well as the following standards for space and security in place of HQS:

- Facilities: Facilities available to the assisted family, whether shared or private (non-shared), must include (per 24 CFR § 982.618(c)) a living room, a bathroom, and food preparation and refuse disposal facilities.
- Space and Security: The entire unit must (per 24 CFR § 982.618(d)(1)) provide adequate space and security for all assisted and unassisted residents. The private, non-shared space for each assisted family must (per 24 CFR § 982.618(d)(2)(ii)) contain at least one bedroom for each two persons in the family. The number of bedrooms in the private, non-shared space of an assisted family must not (per 24 CFR § 982.618(d)(2)(ii)) be less than the family unit size. A 0-bedroom or 1-bedroom unit may not be used for shared housing.

9. Payment Standards and Utility Allowances. The payment standard for a family in Shared Housing (per 24 CFR § 982.617(c)) is the lower of the PHA’s payment standard for the family unit size or the pro-rata share of the PHA’s payment standard for the shared housing unit size. The pro-rata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private, non-shared space by the total number of bedrooms in the unit.

- a. The HAP for a family in shared housing is the lower of the payment standard minus the Total Tenant Payment (TTP) or the gross rent minus the TTP. The utility allowance for an assisted family living in shared housing is the pro-rata share of the utility allowance for the shared housing unit.

Determining Payment Standard in Shared Housing

Example: Household Includes Married Couple and 2-year old son
Shared housing unit size: bedrooms available to assisted family= 2

Total bedrooms in the unit: 3
2 Bedrooms for assisted family
÷ 3 Bedrooms in the unit
.667 pro-rata share

2 BR payment standard: \$1200
3 BR payment standard: \$1695

$\$1695 \times .667$ (pro-rata share) = \$1131

\$1131 is lower than the \$1200 payment standard for the 2 BR family unit size

\$1131 is the payment standard used to calculate the HAP

- 10. Rent Reasonableness.** The rents paid by participating families residing in Shared Housing are generally subject to applicable standards for determining rent reasonableness. The rent paid to the owner for the assisted family may not (per 24 CFR § 982.617(b)) exceed the pro-rata portion of the reasonable rent for the shared unit. For reasonable rent determination, the PHA may consider whether sanitary and food preparation areas are private (non-shared) or shared. When these facilities are private versus shared, the PHA may provide additional consideration when determining the reasonable rent.
- 11. Lease and HAP Contract.** For assistance in a shared housing unit, there is a separate HAP contract and lease required for each assisted family.
- 12. Equal Opportunity Requirements.** PHAs are reminded in administering shared housing to follow all applicable equal opportunity and nondiscrimination requirements at 24 CFR 982.53, including but not limited to Section 504 of the Rehabilitation Act (Section 504), the Fair Housing Act, and Title II of the Americans with Disabilities Act (ADA), which include, among other requirements, the obligation to grant reasonable accommodations that may be necessary for persons with disabilities. PHAs are also reminded that reasonable accommodation requests that require a waiver of HUD regulations must be approved by HUD. Questions concerning waiving program regulations related to granting reasonable accommodations with regard to shared housing must be sent to PIH headquarters.
- 13. Contact Information.** For further questions, please contact your local HUD field office.

_____/ s /_____
Dominique Blom
General Deputy Assistant Secretary
for Public and Indian Housing

From: [sarah kaplansky](#)
To: [Matthew Vorderstrasse](#)
Subject: In favor of shared housing.
Date: Monday, September 9, 2024 12:23:31 PM

To whom it may concern,

I myself have been selected for the HUD voucher in Curry County. Unfortunately I was unable to use that voucher even with a reasonable accommodation extension. There was no rentals that were within the price limits of the HUD voucher in Curry County. Unfortunately I was not able to use my voucher in a shared housing situation that I am in now. Which was the only way I could afford to stay living in Curry County. Even living in a shared housing situation I am paying \$1,200 a month for two bedrooms and one bath. I don't even make enough money to pay the \$1,200 a month. Please consider shared housing.

Thank you,

Sarah Kaplansky

Youth peer support specialist at
St. Timothy's Episcopal Church

From: [Olivia Davis](#)
To: [Matthew Vorderstrasse](#)
Subject: In Support
Date: Monday, September 9, 2024 1:19:32 PM

Good afternoon,

I am writing in response to adding "Shared Housing Type" for the Curry County area.

