

OHA Regular Meeting of the Board of  
Commissioners  
Thursday, February 27, 2025 8:30 AM  
First Floor Boardroom  
1823 Harney Street  
Omaha, NE 68102

1. ANNOUNCEMENT OF OPEN MEETINGS ACT
2. ROLL CALL
3. PUBLIC COMMENTS
4. REPORT OF CHIEF EXECUTIVE OFFICER
5. ACTION ITEMS
  - 5.1. CONSENT AGENDA ITEMS FOR CONSIDERATION
    - 5.1.1. Minutes of Previous Regular Board Meeting (01/30/2025)

**OMAHA HOUSING AUTHORITY**  
**BOARD OF COMMISSIONERS REGULAR MEETING MINUTES**  
Jackson Tower, 600 S 27<sup>th</sup> St, Omaha, Nebraska 68102  
8:30 a.m. January 30, 2025

**STAFF PRESENT:** Joanie Balk, Ashley Hatheway, Brian Hansen, Denise Burmood, Philisa Smith, Latina Jackson, Sal Issaka, Charles Karl, Michael Wehling, Shannon Mahnke, Sarah Nothhorn

*The meeting was called to order at 8:31 a.m.*

**1. ANNOUNCEMENT OF OPEN MEETINGS ACT:**

The meeting falls under the Open Meetings Act and copies of the law are available.

**2. ROLL CALL:** Commissioners Present:

David Levy, Chair  
Joel Dougherty, Vice Chair  
Abdi Hussein  
Keenya Barnes-Heyward  
Tony Veland  
Jennifer Taylor  
Christine Johnson  
Alexis Bromley  
Danielle Goodwin

**3. PUBLIC COMMENTS:**

Chair Levy questioned if there were any public comments.

Five tenants offered public comments. The topics of their comments included safety concerns, unauthorized visitor concerns, maintenance issues, and a laundry machine not working properly.

**4. REPORT OF THE CHIEF EXECUTIVE OFFICER**

Ms. Balk discussed OHA's inspection procedures and process at City View Apartments, noting that OHA has approximately 35 voucher holders residing there. Ms. Balk also discussed legislative bills proposed that target OHA.

**5. ACTION ITEMS**

**5.1. CONSENT AGENDA ITEMS FOR CONSIDERATION**

(All items listed under the Consent Agenda will be enacted by one motion unless a commissioner requires otherwise, in which event the item may be removed from the Consent Agenda and considered separately.)

**5.1.1. Minutes of Previous Regular Board Meeting (12/19/2024)**

**5.1.2. Minutes of Previous Annual Board Meeting (12/19/2024)**

**5.1.3. Finance/Procurement/Operations Committee Resolutions**

5.1.3.1. Resolution 2025-01 OHA Past Due Write Offs

5.1.3.2. Resolution 2025-02 Independent Audit Services

5.1.3.3. Resolution 2025-03 Increase Electrical Code Updates Contract

**5.1.4. Development/External Affairs/Public Relations Committee Resolutions**

5.1.4.1. Resolution 2025-04 Amendments to Annual Plan

Chair Levy questioned if any items needed to be pulled from the Consent Agenda. No items were pulled from the Consent Agenda.

**MOTION** by Commissioner Johnson, seconded by Commissioner Goodwin, to approve the Consent Agenda.

Motion passed. Aye-9, Nay-0

- Commissioner Johnson – Aye
- Commissioner Bromley – Aye
- Commissioner Levy – Aye
- Commissioner Veland – Aye
- Commissioner Goodwin – Aye
- Commissioner Dougherty – Aye
- Commissioner Hussein – Aye
- Commissioner Barnes-Heyward – Aye
- Commissioner Taylor – Aye

**1. DEPARTMENT REPORTS AND DISCUSSION ITEMS (as necessary):**

- **Housing Choice Voucher Program**
- **Asset Management (Public Housing)**
- **Housing in Omaha, Inc.**
- **Compliance**
- **Financials**

Ms. Hatheway provided a financial summary.

- **Development**
- **Procurement/Contracting/Capital Budget**
- **Human Resources**
- **Family and Community Services**
- **Legal**

**2. NEW BUSINESS:**

Mr. Hansen mentioned a new class action lawsuit, noting that the plaintiff sued the incorrect entity, and OHA has retained a firm for representation.

**3. EXECUTIVE SESSION:**

Chair Levy questioned if there was a need for an Executive Session.

**4. ADJOURNMENT:**

**MOTION** by Commissioner Veland seconded by Commissioner Taylor to adjourn the meeting at 9:15 a.m.

Motion passed. Aye-9, Nay-0

- Commissioner Johnson – Aye
- Commissioner Bromley – Aye
- Commissioner Levy – Aye
- Commissioner Veland – Aye
- Commissioner Goodwin – Aye
- Commissioner Dougherty – Aye
- Commissioner Hussein – Aye
- Commissioner Barnes-Heyward – Aye
- Commissioner Taylor – Aye

5.1.2. Development/External Affairs/Public Relations Committee Resolutions

5.1.2.1. Resolution 2025-15 Amend HUD Approval of Disposition of  
Vacant Spencer Lands

# Memorandum

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To: OHA Board of Commissioners

From: Brian Hansen, General Counsel

Date: February 27, 2025

Re: Section 18 amendments & application regarding sale of Spencer vacant lands

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## **RECOMMENDED ACTION:**

OHA staff recommends that the Board authorize amendment to HUD Section 18 approval for disposition of vacant lands on the former Spencer Homes site.

OHA staff also recommends that the Board authorize submission to HUD of a Section 18 application for disposition of remaining vacant lands (east of the freeway) on the former Spencer Homes site.

## **EXPLANATION:**

OHA's Spencer Homes public housing development is undergoing CNI redevelopment. All former Spencer Homes units have been demolished. There are vacant lands on the former Spencer Homes site that cannot be used for new residential housing construction due to their proximity to the freeway. In addition, vacant lands east of the freeway do not have immediate redevelopment plans. OHA proposes to sell these vacant lands for purposes that support the neighborhood revitalization.

OHA & the City & CNI partners have been communicating with community organizations regarding best use of these vacant lands. We propose to sell these vacant lands to a non-profit entity, High Inspiration Academy, or to another entity that will use the vacant lands for purposes that support our CNI redevelopment plans and that will benefit the neighborhood residents.

OHA entered into an Option Agreement with a non-profit entity, High Inspiration Academy, in which OHA agreed to sell the vacant land for the purpose of developing community youth programs that would serve the neighboring community. This option agreement is contingent upon HUD approval.

OHA previously received HUD approval for Section 18 disposition of the Spencer Homes lands west of the freeway. This HUD approval was for disposition of land for housing development. OHA must request (with Board approval) amendment of HUD's approval for disposition of the vacant lands for this different purpose.

In addition, OHA must submit a Section 18 application to HUD for disposition of the vacant lands east of the freeway.

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 - 15**  
**AMENDMENT OF SECTION 18 APPLICATION: SPENCER VACANT LAND**

**WHEREAS**, OHA received HUD approval on December 12, 2022 of its Section 18 application (DDA0012215) for disposition of the vacant land of the former Spencer Homes site west of the North Freeway for CNI housing development;

**WHEREAS**, a portion of this land cannot be used for housing development and remains vacant land;

**WHEREAS**, OHA wishes to sell this vacant land to High Aspiration Academy, a local nonprofit that will provide community services that support the neighborhood and CNI redevelopment;

**WHEREAS**, because material terms including the acquiring entity, purpose of disposition have changed, HUD requires OHA to amend its Section 18 application to reflect changes of material terms;

**WHEREAS**, OHA staff recommends that the Board approve amendments to OHA's Section 18 application (DDA0012215) to reflect changes in material terms, namely for sale of specified vacant land on the former Spencer Homes site to High Aspiration Academy;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves amendments to OHA's Section 18 application (DDA0012215) to reflect changes in material terms and, furthermore, authorizes the OHA CEO, Joanie Balk, and General Counsel, Brian Hansen, to take such actions and execute such documents as needed to amend the Section 18 application.

\_\_\_\_\_  
David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary

5.1.2.2. Resolution 2025-16 Section 18 Application for East Spencer

**RESOLUTION NO. 2025 - 16**  
**HUD SECTION 18 APPLICATION: SALE OF EAST SPENCER VACANT LAND**

**WHEREAS**, the Housing Authority of the City of Omaha (OHA) owns vacant land on the site where Spencer Homes formerly was located, which vacant land is not planned for housing development and includes lands that cannot be used for housing development;

**WHEREAS**, OHA has the opportunity to dispose of this vacant land to High Aspiration Academy, a local nonprofit that will provide community services that support the neighborhood and CNI redevelopment;

**WHEREAS**, disposition would require OHA submission of a Section 18 application to HUD;

**WHEREAS**, OHA submission of a Section 18 application requires consultation with the City of Omaha, which consultation has been conducted, and OHA has obtained a letter of support from the Mayor of the City of Omaha regarding OHA's plans for this disposition:

**WHEREAS**, OHA staff has consulted with the Central Advisory Committee regarding disposition of the Spencer sites;

**WHEREAS**, OHA staff has consulted with the OHA Board in regard to all material parts of the Section 18 disposition application including the justification for disposition and proposed method of disposition; and

**WHEREAS**, OHA staff recommends that the OHA Board of Commissioners authorize OHA staff to submit a Section 18 disposition application to HUD for sale of vacant lands on the former Spencer Homes site to High Aspiration Academy;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners hereby authorizes OHA staff to submit a Section 18 disposition application to HUD for sale of vacant lands on the former Spencer Homes site to High Aspiration Academy; and furthermore the Board authorizes OHA's CEO, Joanie Balk, and General Counsel, Brian Hansen, to take such actions and execute such documents as needed for submission of the Section 18 application.

\_\_\_\_\_  
David Levy, Chair, OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary

## 5.2. ADDITIONAL ITEMS FOR CONSIDERATION

- 5.2.1. Resolution 2025-05 Resident Relocation Services, Renewal



# Memorandum

To: The OHA Board of Commissioners  
From: Jennifer Dexter, Procurement Manager  
Date: February 27, 2025  
Re: Recommendation for Contract Renewal – Residential Relocation Services

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## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract renewal with CVR Associates, Inc. for Resident Relocation Services for all locations not supported by the Choice Neighborhood Implementation Grants. The contract extension amount would not exceed \$100,000.00 for a total amount not to exceed \$200,000. This would be the second one-year renewal with OHA reserving the right to renew for two (2) additional terms with Board of Commissioner approval.

## PREVIOUS ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
Contract 23-Resident-10	2023-10	2/23/2023	\$100,000	\$100,000	4	1	2/22/2024
First Renewal	2023–115	2/23/2024	\$100,000	\$200,000	3	1	2/22/2025

## PROPOSED ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
First Renewal	2025–TBD	2/23/2025	\$100,000	\$300,000	2	1	2/22/2026

## PROJECT COST:

Company Name	MBE/WBE	Section 3 Business	Expended as of 2/18/2025
CVR Associates, Inc.	No	No	\$21,349.17

**METHOD OF PROCUREMENT:** Renewal  
**SOURCE OF FUNDS:** The operating budgets of all OHA departments.  
**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 - 05**  
**RENEWAL OF CONTRACT FOR RESIDENT RELOCATION SERVICES**

**WHEREAS**, the Housing Authority of the City of Omaha (“OHA”) currently has a contract with CVR Associates, Inc. to provide resident relocation services;

**WHEREAS**, the contract was procured in 2023 for a one-year term with an option for renewal for four additional one-year terms;

**WHEREAS**, the current contract will expire in February 2025, and staff recommend renewal of the contract for an additional one-year term;

**WHEREAS**, the previous cumulative amount of the contract was \$200,000, and staff recommend increasing the funding by an additional \$100,000, for a total cumulative contract amount of \$300,000; and

**WHEREAS**, OHA staff recommends that the Board of Commissioners approve a one-year renewal of the contract with CVR Associates, Inc., with an increase in the contract amount of \$100,000, to provide resident relocation services;

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a one-year renewal of the contract with CVR Associates, Inc., with an increase in the contract amount of \$100,000, to provide resident relocation services.

\_\_\_\_\_  
David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.2. Resolution 2025-06 Lawn Care Services Pool, Renewal

# Memorandum



To: The Board of Commissioners  
From: Jennifer Dexter, Procurement Manager  
Date: February 27, 2025  
Re: Recommendation for Contract Renewal – Lawn Care Services

## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a renewal of the IDIQ contracts with Four Alarm Lawn Care and TnT Pro Services for lawn care services in an amount not to exceed \$375,000.00, jointly and severally. This contract renewal would be for a term of (1) one year with OHA reserving the right to renew for (3) three additional (1) one-year terms with the Board of Commissioner’s approval.

