

WEST VALLEY HOUSING AUTHORITY - 2015 AGENCY PLAN

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: <u>West Valley Housing Authority</u> PHA Code: <u>OR008</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing <input type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>10/2015</u>					
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: <u>374</u> Number of HCV units: <u>703</u>					
3.0	Submission Type <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only					
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)					
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
					PH	HCV
	PHA 1:					
	PHA 2:					
	PHA 3:					
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.					
5.1	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: “West Valley Housing Authority’s mission is to serve Polk County citizens by providing quality housing for those in need and to encourage their progress toward self-sufficiency.”					
5.2	Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. See the Attachment pages for 5.2 Goals and Objectives. See the Attachment pages for 10.0 (a) for the report on the progress WVHA has made in meeting the goals and objectives described in the previous 5-Year Plan.					
6.0	PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: Please see Attachment 6.0 (a) for details. (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions. Please see Attachment 6.0 (b) for details.					
7.0	Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. Include statements related to these programs as applicable. Please see Attachment 7.0 for details.					
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.					
8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> , form HUD-50075.1, for each current and open CFP grant and CFP financing. Performance and Evaluation Reports for prior years open grants (CF2012, CF2013, & CF2014) are available for review at the Dallas main office. Those reports are no longer required to be part of the Annual Agency Plan.					
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i> , form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. Please see the Attachment 8.2 for form HUD-50075.1 for CF2015 and form HUD-50075.2 which was approved by HUD in April 2015.					
8.3	Capital Fund Financing Program (CFPP). <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements. N/A					
9.0	Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Please see Attachment 9.0 for Housing Needs.					

9.1	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Please see Attachment 9.1 for details.</p>
10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year Plan. See Attachment 10.0.</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA’s definition of “significant amendment” and “substantial deviation/modification” See Attachment 10.0.</p>
11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) See Attachment 11.0.</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) See Attachment 11.0.</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) See Attachment 11.0.</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) See Attachment 11.0.</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) N/A</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. See Attachment 11.0.</p> <p>(g) Challenged Elements See Attachment 11.0.</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) No longer required for submission with the Agency Plan. Performance and Evaluation Reports for CF2012, CF2013, & CF2014 are available for review at the Dallas Office of WVHA.</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only) See Attachment 8.2.</p>

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. 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 and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained by the public. 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.
3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.
5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, and; **5)** the number of units affected.
7. **Community Service and Self-Sufficiency.** A description of: **(1)** Any programs relating to services and amenities provided or offered to assisted families; **(2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; **(3)** How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**
8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.
13. **Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) **Hope VI or Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.
- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>

- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.

Attachment 5.2

5.2 Goals and Objectives (New Five Year Plan for 2015-2019)

Increase the availability of decent, safe, and affordable housing.

WVHA's Goal: Expand the supply of assisted housing in Polk County

Objectives:

- Apply for any Fair Share Vouchers that come available
- Maintain an occupancy level of 98% in the Public Housing Program
- Leverage private or other public funds to create additional housing opportunities particularly to replace the Public Housing units that were demolished or disposed of in the prior 5 year period
- Acquire 5 multi-family apartments as replacement units and apply to HUD to replace them under Public Housing
- If unable to locate 5 multi-family units that can be acquired, then, look to obtain HUD approval to build the 5 units of replacement housing under Public Housing

WVHA's Goal: Improve the quality of assisted housing

Objectives:

- Maintain our high standards for management of the Public Housing Program: Retain our "High Performer" status and our Asset Management Approval Designation
- Renovate or modernize public housing units: See Five Year Capital Fund Plan and evaluate possibility to leverage private funds to expedite renovation of public housing units
- Continue to dispose of the two remaining disposition properties that have not yet sold – 1275 E. Ellendale and 150 Hawthorne
- Renovate any of the acquired 5 multi-family units, if needed, to better meet the needs of the low-income public housing applicants
- Maintain our high standards for management of the Housing Choice Voucher Program: Retain our "High Performer" status

WVHA's Goal: Increase assisted housing choices

Objectives:

- Increase voucher payment standards to the 100% - 110% range and to encourage lease-ups without extra burden on families and to encourage families to lease up in lower poverty areas
- Provide voucher mobility counseling: Encourage mobility to lower poverty areas within our funding limitations
- Conduct outreach efforts to potential voucher landlords: Hold at least one landlord outreach event to address program changes, to market the program, etc.
- Continue periodic newsletters for the Section 8 landlords to provide program information and remind them of the different roles of WVHA, the landlord, and the tenant and post the newsletters to the website
- Evaluate the potential conversion of public housing to project-based rental assistance program, if HUD's RAD program is expanded to agencies without large capital improvement needs and provided it would provide equal or higher funding than currently receiving under Public Housing
- Work proactively with local governments, non-profit agencies, private industry and the local community development corporation (CDC) to help them understand the role of the Housing Authority and our programs, to encourage support for the Housing Authority's programs and services, and to implement and to continue to press for the development of affordable housing and homeownership opportunities for low-income residents

Improve community quality of life and economic vitality

WVHA's Goal: Provide an improved living environment

Objectives:

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments: Evaluate the distribution of incomes in public housing and implement measures if a family housing site becomes concentrated with lower income households. Currently no action needed as all AMP's average family income is within the 85% - 110% of the average income for all public housing residents.
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments: Evaluate the distribution of incomes in public housing and implement measures if a family housing site becomes concentrated with higher income households. Currently no action needed as all AMP's average family income is within the 85% - 110% of the average income for all public housing residents.
- Ensure the accessibility of public housing units and facilities in accordance with Section 504 requirements: Re-evaluate the needs of the residents for accessibility and include any identified needs in the Five Year Capital Fund Plan (More than 5% of the various housing sites have already been remodeled for accessibility and we will continue to evaluate if this is meeting the needs or should be increased.)

- Work proactively with the public transportation systems to maintain current public transportation options for our residents.

Promote self-sufficiency and asset development of families and individuals

WVHA's Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Increase the number and percentage of employed persons in assisted families: Continue to work with the Polk Job & Career Center to provide tools and training to eligible clients.
- Provide or attract supportive services to improve assistance recipients' employability: Encourage services that promote education and job training.
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Encourage participation in programs through Northwest Senior & Disability Services agency to help families increase their independence.
- Market and encourage families to participate in the Valley Individual Development Accounts available to help leverage more asset building for our eligible clients.

Ensure Equal Opportunity in Housing for all Americans

WVHA's Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, or gender identity: Review all marketing materials and wait list procedures to ensure no adverse impact on any particular protected groups and ensure staff is provided fair housing training.
- 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, disability, sexual orientation, or gender identity: Develop plans to address any problems/issues uncovered in the review of marketing materials and assist clients in addressing discrimination complaints by assisting them with completion of HUD's housing discrimination complaint form and through referrals to fair housing organizations.
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: Consider increasing the number of accessible units above the 5% regulatory requirement should residents and applicants demonstrate an increased need for more than 5% of our units.