We see and meet with clients who are in need of housing. Some of the clients are able to move in with someone but have no funds, but they may have a voucher.

Please consider making this Shared Housing with the Housing Choice Vouchers.

Thank you

Olivia Davis

Executive Director

Brookings Harbor Community Helpers(BHCH)
Food Bank and Resource Center
P.O. Box 1415
Brookings, Oregon 97415
541-469-6988

From: [Dave Hubbard](#)
To: [Matthew Vorderstrasse](#)
Subject: Shared Housing
Date: Tuesday, September 10, 2024 1:20:49 PM

I am excited that the possibility of having shared housing be an option to utilize a voucher. I work with a lot of individuals that have limited income, elderly, or who benefit from companionship that a roommate situation would provide. With the limited amount of available rental units in Curry County, and everywhere, it is good to have as many options available as possible. With my work we are even struggling to find any units that are within the FMR price range. We already have a lot of people that already live in a shared housing situation and this will allow individuals to avoid or exit homelessness. At Brookings CORE response we are a small nonprofit and our housing department has been able to assist a lot of people and will support the housing authority any way we can.

Thank you for your time and consideration.

--

David Hubbard, CHW
Housing Programs Manager / Housing Navigator
Brookings CORE Response
PO Box 4160
Brookings OR 97415
541-251-0825 ext. 11
541-813-3618
www.brookingscoreresponse.org

"The test of our progress is not whether we add more to the abundance of those who have much; it is whether we provide enough for those with too little."

- Franklin D. Roosevelt

Attachment: or020b01
Coos-Curry Housing Authority
Violence Against Women (VAWA)
Goals Taken from ACOP Policy

16-VII.A. OVERVIEW

The Violence Against Women Act (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking who are applying for or receiving assistance under the public housing program. If your state or local laws provide greater protection for such victims, those laws take precedence over VAWA.

- Although the VAWA 2022 statute does not specifically include human trafficking in the list of victims protected under VAWA, in 2022 HUD began including human trafficking as part of the list of victims protected under VAWA (as seen in Notices PIH 2022-06, PIH 2022-22, and PIH 2022-24). In the absence of a final rule implementing VAWA 2022 and to mirror HUD's recent usage, this policy includes human trafficking in addition to domestic violence, dating violence, sexual assault, and stalking anywhere such a list appears.

In addition to definitions of key terms used in VAWA, this part contains general VAWA requirements and PHA policies in three areas: notification, documentation, and confidentiality. Specific VAWA requirements and PHA policies are located in Chapter 3, "Eligibility" (sections 3-I.C and 3-III.F); Chapter 5, "Occupancy Standards and Unit Offers" (section 5-II.D); Chapter 8, "Leasing and Inspections" (section 8-I.B); Chapter 12, "Transfer Policy" (sections 12-III.C, 12-III.F, and 12-IV.D); and Chapter 13, "Lease Terminations" (sections 13-III.F and 13-IV.D).

16-VII.B. DEFINITIONS [24 CFR 5.2003]

As used in VAWA:

- The term *affiliated individual* means, with respect to a person:
 - A spouse, parent, brother or sister, or child of that individual, or an individual to whom that individual stands in the position or place of a parent; or
 - Any individual, tenant or lawful occupant living in the household of that individual.
- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship
 - The type of relationship
 - The frequency of interaction between the persons involved in the relationship
- The term *domestic violence* includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with

the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

- the term *sexual assault* means:
 - Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks the capacity to consent
- The term *stalking* means:
 - To engage in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others, or suffer substantial emotional distress.

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

Notification to Public

The PHA adopts the following policy to help ensure that all actual and potential beneficiaries of its public housing program are aware of their rights under VAWA.

PHA Policy

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

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

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

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

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

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

Contact information for local victim advocacy groups or service providers

Notification to Applicants and Tenants [24 CFR 5.2005(a)(1)]

PHAs are required to inform public housing applicants and tenants of their rights under VAWA, including their right to confidentiality and the limits thereof, when they are denied assistance, when they are admitted to the program, and when they are notified of an eviction or termination of housing benefits.

The PHA must distribute a notice of VAWA rights, along with the VAWA self-certification form (HUD-5382) at each of these three junctures.