## PREVIOUS ACTION:

Contract	Resolution	Contract Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Contract Expire Date
24-Lawns-33	2024-33	4/22/2024	\$375,000	\$375,000	4	2	4/21/2025

## PROPOSED ACTION:

Contract	Resolution	Contract Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Contract Expire Date
First Renewal	2025-TBD	4/22/2025	\$375,000	\$750,000	3	2	4/21/2026

## PROJECT COST:

Company Name	DBE/WBE	Section 3 Business	Expended as of 2/18/2025
Four Alarm Lawn Care	No	Yes	\$ 222,895.00
TnT Pro Services	No	No	\$ 61,985.00
Total			\$ 284,880.00

**METHOD OF PROCUREMENT:** Renewal

**SOURCE OF FUNDS:** Property’s Operating Budgets

**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
Sarah Nothorn, Director of Property Management Operations

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 – 06**  
**RENEWAL OF CONTRACT FOR LAWN CARE AND LANDSCAPING SERVICES**

**WHEREAS**, the Housing Authority of the City of Omaha (OHA) currently has a contract with Four Alarm Care and TNT Pro Services to provide lawncare and landscaping services;

**WHEREAS**, the contract was procured in 2024 for a one-year term with an option for renewal for four additional one-year terms;

**WHEREAS**, the current contract will expire in April 2025, and staff recommend renewal of the contracts for an additional one-year term;

**WHEREAS**, the previous cumulative amount of the contract was \$375,000, and OHA staff recommend increasing the funding by an additional \$375,000, for a total cumulative contract amount of \$750,000; jointly and severally and;

**WHEREAS**, OHA staff recommends that the Board of Commissioners approve a one-year renewal of the contract with Four Alarm Care and TNT Pro Services to provide lawncare and landscaping services, with an increase in the contract amount of \$375,000, jointly, and severally and;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a one-year renewal of the contract with Four Alarm Lawn Care and TNT Pro Services to provide lawncare and landscaping services, with an increase in the contract amount of \$375,000, jointly and severally.

\_\_\_\_\_  
David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.3. Resolution 2025-07 Commercial Real Estate Broker, Renewal

# Memorandum



To: The OHA Board of Commissioners  
From: Jennifer Dexter, Procurement Manager  
Date: February 27, 2025  
Re: Recommendation for Contract Renewal – The Lund Company

## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract renewal with The Lund Company for Commercial Real Estate Broker services for a term of (1) one year with OHA reserving the right to renew for (2) two additional (1) one-year terms with the Board of Commissioner approval.

## PREVIOUS ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
Contract 23-COMMEREAL-25	2023-25	4/1/2023	n/a	n/a	4	1	3/31/2024
First Renewal	2024-05	4/1/2024	n/a	n/a	3	1	3/31/2025

## PROPOSED ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
Second Renewal	2024-TBD	4/1/2025	n/a	n/a	2	1	3/31/2026

## PROJECT COST:

Company Name	MBE/WBE	Section 3 Business	Expended as of 2/18/2025
The Lund Company	No	no	\$0

**METHOD OF PROCUREMENT:** Renewal

**SOURCE OF FUNDS:** 2% Commission per property sale

**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
Brian Hansen, General Counsel & Director of Real Estate Development

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 – 07**  
**RENEWAL OF CONTRACT FOR COMMERCIAL REAL ESTATE BROKER**

**WHEREAS**, the Housing Authority of the City of Omaha (OHA) currently has a contract with The Lund Company to provide real estate broker services;

**WHEREAS**, the contract was procured in 2022 for a one-year term with an option for renewal for four additional one-year terms;

**WHEREAS**, the current contract will expire in March 2025, and staff recommend renewal of the contract for an additional one-year term;

**WHEREAS**, OHA staff recommends that the OHA Board of Commissioners approve a one-year renewal of the contract with The Lund Company to provide real estate broker services at a commission rate of 2% per property sale, and for a contract term of one year with an option to renew for two additional one-year terms;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a one-year renewal of the contract with The Lund Company to provide real estate broker services at a commission rate of 2% per property sale.

\_\_\_\_\_  
David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary

5.2.4. Resolution 2025-08 Painting Services Pool, Renewal

# Memorandum



To: The Board of Commissioners  
From: Jennifer Dexter, Procurement Manager  
Date: February 27, 2025  
Re: Recommendation for Contract Renewal – Painting Services

## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a renewal of the IDIQ contracts with K&L Construction, D&W Property Maintenance, GS Elite Services, and NSRM LLC for painting services in an amount not to exceed \$350,000.00, jointly and severally. This contract renewal would be for a term of (1) one year with OHA reserving the right to renew for (2) two additional (1) one-year terms with the Board of Commissioner’s approval.

## PREVIOUS ACTION:

Contract	Resolution	Contract Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Contract Expire Date
23-PAINTING-42	2023-42	4/26/2023	\$350,000	\$350,000	4	6	4/25/2024
First Renewal	2024-21	4/26/2024	\$350,000	\$700,000	3	6	4/25/2025

## PROPOSED ACTION:

Contract	Resolution	Contract Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Contract Expire Date
Second Renewal	2025-TBD	4/26/2025	\$350,000	\$1,050,000	2	4	4/25/2026

## PROJECT COST:

Company Name	DBE/WBE	Section 3 Business	Expended as of 1/31/2025
K&L Construction	No	No	\$ 225,159.00
D&W Property Maintenance	No	No	\$ 85,354.00
GS Elite Services	DBE	No	\$ 28,289.98
Ground Zero Services	DBE	No	\$ 36,810.00
NSRM LLC	WBE	No	\$ 0.00
Total			\$ 375,612.98

**METHOD OF PROCUREMENT:** Renewal

**SOURCE OF FUNDS:** Property’s Operating Budgets for minor repairs and Capital Fund Grants for major repairs typically those over \$2,000.

**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
Sarah Nothhorn, Director of Property Management Operations

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 - 08**  
**RENEWAL OF CONTRACTS FOR PAINTING SERVICES**

**WHEREAS**, the Housing Authority of the City of Omaha (“OHA”) currently has contracts with a pool of contractors to provide painting services for OHA properties, including K&L Construction, D&W Property Maintenance, GS Elite Services and NSRM LLC;

**WHEREAS**, the contracts were procured in 2023 for a one-year term with an option to renew for four additional one-year terms;

**WHEREAS**, the current contracts will expire in April 2024, and staff recommend renewal of the contract for an additional one-year term;

**WHEREAS**, , the current contracts are approved for a cumulative total amount of \$700,000, and staff recommend increasing the current contract amount by \$350,000, for total cumulative contract amount of \$1,050,000, jointly and severally; and

**WHEREAS**, OHA staff recommends that the Board of Commissioners approve a one-year renewal of the contracts with K&L Construction, D&W Property Maintenance, GS Elite Services and NSRM LLC with an increase in the contract amount of \$350,000, to provide painting services for OHA properties;

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a one-year renewal of the contracts with K&L Construction, D&W Property Maintenance, GS Elite Services, and NSRM LLC, with an increase in the contract amount of \$350,000, jointly and severally, to provide painting services for OHA properties.

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David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

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Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.5. Resolution 2025-09 Affordable Housing Development Legal Services,  
Renewal

# Memorandum



To: The OHA Board of Commissioners

From: Jennifer Dexter, Procurement Manager

Date: February 27, 2025

Re: Recommendation for Contract Renewal – Affordable Housing Development Legal Services

## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract renewal with Reno & Cavanaugh, PLLC for Affordable Housing Development Legal Services. This would be the fourth and final one-year renewal with OHA.

## PREVIOUS ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expiration Date
Contract 21-LEGHD-16	2021-16	4/1/2021	\$100,000	\$100,000	4	1	3/31/2022
First Renewal	2022-18	4/1/2022	\$100,000	\$200,000	3	1	3/31/2023
Second Renewal	2023-29	4/1/2023	\$0	\$200,000	2	1	3/31/2024
Third Renewal	2024-02	4/1/2024	\$0	\$200,000	1	1	3/31/2025

## PROPOSED ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expiration Date
Fourth Renewal	2025-TBD	4/1/2025	\$0	\$200,000	0	1	3/31/2026

## PROJECT COST:

Company Name	DBE/WBE	Section 3 Business	Expended as of 2/18/2025
Reno & Cavanaugh, PLLC	No	No	\$98,671.41

**SOURCE OF FUNDS:** COCC Budget, Capital Funds, Section 32 Homeownership funds and Choice Neighborhood Implementation Grant Funds

**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
Brian Hansen, General Counsel & Director of Real Estate Development

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 – 09**  
**RENEWAL OF CONTRACT WITH RENO & CAVANAUGH FOR LEGAL SERVICES**

**WHEREAS**, the Housing Authority of the City of Omaha (OHA) currently has a contract with Reno & Cavanaugh, PLLC for Affordable Housing Development Legal Services to guide and represent OHA in housing development and mixed finance matters;

**WHEREAS**, the contract was procured in 2021 for a one-year term with an option for renewal for four additional one-year terms;

**WHEREAS**, the current contract will expire in March 2025, and staff recommend renewal of the contract for the fourth and final one-year term;

**WHEREAS**, the previous cumulative amount of the contract was \$200,000, and OHA staff have determined that it is not necessary to increase the contract amount;

**WHEREAS**, OHA staff recommends that the OHA Board of Commissioners approve a one-year renewal of the contract with Reno & Cavanaugh, PLLC to provide legal services in housing development and mixed finance matters on an as-needed basis, with no increase in the contract amount of \$200,000;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners hereby approves renewal of the contract with Reno & Cavanaugh, PLLC, to provide legal services in housing development and mixed finance matters on an as-needed basis, for a one-year term, with no increase in the contract amount.

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David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

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Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.6. Resolution 2025-10 Managed Service Provider, Contract

# Memorandum



To: The Board of Commissioners  
From: Jennifer Dexter, Procurement Manager  
Date: February 27, 2025  
Re: Recommendation for Contract – Managed Service Provider Services

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## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract with American PCS, Inc. for managed service provider services in an amount not to exceed \$225,000.00. This contract would be for a term of (1) one year with OHA reserving the right to renew for (4) four additional (1) one-year terms with the Board of Commissioner approval.

## EXPLANATION:

OHA Procurement Policy requires all contracts over \$100,000 to be solicited through formal procurement methods.

OHA requires a co-managed MSP service to coordinate with other IT service vendors and provide Tier 2 and 3 helpdesk support for IT issues as well as IT support for OHA’s internal IT staff. The service will continue to monitor network and PC security from external threats, perform the back-up of data on devices, and provide updates and patches for OHA’s computers and servers.

## METHOD OF PROCUREMENT:

OHA invited qualified organizations to present proposals on a scope of work for IT Managed Service Provider (MSP) Services. The Request for Proposals (RFP) was advertised locally in *The Daily Record* for two consecutive Thursdays, December 12<sup>th</sup> and 19<sup>th</sup>, 2024 with the proposal available on December 12, 2025. The pre-proposal conference was held on December 19, 2025 via Zoom. Staff was in communication with 27 firms, 16 of which reviewed the RFP, offering MSP services.

OHA received (8) eight proposals for IT MSP services meeting the qualifications outlined in the RFP prior to the deadline of Friday, January 31, 2025. Three (3) OHA staff members evaluated the proposals and American PCS, Inc., Ascend Technologies, and Waterfield Technologies were awarded qualifying points when ranked according to the scale listed in the RFP.

Managed Service Provider Services	Subjective Scoring Total (75 points possible)	Pricing Scoring Total (25 points possible)	Evaluation Total Score
American PCS, Inc.	68.7	17	85.7
Ascend Technology Group	61.0	20	81.0
Waterfield Technologies	52.7	25	77.7
Marco Technologies, LLC	40.7	20	60.7
12 Points Technologies	50.3	0	50.3
CMIT Solutions	37.0	6	43.0
Oxen Technology	42.3	0	42.3
Amzur Technologies, Inc.	39.3	0	39.3

OHA evaluating staff is recommending the award of the IT Managed Service Provider Services contract to American PCS, Inc.

**PROJECT COST:** This contract will not exceed \$225,000.00.

**SOURCE OF FUNDS:** All Department Budgets

**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
Shannon Mahnke, COO

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 – 10**  
**CONTRACT FOR MANAGED SERVICE PROVIDER SERVICES**

**WHEREAS**, OHA requires a contracted IT Managed Service Provider (MSP) to provide helpdesk support for IT issues and OHA’s internal IT staffing services;

**WHEREAS**, OHA conducted a public procurement process in accord with HUD regulations and OHA policies, issuing a Request for Proposals in December 2024;

**WHEREAS**, OHA received 8 proposals, and the proposal submitted by American PCS, Inc. received the strongest evaluation according to the published criteria; and

**WHEREAS**, staff recommends that the OHA Board of Commissioners approve a contract with American PCS, Inc. in an amount not to exceed \$225,000, and for a contract term of one year with an option to renew for four additional one-year terms, to provide IT managed service provider services;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a contract with American PCS, Inc. in an amount not to exceed \$225,000, and for a contract term of one year with an option to renew for four additional one-year terms, to provide IT managed service provider services.