Improve Communications between Management and Residents

WHVA's Goal: Improve communications between management and residents.

- Continue periodic newsletters to Public Housing residents to: keep them abreast of happenings in their apartment community; provide maintenance tips for care and upkeep of their dwelling; and, to provide articles of interest to encourage healthy living.
- Continue frequent notifications to Public Housing residents during construction projects of progress, preparations needed, and any special conditions.
- Continue WVHA Survey of Residents to assess resident satisfaction and to get resident input for improvements.
- Promote development of resident participation in tenant associations and provide option of staff presence at tenant meetings if desired and requested.
- Continue periodic newsletters for Section 8 participants to make them aware of opportunities for family self-sufficiency and other opportunities such as mobility options to move closer to economic opportunities or to areas with less poverty.

Attachment 6.0

6.0 PHA Plan Update

(a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.

PHA Plan Elements. (24 CFR 903.7)

1. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.

The revisions since the 2014 Agency Plan were: (1) on August 27, 2014, the Leasing and Continued Occupancy Policy Appendix C was revised to adopt new Flat Rents for effective 10-1-14; (2) on October 29, 2014, the Leasing and Occupancy Policy was revised at Appendix C to correct the Flat Rent for the regular units at Kingwood West retroactive to effective October 1, 2014; (3) on April 29, 2015, the Section 8 Administrative Plan, the Reasonable Accommodation Plan, and the Leasing and Continued Occupancy Policy were revised to remove the streamlining provisions that had been granted under PIH 2013-3 and to revise the one streamlining provision (self-declaration of assets of less than \$5,000) to reflect the individual local agency waiver as submitted to HUD for approval.

The Public Housing Leasing and Occupancy Policy exact language revision (2):

PUBLIC HOUSING LEASING AND OCCUPANCY POLICY					
APPENDIX "C" FLAT RENT SCHEDULE					
EFFECTIVE 10-1-14 (Correction)					
The Flat Rent Schedule reflects the net tenant rent (meaning after any utility allowance for tenant-supplied utilities).					
	BR SIZE	Gross Comparable	Utility Allowance	Flat Rent	Minimum 80% New FMRs Effective 10-1-14
Pioneer Village	1	\$640	\$0	\$640	\$455
Kingwood West	1	\$590	\$0	\$590	\$455
Kingwood West	1(remodel)	\$640	\$0	\$640	\$455
La Creole Manor	studio	\$509	\$0	\$509	\$430
La Creole Manor	1	\$582	\$0	\$582	\$455
Dallas Townhouses	2	\$723	\$0	\$723	\$614
Dallas Townhouses	3	\$851	\$0	\$906	\$906
Dallas Townhouses	4	\$956	\$0	\$1,088	\$1,088
Arbor Court	1	\$541	\$0	\$541	\$455
Arbor Court	2	\$771	\$0	\$771	\$614
Arbor Court	3	\$855	\$0	\$906	\$906
Arbor Court	4	\$996	\$0	\$1,088	\$1,088
956 Monmouth St.#1,3,4,6 & 7	3	\$911	\$130	\$781	\$776
956 Monmouth St.#2, 5 & 8	4	\$956	\$152	\$936	\$936
956 Monmouth St. #9 only	3	\$911	\$138	\$773	\$768
Single-Family Houses					
15028 Oakdale Road	2	\$839	\$126	\$713	\$488
2250 SE Laura Lane	2	\$869	\$129	\$740	\$485
710 N. Orchard	3	\$1,031	\$94	\$937	\$812
395 SE Fir Villa	3	\$1,155	\$120	\$1,035	\$786
405 SE Fir Villa	3	\$1,155	\$120	\$1,035	\$786
1825 E Ellendale	3	\$1,074	\$143	\$931	\$763
1275 E Ellendale	4	\$1,255	\$109	\$1,146	\$979
2122 SE Laura Lane	4	\$1,255	\$112	\$1,143	\$976

The Section 8 Administrative Plan revisions to remove the prior Streamlining provisions adopted under PIH 2013-3 and the revision for the one streamlining provision retained and requesting an individual agency waiver from HUD to keep (3):

Removed:

~~Use of Fixed Income Recertification Process [PIH 2013-03]~~

~~In cases when the PHA is recertifying an Elderly or Disabled participant family, and 100% of the family's income consists of "Fixed Income", a streamlined recertification process may be used. For this purpose, the term "fixed income" includes income from:~~

- ~~1. Social Security payments to include Supplemental Security Income (SSI) and Supplemental Security Disability Insurance (SSDI);~~
- ~~2. Federal, State, local, and private pension plans; and~~
- ~~3. Other periodic payments received from annuities, insurance policies, retirement funds, disability or death benefits, and other similar types of periodic receipts that are of substantially the same amounts from year to year.~~

~~In a streamlined reexamination, PHAs will recalculate family incomes by applying any published cost of living adjustments to the previously verified income amount. Verifications must still be obtained through the EIV System, but the use of an abbreviated Fixed Income Recertification Packet is authorized.~~

Revised:

E. INCOME FROM ASSETS [24 CFR 982.516, PIH 2012-29, PIH 2013-03 *Asset Declaration provision retained under HUD-approved agency waiver*]

If the Family's total assets are less than \$5,000, the PHA will accept the Family's self-certification of assets and any applicable asset income.

The Reasonable Accommodation Policy was revised to return the local agency approval limit for payment standards on the Section 8 Housing Choice Voucher Program from 120% of Fair Market Rent (FMR) to 110% of FMR due to the expiration of PIH 2013-3.

The Leasing and Continued Occupancy Policy revisions to remove the prior Streamlining provisions adopted under PIH 2013-3 and the revision for the one streamlining provision retained and requesting an individual agency waiver from HUD to keep (3):

SECTION VII. ESTABLISHING A WAITING LIST, RECEIPT OF APPLICATIONS, VERIFICATION PROCEDURES, APPLICANT DENIALS, AND INFORMAL REVIEWS

C. Verification Procedures

2. All income and asset verification will be postponed until a unit is available, offered, and accepted unless there is a question as to the applicant's eligibility regarding the appropriate income limit. When the income and any assets are verified, the following types of verification will be required:
 - a. All earned income shall be verified through employers, W-2 forms, check stubs, or other means to assure accuracy.
 - b. The Authority will require persons who are self-employed and/or have irregular incomes to submit statements, sworn before a Notary that set forth gross receipts, itemized expenses, and net income.
 - c. Unearned income shall be verified by viewing checks, certificates of award, or other means to assure accuracy.