PHA Policy

The VAWA information provided to applicants and participants will consist of the notices in Exhibit 16-1 and 16-2.

The PHA will provide all applicants with information about VAWA at the time they request an application for housing assistance. The PHA will also include such information in all notices of denial of assistance (see section 3-III.F).

The PHA will provide all tenants with information about VAWA at the time of admission (see section 8-I.B) and at annual reexamination. The PHA will also include such information in all lease termination notices (see section 13-IV.D).

The PHA is not limited to providing VAWA information at the times specified in the above policy. If the PHA decides to provide VAWA information to a tenant following an incident of domestic violence, Notice PIH 2006-42 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases the PHA make alternative delivery arrangements that will not put the victim at risk.

PHA Policy

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

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

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections. (Board approved 9/26/17)

16-VII.D. DOCUMENTATION [24 CFR 5.2007]

A PHA presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, sexual assault, stalking, human trafficking or criminal activity related to any of these forms of abuse may—but is not required to—request that the individual making the claim document the abuse. Any request for documentation must be in writing, and the individual must be allowed at least 14 business days after receipt of the request to submit the documentation. The PHA may extend this time period at its discretion. [24 CFR 5.2007(a)]

The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:

- (1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include

the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.

- (2) A federal, state, tribal, territorial, or local police report or court record
- (3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical professional. Acceptable documentation also includes a record of an administrative agency, and documentation from a mental health professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

The PHA may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under "Conflicting Documentation," nor may it require certification in addition to third-party documentation [VAWA final rule].

PHA Policy

Any request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking will be in writing, will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

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

Once the victim provides documentation, the PHA will acknowledge receipt of the documentation within 10 business days.

Conflicting Documentation [24 CFR 5.2007(e)]

In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). The PHA may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the PHA. The PHA must honor any court orders issued to protect the victim or to address the distribution of property. Individuals have 30 calendar days to return third-party verification to the PHA. If the PHA does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the PHA must hold separate hearings for the tenants [Notice PIH 2017-08]. PHA Policy

If presented with conflicting certification documents from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. When requesting third-party documents, the PHA will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation.

If the PHA does not receive third-party documentation within the required timeframe (and any extensions) the PHA will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, the PHA will hold separate hearings for the applicants or tenants.

Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]

The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b).

PHA Policy

If the PHA accepts an individual's statement or other corroborating evidence of domestic violence, dating violence, sexual assault, stalking, or human trafficking the PHA will document acceptance of the statement or evidence in the individual's file.

Failure to Provide Documentation [24 CFR 5.2007(c)]

In order to deny relief for protection under VAWA, a PHA must provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as the PHA may allow, the PHA may deny relief for protection under VAWA.

16-VII.E. CONFIDENTIALITY [24 CFR 5.2007(b)(4)]

All information provided to the PHA regarding domestic violence, dating violence, sexual assault, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence. This means that the PHA (1) may not enter the information into any shared database, (2) may not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and (3) may not provide the information to any other entity or individual, except to the extent that the disclosure is (a) requested or consented to by the individual in writing, (b) required for use in an eviction proceeding, or (c) otherwise required by applicable law.

PHA Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

**EXHIBIT 16-1: SAMPLE NOTICE OF OCCUPANCY RIGHTS UNDER THE
VIOLENCE AGAINST WOMEN ACT, FORM HUD-5380**

[Insert Name of Housing Provider¹]

Notice of Occupancy Rights under the Violence Against Women Act²

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.³ The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that **[insert name of program or rental assistance]** is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

Protections for Applicants

If you otherwise qualify for assistance under **[insert name of program or rental assistance]**, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under **[insert name of program or rental assistance]**, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or

¹ The notice uses HP for housing provider but the housing provider should insert its name where HP is used. HUD’s program-specific regulations identify the individual or entity responsible for providing the notice of occupancy rights.

² Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

³ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under **[insert name of program or rental assistance]** solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

Removing the Abuser or Perpetrator from the Household

HP may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If HP chooses to remove the abuser or perpetrator, HP may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, HP must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, HP must follow Federal, State, and local eviction procedures. In order to divide a lease, HP may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, HP may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, HP may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where

you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

1. You are a victim of domestic violence, dating violence, sexual assault, or stalking.

If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.