\_\_\_\_\_  
David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary

5.2.7. Resolution 2025-11 Retirement Plan Consultant, Renewal

# Memorandum



To: The Board of Commissioners

From: Jennifer Dexter, Procurement Manager

Date: February 27, 2025

Re: Recommendation for Contract Renewal – Retirement Plan Consultant Services

## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a renewal of the contract with Cutler Financial Group, Inc. for retirement plan consultant services. The fee for the contract is 30 basis points or 0.30% of the assets in the plan. This contract renewal would be for a term of (1) one year with OHA reserving the right to renew for (1) one additional (1) one-year term with the Board of Commissioner’s approval.

## PREVIOUS ACTION:

Contract	Resolution	Contract Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Contract Expire Date
22-Retire-02	2022-02	3/7/2022	\$120,000	\$120,000	2	1	3/6/2025

## PROPOSED ACTION:

Contract	Resolution	Contract Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Contract Expire Date
First Renewal	2025-TBD	3/7/2025	\$40,000	\$160,000	1	1	3/6/2026

## PROJECT COST:

Company Name	DBE/WBE	Section 3 Business	Expended as of 2/18/2025
Cutler Financial Group, Inc	No	No	

**METHOD OF PROCUREMENT:** Renewal

**SOURCE OF FUNDS:** Property’s Operating Budgets

**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
Sarah Nothhorn, Director of Property Management Operations

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 - 11**  
**CONTRACT RENEWAL FOR RETIREMENT PLAN CONSULTANT SERVICES**

**WHEREAS**, the Housing Authority of the City of Omaha (“OHA”) currently has a contract with Cutler Financial Group to provide retirement plan consultant services;

**WHEREAS**, the contract was procured in 2022 for a one-year term with an option for renew for four additional one-year terms;

**WHEREAS**, the current contract will expire in March 2025, and staff recommend renewal of the contract for an additional one-year term;

**WHEREAS**, the previous cumulative amount of the contract was \$120,000, and OHA staff recommends increasing the funding by an additional \$40,000, for a total cumulative contract amount of \$160,000; and

**WHEREAS**, OHA staff recommend that the OHA Board of Commissioners approve a one-year renewal of the contract with Cutler Financial Group to provide retirement plan consultant services, with an increase in the contract amount of \$40,000;

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a one-year renewal of the contract with Cutler Financial Group to provide retirement plan consultant services, with an increase in the contract amount of \$40,000.

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David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the regular meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

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Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.8. Resolution 2025-12 Title Insurance, Escrow, Related Services, Contract

# Memorandum



To: The Board of Commissioners

From: Jennifer Dexter, Procurement Manager

Date: February 27, 2025

Re: Recommendation for Contract – Title Insurance, Escrow and Related Services

**BalkRECOMMENDED ACTION:**

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve contracts with Ambassador Title, Nebraska Title, and Midwest Title for title insurance, escrow, and related services in an amount not to exceed \$100,000.00. These contracts would be for a term of (1) one year with OHA reserving the right to renew for (4) four additional (1) one-year terms with the Board of Commissioner approval.

**EXPLANATION:**

OHA requires title services to be performed by a Title Company as part of the due diligence process when buying or selling property.

**METHOD OF PROCUREMENT:**

OHA invited qualified organizations to present proposals on a scope of work for Title Insurance, Escrow, and Related Services. The Request for Proposals (RFP) was advertised locally in *The Daily Record* for two consecutive Thursdays, December 12<sup>th</sup> and 19<sup>th</sup>, 2024 with the proposal available on December 12, 2025. The pre-proposal conference was held on December 19, 2025 via Zoom. Staff were in communication with 27 firms, 16 of which reviewed the RFP, offering the requested services.

OHA received (4) four proposals for title insurance, escrow, and related services. Three of the proposals met the qualifications outlined in the RFP prior to the deadline of Friday, January 31, 2025, (Unity Title Group was disqualified. Three (3) OHA staff members evaluated the proposals, and all (3) three remaining proposals were awarded qualifying points when ranked according to the scale listed in the RFP.

<b>Title Insurance, Escrow and Related Services</b>	<b>Subjective Scoring Total (75 points possible)</b>	<b>Pricing Scoring Total (25 points possible)</b>	<b>Evaluation Total Score</b>
Ambassador Title Services	60.0	25.0	85.0
Midwest Title, Inc.	75.0	6.0	81.0
Nebraska Title Company	66.7	12.0	78.7

OHA evaluating staff is recommending the award of the Title Insurance, Escrow, and Related Services contract to all (3) three respondents: Ambassador Title Services, Midwest Title, Inc., and Nebraska Title Company.

**PROJECT COST:** This contract will not exceed \$100,000.00.

**SOURCE OF FUNDS:** All Department Budgets

**SPONSOR(S):** Jennifer Dexter, Procurement Manager  
Brian Hansen, General Counsel & Director of Real Estate Development

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 – 12**  
**CONTRACT FOR TITLE INSURANCE, ESCROW AND RELATED SERVICES**

**WHEREAS**, OHA requires a contracted Title Company to provide title insurance, escrow, and related services for the due diligence process when buying or selling property; and

**WHEREAS**, OHA conducted a public procurement process in accord with HUD regulations and OHA policies, issuing a Request for Proposals in December 2024;

**WHEREAS**, OHA received 4 proposals, and the proposals submitted by Ambassador Title, Nebraska Title, and Midwest Title received the strongest evaluations according to the published criteria; and

**WHEREAS**, staff recommends that the OHA Board of Commissioners approve a contract with Ambassador Title, Nebraska Title, and Midwest Title in an amount not to exceed \$100,000, jointly and severally for a contract term of one year with an option to renew for four additional one-year terms, to provide title insurance, escrow, and related services;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a contract with Ambassador Title, Nebraska Title, and Midwest Title, in an amount not to exceed \$100,000, jointly and severally for a contract term of one year with an option to renew for four additional one-year terms, to provide title insurance, escrow, and related services.

\_\_\_\_\_  
David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary

5.2.9. Resolution 2025-13 ACOP Revisions

## Chapter 6

### INCOME AND RENT DETERMINATIONS

[24 CFR Part 5, Subparts E and F; 24 CFR 960, Subpart C]

#### INTRODUCTION

**This chapter is applicable prior to the PHA's HOTMA 102/104 compliance date.**

The program regulations in the current Code of Federal Regulations (CFRs) were updated for HOTMA on January 1, 2024. As a result, pre-HOTMA regulations from 2023 are no longer available on the electronic CFRs. However, since full HOTMA implementation is still pending, the pre-HOTMA regulations continue to apply to some elements of the program, and this chapter makes references to both pre-HOTMA and HOTMA regulations where applicable. Where HOTMA regulations apply, citations in this chapter have been provided indicating that current HOTMA CFRs are applicable. For all other citations, the pre-HOTMA CFRs apply. The federal government archives previous versions of the CFRs, and PHAs may access them here:

<https://www.govinfo.gov/app/collection/cfr/2023/title24>.

A family's annual income is used to determine their income eligibility for the public housing program and is also used to calculate the amount of the family's rent payment. The PHA will use the policies and methods described in this chapter to ensure that only income-eligible families receive assistance and that no family pays more or less rent than is required under the regulations. This chapter describes HUD regulations and PHA policies related to these topics in three parts as follows:

Part I: Annual Income. HUD regulations specify the sources of income to include and exclude to arrive at a family's annual income. These requirements and PHA policies for calculating annual income are found in Part I.

Part II: Adjusted Income. Once annual income has been established HUD regulations require the PHA to subtract from annual income any of five mandatory deductions for which a family qualifies. These requirements and PHA policies for calculating adjusted income are found in Part II.

Part III: Calculating Rent: will not be included in this update at this time.

## PART I: ANNUAL INCOME

### 6-I.A. OVERVIEW [24 CFR 5.609]

#### -I.A. OVERVIEW

5.609 Annual income.

(a) Annual income means all amounts, monetary or not, which:

(1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or

(2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and

(3) Which are not specifically excluded in paragraph [5.609(c)].

(4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

In addition to this general definition, HUD regulations establish policies for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- Annual Income Inclusions (Exhibit 6-1)
- Annual Income Exclusions (as updated for HOTMA per Notice PIH 2024-38) (Exhibit 6-2)
- Treatment of Family Assets (Exhibit 6-3)
- The Effect of Welfare Benefit Reduction (Exhibit 6-4)

Sections 6-I.B and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income. Verification requirements for annual income are discussed in Chapter 7.

### 6-I.B. HOUSEHOLD COMPOSITION AND INCOME

#### Overview

Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition in accordance with HUD regulations and PHA policies in Chapter 9. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

<b>Summary of Income Included and Excluded by Person</b>	
Live-in aides	Income from all sources (both earned and unearned) is excluded [24 CFR 5.609(b)(8)].

Foster child or foster adult	Income from all sources (both earned and unearned) is excluded [24 CFR 5.609(b)(8)].
Head, spouse, or cohead Other adult family members	All sources of income not specifically excluded by the regulations are included [24 CFR 5.609(a)].
Minors	Earned income of children under 18 years of age is excluded [24 CFR 5.609(b)(3)]. All other sources of unearned income, except those specifically excluded by the regulations, are included.
Full-time students 18 years of age or older (not head, spouse, or cohead)	Earned income in excess of the dependent deduction is excluded [24 CFR 5.609(b)(14)]. All other sources of unearned income, except those specifically excluded by the regulations, are included.

### **Temporarily Absent Family Members**

The current regulations governing annual income do not specifically address temporarily absent family members. The regulations also do not define “temporarily” or “permanently” absent or specify a timeframe associated with a temporary versus a permanent absence .

#### OHA Policy

Unless specifically excluded by the regulations, the income of all family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit.

Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

#### ***Absent Students***

##### OHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household, or the family declares that the student has established a separate household.

#### ***Absences Due to Placement in Foster Care***

Children temporarily absent from the home as a result of placement in foster care (as confirmed by the state child welfare agency) are considered members of the family [24 CFR 5.403].

### OHA Policy

If a child has been placed in foster care, the child will be counted as temporarily absent from the unit for up to 180 consecutive days. OHA will verify with the appropriate agency whether and when the child is expected to be returned to the home.

### ***Absent Head, Spouse, or Cohead***

#### OHA Policy

An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

### ***Family Members Confined for Medical Reasons***

If a family member is confined to a nursing home or hospital on a permanent basis, PHAs may determine that that person is no longer a member of the assisted household, and the income of that person is not counted [New PH OCC GB, *Income Determinations*, p. 12].

#### OHA Policy

The PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

When an individual who has been counted as a family member is determined permanently absent, the family is eligible for the medical expense deduction only if the remaining head, spouse, or cohead qualifies as an elderly person or a person with disabilities.

### **Joint Custody of Children**

#### OHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family if they live with the applicant or participant family 50 percent or more of the time.

When more than one applicant or assisted family (regardless of program) are claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, an IRS income tax return showing which family has claimed the child for income tax purposes, school records, or other credible documentation.

## **Caretakers for a Child**

### OHA Policy

The approval of a caretaker is at the owner and PHA's discretion and subject to the owner and PHA's screening criteria. If neither a parent nor a designated guardian remains in a household receiving HCV assistance, the PHA will take the following actions.

If a responsible agency has determined that another adult is to be brought into the assisted unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.

If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After the 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary. In such cases the PHA will extend the caretaker's status as an eligible visitor.

At any time that custody or guardianship legally has been awarded to a caretaker, the housing choice voucher will be transferred to the caretaker.

During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

## **6-I.C. ANTICIPATING ANNUAL INCOME**

The PHA is required to count all income "anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date" [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.

### **Basis of Annual Income Projection**

The PHA generally will use current circumstances to determine anticipated income for the coming 12-month period. HUD authorizes the PHA to use other than current circumstances to anticipate income when:

- An imminent change in circumstances is expected [HCV GB, p. 5-17]
- It is not feasible to anticipate a level of income over a 12-month period (e.g., seasonal or cyclic income) [24 CFR 5.609(d)]
- The PHA believes that past income is the best available indicator of expected future income [24 CFR 5.609(d)]

PHAs are required to use HUD's Enterprise Income Verification (EIV) system in its entirety as a third-party source to verify employment and income information, and to reduce administrative subsidy payment errors in accordance with HUD administrative guidance [24 CFR 5.233(a)(2)].

HUD allows PHAs to use tenant-provided documents (pay stubs) dated within 120 days of the date received by the PHA to project income once EIV data has been received in such cases where the family does not dispute the EIV employer data and where the PHA does not determine it is necessary to obtain additional third-party data. The PHA may also accept a statement dated within the appropriate benefit year for fixed income sources.

