East Greenwich Housing Authority Board of Commissioners
Regular Meeting
Tuesday, January 21, 2025, 5:30PM
EG Housing Authority Administrative Office
146 First Avenue, East Greenwich, RI 02818

Agenda

- Chair calls meeting to order and roll call is taken.
  - **Note: One member of the EGHA Board will be participating remotely with renewed OMA Compliant waivers**

- Public Comment

- **Approval of Minutes** **(For Vote)**
  - December 2024 (Regular Meeting)

- **Monthly Management Report** **(For discussion)**
  - Update on Occupancy & Rental income
    - December 2024

- **2025 Policy Updates** **(For vote)**
  - Annual Plan
    - ACOP
    - ADMIN
    - 2025 Capital Fund
    - Tenant Selection Plan for EGHA/CH units
    - Procurement Plan (BOC approved 3/24)
    - Capitalization Plan (BOC approved 12/24)
  - IT Plan

- **Brookside Update** **(For Discussion)**

- **Executive Director Update** **(For Discussion)**
  - Tenant Concerns
  - Auditors visit 2/11
  - FSS Award 2025
  - Holiday Donations Update
  - Future Fundraiser idea EGHA

- **Adjourn** **(For Vote)**

The next meeting is scheduled for February 18, 2025, at 5:30pm.

Members of the public wishing to access the meeting virtually, should contact the executive director, Tracy Johnson, at tjohnson@eghousing.com or call (401) 885-2610 ext. 13 in advance of the meeting and a link will be forwarded.
Posted on January 16, 2025, at the EGHA Administrative Office, EG Town Hall, Shoreside Apts. & RI SOS website.

MINUTES
HOUSING AUTHORITY OF THE
TOWN OF EAST GREENWICH
146 FIRST AVENUE
EAST GREENWICH, RI 02818
REGULAR MEETING
MEETING HELD VIA ZOOM

DATE: December 12, 2024
5:30PM

MEMBERS PRESENT:

Cynthia White-Overton, Chair
Ruth Feder, Vice Chair
Stanley Olszewski, Commissioner
Elizabeth Grumbach, Commissioner

MEMBERS ABSENT:

None

OTHER ATTENDEES:

Tracy Johnson, Executive Director
Sgt. David Petrucci, EGPD

CALLTO ORDER:

Vice Chair called the meeting to order at 5:32pm

PUBLIC COMMENT:

No members of the public attended.

Chair Overton stated for the record that one member of the EGHA Board is participating remotely with renewed waiver through OMA.

APPROVAL OF THE MINUTES OF THE NOVEMBER REGULAR MEETING

Commissioner Olszewski made a motion to approve the minutes of the November 2024, regular meeting, seconded by Commissioner Grumbach and approved by Commissioners Feder, Olszewski Overton & Grumbach.
Discussion: No Discussion.

In Favor: Commissioners Overton, Olszewski, Grumbach & Feder
Opposed: None
Abstained: None

EGPD APPRECIATION AWARD

Sgt. David Petrucci of the East Greenwich Police Department was given an appreciation plaque for himself along with one on behalf of the EGPD International Brotherhood of Police Officers (IBPO) Local 472 for supporting EGHA with their annual toy drive on behalf of our families. Chair Overton expressed gratitude for the Department's support of our agency & tenants. Sgt. Petrucci stated the department enjoys working with EGHA as well.

MONTHLY MANAGEMENT REPORT

Tracy reviewed rent collection and occupancy information which currently remains status quo. Now that the big elevator is up and running, Jenn has started the screening process to fill the vacancies. The bedbug issue is currently under control, tenant with the concerned friend is currently in a rehab facility. Chair Overton mentioned that she has been speaking with a local man about being a commissioner. Kevin is also looking to give back to the community and fight food insecurity. For the last 2 months, he has put together food bags for our residents. This month had a bagel, peanut butter packet, slim Jim, a fruit and a drink packet. This month's selection was a hit.

ELECTION OF OFFICERS

Motion to approve the slate of nominated officers for election, specifically Elizabeth Grumbach as Chair and Ruth Feder for Vice Chair made by Commissioner Olszewski and seconded by Commissioner Grumbach

In Favor: Commissioners Feder, Olszewski, Grumbach & Overton
Opposed: None

STRATEGIC PLAN

Motion to accept the strategic plan as documented but adopt the plan as a guideline for the future made by Commissioner Olszewski, seconded by Commissioner Feder

In Favor: Commissioners Feder, Olszewski, Grumbach & Overton
Opposed: None

Discussion: At the Cove Homes meeting, the Directors discussed they may/may not follow all the suggestions as documented. Commissioner Olszewski felt it was time to move on, and in the future try for a new vibrant approach. Commissioner Grumbach felt it was almost not about EGHA Chair Overton didn't feel like it was our plan. Commissioner Grumbach inquired how to we pursue these items. Chair Overton stated that the agency would pursue and inform the Board, and the Boards responsibility is to stay on top of this.

POLICIES FOR NEW AUDITOR

The new auditors have requested information on programs, accounting and policies. Two policies that they are requesting are an IT Policy & Capitalization policy. EGHA currently does not have either in place. Tracy has reached out to see what information IT policy needs to include: she has contacted other PHAs familiar with this company as well as our IT company. Included in the packet is a Capitalization policy that Judy Kerkhoff created with the assistance of our fee accountants.

Motion to approve the Capitalization policy was made by Commissioner Olszewski, seconded by Commissioner Feder

In Favor: Commissioners Feder, Olszewski, Grumbach & Overton
Opposed: None

HP1

Attorney Marcus requested HP1 be added as an agenda in case there is something that required action prior to the closing scheduled for December 16th. Louise forwarded a document that requires the Chair's signature just before the meeting. The form reiterates that the Board of Commissioners approves Tracy Johnson to be the signer on all documents associated with the closing.

Motion to approve signing the document related to the purchase of HP1 and allow Tracy Johnson in her capacity as Executive Director to sign on behalf of EGHA made by Commissioner Olszewski, seconded by Commissioner Grumbach

In Favor: Commissioners Overton, Olszewski, Grumbach & Feder
Opposed: None
Abstained: None

EXECUTIVE DIRECTOR UPDATE

2025 Calendar of Meetings-Meeting dates for the upcoming year

Auditor Responses-Tracy reviewed the RFP responses for Auditing services. The only submission was Marcum/CBIZ. The two companies referred by HUD emailed they would not be submitting at this time, one other referral from PHARI-D'Amico is no longer in business, two Other companies that were previously sent an RFP did not respond. Our Accountant Lindsey Pinkerton, said the firm is thorough and works well with them. Chair Overton stated that the upside of this firm is that Mike Guyder is familiar with the changes,& players and the price has not risen since they last responded to the RFP.

HUD RRI Notification- EGHA will be receiving an additional $334 in our operating fund under HUDs Reduced Rate Initiative

HUD Letter about HCV Program-Tracy reviewed the letter all PHAs received from HUD in preparation for 2025. Most PHAs will be going into the year facing shortfall; especially with the FMR decreasing. In addition, Tracy informed the Board of a possible change to the Affordable Housing regulation. RI Housing is in agreement with legislation that will allow hosing choice voucher holders in each jurisdiction to count toward the 10%. Tracy expressed concern if this gets close to the allotted slots; town may limit new housing in the future. Although the Commissioners feel the current council is supportive of housing, if this goes on in the future could look differently. They feel this new regulation, supported by RIH is cheating the law.

EG Lions Donation- The Lions Club donated $1200 in gift cards to the EGHA

Oaks Toy Drive- Just a reminder that this annual event will be held on Saturday, December 14th

AJOURN

Commissioner Olszewski made a motion to adjourn at 6:32p; seconded By Commissioner Feder

EG Housing Authority Monthly Management Report as of December 31, 2024

Occupancy and TARS

Facility	Occupancy	Intent to Vacate	This month UTOs	YTD UTOs	Rent	Wait List	Work orders	Updated Rent Roll to Accounting
PH	27 / 28	0	0	0	98%	33	8	Happy
HP 1	2 / 3	0	0	0	98%	14,020	0	Happy
Shoreside	100 / 106	2	0	1	94%		9	One-Site
Regal	33 / 35	0	0	1	94%	14,020	3	Happy/One-Site
CH	10 / 16	0	0	0	98%	14,020	3	Happy
EGHA (2880)	8/ 10	0	0	0	98%	14,020	0	Happy
EGHA (Marl)	5 / 5	0	0	0	100%	14,020	0	Happy

Rent collection: 97.1% (households) Occupancy: 91.1%

	Current Month	Previous Month
Total Allocation	292	292
# Leased	101	101
Utilization rate	47%	47%
Voucher Issuance	0	1
% of HUD HAP expended	100	100
# Porting in	0	1
# Porting out	0	0
# On wait list	14,020	13,510
# Homeowner	0	0

Resident Services

Service	This Month	Previous Month
Service Units: Medical	0	0
Benefits & personal assistance	0	0
Quality of Life	0	0
FSS	18	19

Inspections:	Scheduled	Completed
Annual (Cove/HP/PH)	19	19
Housekeeping		
HCV	16	16
Shoreside		
Regal Court	0	0
Complaint		
Pre-Reac		

CH		**68**
Appliance/oven		
Vanity	1	
Carpet/Vinyl		
Toilet paper holder	1	
Doors		
Soap/tooth holder	2	
Faucets	1	
Hood vent	1	
Fill Valves/Fluss Valves		
Medicine Cabinet	1	
Smoke/CO Detector		
Lighting	1	
Outlets		
Shades/Blinds		
PH		**53**
Appliance/Oven Coil	1	
Cabinet/Vanity		
Carpet/Vinyl		
Fill valves/Flush		
Doors		
Countertops		
Lighting/Ceiling Lights		
Medicine Cabinet		
Filters		
Faucets	2	
Showerheads		
Smoke/CO Detector	1	
Storm door handle	1	
Blinds		
RC		**16**
Appliance		
Shades/Blinds		
Carpet/Vinyl	1	
Painting		
Fill/Fluss Valve		
Ceiling lights		
Faucets		
Filters		
Drip pans		
Smoke/CO Detector		
Thermostat		
Toilet seats		
Doors		
HP1		**5**
Appliance		
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Doors/Windows		
Electrical/Lighting		
Faucets		
Hood vent/garbage disposal		
Paint		
Showerheads		
Smoke/CO Detector		
Thermostat		
Toilet		
EGHA Fee (2880/Marlborough)		**0**
Appliance/Oven		
Cabinet/Vanity/Toilet		
Carpet/Vinyl		
Drip pans		
Fill/Fluss valve		
Hood vents		
Lighting		
Faucets		
Toilet Seats		
Showerheads		
Smoke/CO Detector		
Blinds		
OFFICE/GARAGE		**1**
Refrigerator		

Monthly Notes:

K-9 Inspection detected BB in the following units:

410 – dog alerted but did not see live ones (treated on Dec 31)

303 – dog alerted but did not see live ones (treated on Dec 31)

209 – Dog alerted, live activity (treated on Dec 31)

FSS- one participant moved to NP with escrow

Monthly Legal Report

Program	#'s	Program Violation(s)
HCV:	**0**	
PH:		
EG:		
CH:		
HP1:		
RC:	**114 waiting on non-compliance (Nov 1, 2024, possession of weed in apt.)**	
SS:	**616 non-compliance for smoking week on property** **503 – public urination** **501 – defaced solarium window** **411 – Hearing has been re-scheduled (smoking violation) Waiting for day and time**	

ACOP Changes (update)

Community Service

1. Community Service Requirements
2. Definitions
3. Documentation and Verification
4. Noncompliance and Enforcement Documentation

Requirements

(8) hours per month
Nonexempt adults (18 or older)
Volunteer work or participate in (8) hours of training, counseling, classes

Documentation

EGHA will have all adult family members must sign and date, certifying that they have read and received a copy of the Community Service Policy.

Noncompliance

If family members do not comply with the requirements

- Already listed in ACOP but would like to add more information.

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PHA Policy

Family members turning 18 years of age between annual recertifications will be required to sign the required Consent to the Release of Information Form HUD-9886A at the family's next annual or interim reexamination, whichever is earlier.

Timing of Voucher Issuance

PHA Policy

When a family ports into its jurisdiction, the PHA will issue the family a voucher based on the paperwork provided by the initial PHA unless the family's paperwork from the initial PHA is incomplete, the family's voucher from the initial PHA has expired or the family does not comply with the PHA's procedures. The PHA will update the family's information when verification has been completed.

Voucher Term

PHA Policy

The receiving PHA's voucher will expire 30 calendars days from the expiration date of the initial PHA's voucher. If the initial PHA extends the term of the voucher, the receiving PHA's voucher will expire 30 calendar days from the new expiration date of the initial PHA's voucher.

Voucher Extensions

PHA Policy

The PHA generally will not extend the term of the voucher that it issues to an incoming portable family unless the PHA plans to absorb the family into its own program, in which case it will follow the policies on voucher extension.