2. You expressly request the emergency transfer. Your housing provider may choose to require that you submit a form, or may accept another written or oral request.

3. You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

HP will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

HP's emergency transfer plan provides further information on emergency transfers, and HP must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

HP can, but is not required to, ask you to provide documentation to “certify” that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request

from HP must be in writing, and HP must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. HP may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to HP as documentation. It is your choice which of the following to submit if HP asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by HP with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, “professional”) from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that HP has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, HP does not have to provide you with the protections contained in this notice.

If HP receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning

household members as the abuser or perpetrator), HP has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, HP does not have to provide you with the protections contained in this notice.

Confidentiality

HP must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

HP must not allow any individual administering assistance or other services on behalf of HP (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

HP must not enter your information into any shared database or disclose your information to any other entity or individual. HP, however, may disclose the information provided if:

- You give written permission to HP to release the information on a time limited basis.
- HP needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires HP or your landlord to release the information.

VAWA does not limit HP's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, HP cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if HP can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If HP can demonstrate the above, HP should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with **[insert contact information for any intermediary, if applicable]** or **[insert HUD field office]**.

For Additional Information

You may view a copy of HUD's final VAWA rule at: <https://www.gpo.gov/fdsys/pkg/FR-2016-11-16/pdf/2016-25888.pdf>.

Additionally, HP must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact **[insert name of program or rental assistance contact information able to answer questions on VAWA]**.

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact **[Insert contact information for relevant local organizations]**.

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime’s Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact **[Insert contact information for relevant organizations]**

Victims of stalking seeking help may contact **[Insert contact information for relevant organizations]**.

Attachment: Certification form HUD-5382 **[form approved for this program to be included]**

<p align="center">EXHIBIT 16-2: CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING AND ALTERNATE DOCUMENTATION, FORM HUD-5382</p>
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CERTIFICATION OF 2577-0286 DOMESTIC VIOLENCE, 06/30/2017 DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION	U.S. Department of Housing and Urban Development	OMB Approval No. Exp.
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Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or

(3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

1. Date the written request is received by victim:

2. Name of victim:

3. Your name (if different from victim's): _____

4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim:

6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____

8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date)

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

EXHIBIT 16-3: NMA EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

Attachment: Certification form HUD-5382

[Insert name of covered housing provider]

**Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
Public Housing Program**

Emergency Transfers

The PHA is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with

the Violence Against Women Act (VAWA),⁴ the PHA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.⁵ The ability of the PHA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the PHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

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

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer, if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

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

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

⁴Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

⁵Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify the PHA's management office and submit a written request for a transfer to **any PHA office**. The PHA will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the PHA's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Confidentiality

The PHA will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the PHA written permission to release the information on a time-limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person or persons that committed an act of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence against Women Act for All Tenants for more information about the PHA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

The PHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The PHA will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the

unit to which the tenant has been transferred. The PHA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If the PHA has no safe and available units for which a tenant who needs an emergency transfer is eligible, the PHA will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the PHA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Emergency Transfers: Public Housing (PH) Program

If you are a public housing resident and request an emergency transfer as described in this plan, the PHA will attempt to assist you in moving to a safe unit quickly. The PHA will make exceptions as required to policies restricting moves.

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

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

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

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

- HCV tenant-based program
- HCV project-based assistance
- Other programs administered by the PHA (such as state housing programs)

Emergency transfers will not take priority over waiting list admissions for these types of assistance. At your request, the PHA will refer you to organizations that may be able to further assist you.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for

assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse, and Incest National Network's National Sexual Assault Hotline at 1-800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Attachment: Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

<p align="center">EXHIBIT 16-4: EMERGENCY TRANSFER REQUEST FOR CERTAIN VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, FORM HUD-5383</p>

EMERGENCY TRANSFER
2577-0286

**U.S. Department of Housing
and Urban Development**

OMB Approval No.
Exp.

REQUEST FOR CERTAIN
06/30/2017

**VICTIMS OF DOMESTIC
VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING**

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.
- (2) You expressly request the emergency transfer.** Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral

request. Please see your housing provider's emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer; you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting an emergency transfer: _____
2. Your name (if different from victim's) _____
3. Name(s) of other family member(s) listed on the lease: _____
4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer:

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice:

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date)