#### PHA Policy

When EIV is obtained and the family does not dispute the EIV employer data, the PHA will use current tenant-provided documents to project annual income. When the tenant-provided documents are pay stubs, the PHA will make every effort to obtain current and consecutive pay stubs dated within the last 120 days.

The PHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:

If EIV or other UIV data is not available,

If the family disputes the accuracy of the EIV employer data, and/or

If the PHA determines additional information is needed.

In such cases, the PHA will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.

When the PHA cannot readily anticipate income based upon current circumstances (e.g., in the case of seasonal employment, unstable working hours, or suspected fraud), the PHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.

Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income.

### ***Known Changes in Income***

If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated by applying each income amount to the appropriate part of the 12-month period.

**Example:** An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the reexamination. In such a case the PHA would calculate annual income as follows:  $(\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}) + (\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks})$ .

The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then require an interim reexamination when the change actually occurs. This requirement will be imposed even if the PHA's policy on reexaminations does not require interim reexaminations for other types of changes.

When tenant-provided third-party documents are used to anticipate annual income, they will be dated within 120 days of the date received by the PHA. Statements dated within the appropriate benefit year will be accepted for fixed income sources.

## **Projecting Income**

In HUD's EIV webcast of January 2008, HUD made clear that PHAs are not to use EIV quarterly wages to project annual income.

## **6-I.D. EARNED INCOME**

### **Types of Earned Income Included in Annual Income**

***Wages and Related Compensation [24 CFR 5.609(a); Notice PIH 2023-27; Notice PIH 2024-38]***

The earned income of each member of the family who is 18 years of age or older, or who is the head of household or spouse/cohead regardless of age, is included in annual income. Income received as a day laborer or seasonal worker is also included in annual income, even if the source, date, or amount of the income varies [24 CFR 5.609 (b)(24) as updated for HOTMA].

*Earned income* means income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. Earned income does not include any

pension or annuity, transfer payments (meaning payments made or income received in which no goods or services are being paid for, such as welfare, social security, and governmental subsidies for certain benefits), or any cash or in-kind benefits [24 CFR 5.100 as updated for HOTMA].

*Unearned Income* means any annual income that is not earned income.

A *day laborer* is defined as an individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future [24 CFR 5.603(b) as updated for HOTMA]. Income earned as a day laborer is not considered nonrecurring income.

A *seasonal worker* is defined as an individual who is hired into a short-term position (e.g., for which the customary employment period for the position is six months or fewer) and the employment begins about the same time each year (such as summer or winter). Typically, the individual is hired to address seasonal demands that arise for the particular employer or industry [24 CFR 5.603(b) as updated for HOTMA]. Some examples of seasonal work include employment limited to holidays or agricultural seasons. Seasonal work may include but is not limited to employment as a lifeguard, ballpark vendor, or snowplow driver [Notice PIH 2023-27]. Income earned as a seasonal worker is not considered nonrecurring income.

#### OHA Policy

OHA will include in annual income the gross amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation.

For persons who regularly receive bonuses or commissions, the PHA will verify and then average amounts received for the two years preceding admission or interim reexamination. If only a one-year history is available, the PHA will use the prior year amounts. In either case the family may provide, and the PHA will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, the PHA will count only the amount estimated by the employer. The file will be documented appropriately.

#### ***Some Types of Military Pay***

All regular pay, special pay and allowances of a member of the Armed Forces are counted except for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(b)(11) as updated for HOTMA].

#### **Types of Earned Income Not Counted in Annual Income**

##### ***Earnings of a Minor [24 CFR 5.609(b)(3) as updated for HOTMA]***

A minor is a member of the family, other than the head of household or spouse, who is under 18 years of age. Employment income earned by minors is not included in annual income. All other sources of unearned income, except those specifically excluded by the regulations, are included.

##### ***Earned Income of Full-Time Students [24 CFR 5.609(b)(14) as updated for HOTMA]***

The earned income of a dependent full-time student in excess of the amount of the dependent deduction is excluded from annual income. All sources of unearned income, except those specifically excluded by the regulations, are included.

A family member other than the head of household or spouse/cohead is considered a full-time student if they are attending school or vocational training on a full-time basis [24 CFR 5.603(b)]. Full-time status is defined by the educational or vocational institution the student is attending [New PH OCC GB, *Lease Requirements*, p. 5].

### ***Income of a Live-in Aide***

Income earned by a live-in aide, as defined in [24 CFR 5.403], is not included in annual income [24 CFR 5.609(b)(8) as updated for HOTMA]. (See Eligibility chapter for a full discussion of live-in aides.)

## **6-I.E. EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16; Notice PIH 2023-27]**

HOTMA removed the statutory authority for the EID. The EID is available only to families that are eligible for and participating in the program as of December 31, 2023, or before; no new families may be added on or after January 1, 2024. If a family is receiving the EID prior to or on the effective date of December 31, 2023, they are entitled to the full amount of the benefit for a full 24-month period. The policies below are applicable only to such families. No family will still be receiving the EID after December 31, 2025. The EID will sunset on January 1, 2026, and the PHA policies below will no longer be applicable as of that date or when the last qualifying family exhausts their exclusion period, whichever is sooner.

### **Calculation of the Disallowance**

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with their "baseline income." The family member's baseline income is their income immediately prior to qualifying for the EID. The family member's baseline income remains constant throughout the period that they are participating in the EID.

### **Calculation Method**

#### ***Initial 12-Month Exclusion***

During the initial exclusion period of 12 consecutive months, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded.

#### OHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

#### ***Second 12-Month Exclusion***

During the second exclusion period of 12 consecutive months, the PHA must exclude at least 50 percent of any increase in income attributable to employment or increased earnings.

#### OHA Policy

During the second 12-month exclusion period, the PHA will exclude 100 percent of any increase in income attributable to new employment or increased earnings.

### ***Lifetime Limitation***

The EID has a two-year (24-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. During the 24-month period, an individual remains eligible for EID even if they receive assistance from a different housing agency, move between public housing and Section 8 assistance, or have breaks in assistance. The EID will sunset on January 1, 2026. In no circumstances will a family member's exclusion period continue past January 1, 2026.

### **Individual Savings Accounts [24 CFR 960.255(d)]**

The PHA may, but is not required to, establish a policy to offer a qualified family paying income-based rent an ISA instead of being given the EID.

#### OHA Policy

OHA chooses not to establish a system of individual savings accounts (ISAs) for families who qualify for the EID.

### **6-I.F. BUSINESS AND SELF-EMPLOYMENT INCOME [24 CFR 5.609(b)(28); Notice PIH 2023-27]**

Annual income includes “net income from the operation of a business or profession. *Net income* is gross income minus business expenses that allows the business to operate. *Gross income* is all income amounts received into the business, prior to the deduction of business expenses.

Expenditures for business expansion or amortization of capital indebtedness may not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.”

#### OHA Policy

To determine business expenses that may be deducted from gross income, PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described herein.

### **Independent Contractors**

Income received as an independent contractor is included in annual income, even if the source, date, or amount of the income varies [24 CFR 2.609 (b)(24)].

*An independent contractor* is defined as an individual who qualifies as an independent contractor instead of an employee in accordance with the Internal Revenue Code Federal income tax requirements and whose earnings are consequently subject to the Self-Employment Tax. In general, an individual is an independent contractor if the payer has the right to control or direct only the result of the work and not what will be done and how it will be done [24 CFR 5.603(b)].

## **Business Expansion**

HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.

### OHA Policy

*Business expansion* is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

## **Capital Indebtedness**

HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.

### OHA Policy

*Capital indebtedness* is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the PHA will allow as a business expense interest, but not principal, paid on capital indebtedness.

## **Negative Business Income**

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

## **Withdrawal of Cash or Assets from a Business**

HUD regulations require the PHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

### OHA Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of an assisted family provided an up-front loan of \$2,000 to help a business get started, the PHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid. Investments do not include the value of labor contributed to the business without compensation.

## **Co-owned Businesses**

### OHA Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

## **Assets Owned by a Business Entity**

If a business entity (e.g., limited liability company or limited partnership) owns the asset, then the family's asset is their ownership stake in the business, not some portion of the business's assets. However, if the family holds the assets in their own name (e.g., they own one-third of a restaurant) rather than in the name of a business entity, then the percentage value of the asset owned by the family is what is counted toward net family assets (e.g., one-third of the value of the restaurant) [Notice PIH 2023-27].

## **6-I.G. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]**

The regulations distinguish between two categories of student financial assistance paid to both full-time and part-time students.

### **Types of Assistance**

Any assistance to students under section 479B of the Higher Education Act of 1965 (Title IV of the HEA) must be excluded from the family's annual income [24 CFR 5.609(b)(9)(i)].

Examples of assistance under title IV of the HEA include:

- Federal Pell Grants;
- Teach Grants;
- Federal Work Study Programs;
- Federal Perkins Loans;
- Income earned in employment and training programs under section 134 of the Workforce Innovation and Opportunity Act (WIOA); or
- Bureau of Indian Affairs/Education student assistance programs
  - The Higher Education Tribal Grant
  - The Tribally Controlled Colleges or Universities Grant Program

The second category is any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education (not otherwise excluded by the Federally mandated income exclusions) [24 CFR 5.609(b)(9)(ii)]. Other student financial assistance received by the student that, either by itself or in combination with HEA assistance, exceeds the actual covered costs is included in income.

*Actual covered costs* are defined as the actual costs of:

- Tuition, books, and supplies;
  - Including supplies and equipment to support students with learning disabilities or other disabilities
- Room and board; and
- Other fees required and charged to a student by the education institution.

For a student who is not the head of household or spouse/cohead, actual covered costs also include the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit.

Further, to qualify, other student financial assistance must be expressly:

- For tuition, book, supplies, room and board, or other fees required and charged to the student by the educational institution;
- To assist a student with the costs of higher education; or
- To assist a student who is not the head of household or spouse with the reasonable and actual costs of housing while attending the educational institution and not residing in an assisted unit.

The student financial assistance may be paid directly to the student or to the educational institution on the student's behalf. However, any student financial assistance paid to the student must be verified by the PHA.

The financial assistance must be a grant or scholarship received from:

- The Federal government;
- A state, tribal, or local government;
- A private foundation registered as a nonprofit;
- A business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or
- An institution of higher education.

Student financial assistance, does not include:

- Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded under section 479B of the Higher Education Act HEA);
- Gifts, including gifts from family or friends; or
- Any amount of the scholarship or grant that, either by itself or in combination with assistance excluded under the HEA, exceeds the actual covered costs of the student.

### **Calculating Income from Student Financial Assistance [HOTMA Student Financial Assistance Resource Sheet; Notice PIH 2023-27]**

The formula for calculating the amount of other student financial assistance that is excluded from income always begins with deducting the assistance received under 479B of the HEA from the total actual covered costs, because the 479B assistance is intended to pay the student's actual covered costs. When a student receives assistance from both Title IV of the HEA and from other sources, the assistance received under Title IV of the HEA must be applied to the student's actual covered costs first and then other student financial assistance is applied to any remaining actual covered costs. Once actual costs are covered, any remaining student financial assistance is considered income.

## OHA Policy

If a student only receives financial assistance under Title IV of the HEA and does not receive any other student financial assistance, OHA will exclude the full amount of the assistance received under Title IV from the family's annual income. The PHA will not calculate actual covered costs in this case.

If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, OHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student's financial assistance from the student's actual covered costs. The PHA will include any amount of financial assistance in excess of the student's actual covered costs in the family's annual income.

### **Example 1**

- Actual covered costs: \$20,000
- Other student financial assistance: \$25,000
- Excluded income: \$20,000 (\$25,000 in financial assistance - \$20,000 in actual covered costs)
- Included income: \$5,000

When a student receives assistance from both Title IV of the HEA and from other sources, OHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the other student financial assistance will be applied to any remaining actual covered costs.

If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance" would be excluded from income.

### **Example 2**

- Actual covered costs: \$25,000
- Title IV HEA assistance: \$26,000
- Title IV HEA assistance covers the students entire actual covered costs.
- Other Student Financial Assistance: \$5,000
- Excluded income: The entire Title IV HEA assistance of \$26,000
- Included income: All other financial assistance of \$5,000

If the amount of assistance excluded under Title IV of the HEA is less than the actual covered costs, the PHA will exclude the amount of other student financial assistance up to the amount of the remaining actual covered costs.