The PHA will consider an exception to this policy as reasonable accommodation for a person with disabilities.

Elects to Terminate the HAP Contract.

PHA Policy

The PHA may elect to terminate the HAP contract in each of the following situations:

Available program funding is not sufficient to support continued assistance for families in the program

The unit does not meet HQS size requirements due to change in family composition

The unit does not meet HQS

Landlord Checks

PHA Policy

The PHA has until the 10th of the month to cut and mail Landlord checks.

FMR's and SAFMR's

PHA Policy

When the FMR's and The SAFMR's have been reduced by HUD EGHA will reduce them on the second Annual Recertification.

System Security Policy (EIV)

Housing Authority of the Town of East Greenwich
Cove Homes, Inc.

Executive Director: Tracy Johnson

Coordinators: Carol Giammarco & Jennifer Gallagher
Users: Marta Rivera & Kristin Maggiacomo

INTRODUCTION

The purpose of this policy is to provide instruction and information to staff, auditors, consultants, contractors and applicants and residents for the acceptable use, disposition and storage of data obtained through EIV (Enterprise Income Verification System).

The EIV coordinator for the owner/agent will have the responsibility of ensuring compliance with the security policies and procedures outlined in this document. These responsibilities include:

- Maintaining and enforcing the security procedures
- Keeping records and monitoring security issues
- Communicating security information and requirements to appropriate personnel including coordinating and/or conducting security awareness training sessions
- Conducting review of all User ID's issued to determine if the users still have a valid need to access EIV data and taking necessary steps to ensure that access rights are revoked or modified as appropriate
- Reporting any evidence of unauthorized access or known security breaches to the EIV coordinator for the owner/agent and taking immediate action to address the impact of the breach including but not limited to prompt notification to The EIV coordinator for the owner/agent. to the EIV coordinator for the owner/agent will escalate the incident by reporting to appropriate parties including the Contract Administrator and/or HUD.

The EIV Database is part of HUD's Secure Systems Database. Individual Users must use their own username (MID/WASS ID) and password to access the Secure Systems database. Coordinators, who are not property owners, have obtained a letter of authorization from the property owner for access to EIV. This letter is maintained in the property's EIV file and will be available to Reviewers during the Management and Occupancy Review.

This policy has been developed to ensure that EIV data is secure. This policy has been communicated to all persons with access to EIV or EIV data. This policy has been developed to ensure compliance with HUD's security protocol regarding the three safeguard categories:

Technical Safeguards:

- Each coordinator/user must have a valid WASS User ID and password
- IDs and passwords **must not be shared**
- No one may access the system using another users identity
- Each user must provide an application access authorization form (CAAF or UAAF)
- Access to data is restricted based on EIV role (EIV Coordinator or EIV User)
- Access is limited based on need to know
- Users understand that access and activity are monitored and audited

Administrative Safeguards:

The owner/agent has established standard operating procedures for use of data

Employment and income data is used for certification and compliance purposes only.

Users may not share data with others who do not have a need to know.

Users will check to see if applicant/tenant is receiving assistance under another program at a different location.

The EIV coordinator for the owner/agent will monitor access.

- o Obtain and retain owner approval letters
- o Approved/current signed access authorization form
- o Conduct periodic reviews to see if user still a valid need has to access the EIV data
- o Modify or revoke rights as appropriate
- o Assign Access Ensure access rights and responsibilities are appropriate

Ensure that a signed copy of form HUD-9887 is on file for all adults living in the unit.

Destroy EIV information when it is no longer needed.

Ensure all EIV users receive security training at time of implementation and at least annually thereafter.

Detect, deter, and report improper disclosures, unauthorized access, or security breaches to the EIV coordinator for the owner/agent who will report as necessary to:

- o HUD's Multifamily Help Desk
- o HUD's Security Officer
- o TRACS/EIV mailbox: MFTRACSSecurity@hud.gov
- o Mail to: Department of Housing and Urban Development Office of Multifamily Housing
- o Notify the Office of Inspector General (IG)
  - E-mail it to Hotline@hudoig.gov.

The owner/agent has also implemented the following processes to ensure compliance with HUD's:

Physical Safeguard requirements:

Designated secure areas.

Restricted use of printers, copiers, facsimile machines, etc.

Controlled access to areas containing EIV information.

How to secure computer systems and output

- o If any EIV data is converted to an electronic format, it must be encrypted
- o All emails including EIV data must be encrypted
- o Store downloaded EIV data in a separate, restricted access directory
- o Label CDs containing EIV data "confidential" or "For Official Use Only"
- o Lock in secure place

Users must retrieve all computer printouts as soon as they are generated so that EIV data is not left unattended.

Keep printouts locked up

Printouts should not be transported from premises.

Avoid leaving a computer unattended with EIV data displayed on screen.

Lock computer/Log off/Exit the system when not going to be at desk or when finished for the day (EIV will time-out after 30 minutes of inactivity)

Use a password-protected screensaver.

Secure disposal of EIV information

- o Destroy as soon as it has served its purpose or as prescribed by HUD's policies and procedures
- o Burn/shred
- o Keep log of destroyed data
    - Date destroyed
    - How destroyed
    - By whom

SECURITY AWARENESS TRAINING

Security awareness training is a crucial aspect of ensuring the security of the EIV System and data. Users and potential users will be made aware of the importance of respecting the privacy of data, following established procedures to maintain privacy and security, and notifying management in the event of a security or privacy violation. Before granting access to the EIV information, each person must be trained in EIV Security policies and procedures.

Additionally, all employees having access to EIV Data will be briefed at least annually on the security policy and procedures that require their awareness and compliance. Information about user access and training will be maintained in the property EIV file. See Sample EIV File Checklist.

EIV Users and Coordinators must complete the appropriate EIV Security Awareness Training Questionnaire *www.hud.gov/offices/hsg/mfh/rhiip/eiv/securityawareness.pdf* before requesting access. Do not send the completed questionnaire to HUD. This must be retained and made available to the reviewer at the Management and Occupancy Review.
After initial setup, **coordinators** must certify **annually**. This is done electronically, through EIV. Copies of the paper CAAF and the most recent, electronic CAAF must be available for review during the Management & Occupancy Review.

After initial setup, **users** must certify **semi-annually**. This is done electronically, through EIV. Copies of the paper UAAF and the most recent, electronic UAAF must be available for review during the Management & Occupancy Review.

PHYSICAL SECURITY REQUIREMENTS

Restricted Areas:

The Owner/agent, along with site staff authorized to view EIV data will maintain EIV files in a clearly identified designated management office in a locked file cabinet, when not in active use. The management office is separated from non-restricted areas and will be locked when not in immediate use.

Since the EIV data in resident files is maintained in the locked file room, management will establish and maintain a key control log to track the inventory of keys available, the number of keys issued and to whom the keys are issued. All employees and contractors who have been issued keys to the file room will complete a form acknowledging the receipt of the key. **See EIV Privacy Policy.**

Users will retrieve computer printouts as soon as they are generated so that EIV data is not left unattended in printers or fax machines where unauthorized users may access them. EIV data will be handled in such a manner that it does not become misplaced or available to unauthorized personnel.

LIMITING ACCESS TO EIV DATA
User accounts for the EIV system will be provided on a need-to-know basis, with appropriate approval and authorization.

EIV SYSTEM COORDINATORS
Before accessing EIV, the Secure Systems Coordinators will obtain a letter/memo from each property owner indicating that the owner gives permission for the Secure Systems Coordinator to act as the EIV coordinator. Once that permission is obtained, the Coordinator will

Review the EIV training material provided by HUD.
Participate in EIV Security Training from HUD or another source.
Read and sign the EIV Security Policy
Read the EIV Use Policy

Upon completion of these tasks, the EIV Coordinator will submit to HUD, the appropriate Coordinator Access Authorization Forms. Upon receipt of HUD approval, the EIV Coordinator will complete the EIV Coordinator setup process.

EIV USERS
Before requesting EIV User access, appropriate staff will:

Review the EIV training material provided by HUD
Participate in EIV Security Training from HUD or another source
Read and sign the EIV Security Policy
Read the EIV Use Policy

Upon completion of these tasks, the EIV User will submit, to the EIV Coordinator, the appropriate User Access Authorization Form. Upon receipt, the EIV Coordinator will review the completed Security Awareness Training Questionnaire for accuracy and recommend further training if necessary.

If the EIV Coordinator feels that the EIV User candidate does not understand the security requirements, the EIV Coordinator will not continue with the EIV setup for that user. Under no circumstances will the EIV Coordinator process the User Access Authorization Form unless the signed **EIV Security Policy is attached.**

Once the tasks are satisfactorily completed, the EIV Coordinator will complete the appropriate steps to provide EIV access to the user. In accordance with HUD requirements, the user's need for access will be reviewed on a semiannual basis.
At least once a year, staff with EIV access will be required to:
Participate in training that includes a review of the EIV security requirements and
Complete the EIV Security Awareness Training Questionnaire

The EIV coordinator for the owner/agent will restrict access to EIV data only to persons whose duties or responsibilities require access. EIV Coordinators will be required to request re-certification on an annual basis. EIV Coordinators are authorized to provide access only to those individuals directly involved in the resident certification process and/or compliance monitoring.

EIV Coordinators will carefully review initial and quarterly requests for access and certify only those users who will need access within the next 6 months.

In some cases, EIV information may be provided to auditors charged with ensuring the owner/agent's compliance with HUD requirements. In these cases, the auditor will be required to review and sign the property's Privacy Policy for Auditors and will be required to sign the HUD Rules of Behavior document. These documents will be maintained in the property's EIV File. In addition, the auditor's access will be noted on the EIV File checklist for review during the Management & Occupancy Review.

The EIV coordinator for the owner/agent will maintain a record of users who have approved access to EIV data. Further, the EIV coordinator for the owner/agent will terminate **promptly (within 30 days)** the access rights of those users who no longer require such access.

HUD 9887/9887-A

The HUD 9887 Fact Sheet will be provided to all adult household members required to sign the form. By signing this HUD Form 9887 and HUD Form 9887-A, the applicant/resident authorizes HUD and/or the owner/agent to obtain and verify income and unemployment compensation information from various sources including, but not limited to, the IRS, the Department of Health and Human Services and the Social Security Administration and state agencies.

The EIV coordinator for the owner/agent will assure that a copy of Form 9887 and Form 9887-A has been signed by each member of the household age 18 years or older. The 9887 will be presented at the final eligibility determination, at move-in and/or initial certification and at each annual certification. If a household member turns 18 in the middle of a certification cycle, that household member will be required to sign Form 9887 and Form 9887-A within 30 days of turning 18. (See HUD 9887 Fact Sheet for exceptions due to extenuating circumstances) All HUD-9887's will be placed in a resident file and will be updated on at least an annual basis for each adult household member.

Each member of the household age 18 years or older that chooses not to sign the required HUD 9887/9887-A Consent form will result in termination or denial of admissions.

COMPUTER SYSTEM SECURITY REQUIREMENTS

All computer systems and computers will have password-restricted access. Passwords must be no fewer than 8 characters and must include:

- At least one lower case letter
- At least one upper case letter
- At least one number or character such as a dash or exclamation point

The owner/agent will also use Antivirus software to limit data destruction or unintended transmission via virus, worms, Trojan horses or other malicious means. Remote access by other computers other than those specifically authorized is prohibited.

Authorized users of EIV data are directed to avoid leaving EIV data displayed on their computer screens where unauthorized users may view it. A computer will not be left unattended while the user is "logged in" to Secure Systems. If an authorized user is viewing EIV data and an unauthorized user approaches the work area, the authorized user will lessen the chance of inadvertent disclosure of EIV data by logging out of Secure Systems or minimizing or closing out the screen on which the EIV data is being displayed.

USER NAMES, PASSWORDS AND PASSWORD CHANGES

Many systems require frequent changes to passwords. Secure Systems / EIV passwords will be changed in accordance with HUD Secure Systems requirements. Users will not share passwords with any other employee or with anyone outside the organization. EIV access granted to an employee or authorized user will be revoked when access is no longer required or prior to termination of that employee or user to ensure data safety.

Termination of EIV access and un-assigning property access through "Property Assignment Maintenance" is required.

The EIV file will be documented to indicate when the EIV Coordinator terminated user access. Documentation of termination will be maintained in the property EIV file.

DISCLOSURE OF EIV INFORMATION

The EIV Social Security (SS), Supplemental Security Income (SSI), new hires (W-4), wage, and unemployment compensation information contained in the EIV system may only be used for limited official purposes.