- d. **Families with assets are required to report all assets annually.** All assets shall be verified by photocopies, written documents, or other means to assure accuracy **unless the family declares to have assets of less than \$5,000. In accordance with a HUD-approved waiver, the PHA will accept self-declaration in lieu of verification when the total assets are less than \$5,000. The amount of interest earned on those assets is included as income used to calculate the tenant's rent obligation. The PHA's application and reexamination documentation, which is signed by all adult family members, can serve as the self-declaration.**

SECTION VIII.COMPUTATION OF ANNUAL INCOME, ADJUSTED INCOME, TOTAL TENANT PAYMENT, AND TENANT RENT

HUD PIH Notice 2013-03 Provides A Temporary Alternative Method for Determining Annual Income (Expires March 31, 2014 Unless Extended)

Provision 1. Allow Households to Self-Certify As To Having Assets Of Less Than \$5,000

~~This provision is intended to simplify the requirements associated with determining a participant's annual income (24 CFR 5.609(b)(3), 982.516(a)(2)(ii), 960.259(c)).~~

~~Families with assets are required to report all assets annually. The amount of interest earned on those assets is included as income used to calculate the tenant's rent obligation. Currently, where the family has net family assets in excess of \$5,000, annual income includes the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate.~~

~~This Notice allows a PHA to accept a family's declaration of the amount of assets of less than \$5,000, and the amount of income expected to be received from those assets. The PHA's application and reexamination documentation, which is signed by all adult family members, can serve as the declaration. Where the family has net family assets equal to or less than \$5000, the PHAs does not need to request supporting documentation (e.g. bank statements) from the family to confirm the assets or the amount of income expected to be received from those assets. Where the family has net family assets in excess of \$5000, the PHA must obtain supporting documentation (e.g. bank statements) from the family to confirm the assets. Any assets will continue to be reported on HUD Form 50058.~~

The Temporary Housing Authority Process For Computing Income on Assets Less Than \$5,000

~~If the Family's total assets are less than \$5,000, the Housing Authority will accept the Family's self-certification of assets and any applicable asset income.~~

SECTION XII. RE-EXAMINATION OF FAMILY INCOME AND CIRCUMSTANCES

A. Regular Re-Examinations

HUD PIH Notice 2013-03 Provides A Temporary Alternate Method for Determining Annual Income For Annual Reexaminations (Expires March 31, 2014 Unless Extended)

Provison 2.. Allow optional streamlined annual reexaminations for elderly families and disabled families on fixed incomes

~~PHAs are statutorily required to verify income and calculate rent annually, including for elderly and disabled families on fixed incomes. The requirement to undertake the complete process for income verification and rent determination for families on fixed incomes is not necessary given the~~

~~infrequency of changes to their incomes. Further, this requirement requires considerable staff time and PHA resources. This provision is intended to simplify the requirements associated with determining the annual income of participants on fixed incomes (24 CFR 982.516, 960.257).~~

~~PHAs may opt to conduct a streamlined reexamination of income for elderly families and disabled families when 100 percent of the family's income consists of fixed income. In a streamlined reexamination, PHAs will recalculate family incomes by applying any published cost of living adjustments to the previously verified income amount.~~

The Temporary Housing Authority Process For Use Of The Temporary Fixed Income Recertification Provison

~~In cases when the PHA is recertifying an Elderly or Disabled tenant family, and 100% of the family's income consists of "Fixed Income", a streamlined recertification process may be used. For this purpose, the term "fixed income" includes income from:~~

- ~~1. Social Security payments to include Supplemental Security Income (SSI) and Supplemental Security Disability Insurance (SSDI);~~
- ~~2. Federal, State, local, and private pension plans; and~~
- ~~3. Other periodic payments received from annuities, insurance policies, retirement funds, disability or death benefits, and other similar types of periodic receipts that are of substantially the same amounts from year to year.~~

~~This provision allows the tenant to self certify their actual past income. In this temporary streamlined reexamination provision, the Housing Authority will recalculate tenant family incomes by applying any published cost of living adjustments to the previously verified past income amount. Verifications must still be obtained through the EIV System, but the use of an abbreviated Fixed Income Recertification Packet is authorized.~~

- 2. Financial Resources.** Congress passed a 2015 Appropriations budget in December 2014 that is providing: the Public Housing Operating Subsidy funding proration for 2015 at approximately 83% (down from the 2014 proration of 87%); the 2015 Capital Fund Grant funding is \$456,687 (which is slightly lower than the 2014 funding of \$462,758); the Section 8 Housing Choice Voucher Program's 2015 estimated Housing Assistance Payments funding proration is estimated to be at 100% (which is slightly up from the 2014 proration of 99%); and, the Section 8 Administrative Fee funding for 2015 is estimated to be at a 75% proration (which is the same as the 2014 proration of 75%, until HUD identified some recaptured monies and was able to increase the proration to 79%). It is doubtful that HUD is going to identify any additional money to increase the Section 8 Administrative Fee above the 75% proration provided by Congress. We eliminated one full-time Occupancy Assistant position in March 2013 due to the very low Section 8 Administrative Fee funding level of 69% as a result of the sequestration for 2013 and we have not yet been able to restore that position. It was very difficult to get Vouchers issued out in sufficient quantity to get back leased up with the loss of this position. However, once Congress included the provision to only require HQS inspections on a biennial basis, we were able to redirect the Caseworker/Inspectors to issuing Vouchers and we were finally able to get leased back up in the last quarter of 2014. In March 2015, we brought a temporary ½ time Occupancy Assistant position back to assist at our front desk. We waited to determine whether being leased up would provide enough revenue to support adding back the ½ time position on a regular basis. We will be preparing a FY2015 budget revision for Board consideration that would at least restore a ½ time position of an Occupancy Assistant. The addition of that ½ time position will permit the full-time Occupancy Assistant to do the interviewing

and eligibility work to issue sufficient Vouchers to keep up with the turnover. This way we hope to stay leased up.