### **Example 3**

- Actual covered costs: \$22,000
- Title IV HEA assistance: \$15,000
- The remaining amount not covered by Title IV HEA assistance is \$7,000 (\$22,000 in actual covered costs - \$15,000 in Title IV HEA assistance).
- Other Student Financial Assistance: \$5,000
- \$7,000 in remaining actual covered costs - \$5,000 in other financial assistance
- Excluded income: \$15,000 entire amount of the Title IV HEA Assistance + \$5,000 in other financial assistance
- Included income: \$0

### **Example 4**

- Actual covered costs: \$18,000
- Title IV HEA Assistance: \$15,000
- The remaining amount not covered by Title IV HEA assistance is \$3,000 (\$18,000 in actual covered costs - \$15,000 in Title IV HEA Assistance)
- Other student Financial Assistance: \$5,000
- When other student financial assistance is applied, financial assistance exceeds actual covered costs by \$2,000 (\$3,000 in actual covered costs - \$5,000 in other financial assistance).
- Included income: \$2,000 (the amount by which the financial aid exceeds the student's actual covered costs).

## **6-I.H. PERIODIC PAYMENTS [Notice PIH 2023-27]**

Periodic payments are forms of income received on a regular basis. HUD regulations specify periodic payments that are not included in annual income. Regulations do not specify which types of periodic payments are included in annual income.

Income that has a discrete end date and will not be repeated beyond the coming year is excluded from a family's annual income because it is nonrecurring income. However, this does not include unemployment income and other types of periodic payments that are received at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that can be extended. For example, a family receives income from a guaranteed income program in their city that has a discrete beginning and end date. While the guaranteed income will be repeated in the coming year, it will end before the family's next annual reexamination. This income is fully excluded from annual income.

Insurance payments and settlements for personal or property losses, including but not limited to payments under health insurance, motor vehicle insurance, and workers' compensation, are excluded from annual income. However, periodic payments paid at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that are received in lieu of wages for workers' compensation are included in annual income. Payments received in lieu of wages for worker's compensation are excluded, even if paid in periodic payments, if the income will last for a period of less than one year.

### **Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)]**

Deferred periodic amounts from Supplemental Security Income (SSI) and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred Department of Veterans Affairs (VA) disability benefits that are received in a lump sum amount or in prospective monthly amounts are excluded from annual income.

#### OHA Policy

OHA will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.

When a delayed-start payment is received that is to be included and the family reports this during the period in which OHA is processing an annual reexamination, OHA will adjust the family's rent retroactively for the period the payment was intended to cover.

If the delayed-start payment is received outside of the time OHA is processing an annual reexamination, then OHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, OHA will conduct an interim in accordance with PHA policies in Chapter 9. If not, OHA will consider the amount when processing the family's next annual recertification.

### **Retirement Accounts [24 CFR 5.609(b)(26); Notice PIH 2023-27]**

Income received from any account under a retirement plan recognized as such by the IRS, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals is not considered actual income from assets.

However, any distribution of periodic payments from such accounts is included in annual income at the time they are received by the family.

An asset moved to a retirement account held by a member of the family is not considered to be an asset disposed of for less than fair market value.

### **Social Security Benefits [Notice PIH 2023-27]**

The PHA is required to use the gross benefit amount to calculate annual income from Social Security benefits.

Annually in October, the Social Security Administration (SSA) announces the cost-of-living adjustment (COLA) by which federal Social Security and SSI benefits are adjusted to reflect the increase, if any, in the cost of living. The federal COLA does not apply to state-paid disability benefits. Effective the day after the SSA has announced the COLA, PHAs are required to factor in the COLA when determining Social Security and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1 or later of the upcoming year [Notice PIH 2023-27].

#### OHA Policy

Annual income includes “all amounts received,” not the amount that a family may be legally entitled to receive but which they do not receive. When the SSA overpays an individual, resulting in a withholding or deduction from their benefit amount until the overpayment is paid in full, OHA must use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount.

### **6-I.I. NONRECURRING INCOME [24 CFR 5.609(b)(24) as updated for HOTMA and Notice PIH 2023-27]**

Nonrecurring income, which is income that will not be repeated beyond the coming year (e.g., 12 months following the effective date of the certification) based on information provided by the family, is excluded from annual income. The PHA may accept a self-certification from the family stating that the income will not be repeated in the coming year. See Chapter 7 for PHA policies related to verification of nonrecurring income.

Income received as an independent contractor, day laborer, or seasonal worker is not excluded from income as nonrecurring income, even if the source, date, or amount of the income varies.

Income that has a discrete end date and will not be repeated beyond the coming year during the family’s upcoming annual reexamination period will be excluded from a family’s annual income as nonrecurring income. This exclusion does not include unemployment income and other types of periodic payments that are received at regular intervals (such as weekly, monthly, or yearly).

Income amounts excluded under this category may include, but are not limited to:

- Nonrecurring payments made to the family or to a third party on behalf of the family to assist with utilities;
- Payments for eviction prevention;
- Security deposits to secure housing;
- Payments for participation in research studies (depending on the duration); and
- General one-time payments received by or on behalf of the family.

Nonrecurring income that is excluded under the regulations includes:

- Payments from the U.S. Census Bureau for employment (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not culminating in permanent employment [24 CFR 5.609(b)(24)(i) as updated for HOTMA].
- Direct federal or state payments intended for economic stimulus or recovery [24 CFR 5.609(b)(24)(ii) as updated for HOTMA].
- Amounts directly received by the family as a result of state refundable tax credits or state or federal tax refunds at the time they are received [24 CFR 5.609(b)(24)(iii) and (iv) as updated for HOTMA].
- Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding gifts, baby showers, anniversaries) [24 CFR 5.609(b)(24)(v) as updated for HOTMA].
- Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization [24 CFR 5.609(b)(24)(vi) as updated for HOTMA]. When calculating annual income, PHAs are prohibited from assigning monetary value to such non-monetary in-kind donations received by the family [Notice PIH 2023-27]. Non-recurring, non-monetary in-kind donations from friends and family are excluded as non-recurring income. However, the value of regular in-kind donations (such as the value of groceries) received by friends and family are included.
- Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings [24 CFR 5.609(b)(24)(vii) as updated for HOTMA].

#### **6-I.J. STATE PAYMENTS TO ALLOW INDIVIDUALS WITH DISABILITIES TO LIVE AT HOME [24 CFR 5.609(b)(19) as updated for HOTMA]**

Payments made by or authorized by a state Medicaid agency (including through a managed care entity) or other state or federal agency to an assisted family to enable a member of the assisted family who has a disability to reside in the family's assisted unit are excluded.

Authorized payments may include payments to a member of the assisted family through state Medicaid-managed care systems, other state agencies, federal agencies, or other authorized entities.

The payments must be received for caregiving services a family member provides to enable another member of the assisted family who has a disability to reside in the family's assisted unit. Payments to a family member for caregiving services for someone who is not a member of the assisted family (such as for a relative that resides elsewhere) are not excluded from income.

Furthermore, if the agency is making payments for caregiving services to the family member for an assisted family member and for a person outside of the assisted family, only the payments attributable to the caregiving services for the caregiver's assisted family member would be excluded from income.

#### **6-I.K. CIVIL RIGHTS SETTLEMENTS [24 CFR 5.609(b)(25) as updated for HOTMA; FR Notice 2/14/23]**

Regardless of how the settlement or judgment is structured, civil rights settlements or judgments, including settlements or judgments for back pay, are excluded from annual income. This may include amounts received because of litigation or other actions, such as conciliation agreements, voluntary compliance agreements, consent orders, other forms of settlement agreements, or administrative or judicial orders under the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act (Section 504), the Americans with Disabilities Act, or any other civil rights or fair housing statute or requirement.

While these civil rights settlement or judgment amounts are excluded from income, the settlement or judgment amounts will generally be counted toward the family's net family assets (e.g., if the funds are deposited into the family's savings account or a revocable trust under the control of the family or some other asset that is not excluded from the definition of *net family assets*). Income generated on the settlement or judgment amount after it has become a net family asset is not excluded from income. For example, if the family received a settlement or back pay and deposited the money in an interest-bearing savings account, the interest from that account would be income at the time the interest is received.

Furthermore, if a civil rights settlement or judgment increases the family's net family assets such that they exceed the HUD-published threshold amount (\$50,000 for 2024, and \$51,600 for 2025), then income will be imputed on the net family assets pursuant to 24 CFR 5.609(a)(2). If the imputed income, which HUD considers unearned income, increases the family's annual adjusted income by 10 percent or more, then an interim reexamination of income will be required unless the addition to the family's net family assets occurs within the last three months of the family's income certification period and the PHA or owner chooses not to conduct the examination.

#### **6-I.L. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME [24 CFR 5.609(b) as updated for HOTMA; FR Notice 1/31/2024]**

Other exclusions contained in 24 CFR 5.609(b) as updated for HOTMA and FR Notice 1/31/2024 that have not been discussed earlier in this chapter include the following:

- Payments received for the care of foster children or foster adults or state or tribal kinship or guardianship care payments [24 CFR 5.609(b)(4) as updated for HOTMA].
- Insurance payments and settlements for personal or property losses, including but not limited to payments through health insurance, motor vehicle insurance, and workers' compensation [24 CFR 5.609(b)(5) as updated for HOTMA]. However, periodic payments paid at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that are received in lieu of wages are included in annual income [Notice PIH 2023-27].

- Amounts received by the family that are specifically for, or in reimbursement of, the cost of health and medical care expenses for any family member [24 CFR 5.609(b)(6) as updated for HOTMA].
- Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law, that resulted in a member of the family becoming disabled [24 CFR 5.609(b)(7) as updated for HOTMA].
- Income and distributions from any Coverdell education savings account under Section 530 of the Internal Revenue Code of 1986 or any qualified tuition program under Section 529 of such Code [24 CFR 5.609(b)(10) as updated for HOTMA].
- Income earned by government contributions to, and distributions from, “baby bond” accounts created, authorized, or funded by federal, state, or local government [24 CFR 5.609(b)(10) as updated for HOTMA].
- The special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(b)(11) as updated for HOTMA].
- Payments related to aid and attendance under 38 U.S.C. 1521 to veterans in need of regular aid and attendance [24 CFR 5.609(b)(17) as updated for HOTMA]. This income exclusion applies only to veterans in need of regular aid and attendance and not to other beneficiaries of the payments, such as a surviving spouse [Notice PIH 2023-27].
- Loan proceeds (the net amount disbursed by a lender to or on behalf of a borrower, under the terms of a loan agreement) received by the family or a third party (e.g., proceeds received by the family from a private loan to enable attendance at an educational institution or to finance the purchase of a car) [24 CFR 5.609(b)(20) as updated for HOTMA]. The loan borrower or co-borrower must be a member of the family for this income exclusion to be applicable [Notice PIH 2023-27].
- Payments received by tribal members as a result of claims relating to the mismanagement of assets held in trust by the United States, to the extent such payments are also excluded from gross income under the Internal Revenue Code or other federal law [24 CFR 5.609(b)(21) as updated for HOTMA]. Generally, payments received by tribal members in excess of the first \$2,000 of per capita shares are included in a family’s annual income for purposes of determining eligibility. However, as explained in Notice PIH 2023-27, payments made under the Cobell Settlement, and certain per capita payments under the recent Tribal Trust Settlements, must be excluded from annual income.
- Replacement housing “gap” payments made in accordance with 49 CFR Part 24 that offset increased out of pocket costs of displaced persons that move from one federally subsidized housing unit to another federally subsidized housing unit. Such replacement housing “gap” payments are not excluded from annual income if the increased cost of rent and utilities is subsequently reduced or eliminated, and the displaced person retains or continues to receive the replacement housing “gap” payments [24 CFR 5.609(b)(23) as updated for HOTMA].
- Income earned on amounts placed in a family’s Family Self-Sufficiency account [24 CFR 5.609(b)(27) as updated for HOTMA].

- Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (e.g., special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program [24 CFR 5.609(c)(12)(ii) as updated for HOTMA].
- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(b)(12)(i) as updated for HOTMA].
- Amounts received under a resident service stipend not to exceed \$200 per month. A resident service stipend is a modest amount received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development [24 CFR 5.600(b)(12)(iii) as updated for HOTMA].

***State and Local Employment Training Programs [24 CFR 5.609(b)(12)(iv) as updated for HOTMA]***

- Incremental earnings and benefits to any family member resulting from participation in qualifying training program funded by HUD or in qualifying federal, state, tribal, or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program unless those amounts are excluded under 24 CFR 5.609(b)(9)(i) [24 CFR 5.609(b)(12)(iv) as updated for HOTMA].

OHA Policy

OHA defines *training program* as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual’s ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3].

OHA defines *incremental earnings and benefits* as the difference between (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3-4].

In calculating the incremental difference, OHA will use as the pre-enrollment income the total annualized amount of the family member’s welfare assistance and earnings reported on the family’s most recently completed HUD-50058.

End of participation in a training program must be reported in accordance with the PHA’s interim reporting requirements (see Chapter 11).

- Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(b)(13) as updated for HOTMA].
- Adoption assistance payments for a child in excess of the amount of the dependent deduction per adopted child [24 CFR 5.609(b)(15) as updated for HOTMA].
- Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(b)(20) as updated for HOTMA].
- Amounts that HUD is required by federal statute to exclude from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(b) as updated for HOTMA apply. HUD will publish a notice in the *Federal Register* to identify the benefits that qualify for this exclusion. Updates will be published when necessary [24 CFR 5.609(b)(22) as updated for HOTMA].