- By Contract Administrators (CAs) for monitoring and oversight of the resident recertification process
- By the Office of the Inspector General (OIG) for investigative purposes.
- By owners/agents (O/As) for verifying the employment and income at the time of certification for residents **participating in one of HUD's rental assistance programs listed:**

EIV Data may is disclosed to:

Private owners
Management agents
Service Bureaus
Contract Administrators
HUD staff
HUD Office of Inspector General (OIG) for investigative purposes
Independent public auditors (IPAs) auditing an owner's compliance with HUD's verifying income and the accuracy of rent/subsidy determinations.
Individual to whom the record pertains.

EIV income data may only be used for verification of employment and income at certification. Under no circumstances may users or coordinators provide access to the system by sharing the username/password combination. Owner/agents must not disclose data in any way that would violate the privacy of the individuals.

EIV data must not be disclosed (or re-disclosed) to any third parties such as the local Welfare office, DFCS, etc. Willful disclosure or inspection of EIV data can result in civil and criminal penalties.

Unauthorized disclosure – felony conviction and fine up to $5,000 or imprisonment up to five (5) years, as well as civil damages

Unauthorized inspection – misdemeanor penalty of up to $1,000 and/or one (1) year imprisonment, as well as civil damages.

Official use **does not include** using the EIV data for certifying residents under the Low-Income Housing Tax Credit (LIHTC) or Rural Housing Services (RHS) Section 515 programs. Neither the Internal Revenue Service (IRS) nor RHS are a party to the computer matching agreements HUD has with the Department of Health and Human Services (HHS) and with the Social Security Administration (SSA).

The fact that there is financing through other federal agencies involved in a particular property under one of the authorized HUD programs **does not** permit that federal agency to **use or view** information from the EIV system for certifying residents for their programs or for monitoring purposes. Additional third-party Income verification will be obtained from the source for use for Tax Credit or Rural Housing Service programs. For Social Security and Medicare information, the resident file will include a current SSA Benefit/Award letter or some other acceptable verification documentation. For employment income and unemployment income, the resident file will contain verification documents as provided in HUD Handbook 4350.3 Revision 1, Appendix 3.

USE AND HANDLING OF EIV DATA

EIV Data serves two purposes:

1. Verification of specific income information provided by the resident
2. Monitoring resident and staff compliance

Use of the data is described in the EIV User Policies. This policy is designed to describe the security protocol used to protect EIV data.

EIV Data will be used only to administer HUD programs. The data in EIV is not to be used to assist with eligibility determination or compliance monitoring for any other programs including those administered by the IRS (Tax Credit) or Rural Development (515).

Enterprise Income Verification (EIV) Usage (HOTMA)

- Owner/agent may not use EIV during interim reexaminations (IRs).
- Owner/agent does not participate in Safe Harbor verification to determine household income.
- Owner/agent will continue to use EIV Income Discrepancy Report along with the other forms of verifications.

EIV PRINTOUTS

In addition to use by the owner/agent, EIV reports may also be used by Contract Administrators (CAs) (Performance Based Contract Administrators (PBCAs), Traditional Contract Administrators (TCAs) and HUD staff) for monitoring compliance with the recertification process; independent public auditors (IPAs) auditing an owner's compliance with HUD's verifying income and the accuracy of rent/subsidy determinations; and the Office of Inspector General (IG) for auditing purposes.

EIV Income Reports are retained in the resident file for the term of tenancy and for three years after tenancy ends. If this property also participates in other housing assistance programs (LIHC or 515) the owner/agent will take special precautions to ensure the security of the EIV printouts. EIV printouts will be maintained in the resident file but will be kept in a separate section of the file and will be removed if the file is to be audited or reviewed by any authorized party for purposes other than those defined by HUD. An alternative would be to keep the EIV printouts in a separate secure location within the management office. EIV printouts will be provided to approved parties, when required, to facilitate compliance with HUD requirements and the property's EIV Use Policy.

Owner/Agent MUST keep a "master file" on site of the following:

Failed EIV Pre-Screening (monthly)
Failed Verification (monthly)
New Hires (quarterly)
Multiple Subsidies (quarterly)
Deceased Tenant Reports (quarterly)

Owner / Agent must print out the Income Summary Report showing Identity Verification Status of "verified" for each household member.

Owner / Agent must print out and review the Income Report within 90 days, resolve any discrepancies and do a correction.

Owner / Agent must print Failed EIV Pre-Screening and Failed Verification Reports for "All" tenants monthly, and Correction/IR certs completed promptly as needed.

When discrepancies are investigated, and third-party verifications have been obtained, sites must request that the tenant come in within 10 days of notification to discuss the results.

Effective July 1, 2010, new Repayment Agreements must contain several required items including a renegotiation clause when tenant income goes up or down $200/month or more, total amount owed, lump sum paid at the time of the Agreement and monthly amounts, and specific statements regarding tenant obligations and consequences for failure to meet them.

Sites must review and resolve Income Discrepancy Reports at the time of the recert, or within 30 days of the Income Report date ("resolve" includes doing any retroactive 50059s needed.) Sites are not expected to reconcile dollar amounts to the penny.

PROVIDING EIV PRINTOUTS TO AUDITORS

Independent auditors (IPAs) are approved to view EIV information, when hired by an owner to perform the financial audit of the project, for use in determining the owner's compliance with verifying income and determining the accuracy of the rent and subsidy calculations.

Restrictions on disclosure requirements for IPAs:

(a) Can only access EIV income information within hard copy files and only within e owner or management agent;
(b) Cannot transmit or transport EIV income information in any form;
(c) Cannot enter EIV income information on any portable media;
(d) Must sign non-disclosure oaths (Rules of Behavior) that the EIV income information will be used only for the purpose of the audit; and
(e) Cannot duplicate EIV income information or re-disclose EIV income information to any user not authorized by Section 435(j)(7) of the Social Security Act to have access to the EIV income data.

PROVIDING EIV PRINTOUTS TO RESIDENTS

If a resident requests a copy of their own EIV printout, a copy will be produced. The staff person providing the copy will note that the printout is a copy provided to the resident upon request. This note will include the following:

This is not an original, this is a copy provided to: Resident Name
On _____ ____, 20__
By_____(name will be printed)
Resident Initials_____

The appropriate staff will make a note in the file any time a copy of the EIV data is obtained by authorized persons. This includes copies provided to the applicant/resident, staff responsible for compliance monitoring, other internal staff, HUD, CA or OIG staff. Under no circumstances will the EIV information be provided to anyone other than those noted in this Security Policy.

ELECTRONIC INFORMATION FROM EIV

In some cases, there may be a need to send or store EIV information electronically. If EIV data is converted to an electronic format, the information will be stored in a special, restricted password protected directory and encrypted using an NIST compliant vendor. All emails that contain EIV data will be encrypted as well. No data will be converted or transported by portable media. EIV data converted to an electronic format will be destroyed in accordance with HUD's recordkeeping requirements and HUD's data share agreement with HHS and SSA.

DISPOSAL OF EIV INFORMATION

EIV data will be destroyed in a timely manner based on the information provided in HUD's published EIV training materials, HUD notices or as prescribed by the owner/agent's policy and procedures. The owner/agent's policy and procedures will not allow data retention that is longer than the time allowed in the published HUD materials. Information about use of EIV information and how printouts were destroyed will be maintained in the EIV file.

REPORTING IMPROPER DISCLOSURES

Recognition, reporting, and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system. These security violations may include the disclosure of private data as well as attempts to access unauthorized data and sharing of passwords.

Upon the discovery of a possible improper disclosure of EIV information or other security violation by an employee or any other person, the individual seeing or receiving the information will contact the EIV Coordinator, who will document all improper disclosures in writing providing details including who was involved, what was disclosed, how the disclosure occurred, and where and when it occurred. The EIV Coordinator will immediately review the report of improper disclosure and, if appropriate, the EIV Coordinator will remove EIV access.

Improper disclosure of any information could be grounds for immediate termination. All employees must carefully review the EIV Access Authorization Form or the Rules of Behavior to understand the penalties for improper disclosure of EIV data.

- Breach will be reported as soon as possible but no later than 1 business day following the unauthorized breach.

- Reporting any evidence of unauthorized access or known security breaches to designated staff and taking immediate action to address the impact of the breach including but not limited to prompt notification to designated staff. Designated staff will escalate the incident by reporting to appropriate parties including the Contract Administrator or HUD National Help Desk.

ACKNOWLEDGEMENT

By signing this form, I acknowledge that I have read and understand the EIV Security Requirements. I agree to abide by this policy and to report any improper disclosure of information.

_____

Name (please print)

_____ _____/_____/_____

Signature Date

CC: Personnel File
Property EIV File

RESOLUTION 2025-01
AMENDMENT TO HUD 5 YEAR CAPITAL FUND

Resolved: The EGHA Board of Commissioners approves amending the existing HUD 5-year Capital Fund Plan to program the federal fiscal year 2025 estimated to be $93, 528 into agency operations.

Motion:
Second:
In Favor:
Opposed:
Absent:

_____

Tracy Johnson, Executive Director Date

Selection Occupancy Standards

for

East Greenwich Housing Authority
Properties Owned and Managed.

Revision Date
Jan 15, 2025

The purpose and mission are to provide safe, sanitary, affordable supportive housing for the families, elderly and qualifying non-elderly persons with disabilities. The facilities and recreational services, on an as funded basis, are available to eligible persons without regard to race, color, religion, sex, age, familial status, sexual orientation, national origin, or disability.

EGHA Selection Occupancy Standards

Table of Contents

EGHA Selection Occupancy Standards

East Greenwich Housing Authority Rental Properties

Cove Homes Properties

Shoreside Apt.
300 Sixth Ave
106 Units elderly/disable multifamily

31 Duke St.
4 Units Family HCV

50 Duke St.
2 Units Family HCV

1 Crop St.
4 Units Family PBV Home

111 Duke St.
4 Units Family PBV Home

51 Queen St & 51.5 Queen St
2 Units Family HCV

41 Queen St.
2 Units Family HCV

EGHA Properties

Public Housing

Dedford Farms
146 First Ave
12 Units Family

Marlborough Crossings
Marlborough/London/Duke St.
16 Units Family

2888 South County Trail
10 Units Family HCV FHLB

41-45 Marlborough St
5 Units 1bdr Home HCV 5 Threshold

EGHA/Statewide Affordable

HP1
153 Duke St
3 Units Family HCV

Anziani Realty/EGHA

Regal Court
33 Long St
35 Units 62+ HCV LIHTC
10 Home 4 Threshold

EGHA Selection Occupancy Standards

1) **Project eligibility requirements**
   a) Owner/Agent shall consider eligible applicants who, at the time of application, meet all the following conditions as outlined by HUD regulations and who have submitted complete applications for housing. The following criteria shall be utilized to determine an applicant's eligibility.
      I. Who qualifies as a family or single person.
      II. Whose gross income does not exceed the HUD determined applicable income limits for admission.
      III. Whose net family assets are less than $100,000 (adjusted annually for inflation)
      IV. Whose Net Family Assets Equal to or Less Than $50,000 (adjusted annually for inflation)
         - Owner/Agent will not accept self-certification but will obtain third-party verification.
            - Will determine each family's net family assets at the time of admission and at annual and interim reexaminations.
            - Will determine net family assets and anticipated income earned from assets at new admission.
      V. Who are Citizens or Non-citizens who have eligible immigration status in compliance with 24 CFR Part 200.
      VI. All Adults in each applicant family must sign an Authorization for Release of Information prior to receiving assistance and annually thereafter.
      VII. The unit for which the family is applying must be the family's only residence.
      VIII. The applicant agrees to pay the rent required by the subsidy program.
      IX. $25.00 minim rent is required.
      X. All information reported by the family is subject to verification.
      XI. Who have not committed any Fraud in any Federal Housing Assistance program.
      XII. The applicant family shall be ineligible for admission to housing if any family member has been evicted from housing, Indian housing, Section 23 or any Section 8 program because of drug related criminal activity. The five-year period shall start on the date of the eviction.
         - The repayment agreement must be paid in full.
           Drug related criminal activity is defined as the illegal manufacture, sale, distribute, use or possession with intent to manufacture, sell, distribute, or use a controlled substance.
      XIII. The applicant shall be permanently denied housing if any applicant household member has been convicted of manufacturing or producing methamphetamine.
      XIV. Housing Authority may lease a unit to a local police officer, who would otherwise be ineligible, as part of the Management's comprehensive security program.

2) Citizenship requirements

a) The Family shall execute the necessary certification indicating each family member's citizenship or eligible immigration status. If a family member has declared eligible immigration status, she/he shall supply the necessary verification documents and authorize primary (and secondary, if needed) verification through the INS SAVE system.

b) Assistance to an applicant may be delayed only after the conclusion of the INS appeals process. Assistance cannot be denied until after the conclusion of the Authority informal hearing process, if requested by the Family. Applicants who are verified to include mixed family status (members of the family who are both eligible and not eligible) shall be offered prorated assistance, after exhausting the appeals and informal hearing procedures, in accordance with the formula requirements prescribed in 24 CFR Part 912.

c) Owner/Agent shall grant a 120-day extension for applicants who claim eligible immigration status and do not have their original documentation. Upon the conclusion of the extension, the Authority reserves the right to deny assistance if an original form of documentation has not been secured.