- 3. Rent Determination.** WVHA's minimum rent has been \$50 for both the Section 8 Housing Choice Voucher Program and the Public Housing Program since October 1, 2011. WVHA's income-based rents are established in accordance with HUD requirements. As of October 1, 2014, WVHA had to increase the Public Housing Flat Rents for a few of the larger-sized multi-family units to comply with a new requirement to have all Flat Rents be at least equal to 80% of the Fair Market Rent (FMR) as published by HUD. Currently, we have no large families paying Flat Rent so it is not affecting any residents. We discovered a correction was needed to the Flat Rent for the regular one-bedroom units at Kingwood West so we did a correction to the Flat Rent schedule for 10-1-14. That corrected schedule is shown above.
- 4. Operation and Management.** Back in 2010 WVHA made changes in operation and management of our Public Housing program to implement a "non-smoking" policy for all of our properties. This information was included in the 2009, 2010, 2011, 2012, 2013, and 2014 Agency Plans. We have certain designated smoking areas with weather shelters at each of our multi-family housing sites. The change has helped WVHA provide all residents and employees with "smoke free" living/working environments and it will help reduce our turnover costs (renovating units after a smoker has vacated generally added \$400-\$1,000 additional expense to eliminate the residual effects of the smoke residue). Effective January 1, 2013, WVHA increased the Public Housing security deposits as follows: (1) studio and one bedroom units have a \$100 security deposit; (2) two bedroom units have a \$150 security deposit; (3) three bedroom units have a \$200 security deposit; and, (4) four bedroom units have a \$250 security deposit. Additionally in 2013, WVHA made the operational change to require residents who transfer to another dwelling to pay a new security deposit at the time of their move. Too frequently, the prior security deposit paid on the prior unit was used up in covering the vacate charges from the move. This will avoid WVHA having a period of time where there is no security deposit on the new unit and the residents will not then be surprised with having to come up with a new deposit after they had already moved. No further changes anticipated at this time.
- 5. Grievance Procedure.** No changes. (Grievance Procedure is available on our website at www.wvpha.org)
- 6. Designated Housing for Elderly and Disabled Families.** No changes. (WVHA has no properties that have been designated as just "elderly" or just "disabled.")
- 7. Community Service and Self-Sufficiency.** No changes to community service. WVHA has an ongoing Section 8 HCV Family Self-Sufficiency Program of 40 families. WVHA has not been receiving Public Housing FSS Coordinator Funding since 2012 when HUD changed the requirements to be funded for even a part-time position the PHA had to have at least 15 families participating. WVHA's Public Housing Program is almost entirely elderly and disabled and cannot support even a 15 family FSS program. In 2015, HUD changed the FSS Coordinator Grant to a ROSS combined Section 8 HCV and Public Housing FSS Coordinator. Therefore, if we have persons residing in our Public Housing that wish to participate in FSS, the current FSS Coordinator would be able to sign them up and work with them on FSS. We may look to increase the number of FSS families in 2016.
- 8. Safety and Crime Prevention.** No changes have been made in our operations related to safety and crime prevention within the past year.
- 9. Pets.** No changes anticipated. (Current Pet Policy is available on our website at www.wvpha.org)

10. Civil Rights Certification. A detailed summary of actions WVHA took in 2014 to address identified impediments to fair housing as identified from the Oregon State Consolidated Plan for 2011 – 2015 under the 2011 – 2015 Analysis of Impediments to Fair Housing:

- A. Lack of strategic communication regarding fair housing, further hampered by language and cultural differences. WVHA reviewed the census data for Polk County and determined that the one minority population of significant presence is Spanish speaking. WVHA continued to have bilingual staff (2 full-time) that uses their Spanish speaking ability to assist the Spanish speaking applicants/clients for the entire year of 2014. WVHA also reviewed its marketing materials, applications, and forms and continued to provide them in Spanish as well as English and all materials have the Equal Housing Opportunity logo in appropriate size on them. WVHA also has a current Limited English Proficiency (LEP) Plan that addresses how WVHA assists applicants/participants of different language and cultures. WVHA also has both an English language version of our website and a means for Spanish-speaking clients to click on a button and convert all written information into Spanish. WVHA included information about Fair Housing with applications and with the Section 8 Voucher briefing packets throughout 2014. At the Section 8 Voucher briefings, WVHA informed all clients about Fair Housing and went over the Housing Discrimination Complaint form and stressed that WVHA can assist with the completion of the Housing Discrimination Complaint form when requested. There were no requests for assistance with completing the Housing Discrimination Complaint forms during 2014.
- B. Local zoning constraints and NIMBYism restrict inclusive housing production policies; existence of such policies or administrative actions that may not be in the spirit of affirmatively furthering fair housing. WVHA has little ability to impact local zoning constraints and NIMBYism. However, WVHA does have the ability to make its owned properties have a positive appearance and impact in the neighborhoods where they are located in order to minimize NIMBYism. WVHA put much emphasis on maintaining the overall curb appeal of our properties throughout 2014. In addition, in 2013, we installed new signs for the last of our Public Housing sites that all include the equal housing logo and verbiage. It has really paid off in the fact that we received local government officials comments verbally about how nice our properties look and that they appreciate that we have been doing a good job at maintaining our housing properties. We have hopes that this will provide a positive influence when we will be seeking approval to add five replacement Public Housing units in either the City of Dallas or the City of Independence. We will need an addition of five units to the Cooperation Agreements with each of those cities before we can look to acquire replacement properties or build replacement properties. The Section 8 staff strongly enforced established inspection standards in order to keep all assisted housing up to HUD's Housing Quality Standards and maintained program integrity through continued communication with landlords in 2014. This effort also helped to minimize NIMBYism in Polk County.
- C. Lack of understanding of fair housing laws and fair housing complaint system. The Housing Authority Risk Retention Pool (HARRP) provides an on-line training program for Fair Housing. WVHA staff members were required to go through the on-line training program and take the Fair Housing test that is part of the training module in December 2014/January 2015. All staff completed and passed the test. All new staff persons are required to do the same training module and take the test. WVHA staff continued to inform all Section 8 Voucher recipients at the Voucher briefings about fair housing laws and provided them with a fair housing discrimination form. WVHA staff also explained the process for filing a fair housing discrimination complaint. WVHA also includes a fair housing information poster in each of our office lobbies on an on-going basis. Housing discrimination complaint forms are readily available in our office lobbies, as well.