HUD publishes an updated list of these exclusions periodically. The most recent list of exclusions was published in the *Federal Register* on January 31, 2024. It includes:

- (a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b)). This exclusion also applies to assets.
- (b) Benefits under Section 1780 of the Richard B. Russell School Lunch Act and Child Nutrition Act of 1966, including WIC and reduced-price lunches.
- (c) Payments, including for supportive services and reimbursement of out-of-pocket expenses, to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058). The exclusion also applies to assets.
  - Except, the exclusion does not apply when the Chief Executive Officer of the Corporation for National and Community Service determines that the value of all such payments, adjusted to reflect the number of hours such volunteers are serving, is equivalent to or greater than the minimum wage then in effect under the Fair Labor Standards Act of 1938 (29 U.S.C. 201 et seq.) or the minimum wage, under the laws of the State where such volunteers are serving, whichever is the greater (42 U.S.C. 5044(f)(1)).
- (d) Certain payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c)).
- (e) Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 5506).
- (f) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f)(1)).
- (g) Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998 which was reauthorized as the Workforce Innovation and Opportunity Act of 2014 (29 U.S.C. 3241(a)(2)).
- (h) Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective amounts.

- (i) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Section 6).
- (j) Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b)).
- (k) A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled *Elouise Cobell et al. v. Ken Salazar et al.*, for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010.
- (l) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408). This exclusion does not include proceeds of gaming operations regulated by the Commission (25 U.S.C. 1407–1408).
- (m) Payments received from programs funded under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056(f)).
- (n) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in *In Re Agent Orange* product liability litigation, M.D.L. No. 381 (E.D.N.Y.). This exclusion also applies to assets.
- (o) Payments received under 38 U.S.C. 1833(c) to children of Vietnam veterans born with spinal bifida, children of women Vietnam veterans born with certain birth defects, and children of certain Korean and Thailand service veterans born with spinal bifida (42 U.S.C. 12637(d)).
- (p) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721). This exclusion also applies to assets.
- (q) The value of any childcare provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Childcare and Development Block Grant Act of 1990 (42 U.S.C. 9858q).
- (r) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j)). This exclusion also applies to assets.
- (s) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433). This exclusion also applies to assets.
- (t) Amounts of student financial assistance funded under Title IV of the Higher Education Act of 1965j, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu).

For Section 8 programs only, any financial assistance in excess of amounts received by an individual for tuition and any other required fees and charges under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C.

- 1002)), shall be considered income if the individual is over the age of 23 with dependent children (Pub. L. 109–115, section 327 (as amended)).
- (u) Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d)).
  - (v) Any amount of crime victim compensation that provides medical or other assistance (or payment or reimbursement of the cost of such assistance) under the Victims of Crime Act of 1984 received through a crime victim assistance program, unless the total amount of assistance that the applicant receives from all such programs is sufficient to fully compensate the applicant for losses suffered as a result of the crime (34 U.S.C. 20102(c)).
  - (w) Any amounts in an “individual development account” are excluded from assets and any assistance, benefit, or amounts earned by or provided to the individual development account are excluded from income, as provided by the Assets for Independence Act, as amended (42 U.S.C. 604(h)(4)).
  - (x) Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations. This exclusion also applies to assets.
  - (y) Distributions from an ABLE account, distributions from and certain contributions to an ABLE account established under the ABLE Act of 2014 (Pub. L. 113–295.), as described in Notice PIH 2019–09 or subsequent or superseding notice is excluded from income and assets.
  - (z) The amount of any refund (or advance payment with respect to a refundable credit) issued under the Internal Revenue Code is excluded from income and assets for a period of 12 months from receipt (26 U.S.C. 6409).
  - (aa) Assistance received by a household under the Emergency Rental Assistance Program pursuant to the Consolidated Appropriations Act, 2021 (Pub. L. 116–260, section 501(j)), and the American Rescue Plan Act of 2021.
  - (ab) Per capita payments made from the proceeds of Indian Tribal Trust Settlements listed in IRS Notice 2013-1 and 2013-55 must be excluded from annual income unless the per capita payments exceed the amount of the original Tribal Trust Settlement proceeds and are made from a Tribe’s private bank account in which the Tribe has deposited the settlement proceeds. Such amounts received in excess of the Tribal Trust Settlement are included in the gross income of the members of the Tribe receiving the per capita payments as described in IRS Notice 2013-1. The first \$2,000 of per capita payments are also excluded from assets unless the per capita payments exceed the amount of the original Tribal Trust Settlement proceeds and are made from a Tribe’s private bank account in which the Tribe has deposited the settlement proceeds (25 U.S.C. 117b(a), 25 U.S.C. 1407).
  - (ac) Any amounts (i) not actually received by the family, (ii) that would be eligible for exclusion under 42 U.S.C. 1382b(a)(7), and (iii) received for service-connected disability under 38 U.S.C. Chapter 11 or dependency and indemnity compensation under 38 U.S.C. Chapter 13 (25 U.S.C. 4103(9)(C)) as provided by an amendment by the

Indian Veterans Housing Opportunity Act of 2010 (Pub. L. 111–269 section 2) to the definition of income applicable to programs under the Native American Housing Assistance and Self-Determination Act (NAHASDA) (25 U.S.C. 4101 et seq.).

## **6-I.M. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)]**

### **Overview**

There is no asset limitation for participation in the public housing program. However, HUD requires that the PHA include in annual income the anticipated “interest, dividends, and other net income of any kind from real or personal property” [24 CFR 5.609(b)(3)]. This section discusses how the income from various types of assets is determined. For most types of assets, the PHA must determine the value of the asset in order to compute income from the asset. Therefore, for each asset type, this section discusses:

- How the value of the asset will be determined
- How income from the asset will be calculated

Exhibit 6-1 provides the regulatory requirements for calculating income from assets [24 CFR 5.609(b)(3)] and Exhibit 6-3 provides the regulatory definition of *net family assets*. This section begins with a discussion of general policies related to assets and then provides HUD rules and PHA policies related to each type of asset.

Optional policies for family self-certification of assets are found in Chapter 7.

### **General Policies**

#### ***Income from Assets***

The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. As is true for all sources of income, HUD authorizes the PHA to use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected (2) it is not feasible to anticipate a level of income over 12 months or (3) the PHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, the PHA can take into consideration past rental income along with the prospects of obtaining a new tenant.

#### OHA Policy

Any time current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to OHA to show why the asset income determination does not represent the family’s anticipated asset income.

#### ***Valuing Assets***

The calculation of asset income sometimes requires the PHA to make a distinction between an asset’s market value and its cash value.

- The market value of an asset is its worth in the market (e.g., the amount a buyer would pay for real estate or the total value of an investment account).
- The cash value of an asset is its market value less all reasonable amounts that would be incurred when converting the asset to cash.

#### OHA Policy

Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions [HCV GB, p. 5-28 and PH Occ GB, p. 121].

#### ***Lump-Sum Additions to Net Family Assets [24 CFR 5.609(b)(24)(viii) as updated for HOTMA; Notice PIH 2023-27]***

The regulations exclude income from lump-sum additions to family assets, including lottery or other contest winnings as a type of nonrecurring income.

In addition, lump sums from insurance payments, settlements for personal or property losses, and recoveries from civil actions or settlements based on claims of malpractice, negligence, or other breach of duty owed to a family member arising out of law that resulted in a member of the family becoming a family member with a disability are excluded from income.

Further, deferred periodic amounts from Supplemental Security Income (SSI) and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts are also excluded from income.

However, these amounts may count toward net family assets. The PHA must consider any actual or imputed returns from assets as income at the next applicable income examination. In the case where the lump sum addition to assets would lead to imputed income, which is unearned income, that increases the family's annual adjusted income by 10 percent or more, then the addition of the lump sum to the family's assets will trigger an immediate interim reexamination of income in accordance with Chapter 9. This reexamination of income must take place as soon as the lump sum is added to the family's net family assets unless the addition takes place in the last three months of family's income certification period and the PHA chooses not to conduct the examination.

For a discussion of lump-sum payments that represent the delayed start of a periodic payment, most of which are counted as income, see sections 6-I.H and 6-I.I.

#### OHA Policy

Any lump-sum receipts are only counted as assets if they are retained by a family in a form recognizable as an asset. [RHIIP FAQs]. For example, if the family receives a \$1,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets.

#### ***Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PIH 2012-29]***

When net family assets are \$5,000 or less, the PHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by an average passbook savings rate as determined by the PHA.

- Note: The HUD field office no longer provides an interest rate for imputed asset income. The “safe harbor” is now for the PHA to establish a passbook rate within 0.75 percent of a national average.
- The PHA must review its passbook rate annually to ensure that it remains within 0.75 percent of the national average.

#### OHA Policy

The PHA initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).

The PHA will review the passbook rate annually. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.

The effective date of changes to the passbook rate will be determined at the time of the review.

#### ***Determining Actual Anticipated Income from Assets***

It may or may not be necessary for the PHA to use the value of an asset to compute the actual anticipated income from the asset. When the value is required to compute the anticipated income from an asset, the market value of the asset is used. For example, if the asset is a property for which a family receives rental income, the anticipated income is determined by annualizing the actual monthly rental amount received for the property; it is not based on the property’s market value. However, if the asset is a savings account, the anticipated income is determined by multiplying the market value of the account by the interest rate on the account.

#### ***Withdrawal of Cash or Liquidation of Investments***

Any withdrawal of cash or assets from an investment will be included in income except to the extent that the withdrawal reimburses amounts invested by the family. For example, when a family member retires, the amount received by the family from a retirement investment plan is not counted as income until the family has received payments equal to the amount the family member deposited into the retirement investment plan.

#### ***Jointly Owned Assets***

The regulation at 24 CFR 5.609(a)(4) specifies that annual income includes “amounts derived (during the 12-month period) from assets to which any member of the family has access.”

#### OHA Policy

If an asset is owned by more than one person and any family member has unrestricted access to the asset, the PHA will count the full value of the asset. A family member has

unrestricted access to an asset when they can legally dispose of the asset without the consent of any of the other owners.

If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the PHA will prorate the asset according to the percentage of ownership. If no percentage is specified or provided for by state or local law, the PHA will prorate the asset evenly among all owners.

### ***Assets Disposed of for Less than Fair Market Value [24 CFR 5.603(b)]***

HUD regulations require the PHA to count as a current asset any business or family asset that was disposed of for less than fair market value during the two years prior to the effective date of the examination/reexamination, except as noted below.

#### *Minimum Threshold*

The PHA may set a threshold below which assets disposed of for less than fair market value will not be counted [HCV GB, p. 5-27].

#### OHA Policy

OHA will not include the value of assets disposed of for less than fair market value unless the cumulative fair market value of all assets disposed of during the past two years exceeds the gross amount received for the assets by more than \$1,000.

When the two-year period expires, the income assigned to the disposed asset(s) also expires. If the two-year period ends between annual recertifications, the family may request an interim recertification to eliminate consideration of the asset(s).

Assets placed by the family in nonrevocable trusts are considered assets disposed of for less than fair market value except when the assets placed in trust were received through settlements or judgments.

#### *Separation or Divorce*

The regulation also specifies that assets are not considered disposed of for less than fair market value if they are disposed of as part of a separation or divorce settlement and the applicant or tenant receives important consideration not measurable in dollar terms.

#### OHA Policy

All assets disposed of as part of a separation or divorce settlement will be considered assets for which important consideration not measurable in monetary terms has been received. In order to qualify for this exemption, a family member must be subject to a formal separation or divorce settlement agreement established through arbitration, mediation, or court order.

#### *Foreclosure or Bankruptcy*

Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale.

#### *Family Declaration*

#### OHA Policy

Families must complete application question at initial certification and each annual recertification identifying all assets that have been disposed of for less than fair market value or declaring that no assets have been disposed of for less than fair market value. The PHA may verify the value of the assets disposed of if other information available to the PHA does not appear to agree with the information reported by the family.

## **Types of Assets**

### ***Checking and Savings Accounts***

For regular checking accounts and savings accounts, *cash value* has the same meaning as *market value*. If a checking account does not bear interest, the anticipated income from the account is zero.

#### OHA Policy

In determining the value of a checking account, the PHA will use the current balance.

In determining the value of a savings account, the PHA will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account, the PHA will multiply the value of the account by the current rate of interest paid on the account.

### ***ABLE Accounts [24 CFR 5.609(b)(10) as updated for HOTMA; Notice PIH 2019-09]***

An Achieving a Better Life Experience (ABLE) account is a type of tax-advantaged savings account that an eligible individual can use to pay for qualified disability expenses. Section 103 of the ABLE Act mandates that an individual's ABLE account (specifically, its account balance, contributions to the account, and distributions from the account) is excluded when determining the designated beneficiary's eligibility and continued occupancy under certain federal means-tested programs. The PHA must exclude the entire value of the individual's ABLE account from the household's assets. Distributions from the ABLE account are also not considered income. However, all wage income received, regardless of which account the money is paid to, is included as income.