3) Social security number requirements

a) Families are required to provide Social Security Numbers for all family members prior to admission, if the Social Security Administration has issued them a number.

b) All members of the family defined above must:

I. Submit a copy of their Social Security Card (or other appropriate documentation as outlined below); or

II. Sign a certification if they do not have a Social Security Number. If the individual family member is younger than 18, the certification must be signed by his/her parent or guardian. If the individual obtains a Social Security Number, it must be disclosed at the next regular annual reexamination.

III. Applicants and tenants must disclose SSNs for all household members, except those who do not contend eligible immigration status, and tenants age 62 or older as of January 31, 2010, whose initial determination of eligibility was begun before January 31, 2010, and provide verification of the complete and accurate SSN assigned to them

c) Verification will be done through the provision of a Social Security Card issued by the SSA or other documentation listed below, including:

I. Driver's License

II. Identification Card issued by a Federal, State, or local agency, identification card issued by a medical insurance company, earnings statements or payroll stub, bank statements.

III. IRS form 1099 Benefit award notification letter from government agencies Unemployment benefit letter, Retirement benefit letter, Life Insurance policies, Court records such as real estate, tax notices, marriage and divorce, judgment, or bankruptcy records.

d) Applicants may not become participants until the documentation is provided.
e) New family members will be required to verify or certify their SSN information when the family reports the change in the family composition, whether it is an annual reexamination or interim adjustment.
f) Effective January 31, 2010, a valid Social Security Number (SSN) must be furnished by applicant members prior to being housed and by existing tenants. Exceptions to this requirement include: 1. Individuals who do not contend eligible immigration status where prorated assistance is applicable for mixed families. 2. Individuals aged 62 or older as of January 31, 2010, whose initial determination of eligibility was begun before January 31, 2010. Applicants 62 and older who received federal housing assistance at another federally assisted property prior to January 31, 2010, are also exempt from the SSN disclosure. This must be verified by receiving a copy of form HUD-50059 or 50058 from the previous assisted property, with an effective date on or before January 31, 2010. 3. Households must also provide documentation of a SSN for household members age six (6) or under prior to initial certification. If the household member age 6 or under does not have a SSN, the O/A will provide the household with form SS-5, Application for a Social Security Card, and allow 90 days for the household to obtain and provide verification of the SSN. An additional 90 days may be granted for extenuating circumstances as outlined in the final HUD rule. 4. Applicants do not need to provide verification of their SSN to remain on the waiting list. However, verification needs to be provided prior to initial certification. If the household cannot provide the verification (except for a household member who does not declare eligible immigration status) within 90 days, they will be removed from the waiting list. 5. Existing residents who have not previously provided a SSN must do so at the first full certification effective February 1, 2010 or thereafter (annual or interim). Exceptions to this requirement are listed in section 1 and 2 above.

4) Income limits

HUD 2024 income limits, updated to stay current with HUD Limits
Effective upon Approval

	1 Person	2 Persons	3 Persons	4 Persons
30% Extremely Low	23,600	27,000	30,350	33,700
50% Very Low	39,350	45,000	50,600	56,200
80% Low	62,950	71,950	80,950	89,900

5) Procedures for accepting applications.

a) Families wishing to apply for any of EGHA programs are to fill out an application during such times that applications are being accepted. If the wait list is closed and the Authority decides to open the wait list, the Authority will publish the application date(s) and program for which applications are opening in the East Greenwich Pendulum, The Providence Journal, and publications marketed to ethnic minorities and/or broadcast media marketed to ethnic minorities. The publication will also specify the location from which applications are mailed and a means of request. Generally, applications will be made at the Owner/Agent of the Town of East Greenwich and or the Main Office on 300 Sixth Ave.

b) Prospective applicants can obtain an application as stated in the newspaper advertisement. When an incomplete application is received the applicant will have 10 days from the date of the letter requesting required documents to provide Owner/Agent with more information. If the required documents are not received within 10 days of the date of the request letter, then the application will be considered ineligible, and the applicant may request a new application if the waitlist is open.

c) Acceptance of Applications:

I. Any family requesting an application for Section 8 assistance will be given the opportunity to fill one out if the wait list is open, and Owner/Agent is accepting applications. The application must be dated, time stamped and referred to the Authority's office for processing. Applications are dated and time stamped when Owner/Agent receives them.

II. Individuals who have a physical impairment may make special arrangements to complete their application.

6) Procedures for applying preferences.

a) The following preferences and date & time of application determine an applicant's position on the wait list.

I. **Residency Preference** - A residency preference shall be given to an applicant who is a bona fide resident of the Town of East Greenwich or who is actively engaged in full time employment (Or has been notified that they have been hired to work) in the Town of East Greenwich at the time the application was filed.

II. **Local Preference**:

- A local preference shall be given as "housing for older persons" which would exclude persons under 62 years.
- A local preference is given to an applicant who has been displaced by a Government Action, which includes displacement by a Group Home.

III. **Veterans Preference** - The Veterans Preference shall further be ranked in the following order:

- Disabled Veterans Preference shall be given to veterans and family members of a disabled veteran whose disability has been determined by the Veteran's Administration to be service connected.
- Families of a deceased veteran
- All other veterans

Applicants claiming a Veteran's Preference must provide a copy of the discharge documents of the veteran for whom the preference is claimed. The Veteran's Preference is only applicable to veterans and/or immediate families of veterans who were discharged under circumstances other than dishonorable.

7) Income Targeting

a) Wait list to achieve income mix goals, as follows:

I. Owner/Agent 40% of families do not exceed 30% of AMI 60% of families do not exceed 80% of AMI

b) Owner/Agent will reserve a minimum of 40% of its units for new admissions for families whose income does not exceed 30% of the AMI.

c) Income targeting Owner/Agent will reserve a minimum of 75% of its new admissions for families whose income does not exceed 30% of AMI

d) Income-Target Applicants

I. Method 1

Admit only extremely low-income families until the 40% target is met. In chronological order, Owner/Agent will select eligible applicants from the waiting list whose incomes are at or below the extremely low-income limit to fill the first 40% of expected vacancies in Shoreside Apartments. Once this target has been reached, admit applicants in waiting list order.

I. Method 2

Alternate between the first extremely low-income applicant on the waiting list and the applicant at the top of the waiting list. To implement this method, owners select the first extremely low-income applicant on the waiting list (which may mean "skipping over" some applicants with higher incomes) for the available unit, and then select the next eligible applicant currently at the top of the waiting list (regardless of income level) for the next available unit. As subsequent units become available, tenant selection continues to alternate between the next extremely low-income applicant and the eligible applicant at the top of the waiting list until the 40% target is reached.

e) NOTE: It is possible that:
   I. Selection of the "next extremely low-income applicant" may result in selecting the applicant at the top of the waiting list; or
   II. Selection of the "eligible applicant at the top of the waiting list" may result in the selection of an extremely low-income family.

8) Applicant screening criteria

a) BCI Check
   I. A BCI check within the State of Rhode Island will be conducted, Rhode Island Court Connect, as well as criminal check with the local police department. if the results of a preliminary BCI shows a 'possible match' and applicant fingerprint card MUST be completed and submitted to the Federal Bureau of Investigation (FBI) for a national criminal history background check (NCIC)

   II. Reason for rejection:
      - Illegal uses or pattern of use of drugs and/or violent criminal activity or felonies act, which would interfere with the health, and safety of other residents.
      - Applicant name will be kept on file for 3 years at which time not withstanding any other acts as stated in #1 above, the applicant will be offered a unit in compliance with Section III of this policy and HUD regulations.

b) Credit Check
   I. Reason for rejections:
      - Current nonpayment of debt without evidence of attempt to rectify the poor credit history.

c) Current Landlord Check
   I. Reason for rejection:
      - The applicant is a poor rent payer, does not comply with the basic rules of tenancy, does not comply with the lease agreement or the Federal and/or State laws, where applicable or applicant interferes with the health and safety of their neighbors.

d) Previous Landlord Check
   I. Reason for rejection:
      - Applicant was poor rent payer, has a poor history of compliance with the basic rules of tenancy, did not comply with the lease agreement or the federal and/or State laws, where applicable or applicant interferes with the health and safety of their neighbors.
      - Nonpayment of rent, rental schedule shows continuous late payments, rental schedule shows continuous charges for damages, eviction within past five years for drugs, negative report regarding compliance with Federal and/or State laws, where applicable or applicant interfered with the health and safety of their neighbors.

e) Other means of screening:
   I. RI Courts Rhode Island Judiciary Public Portal (ri.gov)
   II. DRU SJODIN National Sex Offender Public Website Home | Dru Sjodin National Sex Offender Public Website (nsopw.gov)
   III. Happy Tenant Check

f) In all cases of ineligibility determination, the applicant will be afforded the opportunity to request an Informal Hearing on the determination and provide the opportunity for the applicant to dispute the accuracy and relevance of the record.

g) This applicant family must not engage in the abuse of alcohol, which interferes with the health, safety or right of peaceful enjoyment of other residents.
   I. Example:
      - Drunk and disorderly conduct
      - Harassment
      - Stalking
      - Threats to other persons of physical violence or intimidation
      - Breaking & Entering
      - Assault & hate crimes

h) Their applications shall be verified by local, state, or national records and incidents reports, arrests and /or convictions.

i) In all cases the East Greenwich Housing Authority will comply with all U.S. Department of Housing & Urban Development regulations.

j) Management also follows the VAWA Policy along with the letter of rejection. Notice of Rights and a copy of VAWA is also sent to the applicant.

k) Tenants' information is kept confident in accordance with VAWA.

l) **Mitigating Circumstances or Reasonable Accommodation**

I. If an applicant with a verified disability is unable to satisfy the property's selection standards, they are entitled to considerations that could accommodate any special needs.

II. Mitigating circumstances would be verifiable facts that would outweigh information already gathered in the screening process. Staff must document the improvement in the specific screening standard before considering the applicant. The verifier must corroborate the reason given by the applicant for past unsuitable behavior and indicate that the behavior has improved.

III. If the evidence of mitigating circumstances presented by the applicant relates to a change in medical condition or course of treatment, Housing Authority shall have the right to refer such information to persons qualified to evaluate the evidence and verify the mitigating circumstance. Staff shall also have the right to request further information reasonably needed to verify the mitigating circumstance, even if it is of a medically confidential nature. If the applicant refuses to give access to such further information, Owner/Agent will give no further consideration to the mitigating circumstance.

IV. Staff will keep in mind those applicants with a handicap or disability that may, for example, be unable to care for a current apartment alone, may still qualify as able to comply with the Lease if he or she can demonstrate that assistance with caring for the unit has been secured. Such assistance can include a Live-In Attendant, friend or family member, chore service, etc. It is the responsibility of Owner/Agent to determine whether the assistance will enable the applicant to meet the screening criteria.

V. If some form of assistance is necessary, staff shall verify that reasonable accommodation has been secured with the provider. Other reasonable accommodations Housing Authority may consider in appropriate situations shall include adjusting the location of services to an accessible location, modifying policies or practices. Where necessary and verified, Owner/Agent may perform structural modifications to housing or non-housing facilities for applicants with a verified disability. Under no circumstances can such an arrangement be continued longer than necessary or permitted only for the convenience of the tenant. This provision is applicable both for admission as well as continued occupancy and is not restricted to elderly families.

VI. Such accommodations must not cause an undue financial and administrative burden to Owner/Agent nor result in a fundamental alteration of the nature of the housing program, such as individually prescribed devices or services.

VII. Prior to execution of the Lease Agreement, all adult family members shall be required to attend the Resident Orientation Session and complete a form indicating they have attended and understand the rights and requirements of residency at the property. Among the items covered in the Resident Orientation session shall be:

- The Lease, including Security Deposit
- Rent collection procedures and late charges
- Reexamination procedures
- Interim adjustments to rent
- Maintenance procedures
- Unit inspection
- Use of premises
- Other rules of occupancy
- Responsibilities of residents
- Role of Resident Association
- Transfer Policy
- Pet Addend

9) Required drug-related or criminal activity criteria.

a) Required denial of admission

b) Persons evicted for drug-related criminal activity. Applicants are prohibited from admission to housing for ten years from the date of the eviction if any household member has been evicted from federally assisted housing for drug-related criminal activity. However, Owner/Agent may admit the household if Owner/Agent determines:

I. The evicted household member who engaged in drug- related criminal activity has successfully completed a supervised drug rehabilitation program approved by the EGHA: or

II. The circumstances leading to the eviction no longer exits (for example the criminal household member has died or is imprisoned).

c) Persons engaging in illegal use of a drug. Applicants are prohibited from admission to the program if:

I. Repeated (two or more) violations of prior lease agreements, as verified by prior landlords.

II. Police involvement and/or arrest and/or police involvement of the applicant or member of applicant family once or conviction of the applicant or member of the applicant family within the prior 120 months for drug related activity or violent criminal activity.