- D. Lack of an effective referral system. WVHA staff were reminded of fair housing issues and provided information about how to assist any client with help to complete and submit a fair housing discrimination complaint if they request assistance. WVHA also has a staff member who participates in the Polk County Service Integration Network and interacts with all of the service agencies in Polk County. This person has also shared information about fair housing and the process for filing a housing discrimination complaint and stressed that WVHA staff can assist with this process.
- E. Lack of sufficient enforcement capacity. WVHA did advise Section 8 landlords that fair housing is the law and that they must abide by those laws whenever speaking directly with any landlords about any related issues. Whenever Section 8 landlords contact us regarding any type of problems or issues that might be a fair housing related issue, we advise them about the fair housing protections for protected classes. Questions that come up most frequently are related to requests for reasonable accommodation that the Section 8 landlord has received and we make sure they are aware of the fair housing laws related to protection of disabled persons.
- F. Refusal to allow reasonable accommodations. During 2014, WVHA staff continued to advise the Section 8 landlords about the fair housing laws related to protection of disabled persons and particularly about the disabled person's rights to a reasonable accommodation. This is the most frequent fair housing issue that we receive questions from the landlords. WVHA also includes information about requests for reasonable accommodation in all housing program applications and helps applicants/clients with completion of the request as needed. WVHA regularly receives requests for reasonable accommodation from housing program applicants and participants and we maintain a log of all requests and the outcome from the requests. In 2014, we received a total of 54 reasonable accommodation requests; 23 from our Public Housing residents; and, 31 from Section 8 (mostly applicants). While generally we receive the most requests from the Public Housing residents with most requesting approval of companion animals, in 2013 we reduced our Section 8 Subsidy Standards due to our reduced funding from sequestration and this generated an unusually high number of reasonable accommodation requests for larger Subsidy Standards for their disability issues. Once we had information that our 2014 funding level was better, we returned to the prior Subsidy Standards and therefore, we expect fewer requests for reasonable accommodation in Section 8 in 2015.
- G. Discrimination against Section 8 voucher holders. WVHA has not received a lot of feedback from the Section 8 voucher holders in Polk County to say that discrimination against Section 8 voucher holders as a whole is a wide-spread issue in Polk County. Generally, we do not see this as a big issue in Polk County as we have many landlords of all types of dwellings that regularly want to list vacancies on our "Rental Listing Board". The turning away of voucher holders based upon not participating in Section 8 was enough of an issue in the metro-Portland area that in 2013, the state legislature passed a new law preventing discrimination of Voucher holders simply because of the housing subsidy. That law went into effect in July 2014. We continue to do outreach to encourage new landlords to consider a Section 8 voucher holder just as they would consider any other applicant and do their same type of screenings. Since July 2014, we had received many requests for information from new prospective landlords and we have had Section 8 voucher holders lease up with new landlords in Polk County. We have staff readily available to answer any new landlord questions about how the Section 8 program works and we encourage them to give it a try which seems to be successful in Polk County.
- H. Discriminatory terms and conditions exist in the marketplace. WVHA has reviewed its own terms and conditions for the Public Housing program and ensured that it does not have discriminatory terms and conditions. WVHA reviews all proposed lease terms and conditions that landlords submit for approval on the Section 8 Voucher program and does not allow any discriminatory terms and

conditions on the program. Occasionally, WVHA has had to require that a landlord remove provisions that are either discriminatory or illegal and they have been willing to do so.

- I. Discriminatory refusal to rent. In 2014, WVHA's Public Housing and Section 8 Voucher programs ensured that applicants were not refused based upon a discriminatory reason. WVHA staff members followed the program policies regarding whether or not to admit applicants to the program and WVHA's policies do not contain discriminatory practices.

A detailed summary of the activities WVHA plans to take in 2015 to implement initiatives to affirmatively further fair housing in addition to the on-going activities that were identified above:

WVHA will be hosting a rental landlord meeting in Polk County to discuss the new Oregon law that added a provision to include the Section 8 and other types of housing assistance to the protected class of income source. This new law went into effect July 1, 2014 and we will try to coordinate to provide Fair Housing training at that same landlord meeting. We will advertise the meeting and encourage all landlords to participate and not just those landlords already participating in the Section 8 Program. This landlord meeting was postponed until materials were provided that were approved by both the Legal Aid advocates and the landlord associations and we anticipate hosting the meeting in July or August of 2015.

11. Fiscal Year Audit. No findings in the fiscal year audit for fiscal year ending 09/30/14. The final printed bound copy from the Auditor is available for review at the Dallas Main Administration Office.

12. Asset Management. WVHA has met the requirements for Asset Management and we were approved for the fourth year "Stop Loss", which was effective for October 1, 2009. A copy of the "Stop Loss" application and the HUD approval of our "Stop Loss" application are available at the WVHA Main Office in Dallas.

13. Violence Against Women Act (VAWA). No Changes except due to VAWA 2013, which has not yet been fully implemented awaiting for HUD to issue final implementation regulations. However, WVHA did implement the notification procedure for any applicant who is denied or any Section 8 participant who is being terminated or any Public Housing tenant who is being evicted. We are using a notification sample that was prepared by the National Housing Law Project while we await notifications to be provided from HUD. This notice is to explain the victim's rights under VAWA.

A description of:

a) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking – SABLE (Safe from Abuse and Battered Living Environments) HOUSE is a local non-profit, community-supported agency whose mission is to eliminate domestic and sexual violence by providing comprehensive services to victims and their children in Polk County, Oregon. Sable House services include safe shelter, 24-hour crisis hotline, in-person sexual assault response, support groups, information and referral, community resource advocacy and community outreach and education. Sable House provides services to victims and their children in an effort to increase their safety and to empower them with information, support, and education. Sable House' goal is to offer these services so that victims are fully aware of their options and can make informed choices about their lives. Sable House services empower victims to help themselves. Sable House also provides outreach and educational services to the Polk County Community about domestic violence and sexual assault and the services that are available to address these serious issues.

b) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing – West

Valley Housing Authority has adopted a local preference for the Section 8 Housing Choice Voucher Program for victims of domestic violence who meet certain criteria, provided the identified abuser is not a member of the applicant family. (See the Section 8 Administrative Plan, Chapter 4, Section C. 2.) This local preference and the criteria for qualifying for the preference were the result of collaboration with SABLE House to assist victims of domestic violence to obtain and maintain housing of their own separate from the abuser.

c) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families - At the family's request, West Valley Housing Authority will take precautions to ensure that the new location of the family is concealed in cases of domestic abuse. In addition, West Valley Housing Authority designated in the Section 8 Administrative Plan under Chapter 4, Section G, Voucher Issuance Determination for Split Households, that: (a) if only one portion of the family has minor children, then that portion of the family will continue to keep the Voucher for assistance; (b) if both portions of the family have minor children, WVHA will take into consideration whether domestic violence was involved in the breakup and whether there is a recommendation from other social service professions. This can enable victims of domestic violence to maintain housing assistance even if the abuser is still residing in the previously assisted dwelling unit. In early 2007, West Valley Housing Authority provided notification to all our Public Housing residents, all our Section 8 participants, and to all our applicants of the VAWA and their rights under that Act. We also are providing that same notification to all new applicants to make sure that they are aware of the protections provided. WVHA staff are continually provided information about the services offered by SABLE House and staff regularly make referrals when clients might be in need of those services. WVHA maintains a supply of information brochures from SABLE House available in our office lobby for all clients, landlords, and interested persons. In addition, WVHA adopted a Public Housing rental agreement that permits the bifurcation of the lease, should that be an issue which would permit the victim of domestic violence to remain in a Public Housing dwelling unit following a household split.

6.0 PHA Plan Update

(b) Identify where the 5-Year and Annual Plan may be obtained by the public. 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan. WVHA's 5-Year and Annual Agency Plan may be obtained by the public at the main office (204 SW Walnut Avenue, Dallas, OR 97338), at the Pioneer Village Office (375 Taybin Road NW, Salem, OR 97304), at the Kingwood West Office (1947 Salem-Dallas Hwy NW, Salem, OR 97304), and on the WVHA website (www.wvpha.org). The Resident Advisory Board is also provided copies of the 5-Year and Annual Agency Plan in its draft form and once HUD approval is made, a final approved copy.