### ***Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds***

Interest or dividends earned by investment accounts are counted as actual income from assets even when the earnings are reinvested. The cash value of such an asset is determined by deducting from the market value any broker fees, penalties for early withdrawal, or other costs of converting the asset to cash.

#### OHA Policy

In determining the market value of an investment account, OHA will use the value of the account on the most recent investment report.

How anticipated income from an investment account will be calculated depends on whether the rate of return is known.

For assets that are held in an investment account with a known rate of return (e.g., savings certificates), asset income will be calculated based on that known rate (market value multiplied by rate of earnings).

When the anticipated rate of return is not known (e.g., stocks), the PHA will calculate asset income based on the earnings for the most recent reporting period.

### ***Equity in Real Property or Other Capital Investments***

Equity (cash value) in a property or other capital asset is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs (such as broker fees) that would be incurred in selling the asset [HCV GB, p. 5-25 and PH, p. 121].

#### OHA Policy

In determining the equity, OHA will determine market value by examining recent sales of at least three properties in the surrounding or similar neighborhood that possess comparable factors that affect market value.

PHA will first use the payoff amount for the loan (mortgage) as the unpaid balance to calculate equity. If the payoff amount is not available, the PHA will use the basic loan balance information to deduct from the market value in the equity calculation.

Equity in real property and other capital investments is considered in the calculation of asset income **except** for the following types of assets:

- Equity accounts in HUD homeownership programs [24 CFR 5.603(b)]
- Equity in real property when a family member's main occupation is real estate [HCV GB, p. 5-25]. This real estate is considered a business asset, and income related to this asset will be calculated as described in section 6-I.F.
- Interests in Indian Trust lands [24 CFR 5.603(b)]
- Real property and capital assets that are part of an active business or farming operation [HCV GB, p. 5-25]

The PHA must also deduct from the equity the reasonable costs for converting the asset to cash. Using the formula for calculating equity specified above, the net cash value of real property is the market value of the loan (mortgage) minus the expenses to convert to cash [Notice PIH 2012-3].

#### OHA Policy

For the purposes of calculating expenses to convert to cash for real property, OHA will use ten percent of the market value of the home.

A family may have real property as an asset in two ways: (1) owning the property itself and (2) holding a mortgage or deed of trust on the property. In the case of a property owned by a family member, the anticipated asset income generally will be in the form of rent or other payment for the use of the property. If the property generates no income, actual anticipated income from the asset will be zero.

In the case of a mortgage or deed of trust held by a family member, the outstanding balance (unpaid principal) is the cash value of the asset. The interest portion only of payments made to the family in accordance with the terms of the mortgage or deed of trust is counted as anticipated asset income.

## OHA Policy

In the case of capital investments owned jointly with others not living in a family's unit, a prorated share of the property's cash value will be counted as an asset unless OHA determines that the family receives no income from the property and is unable to sell or otherwise convert the asset to cash.

### ***Trusts [24 CFR 5.609(b)(2) as updated for HOTMA]***

A *trust* is a legal arrangement generally regulated by state law in which one party (the creator or grantor) transfers property to a second party (the trustee) who holds the property for the benefit of one or more third parties (the beneficiaries).

The basis for determining how to treat trusts relies on information about who has access to either the principal in the account or the income from the account. There are two types of trusts, *revocable* and *irrevocable*.

When the creator sets up an *irrevocable trust*, the creator has no access to the funds in the account. Typically, special needs trusts are considered irrevocable. Irrevocable trusts not under the control of any member of the family are excluded from net family assets. The value of the trust continues to be excluded from net family assets so long as the fund continues to be held in a trust that is not revocable by, or under the control of, any member of the family or household [24 CFR 5.603(b)(4) as updated for HOTMA]. Further, where an irrevocable trust is excluded from net family assets, the PHA must not consider actual income earned by the trust (e.g., interest earned, rental income if property is held in the trust) for so long as the income from the trust is not distributed.

A *revocable trust* is a trust that the creator of the trust may amend or end (revoke). When there is a revocable trust, the creator has access to the funds in the trust account.

- A revocable trust that is under the control of the family is included in net family assets when the grantor is a member of the assisted family. If a revocable trust is included in the calculation of net family assets, then the actual income earned by the revocable trust is also included in the family's income. For example, interest earned or rental income if the property is held in the trust. The PHA must calculate imputed income on the revocable trust if net family assets are more than the HUD-published threshold amount, which is adjusted annually and listed in HUD's Inflation Adjusted Values tables (\$50,000 for 2024, and \$51,600 for 2025), and actual income from the trust cannot be calculated (e.g., if the trust is comprised of farmland that is not in use).
- A revocable trust that is not under the control of the family is excluded from net family assets. This happens when a member of the assisted family is the beneficiary of a revocable trust, but the grantor is not a member of the assisted family. In this case the beneficiary does not "own" the revocable trust, and the value of the trust is excluded from net family assets. For the revocable trust to be considered excluded from net family assets, no family or household member may be the account's trustee.

For both irrevocable and revocable trusts, if the value of the trust is not considered part of net family assets, then distributions from the trust are treated as follows:

- All distributions from the trust's principal are excluded from income.

- Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust's principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor.

### ***Retirement Accounts***

#### *Company Retirement/Pension Accounts*

In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, the PHA must know whether the money is accessible before retirement [HCV GB, p. 5-26].

While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset [HCV GB, p. 5-26].

After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lump-sum receipt, as appropriate [HCV GB, p. 5-26], except to the extent that it represents funds invested in the account by the family member. (For more on periodic payments, see section 6-I.H.) The balance in the account is counted as an asset only if it remains accessible to the family member.

#### *IRA, Keogh, and Similar Retirement Savings Accounts*

IRA, Keogh, and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty [HCV GB, p. 5-25].

### ***Personal Property***

Personal property held as an investment, such as gems, jewelry, coin collections, antique cars, etc., is considered an asset [HCV GB, p. 5-25].

#### OHA Policy

In determining the value of personal property held as an investment, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal if there is reason to believe that the family's estimated value is off by \$50 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.

Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset.

Necessary items of personal property are not considered assets [24 CFR 5.603(b)].

#### OHA Policy

Necessary personal property consists of only those items not held as an investment. It may include clothing, furniture, household furnishings, jewelry, and vehicles, including those specially equipped for persons with disabilities.

### ***Life Insurance***

The cash value of a life insurance policy available to a family member before death, such as a whole life or universal life policy, is included in the calculation of the value of the family's assets [HCV GB 5-25]. The cash value is the surrender value. If such a policy earns dividends or

interest that the family could elect to receive, the anticipated amount of dividends or interest is counted as income from the asset whether or not the family actually receives it.

## **6-I.N. WELFARE ASSISTANCE**

### **Overview**

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments [24 CFR 5.603(b)].

### **Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]**

The PHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-5. The requirements are summarized below. This rule applies only if a family was a public housing resident at the time the sanction was imposed.

#### ***Covered Families***

The families covered by 24 CFR 5.615 are those “who receive welfare assistance or other public assistance benefits (‘welfare benefits’) from a State or other public agency (‘welfare agency’) under a program for which Federal, State or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance” [24 CFR 5.615(b)]

#### ***Imputed Income***

When a welfare agency imposes a sanction that reduces a family’s welfare income because the family commits fraud or fails to comply with the agency’s economic self-sufficiency program or work activities requirement, the PHA must include in annual income “imputed” welfare income. The PHA must request that the welfare agency provide the reason for the reduction of benefits and the amount of the reduction of benefits. The imputed welfare income is the amount that the benefits were reduced as a result of the sanction.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

For special procedures related to grievance hearings based upon the PHA’s denial of a family’s request to lower rent when the family experiences a welfare benefit reduction, see Chapter 14, Grievances and Appeals.

#### ***Offsets***

The amount of the imputed welfare income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero [24 CFR 5.615(c)(4)].

## **6-I.O. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]**

Annual income includes periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing with a tenant family.

### **Alimony and Child Support**

The PHA must count alimony or child support amounts awarded as part of a divorce or separation agreement.

#### OHA Policy

OHA will count court-awarded amounts for alimony and child support unless the PHA verifies that (1) the payments are not being made.

Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.

## **PART II: ADJUSTED INCOME**

### **6-II.A. INTRODUCTION**

#### **Overview**

HUD regulations require PHAs to deduct from annual income any of five mandatory deductions for which a family qualifies. The resulting amount is the family's adjusted income. Mandatory deductions are found in 24 CFR 5.611.

5.611(a) Mandatory deductions. In determining adjusted income, the responsible entity (PHA) must deduct the following amounts from annual income:

- (1) \$480 for each dependent;
- (2) \$400 for any elderly family or disabled family;
- (3) The sum of the following, to the extent the sum exceeds three percent of annual income:
  - (i) Unreimbursed health and medical care expenses of any elderly family or disabled family;
  - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and
- (4) Any reasonable childcare expenses necessary to enable a member of the family to be employed or to further their education.

This part covers policies related to these mandatory deductions. Verification requirements related to these deductions are found in Chapter 7, Verifications.

## **Anticipating Expenses**

### OHA Policy

Generally, OHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g., childcare during school and nonschool periods and cyclical medical expenses), OHA will estimate costs based on historic data and known future costs.

If a family has an accumulated debt for medical or disability assistance expenses, OHA will include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. OHA may require the family to provide documentation of payments made in the preceding year.

### **6-II.B. DEPENDENT DEDUCTION**

An allowance of \$480 is deducted from annual income for each dependent [24 CFR 5.611(a)(1)]. *Dependent* is defined as any family member other than the head, spouse, or cohead who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults, and live-in aides are never considered dependents [24 CFR 5.603(b) as updated for HOTMA].

### **6-II.C. ELDERLY OR DISABLED FAMILY DEDUCTION**

A single deduction of \$400 is taken for any elderly or disabled family [24 CFR 5.611(a)(2)]. An *elderly family* is a family whose head, spouse, cohead, or sole member is 62 years of age or older, and a *disabled family* is a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403].

### **6-II.D. HEALTH AND MEDICAL CARE EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i) and 5.603(b) as updated for HOTMA]**

Unreimbursed health and medical care expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income.

The health and medical care expense deduction is permitted only for families in which the head, spouse, or cohead is at least 62 or is a person with disabilities. If a family is eligible for a health and medical care expense deduction, the medical expenses of all family members are counted [VG, p. 28].

### **Definition of *Medical Expenses***

HUD regulations define *health and medical care expenses* at 24 CFR 5.603(b) (as updated for HOTMA) to mean “any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.” Health and medical care expenses may be deducted from annual income only if they are eligible under this definition and not otherwise reimbursed.

Although HUD revised the definition of *health and medical care expenses* to reflect the Internal Revenue Service (IRS) general definition of medical expenses, HUD is not permitting PHAs to specifically align their policies to IRS Publication 502. PHAs must review each expense to determine whether it is eligible in accordance with HUD’s definition. While PHA policies may not specifically align with IRS Publication 502, HUD recommends PHAs use it as a standard for determining allowable expenses, and the PHA may list examples of allowable expenses in their policy provided they comply with HUD’s definition at 24 CFR 5.603 as updated for HOTMA. The PHA may not define *health and medical care expenses* more narrowly than the regulation.

OHA Policy

OHA will use the most current IRS Publication 502 as a standard for determining if expenses claimed by eligible families qualify as health and medical care expenses. However, under no circumstances will OHA deduct any expenses listed in IRS Publication 502 that do not conform with HUD’s definition of *health and medical care expenses*.

<b>Summary of Typical Allowable Health and Medical Care Expenses</b>	
<p>Services of medical professionals</p> <p>Surgery and medical procedures that are necessary, legal, and non-cosmetic</p> <p>Services of medical facilities</p> <p>Hospitalization, long-term care, and in-home nursing services</p> <p>Prescription medicines and insulin, but <u>not</u> nonprescription medicines even if recommended by a doctor</p> <p>Improvements to housing directly related to medical needs (e.g., ramps for a wheelchair, handrails)</p> <p>Medical insurance premiums or the cost of a health maintenance organization (HMO)</p> <p>Medicare Part B and Part D premiums</p>	<p>Substance abuse treatment programs</p> <p>Psychiatric treatment</p> <p>Ambulance services and some costs of transportation related to medical expenses. The PHA will use the most current medical mileage rate listed in IRS Publication 502.</p> <p>The cost and care of necessary equipment related to a medical condition (e.g., eyeglasses/lenses, hearing aids, crutches, and artificial teeth)</p> <p>The costs of buying, training, and maintaining a guide dog or other service animal to assist a visually impaired or hearing disabled person, or a person with other physical disabilities. In general, this includes any costs, such as food, grooming, and veterinary care, incurred in maintaining the health and vitality of the service animal so that it may perform its duties.</p>

**Note:** This chart provides a summary of eligible health and medical care expenses only. In all cases, the PHA will consider whether health and medical expenses care expenses claimed by the family are eligible under HUD’s definition.