III. Owner/Agent determines that any household member is currently engaging in illegal use of a drug (for purposes of this section, a household member is 'currently engaged in' the criminal activity if the person has engaged in the behavior recently enough to justify a reasonable belief that the behavior is current); or

IV. The owner/Agent determines that it has reasonable cause to believe that a household member's illegal use or pattern or illegal use of a drug may threaten the health, safety or right to peaceful enjoyment of the premises by other tenants.

V. The Authority prohibits new admissions and continued occupancy for federally assisted housing of medical marijuana users.

d) Drug related activity is defined as the manufacture, sale, use, or distribution, or the possession with intent to manufacture, sell, use, or distribute a controlled substance (as defined in the Controlled Substance Act).

e) The applicant family must not engage in drug related or violent criminal activity, including criminal activity of any family member.

f) Violent criminal activity includes criminal activity that has as one of its elements the use, attempted use, or threatened use of physical forces against the person or Housing Authority of another.

g) Current use of controlled substance by the applicant family is grounds for denial of admission to Public Housing

h) Conviction of an applicant, or member of an applicant family, for possession of an unregistered firearm or possession of an illegal weapon.

i) Felony Conviction with the past ten years of applicant family

j) The applicant family must not engage in the abuse of alcohol, which interferes with the health, safety or right to peaceful enjoyment of the premises by other residents. Examples of such activities which interfere with the health, safety or right to peaceful enjoyment include but are not limited to: Drunk and disorderly conduct, harassment, stalking, threats to other persons of physical violence or intimidation, breaking and entering, assault and hate crimes. These activities shall be verified by local, state, or national criminal records and include incident reports, arrests, and convictions.

k) The applicant family must not have a pattern of controlled substance abuse or alcohol abuse, which interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. Examples of such, activities which interfere with the health, safety or right to peaceful enjoyment include but are not limited to drunk and disorderly conduct, harassment, stalking, threats to other persons of physical violence or intimidation, breaking and entering, and assault. These activities shall be verified by local, state, or national criminal records and include incident reports, arrests, and convictions.

l) The applicant shall not be accepted as a tenant if after a BCI check it has been determined that he/she and/or family member is a habitual criminal.

m) Owner/Agent shall not waive this condition of eligibility for applicant families who, through a pattern of controlled substance or alcohol abuse, are, in the determination of the HA, a habitual abuser of alcohol or controlled substances and represent a threat to the safety and health of other residents.

n) Owner/Agent shall perform criminal checks, prior landlords' inquiries, and other relevant verifications on all applicants to determine ability to comply with the lease conditions.

o) **Persons convicted of methamphetamine production.** Applicants are permanently prohibited from admission to the housing program if any household member has ever been convicted of drug-related criminal activity for the manufacture or production of methamphetamine on the premises of federally assisted housing.

p) **Persons subject to sex offender registration requirement.** Applicants are prohibited admission to the housing program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program. In the screening of applicants, the Authority must perform necessary criminal history background checks in the State where the housing is located and in other States where household members are known to have resided.

10) Procedures for rejecting ineligible applicants.

a) If an applicant is denied admission, they will receive a written notice stating the reason (s) for the rejection. The applicant has the right to respond in writing or request a meeting to dispute the rejection within 14 days of the notice. Persons with disabilities have the right to request reasonable accommodations to participate in the informal hearing process.

b) If admission is denied because criminal background screening indicates the applicant provided false information; the entity making the determination must provide the subject of the record and the applicant a copy of the information the action is based upon. The subject of the record and the applicant could dispute the accuracy and relevance of the information obtained from any law enforcement agency.

c) Applicants may be rejected for the following reasons:

I. The household is not eligible for occupancy at the project;

II. SSN's are not provided for all household members (except those who do not claim eligible immigration status or were 62 or older on January 31, 2010, and whose initial determination of eligibility began before January 31, 2010);

III. Any household member age 18+ refuses to sign required consent forms;

IV. The household has characteristics that are not appropriate for certain type of unit or not of an appropriate size for available units. They must be retained in the waiting list;

V. The household contains members who did not declare citizenship or noncitizen status, or sign a statement electing them not to contend noncitizen status. You must give the applicants an opportunity to revise the application excluding nonqualifying members; and

VI. Applicant does not meet site screening criteria.

VII. If a household has assets with a total cash value of more than $100,000, they are ineligible for assistance.

VIII. The family has **Real Property Ownership**: Family will be ineligible if they present a present ownership interest in, a legal right to reside in, and the legal authority to sell a piece of property that is suitable for occupancy by the family.

- A property will be considered suitable for occupancy, unless the family provides sufficient evidence that the real property meets at least 1 of the following exceptions:
  - The property is not capable of meeting the disability-related needs of all members of the family
  - The property is not sufficient for the size of the family
  - The property's physical conditions pose a threat to the family's health and safety
  - The family is unable to reside on the property due to state and local laws
- Real property exemptions:
  - Any property for which the family is receiving assistance under 24 CFR 982
  - Any property jointly owned by a family member and another individual, where the other individual residents and the family member does not
  - Any property that the family is offering for sale, as documented by evidence
  - The property is owned by a member of the family that is a victim of domestic/dating violence, sexual assault, or stalking (when a family requests an exemption on this basis, the PHA must accept self-certification and follow all confidentiality and document-request guidelines outlined in 24 CFR 5.2007)
- Real property may still be included in a family's net assets and contribute to the $50,000 limit even if the property is not suitable for occupancy. Real property is excluded from net family assets if the family does not have the legal authority to sell it.
- EGHA will require documentation that they do not have any present ownership interest in real property.

EGHA Selection Occupancy Standards

11) Occupancy standards

a) Dwelling units are to be leased in accordance with the standards set forth below (except that such standards may be waived if deemed necessary by Owner/Agent to achieve or maintain full occupancy, in which case a family may be temporarily assigned a larger unit size than required):

b) Person per Household

Bedroom Size	Minimum	Maximum	
1	1	1	2
2	2	4	

c) No more than two people shall occupy a bedroom.

d) A live-in care attendant who is not a member of the family shall not be required to share a bedroom with another member of the household.

e) Families temporarily assigned a larger unit size to achieve or sustain full occupancy will be transferred to the proper unit size as soon as one becomes available. Families with a disabled member may require a larger unit size. The household may apply for and obtain such a unit as the Authority's reasonable accommodation. Families occupying a mobility accessible unit who do not require the features of the unit shall be required to transfer if a family with mobility impairment needs the features of the unit. The same policy shall be adhered to for families with a visual or hearing impairment. Transfers or reassignments to other units shall be made without regard to race, color, handicap, or natural origin as follows:

   I. Transfers shall be made to correct over-housing or under-housing with under-housing having priority over over-housing.

   II. Residents shall not be transferred to a unit of larger size unless Owner/Agent has verified medical need for larger unit. Residents shall be given 30 days in which to move. Failure of a resident to accept a transfer to an appropriate size unit may result in termination of their lease and eviction.

f) Families are required to move because of family composition changes causing over-housing or under-housing will incur all moving costs including but not limited to mandatory use of a licensed/bonded moving company.

12) Unit transfer policies

a) Residents who wish to transfer to a different unit must complete an application once the waitlist is open. Their name will be added to the waitlist for the type of apartment they are seeking. To transfer, residents must have completed a one-year lease in their current apartment prior to requesting a transfer within the building. Resident's current apartment must be clean, free of trash, garbage, waste, and alterations. If a resident is seeking to transfer to a larger or smaller unit or for reasons other than reasonable accommodation, they will be placed on the waitlist and will receive priority for the next available unit following any transfer requests due to reasonable accommodation.

b) Residents who seek a transfer as reasonable accommodation for a disability will be transferred at the owners' expense if it is not an undue financial or administrative burden and provided that the transfer is an accommodation to a verified disability or medical reason. The resident must provide written documentation from a licensed physician, psychologist, clinical social worker, or other licensed health care professional stating that such an accommodation is necessary for the resident's verified disability or medical reason. Transfer for reasonable accommodation ***does not*** include factors of view, noise, or apartment location when these factors are not related to the disability. Those seeking transfer for reasonable accommodation will take precedence on the waitlist. All other requests will occur in chronological order by the date the request is received.

c) Residents who wish to transfer must complete a written request unless it is an emergency transfer in accordance with VAWA or is unable to do so because of a disability. Upon request management will assist any resident in completing a request.

13) Policies to comply with Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act and other relevant civil rights laws and statutes.

a) **Section 504 of the Rehabilitation Act of 1973**

I. prohibits discrimination based on disability in any program or activity receiving federal financial assistance from HUD, USDA Rural Development, Federal Low-Income Housing Tax Credit and/or the HOME Program. The Fair Housing Act prohibits discrimination in housing and housing related transactions based on race, color, religion, sex, national origin, disability, and familial status. It applies to housing, regardless of the presence of federal financial assistance. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color or natural origin in any program or activity receiving federal financial assistance from HUD, USDA Rural Development, Federal Low-Income Housing Tax Credit and/or the HOME Program.

II. All marketing, tenant selection, program delivery and residential Housing Authority policies and procedures shall be conducted in accordance with these laws.

III. Necessary modifications shall be made to policies and practices, so they do not discriminate against persons with disabilities.

IV. Appropriate steps to ensure effective communication with applicants, tenants and the public shall take place. Persons with disabilities shall base the determination as to what alterations and auxiliary aids are necessary upon requests.

V. Requests from applicants and tenants with disabilities for reasonable accommodation shall be processed. Currently, services and programs are available in accessible buildings, and the minimum number of accessible units is available.

VI. Section 504 Coordinated has been designated by the Owner.

VII. Complaints should be directed to the HUD Regional Office of Fair Housing and Equal Opportunity (FHEO). The Owner will provide the complainant with FHEO's pamphlet, Fair Housing-It's Your Right (HUD-1686- FHEO, March 2001).

b) **Fair Housing and Equal Opportunity Requirements and Statement of Nondiscrimination:**

I. It is the policy of Owner/Agent to comply fully with Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974), Executive Order 11063, Section 504 of the 1973 Rehabilitation Act of 1973, the Age discrimination Act of 1975, and any legislation protecting the individual rights of the residents, applicants or staff which may subsequently be enacted.

II. Owner/Agent shall not discriminate because of race, color, sex, religion, age, sexual orientation, gender identity, marital status, handicap, disability, or national origin in the leasing, rental, or other disposition of housing or related facilities under its jurisdiction thereof, in the following areas:

- Deny to any family the opportunity to apply for housing, nor deny to any eligible applicant the opportunity to lease housing suitable to its needs.
- Provide housing, which is different than those provided by others.
- Subject a person to segregation or disparate treatment.
- Restrict a person's access to any benefit enjoyed by others in connection with the housing program.
- Treat a person differently in determining eligibility or other requirements for admission.
- Deny a person access to the same level of services: or,
- Deny a person the opportunity to participate in a planning or advisory group, which is an integral part of the housing program.

III. The owner/Agent shall not automatically deny admission to a particular group of otherwise eligible applicants. Each applicant shall be treated on an individual basis in the normal processing routine.

IV. Owner/Agent will seek to identify and eliminate situations or procedures which create a barrier to equal housing opportunity for all. In accordance with Section 504, Owner/Agent will make reasonable accommodations for individuals with handicaps or disabilities (applicants and residents). Such accommodations may include changes in the administration of policies, procedures, or services. In addition, Owner/Agent may
perform structural modifications to housing and non-housing facilities where such modifications would be necessary to afford full access to the housing program for qualified individuals with handicaps.

V. In reaching a reasonable accommodation with, or performing structural modifications for, otherwise qualified individuals with handicaps, Owner/Agent is not required to:
- make alterations that require the removal or alteration of a load bearing structural member.
- provide an elevator for achieving accessibility.
- provide support services that are not already part of its housing programs.
- take any action that would result in a fundamental alteration of the nature of the program or service.
- take any action that would result in an undue financial and administrative burden for the property.

14) Policy for opening and closing the waiting list for the property.

a) Wait lists may be closed completely if there are more applicants than we can reasonably expect to house in the next 12 months.

b) Reopening the List:

I. If the waiting list is closed and Owner/Agent decides to open the waiting list, the Agent shall publicly announce the opening in the manner described in our Affirmative Fair Housing Marketing Plan.

II. This action is taken via the following procedures:
- Notice in a newspaper of general circulation.
- Posting such notice in plain view in the applications office.
- Notice published in minority media publication or other media outlet in the Authority's jurisdiction.