Attachment 7.0

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

a. Hope VI or Mixed Finance Modernization or Development. WVHA has no plans to apply for Hope VI or to do Mixed Finance Modernization or Development within the next year.

b. Demolition and/or Disposition. WVHA got approval for a De Minimis Demolition of one single-family house located at 150 Hawthorne, Dallas, Oregon (3BR unit, not accessible) in April 2011 and has since demolished the house in late 2011. WVHA has also obtained HUD approval for a Section 18 disposition for the disposal of the land for the same property and disposition of four other single-family houses. All of the properties were part of the Dallas/Independence AMP#OR008890001 (old project #8-007). Several of the properties had large parcels of land but were zoned for single-family residential/agriculture. WVHA determined that those particular properties were not the best housing type for our low-income clientele and

WVHA needed to streamline its management and maintenance needs. WVHA was repositioning the housing resources by disposing of these single-family houses, particularly those with large parcels of land and heavier maintenance needs, and then replacing those five units in a multi-family housing situation. WVHA is planning to use the proceeds from the sale of those properties to either acquire or build the replacement units. WVHA received Housing Choice Vouchers for the residents needing relocation and they were relocated with their Housing Choice Voucher, except one family accepted a transfer within the Public Housing Program. The properties were put up for sale via public bid with the minimum bid price equal to the assessed valuation obtained in early 2012 but WVHA did not receive any responsive bids. WVHA then obtained the services of a local realtor to assist with the marketing and sale of the properties. We have since sold three of the properties and have additional offers on the remaining two properties that have been accepted. Both of those properties should be closing escrow in late July. WVHA has no other plans to demolish or dispose of any other properties.

c. Conversion of Public Housing. WVHA has no properties required for conversion at this time. WVHA will not consider applying for conversion of its Public Housing in 2015 but will continue to review the feasibility of converting one property or the entire Public Housing portfolio under HUD's new Rental Assistance Demonstration in the future.

d. Homeownership. WVHA does not intend to apply for HUD approval to begin a Voucher Homeownership program due to the reduction in Section 8 Administrative Fees making less money available to support the extra staff activity that would be required. Additionally, the high demand for the Housing Choice Vouchers for rental assistance and the insecurity in funding from HUD makes it inconceivable to begin a Voucher Homeownership program at this time. WVHA may re-evaluate the feasibility of a Voucher Homeownership program in future years.

e. Project-based Vouchers. WVHA is not planning to do any project-based vouchers at this time. WVHA may evaluate the feasibility to do project-based vouchers in conjunction with some transitional special needs housing projects in the community in the future. Section 8 Administrative Plan revisions will have to be completed prior to even putting out an RFP for project-basing vouchers and at this time WVHA does not intend to pursue doing any project-based vouchers. Should WVHA decide to pursue this further, it will be limited to the transitional special needs housing projects that have generally been approved for local preferences in the past.

Attachment 8.2
for the Capital Fund 2015 Annual Statement and the Capital Fund Program Five-Year
Action Plan

See the attachment as a separate file at the end of this document.

Attachment 9.0

9.0 Statement of Housing Needs

A. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the PHA's Waiting Lists As of 5/3/2015			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	80	90%	72
Extremely low income <=30% AMI	56	70.0%	
Very low income (>30% but <=50% AMI)	20	25.0%	
Low income (>50% but <80% AMI)	4	5.0%	
Families with children	16	20.0%	
Elderly families	32	40.0%	
Families with Disabilities	34	42.5%	
Race/Ethnicity - White/Non-Hispanic	78	97.5%	
Race/Ethnicity - White/Hispanic	10	12.5%	
Race/Ethnicity - Black/Non-Hispanic	1	1.3%	
Race/Ethnicity - Asian/Other	1	1.3%	
Characteristics by Bedroom Size (Public Housing Only)			
1 BR	63		
2 BR	12		
3 BR	2		
4 BR	3		
5 BR	0		
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the PHA's Waiting Lists As of 5/3/2015			
Waiting list type: (select one)			
<input checked="" type="checkbox"/>	Section 8 tenant-based assistance		
<input type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/sub-jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	450	40%	180
Extremely low income <=30% AMI	360	80.0%	
Very low income (>30% but <=50% AMI)	90	20.0%	
Low income (>50% but <80% AMI)	0	0.0%	
Families with children	247	55.5%	
Elderly families	45	10.0%	
Families with Disabilities	146	32.5%	
Race/Ethnicity - White/Non-Hispanic	418	92.9%	
Race/Ethnicity - White/Hispanic	40	8.9%	
Race/Ethnicity - Black/Non-Hispanic	10	2.2%	
Race/Ethnicity - Asian/Other	22	4.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

The housing assistance needs in Polk County has steadily continued in 2014. Back in 2013, we were unable to pull additional families off the Section 8 waiting list due to funding reductions from sequestration. We were over-leased slightly when the sequestration significantly reduced our Section 8 funding so we stopped issuing any new Vouchers until around November 2013. Then, in 2014, our funding for Section 8 increased back up and we found ourselves struggling to get back leased up. This was quite difficult since the Section 8 Administrative Fees had a low proration of 75% for 2014 and we had previously reduced staff in 2013. In 2014, we pulled families off the waiting list at a very rapid pace and it took us until the last quarter of 2014 to get fully leased up on Section 8. Since then, we are working very hard to maintain our lease-up rates to house as many families as we can.

The Public Housing waiting list grew to more than 100 households during 2014 and that is the most applicants that have been waiting for Public Housing admission in the last 25 years. The delay in issuing Vouchers in 2013, encouraged more households to apply for our Public Housing Program. In addition, our Public Housing developments are in very good condition and that has also encouraged more applicants to apply for Public Housing. We continue to have similar turnover rates as our prior three year average of 17.5% is slightly higher than our current fiscal year to date average of 16.5%.

Attachment 9.1

9.1 Strategy for Addressing Housing Needs.

Strategy 1: Maximize the number of affordable units available to the PHA within its current resources by:

- Keep turnover time as low as possible for vacated public housing units
- Renovate public housing units at turnover as quickly as possible
- Replace the 5 public housing units that were demolished (1 unit) or disposed (4 units) of within the past five years through either acquisition or new construction of multi-family units in either the City of Dallas or the City of Independence, whichever location becomes most feasible
- Maintain or increase Section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction and in keeping up with the regular program turnover
- 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
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

Strategy 2: Increase the number of affordable housing units by:

- Apply for additional regular Section 8 Vouchers should they become available
- The Housing Authority will work proactively with local governments, non-profit agencies, private industry and the local community development corporation (CDC) to help them understand the role of the Housing Authority and our programs, to encourage support for the Housing Authority's programs and services, and to implement and continue to press for the development of affordable housing and homeownership opportunities for low-income residents.