15) Eligibility of students to receive assistance.

a) Housing Authority must determine a student's eligibility for Section 8 assistance at:

I. Move In

II. Annual Recertification

III. Initial Certification

IV. Interim Recertification if one of the family composition changes reported is that a household member is enrolled as a student.

b) Section 8 assistance shall not be provided to any individual who:
   I. Is enrolled as either a part time of full-time student at an institution of higher education for the purpose of obtaining a degree
   II. Is under the age of 24.
   III. Is not a veteran of the United States Military
   IV. Does not have dependent child.
   V. Is not a person with disabilities, as such terms is defined in the 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437 a (b)(3)(E) and was not receiving section 8 assistance as of November 30, 2005
   VI. Is not living with his or her parents who are receiving Section 8 assistance; and
   VII. is not individually eligible to receive Section 8 assistance and has parents who are not income eligible to receive section 8 assistance. INCOME TARGETING

16) Applicant notification and opportunity to supplement information already provided.

a) All information from each applicant must be certified to be true, signed by all adult family members of the family, and be verified by Owner/Agent Staff. False information shall be grounds for rejecting the applicant. Knowledge of false information shall execute appropriate releases permitting Owner/Agent staff to obtain information from all sources. Failure to promptly execute such releases shall render an applicant ineligible for housing. Any information relative to the acceptance or rejection of an applicant shall be documented and placed in the applicant's file. This may include reports of interviews, letters, or telephone conversations with reliable sources. At a minimum, these reports shall include the date, the source of information, including the name and title of the individual contacted and a summary of the information received.

b) Sources of information include, but are not limited to, the applicant (through interviews), landlords, employers, credit bureaus, family, schools, social workers, parole officers, court records, drug treatment centers, clinics, physicians, the police department, and income tax returns.

c) Owner/Agent shall promptly notify any applicant determined to be ineligible, in writing, of such determination, with the reasons therefore, and of his or her rights. The family will be notified that they have fourteen (14) working days from notification of ineligibility to request an informal hearing with Owner/Agent for the applicant to make an appeal. In the event of the receipt of unfavorable information, consideration may be given to the time, nature, and extent of the applicant's conduct and to factors that might indicate a reasonable probability of future conduct or financial prospects, such as:
   I. Evidence of rehabilitation
   II. Evidence of applicant family's participation in social services or other appropriate counseling programs
   III. Evidence of the applicant family's willingness to attempt to increase family income and the availability of training or employment programs within the South County area.

d) The eligible applicant will be offered a suitable unit, in writing. The applicant will have (14) days to notify the Authority of acceptance. If the applicant fails to respond within the prescribed period, the applicant's name will be removed from the waitlist, unless documented evidence is provided that the applicant was unable, due to health reasons, to comply with the deadline requirements.

e) If the applicant refuses a unit, the applicant must respond in writing to have their name go to the bottom of the waiting list.

f) However, if an applicant refuses a unit the second time, the applicant will then be removed from the waitlist.

g) Housing Authority will notify the applicant promptly and indicate:

   I. If the applicant is approved for admission, the approximate date that the family could be offered a unit (to the extent a date can be estimated).

   II. If the applicant is not approved for admission, the reason (s) for that determination will be provided; and if requested by the applicant, Housing Authority will arrange an informal hearing within a reasonable period of time after the applicant has requested the hearing. Selection Standards include the following:

   - An applicant's past performance in meeting financial obligations, especially rent:
   - All qualified applicants, at the time of in person interviews, will be requested to submit list of previous landlords for examination by the staff for the purpose of verifying residence, rental amount and timely payment history. Verification will be obtained also from the current landlord verification form. The exception to this is qualified applicants who have been residing with friends or relatives and have no prior leasing experience for the last year or more. Such applicants will be afforded the same treatment as other applicants.

h) Those applicants whose receipts evidence a late payment record (more than ten days past due on two or more occasions over the last year) may be rejected on the basis of poor payment habits.

i) All available credit references will be checked without charge to the applicant. The following items will be considered evidence of unfavorable credit reference, and may serve as the basis for rejection:

   I. Families/persons with more than two accounts rated 120 days or more past due within the past year, or

   II. Families/persons with two or more outstanding collections at the time of initial application and or collection records for nonpayment of rent within the past year, or

   III. Families/persons with one or more outstanding civil judgments or civil suits within the past year at the time of application for matters other than nonpayment of rent, or

IV. Families/persons who have filed bankruptcy within the past year unless said bankruptcy, the result of a medical catastrophe or part of a divorce or legal separation agreement.

j) Those applicants who have an unsatisfactory credit rating, as indicated above, or who have been late in rent payments on two or more occasions within the past year, will not be considered ineligible if the reason for such rental delinquency or unfavorable credit is due to that applicant family paying more than 50% of their income for rent. In such instances, those families shall be afforded treatment with consideration given to other screening criteria.

k) All credit shown in the report issued by the local credit bureau will reflect positively or negatively on both spouses in the absence of divorce and/or other legal documentation, brought to the attention of Housing Authority by the initiation of the applicants, which clearly separates the parties' credit responsibilities.

l) In the case of unfavorable credit references, the responsibility of Owner/Agent is limited to informing applicant families that their eligibility has been rejected based on confidential information received from the local credit bureau. Housing Authority is, of course, agreeable to reappraise a credit report forwarded to Housing Authority by the credit bureau on behalf of the applicant, which encompasses certain corrections or additions made in that report because of action taken, directly by the applicant with the credit bureau. The application is, however, considered rejected until updated information is received from the credit agency. Waiting List priority or preference is suspended until such time of receipt. This suspension is limited to thirty days following the date of issuance of the credit reject letter. Other qualified applicants will be contacted for the available unit during this suspension. If the application process for another qualified applicant results in the possibility for leasing before a rejected applicant's record is satisfactorily corrected, a lease will be executed for the applicant and the reinstated applicant will be leased the next available unit of proper size.

m) Qualified applicants who have no prior leasing experience of their own and no credit or stable employment history will be given all due consideration regarding personal references and home visits. If an applicant is living with a relative and pays rent, verification shall be obtained from the relative's Income Tax Return.

n) Applicants who evidence a steady income from employment or other sources, such as AFDC, Social Security and/or pensions, will be afforded treatment. Female heads of households and male heads of households will similarly be afforded like treatment.

o) Applicants who are working shall supply an Income Tax Return as income verification.

17) Procedures for identifying applicant needs for the features of accessible units or reasonable accommodations.

a) It is the intention of Shoreside Apartments to make 'reasonable accommodations' both in the application process and residency in accordance with HUD Handbook 4350.3 and especially with regards to Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act and other relevant civil rights laws and statutes. This also includes taking reasonable steps to ensure meaningful access to information and services we provide for persons with LEP (Limited English Proficiency).

b) An applicant or member of an applicant family who requires a service or accommodation to be able to care for the unit shall be afforded the opportunity to obtain the service or supply the accommodation. In cases where the accommodation shall not cause undue financial and administrative burden to management, nor result in fundamental alteration in the nature of the program administered, Housing Authority shall provide such reasonable accommodation. An applicant or member of an applicant family who has been determined to require such services or accommodations shall be responsible for securing the services and supplying the accommodations where it has been determined that Owner/Agent would incur a financial hardship, administrative burden, or would experience a fundamental alteration in the program.

c) Refusal to provide services or supply accommodations on the part of the applicants is grounds for rejection of program participation.

d) An applicant's ability and willingness to cooperate with management.

18) Updating the waiting list

a) Owner/Agent shall contact applicants in writing once annually to update applicants' continued interest in remaining on the waiting list. Refusal to respond to the request letter by the applicant shall result in the withdrawal of the application from the wait list. The applicant has ten days to respond.

b) Upon re opening the wait list, the Owner/Agent shall publicly announce in local newspapers, including minority papers, the new date of application taking.

c) All applications received by the Authority shall be date and time stamped upon receipt.

d) In the event no applicant on the waiting list is available to occupy a housing unit, the Executive Director shall take such steps as are necessary to find an eligible tenant for the unit.

19) Unit inspections

a) The Owner/Agent is required by HUD regulations to inspect the unit to ensure that it is "decent, safe and sanitary" according to Housing Quality Standards (HQS).

b) There are four types of inspections the Owner/Agent will perform:
   I. Initial
   II. Annual
   III. Complaint
   IV. Move Out
   V. Housekeeping

c) HQS takes precedence over local housing codes and other pertinent codes.

d) Many times, inspectors are required to make repeated visits before the unit passes inspection. Some reasons for this are:
   I. The Family or Owner is not home.
   II. A key was not left with neighbors.
   III. There is no adult in the unit.
   IV. Repairs are not completed.

e) Acceptability Criteria and Exceptions To HQS
   I. The Owner/Agent adheres to the acceptability criteria in the program regulations and HUD Inspection Booklet with the following exceptions:
      - Screens shall be required on all exterior windows and doors
      - All units are required to have sufficient weather-stripping and insulation to ensure the unit is free from drafts.
      - The Authority may fail unsanitary conditions were exposed food, garbage, and
      - excrement exists to a degree where health may be endangered.
      - All windows must have shades or blinds or equivalent, provided by the owner.
      - Any amenities which are a part of the original Rental Contract Agreement MUST, continue to be operational throughout the tenancy.
      - All Pull Cords must be hanging to the floor.

20) Annual recertification requirements

a) The status of each resident family is to be re-examined at least once per year in accordance with an established re-examination schedule. However, at the discretion of management, re- examination may be scheduled more often than once per year.

b) The Owner/Agent requires a written application for continued occupancy from each family, as well as a completed Personal Declaration Form and an Authorization for Release of Information Form, signed by all adult household members. These documents will provide the necessary information to enable the Authority to determine:

I. whether the family meets the requirements of eligibility for continued occupancy; and
II. the rent to be charged; and
III. the unit size required.

c) Owner/Agent will utilize EIV during Annual Reexamination but not during an Interim Reexamination.

d) At the first annual reexamination after June 19, 1995, residents shall execute the necessary certification indicating each family's member's citizenship or eligible immigration status. If a family member has declared eligible immigration status, s/he shall supply the necessary verification documents and authorize primary (and secondary if needed) verification through the INS SAVE system. Based upon the verifications received from INS, and after exhausting the appeals process, families shall receive one of the three types of assistance:

I. Continued assistance – Received by families with citizenship or eligible immigration status or received by a mixed family with the Head or Spouse having eligible immigration status, and the family is receiving assistance on 6/19/95, and the family has no members with ineligible immigration status other than Head, Spouse, children of Head or Spouse, or parents of Head or Spouse.
II. Prorated Assistance – Offered to mixed families and based on the statutory formula 24 CFR Part 912.
III. Temporary Deferral of Termination of Assistance - Received by families who refuse prorated assistance; such temporary deferral allows families an opportunity to locate and secure "affordable" housing which does not exceed the current rent including utilities plus 25%. The owner/Agent shall grant temporary deferral in six-month increments and shall require monthly progress reports from the family regarding their affordable housing search. At the end of the six-month increments, which cannot exceed a total deferral of three years, if the family has made a concerted effort to obtain affordable housing, as verified, and has been unable to secure such housing, then the Authority shall grant the family continued prorated assistance, in accordance with the calculation formula in 24CFR Part 912:

e) **Step One:** HAP x the percentage of Eligible Family Members/Total Family Members =adjusted HAP

f) **Step Two:** Contract Rent minus the adjusted HAP = Tenant Rent

g) The Authority shall authorize the accurate type of assistance for those families who have complied with the HUD regulatory requirements and PHA administrative policies. Families found to have violated the lease, not maintained the unit in decent, safe, and sanitary condition, have failed to cooperate with management, or who have not paid their rent within the lease requirements shall be declared "families in unsatisfactory standing" and thus not qualify for the appropriate type of assistance.

h) Resident families who are ineligible for continued occupancy shall be notified in writing of their ineligibility and the reasons therefore and be advised of their right to request an informal hearing. Such a request must be made by the resident family in writing within five (5) days after being notified by Owner/Agent of their ineligibility. Ineligible families shall be allowed for up to three (3) months to move from the property.

i) Rents will be reviewed at the time of the annual re-examination and, if appropriate, be changed to conform to the approved Rent Schedule.

j) Once rent is established, such rental rate shall remain in effect until the next annual re-examination, special re-examination or an interim adjustment for an unanticipated change in income or family composition.

k) Resulting rent increases will take effect with a thirty-day notice (the scheduled effective date for the family) to the family unless the family has caused a delay in completing the re-examination. In such cases, the resulting rent increase will take effect retroactively from the scheduled effective date.

l) If, upon re-examination, it is found that the size or composition of the resident family has changed such that the unit contains a number of rooms less or greater than needed to provide decent, safe and sanitary housing as described in the occupancy standards listed earlier, Housing Authority shall give notice of 30 days to the family requiring that the resident family move to another available unit.

m) If it is determined that a resident has misrepresented information to Housing Authority and as a result the rent paid is less than what should have been charged, then the resulting rent increase shall take effect retroactively to the month following the date the action occurred causing the rent change. If Housing Authority determines that the resident has gained admission or remained in occupancy in Owner/Agent through willful misrepresentation of information, then Housing Authority shall notify the resident in writing with a 10-Day Letter of Notification. The letter shall inform the resident of the reasons for said violation and request the resident's presence at an informal conference with management. Failure by the resident to appear at the scheduled conference shall authorize Owner/Agent to terminate the lease and commence eviction proceedings.

n) During the re-examination, residents shall execute any additional releases necessary to allow Owner/Agent to obtain all the information required to determine rent and continued eligibility. Failure to provide said releases shall result in termination of the lease.

o) Owner/Agent will not initiate termination or eviction for a family that is noncompliant with the asset limitations at the time of reexamination. The owner/Agent will calculate assets as a part of calculating income. The family continues to receive assistance.

p) Hardship is an exception for those families already paying a minimum monthly rent.
   I. Families can request a hardship exception for one of the following reasons:
      - Family has lost eligibility for, or is awaiting an eligibility determination for a Federal, State, or local assistance program,
      - Family would be evicted because of minimum rent,
      - A family's income has decreased to changed circumstances.

q) Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses
   I. Families who receive a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on the most recent income examination prior to January 1, 2024, will begin receiving the 24-month phase in relief at their next annual reexamination. (HOTMA this date will publicity be announced when available)
   II. Families who receive this phase in-relief will have eligible expenses deducted as follows:
      - 1st twelve months – in excess of 5% of annual income
      - 2nd twelve months – in excess of 7.5% annual income
      - After 24-months in excess of 10% threshold will phase in and remain in effect unless the family qualifies for a general hardship relief.
      - East Greenwich Housing Authority will provide a 90-day hardship period allowable but will not exceed 90 days.

r) Hardship Exemption to Continue Childcare Expense Hardship
   I. If a family reports the change in circumstances in a timely manner (within 7 days) East Greenwich Housing Authority will provide the family with a (30 day) advance notice of any rent increase, and such rent increase will be effective the first day of the month beginning after the end of that (30 day) notice period.

      If the family does not report the change in a timely manner, the adjustment will be made retroactive to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any underpaid rent and may be offered a repayment agreement.

      The owner/Agent will provide a 90-day hardship period but will not exceed 90 days.

21) Interim recertification reporting policies

a) The rent and income of a resident family shall be reviewed and rent adjustments made as appropriate upon receipt of written notification by a resident of one or more of the following changes in family circumstances:
   I. Loss or addition of a person to the household who should become a member of the household under Authority policy (no additional members may be added w/o the prior approval of the Authority)
   II. Receipt or discontinuance of public assistance
   III. Receipt or discontinuance by wage earners of unemployment or other compensation
   IV. Physical loss or addition to the family of a wage earner
   V. Increase or decrease in wages at employment of record.
   VI. Changes in employment.
   VII. Any changes in income or assets must be reported.

   Residents shall report any of the above changes in writing to Owner/Agent within ten (10) calendar days of the change.

b) Verification of Information. At the time a change in any of the above circumstances is reported, the resident shall provide the Authority with any additional releases permitting it to obtain information necessary to determine rent adjustment. Failure to do so shall result in termination of the lease.

c) Increases in rent will be made effective on the first day of the second month following the date the action occurred causing the change in circumstances.
   I. If the family does not report the change, in writing, within ten (10) calendar days of the change, the family will have delayed the interim adjustment and thus, lose the right to any thirty (30) day notice prior to a rent increase. A delay reporting a change resulting in a rent decrease shall cause the lower rent to take effect the month following the completion of the interim adjustment.

d) Decreases in rent will be made effective on the first day of the month following the date on which the action is reported. However, decreases will not be made until after the Authority has verified the reported changes. Pending such verification, the resident shall pay the previously established rent.

e) If, during the term of tenancy or during the initial application process, the resident or any member of the household intentionally misrepresents or fails to report to Housing Authority in writing all facts upon which the rent should be based, this shall constitute fraud and be considered a violation of the Lease Agreement and is grounds for eviction.

f) Families with 'no income' will have a status review every three months.

g) Interim Reexaminations - Reporting Changes & Effective Date
   I. (SEE above)

22) Increases/Decreases in Adjusted Income

a) The owner/Agent will continue to adjust rent upon receipt of written notification by a resident of one or more of the following changes in family circumstances. (SEE PAGE 27)

23) De Minimis Errors in Income Determinations

a) If the tenant submits false information on any application, certification or request for interim adjustment or does not report interim changes in family income as a result, is charged a rent less than the amount required by HUD's rent formulas, the Tenant agrees to reimburse the Landlord for the difference between the rent he/she should have paid and the rent he/she was charged. (part of the lease)

b) The Tenant is not required to reimburse the Landlord for undercharges caused solely by the Landlord's failure to follow HUD's procedures for computing rent or assistance payments. (part of the lease)

24) Implementation of House Rule changes

a) Owner/Agent establishes house rules that are reasonably related to the safety, care and cleanliness of the building and the safety, comfort, and convenience of the Tenants. If any changes are to occur, the Tenant receives written notice of the proposed rule at least 30 days before the rule is enforced.

25) Verification of income through Enterprise Income Verification System (EIV)

a) HUD provides the Owner/Agent with information about an applicant's status as a HUD Housing assistant recipient. The Owner/Agent will use the "Existing Tenant Report" in EIV to determine if the applicant or any member of the applicant household is currently receiving HUD assistance. Nothing prohibits a HUD housing assistance recipient from applying to this property. However, the applicant must move out of the current Housing Authority and/or forfeit any other subsidy before HUD assistance on this Housing Authority will begin. If the applicant or any member of the applicant household fails to disclose rental history fully and accurately, the application may be denied based on the applicant's "misrepresentation" of information.

b) Owner/Agent will utilize EIV during Annual Reexamination but not during an Interim Reexamination.

26) Live-in Aide policy

a) Family may include a live in attendant who:
   I. Has been determined by Owner/Agent to be essential to the care and well-being of an elderly, handicap, or disabled family member; and
   II. Is not obligated for the support of the elderly, disabled or handicapped member; and
   III. Would not be living in the unit except to provide care for the elderly, handicapped or disabled family member; and
   IV. Whose income shall not be counted for the purposes of determining eligibility or rent; and
   V. Who may not be considered the remaining member of the family?
   VI. After the tenant has left the unit that the attendant was attending to, the care attendant is required to move from said unit immediately, but not to exceed 30 days.

b) Relatives may be considered as a live-in attendant, but they must meet the above criteria. To determine whether a live in attendant is essential to the care and well-being of the elderly, handicapped or disabled person," Owner/Agent will send third party verification to a reliable medical source familiar with the applicant. The letter will seek verification of the services the attendant needs to provide to make the attendant essential and why he/she is needed.

c) Once eligibility has been determined based on the criteria set forth by the HUD regulations, Owner/Agent will evaluate each applicant to determine eligibility utilizing resident screening criteria. Housing Authority will deny admission to any otherwise eligible applicant whose habits, conduct or practices in present or prior housing has been such as would likely interfere with other residents as to diminish their enjoyment of the premises by adversely affecting their health, safety, or welfare, or by adversely affecting the physical environment or financial stability of Owner/Agent if the applicant were admitted to the property.

27) Methods to comply with the Limited English Proficiency (LEP) requirements.

a) Executive Order (E.O.) 13166 requires Federal agencies and grantees to take affirmative steps to communicate with persons who need services or information in a language other than English. The Owner/Manager will take reasonable steps to ensure meaningful access to the information and services we provide for persons with LEP. This may include interpreter services and/or written materials translated into other languages.

b) HUD specific LEP Guidance, "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" was published in the Federal Register on January 22, 2007."

28) Methods to comply with the Violence against Women Act

a) An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence, and shall not be good cause for terminating the assistance, tenancy, or occupancy rights of the victim of such violence.

b) The Owner/Agent may terminate the assistance to remove a lawful occupant or tenant who engages in criminal acts or threatened acts of violence or stalking to family members or others without terminating the assistance or evicting victimized lawful occupants.

c) The Owner/Agent may honor court orders regarding the rights of access or control of the property, including Emergency Protective Order's, Domestic Violence Order's, and other orders issued to protect the victim and used to address the distribution or possession or property among household members where the family "breaks up."

d) There is no limitation on the ability of the EGHA to terminate assistance for other good cause unrelated to the incident or incidents of domestic violence, dating violence or stalking, other than the victim may not be subject to a "more demanding standard" than non-victims.

e) There is no prohibition on the EGHA terminating assistance if it "can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant's (victim's) assistance is not terminated."

f) These provisions do not supersede any protections provided by law, which give greater protection to the victim.

g) The Owner/Agent may require certification by the victim of victim status on such forms as the Owner/Agent and/or HUD shall prescribe or approve.

h) All information is kept confidential in accordance with VAWA.

i) Measure of Priority

   I. When a resident requests an emergency transfer due to a VAWA act, their request will be put above any other requests for transfers at that property including:

      - Section 504 over housed and under housed requests.
      - Reasonable Accommodation purposes, i.e. a first floor or fully accessible unit.
      - Change in Household Size that requires a change in bedroom size.

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

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

IV. Owner/Agent has not adopted a preference or priority for external transfers and for external wait list.

j) Statutory definitions:

I. The same definitions of "domestic violence," "dating violence," and "stalking," and of "immediate family member" are provided in Sections 606 and 607. While definitions of domestic and dating violence refer to standard definitions in the Violence Against Women Act, the definition of stalking provided in Title VI is specific to the housing provisions.

II. **Domestic Violence** – [as defined in Section 40002 of VAWA 1994] which states as follows:

- SEC 40002(a)(6) – "DOMESTIC VIOLENCE - The term 'domestic violence' includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabiting with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction."

III. **Dating Violence** – [as defined in Section 40002 of VAWA 1994] which states as follows:
- SEC 40002(a)(8) – "DATING VIOLENCE- The term 'dating violence' means violence committed by a person—
  - who is or has been in a social relationship of a romantic or intimate nature with the victim; and
  - where the existence of such a relationship shall be determined based on a consideration of the following factors:
    - The length of the relationship.
    - The type of relationship.
    - The frequency of interaction between the persons involved in the relationship."

IV. **Stalking** – "means -
- to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; and (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
- during, or because of, such following, pursuit, surveillance or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to –
  - that person.
  - a member of the immediate family of that person; or
  - the spouse or intimate partner of that person; …"

V. **Immediate Family Member** - "means, with respect to a person –
- a spouse, parent, brother, sister, or child of that person, or an individual to whom that person stands in loco parentis; or
- any other person living in the household of that person and related to that person by blood or marriage."

k) VAWA protections (applicable to the Section 8 program only). The plan, as well as House Rules where applicable, must include policies and procedures covering the VAWA protections. Owner policies must support or assist victims of domestic violence, dating violence or stalking and protect victims, as well as members of their family, from being denied housing or from losing their HUD assisted housing because of domestic violence, dating violence or stalking. (a) Owners must provide notice to Section 8 tenants of their rights and obligations under VAWA. (b) Certification of Domestic Violence, Dating Violence or Stalking.

l) Management follows the VAWA Policy along with rejection letter.

m) Confidentiality of Information. The identity of the victim and all information provided to owners relating to the incident(s) of domestic violence, dating violence or stalking must be retained in confidence by the owner and must not be entered into any shared database or provided to a related entity, except to the extent that the disclosure is: (1) Requested or consented to by the individual in writing; (2) Required for use in an eviction proceeding; or (3) Otherwise required by applicable law. The HUD-approved certification form provides notice to the tenant of the confidentiality of the form and the limits thereof. (d) Retention of information. Owner/Agent must retain all documentation relating to an individual's domestic violence, dating violence, or stalking in a separate file that is kept in a separate secure location from other tenant files. (e) VAWA Lease Addendum. Owner/Agent must have tenants sign the VAWA lease addendum, form HUD-91067 (see Chapter 8 for requirements on issuance of modifications to the model lease). Emergency transfer plan

n) Preferences may be established by federal law, HUD regulations, State or local law, or written owner policy. [24 CFR 5.601; 5.655; 236.715; 880.603; 880.612a; 881.601; 883.701; 884.214; 884.223a; 886.132; 886.337; 886.329a; 891.230; 891.750]

29) Privacy Act Requirements

a) It is the policy of Owner/Agent to guard the privacy of individuals conferred by the Federal Privacy Act of 1974 and to ensure the protection of such individuals' records maintained by the property.

b) Therefore, Owner/Agent shall not disclose any personal information contained in its records to any person or agency unless the individual about whom such information is requested shall give written consent to such disclosure (as permitted in the Authorization for Release of Information Form).

c) This privacy policy in no way limits Owner/Agent ability to collect needed information to determine eligibility or compute rent.

d) Consistent with the intent of Section 504 of the Rehabilitation Act of 1973, any information obtained on the handicap or disability of an individual will be treated in a confidential manner.