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

Strategy 1: Target available assistance to families at or below 30% of AMI

- Meet or exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing and in tenant-based Section 8 assistance
- Maintain rent policies to support and encourage work: Minimum Rent of \$50.00; required reporting of income changes when on zero income; and, no interim changes for increased income between annual recertifications.

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

Strategy 1: Target available assistance to families at or below 50% of AMI

- Maintain Section 8 Admission income limit at 50% of AMI
- Maintain rent policies to support and encourage work: Minimum Rent of \$50.00; required reporting of income changes when on zero income; and, no interim changes for increased income between annual recertifications.

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

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Maintain having bilingual staff (minimum of two) available to assist the Spanish-speaking families

Strategy 2: Conduct activities to affirmatively further fair housing

- 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 of areas of poverty /minority concentrations
- Advise Section 8 tenants of the Mobility Agreement between WVHA, the City of Salem Housing Authority, and Marion County Housing Authority, easing the path for families desiring to move

Reasons for Selecting Strategies

- Funding constraints and Staffing constraints
- 5%+ of current Public Housing units have already been modified for accessibility needs
- Extent to which particular housing needs are met by other organizations in the community
- Community priorities regarding housing assistance

Attachment 10.0

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

(a) Progress in Meeting Mission and Goals. West Valley Housing Authority (WVHA) Progress in Meeting the Mission and Goals

- PHA Goal: Expand the supply of assisted housing
 - No Fair Share Vouchers were available for WVHA to apply for in the last year.
 - WVHA worked to keep public housing vacancy times very low in spite of the turnovers. The last quarterly report for year-to-date occupancy rates were: Pioneer Village AMP (99.12%); Kingwood West AMP (99.21%); and, the Dallas/Independence AMP (95.83%). The Dallas/Independence AMP's occupancy rate is down because of the four units kept vacant for disposition and the vacancy time was included until the houses were sold. We have sold three of the four houses as of May 2015.
 - West Valley Housing Authority has continued to partner with Polk CDC to foster development of additional affordable housing and has provided Section 8 local preferences for transitional housing developments that have extensive service components. Without the Section 8 local preference the developments would not have been financially feasible and they are housing high needs populations.
 - Acquiring or building five Public Housing replacement units has been delayed since we did not receive HUD approval for the disposition of the five properties until April 2013. We then had to apply to receive Vouchers to assist the families with relocation. It has taken longer to dispose of the four houses and the vacant land than originally anticipated. However, WVHA has sold three of the properties and currently has sales transactions underway for the other two properties.

- PHA Goal: Improve the quality of assisted housing
 - WVHA has made good progress with renovating public housing units with the Capital Fund Program. We had a full Physical Needs Assessment (PNA) completed in 2009. This has given us very comprehensive data for our projections for the next 20 year needs for our Public Housing units and is continuing to be used to develop our Five Year Capital Fund Plan.
 - WVHA is currently having a Green Physical Needs Assessment (GPNA) completed to update our needs projections. We have received the draft report, reviewed it and are awaiting the final report from the vendor. WVHA will then be considering the GPNA when doing capital improvement planning for 2016 and forward.
 - WVHA, with HUD approval, demolished one single-family house that was beyond repair in 2012. WVHA submitted a Section 18 Disposition Application to dispose of four of the agency's single-family houses and the land from the demolition. The Disposition application was approved in April 2013. Property appraisals were completed in early April 2012 and that is the benchmark that HUD used for the anticipated proceeds from sale of these properties. The prior residents have been relocated and we have sold three of the houses and are working to sell the last house and the vacant land. No replacement public housing can be acquired or built until after the disposition has been fully completed. WVHA does plan to use the proceeds from the sales to acquire or construct replacement Public Housing units. In addition, WVHA may need to use some of the Dallas/Independence AMP Operating Reserves to supplement the sale proceeds for the full replacement in multi-family units.

- PHA Goal: Increase assisted housing choices
 - WVHA has increased our Voucher payment standards to around 96% to 108% of the Fair Market Rents to enable them to have choices to rent in some of the lower poverty areas in Polk County. We have been watching to make sure the majority of the families have not been over-burdened. It is a fine line with balancing the payment standards and the funding to be sure to continue to assist our full baseline number of families. We will continue to watch this and raise the payment standards if it is over-burdening a significant number of the assisted households.
 - WVHA has an ongoing "Mobility" Agreement for the Voucher Program with Salem Housing Authority and Marion County Housing Authority. This enables WVHA Voucher participants to locate units in the City of Salem or in Marion County and remain WVHA clients. We contract through the "Mobility" Agreement for each agency to do the HQS inspections and the rent reasonableness determinations within their area but the client remains with the initial PHA and the initial PHA issues the HAP payment. This will provide greater housing choices for all of our clients.
 - Due to the extremely low Administrative Fees for the Voucher Program, WVHA has had to limit the Landlord outreach newsletters due to the printing and postage costs. However, we are now posting the Landlord outreach newsletters on our website and are sending an e-mail notice to advise them of the newsletters. In July 2014, Oregon's law that prohibits discrimination based upon income source, added

the Section 8 rental assistance program under that provision. Since, then, we have had a significant number of new landlords contact us about the program and we have actually entered into contracts with many of these new landlords. Previously, those landlords just assumed that the program would be too burdensome on their part but they are now learning that it is not that much different than renting their units on the open market. We have encouraged the new landlords to give the program a try and that has been successful in Polk County.