30) Revocation of Consent Form (Form HUD-9887)

a) Each member of the household age 18 years or older that chooses not to sign the required HUD 9887/9887-A Consent form will result in termination or denial of admissions.

31) Determination of Family Income Using Other Means Tested Public Assistance, i.e., "Safe Harbor"

a) Owner/Agent chose not to implement the Safe Harbor income determination.

Civil Rights Certification *(Qualified PHAs)*	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB Approval No. 2577-0226** **Expires 3/31/2024**

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning July 1, 2025 *in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq.*), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

Housing Authority of the Town of East Greenwich	RI024
PHA Name	PHA Number/HA Code

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

Name of Executive Director:	Name of Board Chairperson:
Tracy L. Johnson	Elizabeth Grumbach
Signature Date	Signature Date

The United States Department of Housing and Urban Development is authorized to collect 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. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 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.

East Greenwich Housing Authority

Memorandum

To: EGHA Board of Commissioners
From: Tracy Johnson, Executive Director

On Saturday, December 14, 2024, a fire occurred at Brookside Terrace in one of the first buildings to open. In this this building, 12 units were found to be inhabitable. 9 of the 12 units housed EGHA HCV participants.

EGHA staff, mostly Carol Giammarco-HCV Administrator, has been in contact with Brookside Management, Winn-Gate leadership, HUD, and Town departments and most importantly our residents affected.

Tracy was in frequent contact with HUD as well as representatives from Senator Reeds office.

Attached is a status synopsis of EGHAs Brooksides HCV recipients displaced by the fire.

146 FIRST AVENUE EAST GREENWICH, RI 02818
(401) 885-2610 WWW.EGHOUSING.COM

VG - Showed her 2 - 1 bedrooms at Shoreside. Tenant decided to request a RA for a 2 bedroom to add another adult due to stress of fire. EGHA is still waiting on RA. Tenants have renters' insurance that will pay up to 1 year at the residency hotel.

KC – Kim has contacted me through email, but she has had no interest in discussing housing.

SD – brought in a landlord packet on 1/4/25 called and said the landlord decided not to take her. Then said to put packet through to a Wingate property (Lincoln Loft) then informed staff to submit to Walker Street in (not taking Lincoln loft). Then received a message from tenant and Wingate that she would be submitting for Lincoln lofts and would be moving there. Tenant signed voucher 1/16/2025 and will send to Lincoln Housing Authority

JD – showed 2 units at Regal Court called to pick up landlord packet decided she was not taking unit feels the bedroom is too small. The tenant was going to take a Wingate property in Attleboro stating she was not comfortable taking that unit. Staff a second unit at Regal Court on 1/16/2025; she liked the unit but was going to see another property will notify staff by end of day with answer.

DG – Still looking (no available unit)

TM - Transfer was in process for another bldg. at Brookside Terrace before Fire; will be moving to new unit on 1/17/2025

MN – showed her CH 2 units, initially accepted (started paperwork). The tenant decided the unit was to small, asked to see something else. EGHA showed her another unit that was not ready yet; the tenant accepted that unit and then called and left a message that she will be accepting a unit at Brookside Terrace instead. EGHA has not received landlord packet for the new unit as of 1/16/2025

JS – setup appointment to view CH units. Tenant called cancelled was feeling ill have not heard back from her (Renters Insurance will pay up to 1 year at residency hotel)

LW – picked up landlord packet for other units. EGHA showed her unit at 2880 SCT. Tenant called on 1/15/2025 stating she will not be taken the unit.

FY24 Family Self-Sufficiency Announcement

State	Type	Code	Name	Amount	Renewal Positions	Expansion Positions	Total Positions
OR	PHA	OR008	Housing Authority and Urban Renewal Agency of Polk County	$72,000	1	0	1
OR	PHA	OR011	Housing Authority of the City of Salem	$441,144	4	0	4
OR	PHA	OR014	Marion County Housing Authority	$97,000	1	0	1
OR	PHA	OR015	Housing Authority of Jackson County	$206,770	2	0	2
OR	PHA	OR016	Housing Authority of Yamhill County	$298,374	3	0	3
OR	PHA	OR019	Linn-Benton Housing Authority	$267,390	2	1	3
OR	PHA	OR022	Housing Authority of Washington County	$174,720	2	0	2
OR	PHA	OR026	Mid-Columbia Housing Authority	$74,000	1	0	1
OR	PHA	OR032	Northeast Oregon Housing Authority	$182,358	2	0	2
OR	PHA	OR034	Central Oregon Regional Housing Authority	$332,850	2	1	3
			Oregon	**$3,540,252**	**33**	**2**	**35**
PA	PHA	PA001	Housing Authority of the City of Pittsburgh	$392,352	8	0	8
PA	PHA	PA002	Philadelphia Housing Authority	$469,000	5	0	5
PA	PHA	PA006	Allegheny County Housing Authority	$248,901	3	0	3
PA	PHA	PA008	Harrisburg Housing Authority	$25,223	0.5	0	0.5
PA	PHA	PA010	Housing Authority of the County of Butler	$95,000	1	0	1
PA	PHA	PA012	Montgomery County Housing Authority	$107,998	1	0	1
PA	PHA	PA018	Westmoreland County Housing Authority	$366,712	4	0	4
PA	PHA	PA019	Johnstown Housing Authority, Pennsylvania	$72,840	1	0	1
PA	PHA	PA021	Lycoming County Housing Authority	$71,542	1	0	1
PA	PHA	PA022	Housing Authority of the City of York	$89,832	1	0	1
PA	PHA	PA023	Delaware County Housing Authority	$78,000	1	0	1
PA	PHA	PA024	Housing Authority of the City of Easton	$143,324	1	0	1
PA	PHA	PA031	Altoona Housing Authority	$88,500	1	0	1
PA	PHA	PA034	the Housing Authority of the County of Franklin	$43,680	1	0	1
PA	PHA	PA035	Housing Authority of the County of Dauphin	$110,115	1	0	1
PA	PHA	PA036	Housing Authority of the City of Lancaster	$104,571	1	0	1
PA	PHA	PA039	Housing Authority of the County of Armstrong	$47,721	1	0	1
PA	PHA	PA040	Clinton County Housing Authoity	$63,920	1	0	1
PA	PHA	PA046	Housing Authority of the County of Chester	$103,282	1	0	1
PA	PHA	PA048	Housing Authority of Indiana County	$56,175	1	0	1
PA	PHA	PA051	Bucks County Housing Authority	$85,015	1	0	1
PA	PHA	PA060	Housing Authority of Northumberland County	$46,406	1	0	1
PA	PHA	PA081	Lehigh County Housing Authority	$77,480	1	0	1
PA	PHA	PA082	Housing Authority of the County of Union	$64,680	1	0	1
PA	PHA	PA086	Housing Authority of the County of Clarion	$200,908	2	0	2
PA	PHA	PA088	Housing Authority of Centre County	$102,533	1	0	1
PA	PHA	PA091	Adams County Housing Authority	$85,000	1	0	1
PA	MFH	PA26H084116	Midtown Plaza Apartments Limited Partnership	$95,000	1	0	1
PA	MFH	PA26R000015	York Area Development Corporation	$52,500	1	0	1
PA	MFH	PA28M000280	Alleghany Commons Community Partners, LP	$111,232	1	0	1
			Pennsylvania	**$3,699,442**	**46.5**	**0**	**46.5**
RI	PHA	RI001	Housing Authority of the City of Providence	$219,159	3	0	3
RI	PHA	RI002	Housing Authority of the City of Pawtucket	$191,100	2	0	2
RI	PHA	RI004	Central Falls Housing Authority	$93,641	1	0	1
RI	PHA	RI007	East Providence Housing Authority	$81,640	1	0	1
RI	PHA	RI010	Town of Cumberland Housing Authority	$95,528	1	0	1
RI	PHA	RI011	Warwick Housing Authority	$45,027	1	0	1
RI	PHA	RI016	Town of Coventry Housing Authority	$115,111	1	0	1
RI	PHA	RI017	Town of North Providence Housing Authority	$89,000	1	0	1
RI	PHA	RI024	Housing Authority of the Town of East Greenwich	$77,896	1	0	1
RI	PHA	RI026	Narragansett Housing Authority	$109,200	1	0	1
RI	PHA	RI901	Rhode Island Housing and Mortgage Finance Corporation	$308,700	3	0	3
RI	MFH	RI43H023037	Heritage Preservation Associates Limited Partnership	$87,620	1	0	1
RI	MFH	RI43H023058	Phoenix Apartments Limited Partnership	$63,110	0.5	0	0.5
RI	MFH	RI43RD00001	Prospect Redevelopment I Limited Partnership	$93,546	1	0	1
RI	MFH	RI43RD00003	Prospect Redevelopment II Limited Partnership	$93,546	1	0	1
RI	MFH	RI43RD00004	Prospect Redevelopment III Limited Partnership	$93,546	1	0	1
			Rhode Island	**$1,857,370**	**20.5**	**0**	**20.5**
RQ	PHA	RQ006	Municipality of San Juan	$21,840	0.5	0	0.5
RQ	PHA	RQ008	Municipality of Ponce	$7,500	0.5	0	0.5
RQ	PHA	RQ011	Municipality of Bayamon	$48,120	1	0	1
RQ	PHA	RQ013	Municipality of Trujillo Alto	$45,878	1	0	1
RQ	PHA	RQ030	Municipality of San German	$64,997	1	0	1
RQ	PHA	RQ038	Municipality of Juana Diaz	$28,464	1	0	1
			Puerto Rico	**$216,799**	**5**	**0**	**5**
SC	PHA	SC001	the Housing Authority City of Charleston	$82,830	1	0	1
SC	PHA	SC002	Housing Authority of the City of Columbia, South Carolina	$138,972	2	0	2
SC	PHA	SC003	Housing Authority of the City of Spartanburg	$145,000	2	0	2
SC	PHA	SC004	Housing Authority of Greenville	$186,412	2	0	2
SC	PHA	SC024	South Carolina Regional Housing Authority #3	$100,000	1	0	1
SC	PHA	SC026	Beaufort Housing Authority	$97,338	1	0	1
SC	PHA	SC034	Housing Authority of Myrtle Beach	$32,836	0.5	0	0.5
SC	PHA	SC056	Charleston County Housing and Redevelopment Authority	$162,570	1	1	2
SC	PHA	SC057	North Charleston Housing Authority	$223,998	1	1	2
			South Carolina	**$1,169,956**	**11.5**	**2**	**13.5**
SD	PHA	SD016	Sioux Falls Housing and Redevelopment Commission	$122,732	2	0	2
SD	PHA	SD056	Brookings County Housing & Redevelopment Commission	$43,680	1	0	1
SD	PHA	SD057	Mobridge Housing and Redevelopment Commission	$43,680	1	0	1
			South Dakota	**$210,092**	**4**	**0**	**4**
TN	PHA	TN001	Memphis Housing Authority	$134,134	1	1	2

Vendors			
AAA Network Realty			$ 40.00
Dayco			$ 40.00
Mark's Carpet Concep[ts			$ 50.00
A. Fire & Safety			$ 50.00
Custom Supply			$ 40.00
Classic Seal Coating			$ 40.00
Certa Pro Painters			$ 200.00
PR Materials			$ 40.00
Phalanx			$ 100.00
Marcus Law			$ 750.00
CE Boggia Plumbing			$ 200.00
Feeney Pinkerton			$ 100.00
Others			
Krupa Johnson & Sotis			$ 100.00
Private Donor			$ 100.00
			$ 1,850.00

The OAKS

RAFFLE PRIZES

FRAMED DICKIE MILNER ORIGINAL

STOP &SHOP GIFT CARD

GIFT CERT HAIR PLUS

GIFT CERT MAGIC NAILS

BASKET BY DAVES MARKET PLACE

GIFT CERT SILVER SPOON BAKERY

THORPES LIQUOR MYSTERY PRIZES

GIFT CERT OAKS TAVERN

ANTHONYS LIQUOR BASKETS

L&S AUTOMOTIVE OIL CHANGE

GIFT CERT CATHAY GARDEN

GREENWICH BAY OYSTER BAR GIFT CERTIFICATE

GIFT CERT VICTORS KITCHEN

TIQ MATEO'S GIFT CERTIFICATE

TWIN SHELLFISH

MAIN STREET COFFEE

EAST GREENWICH COUNTRY CLUB GREENS FEES FOR 2

RAFFLE TICKETS

$1 EACH OR $5 FOR 6

A SPECIAL THANK YOU TO Sabor

TWISTED,

BERKSHIRE-HATHAWAY

AND

ELIZABETH LEDDY, MS., L.M.F.T

AND EVERYONE IN THE OAKS FAMILY

FOR ALL YOUR SUPPORT THROUGH THE YEARS

Nathan White