- WVHA will evaluate the feasibility of potential conversion of public housing to a project-based rental assistance program through the Rental Assistance Demonstration (RAD) Program if Congress increases the number of units that it permits to convert. However, it will be best to complete the disposition process and replace the five Public Housing units before moving to convert to RAD. It would be most feasible if WVHA were to convert the entire Public Housing portfolio at once.
 - WVHA continues the collaborative effort with Polk CDC for a Housing Resource Center for Polk County to promote and foster homeownership for lower income families. WVHA's Voucher Homeownership Program has been put on hold due to the reduction in the Section 8 Administrative Fees. In addition, the increased need for rental assistance in Polk County required us to prioritize the rental need above the more expensive homeownership option since homeownership must be taken from the existing Vouchers and Voucher funds. WVHA did decide to provide homeownership counseling training in 2013 for our Family Self-Sufficiency (FSS) Caseworker so that WVHA can offer homeownership Individual Development Accounts (IDA) for our FSS participants who desire to move to homeownership. This helps us foster more homeownership opportunities for our families.
- PHA Goal: Provide an improved living environment
 - WVHA made changes in operation and management of our Public Housing program to implement a "non-smoking" policy for all of our properties in 2010 and this has improved the living environment for the majority of the residents. We continue to enforce those guidelines and it has improved the air quality within all of our buildings.
 - WVHA evaluated the distribution of incomes in our Public Housing developments and determined that specific deconcentration efforts are not needed as all developments have average incomes between 85% and 115% of the overall average tenant income.
 - WVHA has ensured the accessibility of our public housing units in accordance with Section 504 requirements and passed a Section 504 HUD review in 2008 with only one finding. The one finding was resolved with the adoption of a 504 Grievance Procedure. There were no findings for the physical accessibility issues and WVHA has met the requirement for 5% of our public housing units to have been remodeled to meet the Uniform Federal Accessibility Standards.
 - WVHA continues to work with the CARTS transportation program through participation in the Polk County Transportation Advisory Committee and readily makes the CARTS bus schedules available for our clients.
 - WVHA has added a distribution of fresh produce for our Dallas residents through the Neighborhood Fresh Connect Program that distributes fresh produce from the Marion/Polk Food Bank. WVHA staff go to a neighborhood church to pick up the produce and bring it to our social hall for our residents; primarily the elderly and disabled residents of the La Creole Manor Hi-Rise but the family residents can come to get the produce as well. The fresh produce is helping them to stretch their food budgets and encouraging healthier eating.
 - PHA Goal: Promote self-sufficiency and asset development of assisted households
 - WVHA has entered into an agreement with the Polk Job & Career Center to assist our clients with training by guaranteeing slots available for WVHA referred clients.
 - WVHA continues to provide coordination and referral for supportive services for our elderly and families with disabilities to help increase independence. WVHA encourages participation in programs through Northwest Senior & Disability Services agency and WVHA has participated in several advocacy functions to keep funding for these services available in Oregon.
 - WVHA increased the voluntary Family Self-Sufficiency goals for the Section 8 Housing Choice Voucher Program in 2014 and has met the increased goals. WVHA continues to assist families in becoming self-sufficient by encouraging the use of the "Individual Development Accounts" (IDA) for matched savings to assist with education expenses, small business assistance, or home purchase down payment costs. WVHA continues the collaborative effort with Polk CDC for a Housing Resource Center for Polk County to promote and foster homeownership for lower income families. WVHA has had several families graduate from the HCV-FSS program during 2014. A couple of those families moved to homeownership and a couple are still saving under the IDA program to have sufficient resources to move to homeownership.

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing
 - WVHA continues to undertake affirmative measures to provide assisted housing free from discrimination. WVHA has reviewed all marketing materials and wait list procedures assuring no adverse impact on any particular protected group.
 - WVHA continues to advise voucher recipients that we will assist them with completion of HUD's housing discrimination complaint form and refer them to fair housing organizations should they encounter discrimination during their housing search.
 - WVHA is planning to combine Fair Housing training for landlords in 2015 along with educating the landlords about the new non-discrimination law related to the Section 8 Voucher program. That new law went into effect in July 2014. WVHA will advertise the training to not only current Section 8 landlords but to all landlords in Polk County to encourage more participation from all landlords.
 - WVHA has taken affirmative measures to provide accessible housing by doing remodels of at least 5% of our Public Housing developments to meet the Uniform Accessibility Federal Standards. Due to the significant reductions in the Capital Fund program over the past couple of years, we have not been able to consider increasing the number of accessible units above the 5% required by Section 504 rules in all sites. Some housing sites already have more than the required 5% accessible units and those units continue to meet the needs of our current residents and new applicants.
 - WVHA had a HUD Civil Rights Review during 2008 and had no findings! This is a demonstration of the efforts that are made by WVHA on an on-going basis.

- PHA Goal: Improve communications between management and residents
 - Periodic newsletters for Public Housing have continued to provide information to residents on a regular basis. Most of the Public Housing newsletters can be delivered to residents by volunteers to avoid the postage costs.
 - A Public Housing Survey was completed in 2009 to assess the desires of the residents in making our properties "non-smoking" and a larger majority of residents were eager to see this change move forward. WVHA moved that plan forward and made all Public Housing units and buildings non-smoking. WVHA created "weather shelters" to be the designated smoking areas on each multi-family housing site. This move to make our units all "non-smoking" is improving the overall livability of the dwellings.
 - WVHA has continued to encourage resident participation in tenant associations and has offered a staff presence at tenant meetings. Currently, only one development, Pioneer Village, has an active tenant association. However, more interest is being shown at the Kingwood West development and they may reactivate an active tenant association in the near future.
 - WVHA has been very diligent in getting written information out to residents before all construction work and the residents have been most appreciative of being kept informed.
 - WVHA had to eliminate doing periodic newsletters for the Section 8 Landlords and Residents due to the severe reduction in the Administrative Fees in 2012 and even worse reduction in 2013. We can no longer afford the printing and postage costs. We did develop a new website in 2014 that does permit us to post periodic newsletters at little cost. We also can include a message in the Section 8 Landlord e-mails related to their HAP payments to let them know a new newsletter is now posted.

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

West Valley Housing Authority's definitions are listed below:

- Substantial Deviation from the 5-Year Plan:
 - Any revisions related to Demolition, Disposal, or Conversion of Public Housing Units

- Significant Amendment or Modification to the Annual Plan:
 - Changes of a significant nature to the admissions policies, primarily any revision to local preferences on the waiting lists.
 - Any change with regard to demolition or disposition, designation, home ownership programs or conversion activities.
 - The addition of non-emergency work items (items not included in the current Annual Statement or Five Year Capital Fund Plan) or change in the use of replacement reserve funds under the Capital Fund.

- Revisions that **will not be** considered a “substantial deviation” or a “significant amendment or modification” are:
 - Changes to any of the items listed above that are being adopted to reflect changes in HUD regulatory requirements.
 - Changes to any category not included above.
 - Revisions to any attachments to the Agency Plan that would not be a change to any items included above.

Attachment 11.0

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
Will be attached electronically with scanned signatures. Form attached without signature until Board approval.
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
Will be attached electronically with scanned signatures. Form attached without signature until Board approval.
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
Will be attached electronically with scanned signatures. Form attached without signature until Board approval.
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
Will be attached electronically with scanned signatures. Form attached without signature until Board approval.
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
N/A
- (f) Resident Advisory Board (RAB) comments.
The Resident Advisory Board review of this Five Year and Annual Agency Plan was held on June 23, 2015 and there were no comments from RAB members.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
No Challenged Elements.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report*
HUD's Final Capital Fund Rule no longer requires the Performance and Evaluation Reports to be included in the Agency Plan. Those documents are available at the Dallas Main Office only.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.
Attached as noted in 8.2.