### OHA Policy

This policy applies only to families in which the head, spouse, or cohead is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either health and medical care or disability assistance expenses, OHA will consider them health and medical care expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

## **6-II.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]**

Reasonable expenses for attendant care and auxiliary apparatus for a disabled family member may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed three percent of annual income, and (4) do not exceed the earned income received by the family member who is enabled to work.

### **Earned Income Limit on the Disability Assistance Expense Deduction**

A family can qualify for the disability assistance expense deduction only if at least one family member (who may be the person with disabilities) is enabled to work [24 CFR 5.603(b)].

The disability expense deduction is capped by the amount of “earned income received by family members who are 18 years of age or older and who are able to work” because of the expense [24 CFR 5.611(a)(3)(ii)]. The earned income used for this purpose is the amount verified before any income exclusions are applied.

### OHA Policy

The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family’s request, OHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.

When OHA determines that the disability assistance expenses enable more than one family member to work, the disability assistance expenses will be capped by the sum of the family members’ incomes [PH Occ GB, p. 124].

## **Eligible Disability Expenses**

Examples of auxiliary apparatus are provided in the *PH Occupancy Guidebook* as follows: “Auxiliary apparatus: Including wheelchairs, walkers, scooters, reading devices for persons with visual disabilities, equipment added to cars and vans to permit their use by the family member with a disability, or service animals” [PH Occ GB, p. 124], but only if these items are directly related to permitting the disabled person or other family member to work [HCV GB, p. 5-30].

HUD advises PHAs to further define and describe auxiliary apparatus [VG, p. 30].

### ***Eligible Auxiliary Apparatus***

#### OHA Policy

Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.

### ***Eligible Attendant Care***

The family determines the type of attendant care that is appropriate for the person with disabilities.

#### OHA Policy

Attendant care includes, but is not limited to, reasonable costs for home medical care, nursing services, in-home or center-based care services, interpreters for persons with hearing impairments, and readers for persons with visual disabilities.

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, OHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work. For example, if the care provider also cares for a child who is not the person with disabilities, the cost of care must be prorated. Unless otherwise specified by the care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

### ***Payments to Family Members***

No disability expenses may be deducted for payments to a member of a tenant family [23 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the tenant family may be deducted if they are not reimbursed by an outside source.

## **Necessary and Reasonable Expenses**

The family determines the type of care or auxiliary apparatus to be provided and must describe how the expenses enable a family member to work. The family must certify that the disability assistance expenses are necessary and are not paid or reimbursed by any other source.

### OHA Policy

OHA determines the reasonableness of the expenses based on typical costs of care or apparatus in the locality. To establish typical costs, OHA will collect information from organizations that provide services and support to persons with disabilities. A family may present, and OHA will consider, the family's justification for costs that exceed typical costs in the area.

## **Families That Qualify for Both Medical and Disability Assistance Expenses**

### OHA Policy

This policy applies only to families in which the head, spouse, or cohead is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, OHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

## **6-II.F. CHILDCARE EXPENSE DEDUCTION**

HUD defines *childcare expenses* at 24 CFR 5.603(b) as “amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further their education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for childcare. In the case of childcare necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.”

Childcare expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family's household [VG, p. 26]. However, childcare expenses for foster children that are living in the assisted family's household are included when determining the family's childcare expenses.

### **Qualifying for the Deduction**

#### ***Determining Who Is Enabled to Pursue an Eligible Activity***

### OHA Policy

The family must identify the family member(s) enabled to pursue an eligible activity. The term *eligible activity* in this section means any of the activities that may make the family eligible for a childcare deduction (seeking work, pursuing an education, or being gainfully employed).

In evaluating the family's request, OHA will consider factors such as how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the relationship of the family member(s) to the child, and any special

needs of the child that might help determine which family member is enabled to pursue an eligible activity.

### ***Seeking Work***

#### OHA Policy

If the childcare expense being claimed is to enable a family member to seek employment, the family must provide evidence of the family member's efforts to obtain employment at each reexamination. The deduction may be reduced or denied if the family member's job search efforts are not commensurate with the childcare expense being allowed by OHA.

### ***Furthering Education***

#### OHA Policy

If the childcare expense being claimed is to enable a family member to further their education, the member must be enrolled in school (academic or vocational) or participating in a formal training program. The family member is not required to be a full-time student, but the time spent in educational activities must be commensurate with the childcare claimed.

### ***Being Gainfully Employed***

#### OHA Policy

If the childcare expense being claimed is to enable a family member to be gainfully employed, the family must provide evidence of the family member's employment during the time that childcare is being provided. Gainful employment is any legal work activity (full- or part-time) for which a family member is compensated.

### **Earned Income Limit on Childcare Expense Deduction**

When a family member looks for work or furthers their education, there is no cap on the amount that may be deducted for childcare – although the care must still be necessary and reasonable. However, when childcare enables a family member to work, the deduction is capped by “the amount of employment income that is included in annual income” [24 CFR 5.603(b)].

The earned income used for this purpose is the amount of earned income verified after any income exclusions are applied.

When the person who is enabled to work is a full-time student whose earned income above \$480 is excluded, childcare costs related to enabling a family member to work may not exceed the portion of the person's earned income that actually is included in annual income.

The PHA must not limit the deduction to the least expensive type of childcare. If the care allows the family to pursue more than one eligible activity, including work, the cap is calculated in proportion to the amount of time spent working [HCV GB, p. 5-30].

#### OHA Policy

When the childcare expense being claimed is to enable a family member to work, only one family member's income will be considered for a given period of time. When more than one family member works during a given period, OHA generally will limit

allowable childcare expenses to the earned income of the lowest-paid member. The family may provide information that supports a request to designate another family member as the person enabled to work.

### **Eligible Childcare Expenses**

The type of care to be provided is determined by the tenant family. The PHA may not refuse to give a family the childcare expense deduction because there is an adult family member in the household that may be available to provide childcare [VG, p. 26].

### ***Allowable Childcare Activities***

#### OHA Policy

For school-age children, costs attributable to public or private school activities during standard school hours are not considered. Expenses incurred for supervised activities after school or during school holidays (e.g., summer day camp, after-school sports league) are allowable forms of childcare.

The costs of general housekeeping and personal services are not eligible. Likewise, childcare expenses paid to a family member who lives in the family's unit are not eligible; however, payments for childcare to relatives who do not live in the unit are eligible.

If a childcare provider also renders other services to a family or childcare is used to enable a family member to conduct activities that are not eligible for consideration, the PHA will prorate the costs and allow only that portion of the expenses that is attributable to childcare for eligible activities. For example, if the care provider also cares for a child with disabilities who is 13 or older, the cost of care will be prorated. Unless otherwise specified by the childcare provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

### ***Necessary and Reasonable Costs***

Childcare expenses will be considered necessary if: (1) a family adequately explains how the care enables a family member to work, actively seek employment, or further their education, and (2) the family certifies, and the childcare provider verifies, that the expenses are not paid or reimbursed by any other source.

#### OHA Policy

Childcare expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For childcare that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of childcare costs, OHA will use the schedule of childcare costs from a qualified local entity that either subsidizes childcare costs or licenses childcare providers. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.

## **6-II.G. PERMISSIVE DEDUCTIONS [24 CFR 5.611(b)(1)]**

Permissive deductions are additional, optional deductions that may be applied to annual income. As with mandatory deductions, permissive deductions must be based on need or family circumstance and deductions must be designed to encourage self-sufficiency or other economic purpose. If the PHA offers permissive deductions, they must be granted to all families that qualify for them and should complement existing income exclusions and deductions [PH Occ GB, p. 128].

The *Form HUD-50058 Instruction Booklet* states that the maximum allowable amount for total permissive deductions is less than \$90,000 per year.

### OHA Policy

OHA has opted not to use permissive deductions.



## Chapter 7

### VERIFICATION

[24 CFR 960.259, 24 CFR 5.230, Notice PIH 2023-27]

#### INTRODUCTION

The areas marked in red in this chapter will be effective July 1, 2025, prior to the full implementation of HOTMA. The areas marked in blue have already been updated and board approved. The areas in black have not been revised.

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain written authorization from the family in order to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA must follow the verification guidance provided by HUD in Notice PIH 2023-27 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Part I describes the general verification process. Part II provides more detailed requirements related to family information. Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies established by the PHA.

#### PART I: GENERAL VERIFICATION REQUIREMENTS

##### 7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259; 24 CFR 5.230; and Notice PIH 2023-27]

###### Consent Forms

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 960.259(a)(1)]. All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance. While PHAs must use form HUD-9886, this form does not release all the information necessary to the administration of the program. The PHA must also develop its own release forms to cover all other necessary information.

## **Form HUD-9886 [24 CFR 5.230(b)(1), (b)(2), (c)(4), and (c)(5); Notice PIH 2023-27]**

All adult applicants and tenants must sign form HUD-9886, Authorization for Release of Information. All adult family members (and the head and spouse/cohead regardless of age) are required to sign the Form HUD-9886 at admission. Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886a be signed only once. On or after January 1, 2024 (regardless of the PHA's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886a at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886a will not be submitted to the PHA except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the PHA in administrative instructions.

The PHA has the discretion to establish policies around when family members must sign consent forms when they turn 18. PHAs must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

### OHA Policy

Family members turning 18 years of age between annual recertifications will be notified in writing that they are 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.

The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

The PHA may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the PHA determines the record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the PHA to revoke consent.

## **Penalties for Failing to Consent [24 CFR 5.232]**

If any family member who is required to sign a consent form fails to do so, the PHA must deny admission to applicants and terminate the lease of tenants [24 CFR 5.232(a)]. The family may request a hearing in accordance with the PHA's grievance procedures.

However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in denial or termination of assistance or admission [24 CFR 5.232(c)]. PHAs may not process interim or annual reexaminations of income without the family's executed consent forms.

### OHA Policy

OHA has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with OHA policy.

In order for a family to revoke their consent, the family must provide written notice to OHA.

Within 10 business days of the date the family provides written notice, OHA will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, OHA will notify the local HUD office.

## **7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]**

PHAs may, but are not required to, determine a family's annual income, including income from assets, prior to the application of any deductions, based on income determinations made within the previous 12-month period, using income determinations from means-tested federal public assistance programs. PHAs are not required to accept or use determinations of income from other federal means-tested forms of assistance. If the PHA adopts a policy to accept this type of verification, the PHA must establish in policy when they will accept Safe Harbor income determinations and from which programs. PHAs must also create policies that outline the course of action when families present multiple verifications from the same or different acceptable Safe Harbor programs. Means-tested federal public assistance programs include:

- Temporary Assistance for Needy Families (TANF) (42 U.S.C. 601, et seq.);
- Medicaid (42 U.S.C. 1396 et seq.);
- Supplemental Nutrition Assistance Program (SNAP) (42 U.S.C. 2011 et seq.);
- Earned Income Tax Credit (EITC) (26 U.S.C. 32);
- Low-Income Housing Credit (LIHTC) program (26 U.S.C. 42);
- Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC) (42 U.S.C. 1786);
- Supplemental Security Income (SSI) (42 U.S.C. 1381 et seq.);
- Other programs administered by the HUD Secretary;
- Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding; and
- Other federal benefit determinations made in other forms of means-tested federal public assistance that the Secretary determines to have comparable reliability and announces through the *Federal Register*.

If the PHA elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, then they must obtain the income information by means of a third-party verification. The third-party verification must state the family size, must be for the entire family, and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, PHAs will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR 5.618. The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by the PHA:

- Income determination effective date;
- Program administrator's signature date;
- Family's signature date;
- Report effective date; or
- Other report-specific dates that verify the income determination date.

The only information that PHAs are permitted to use to determine income under this method is the total income determination made by the federal means-tested program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information must not be considered by the PHA. PHAs are not permitted to mix and match Safe Harbor income determinations and other income verifications.

If the PHA is unable to obtain Safe Harbor documentation or if the family disputes the other program's income determination, the PHA must calculate the family's annual income using traditional methods as outlined in Notice PIH 2023-27 and this chapter.

If the PHA uses a Safe Harbor determination to determine the family's income, the family is obligated to report changes in income that meet the PHA's reporting requirement and occur after the effective date of the transaction.

The amounts of unreimbursed reasonable attendant care expenses and child-care expenses deducted from a family's annual income, except for when a family is approved for a child-care expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. PHAs are therefore required to obtain third-party verification of the applicable employment income and cap the respective expense deductions accordingly.

### PHA Policy

When available and applicable, the PHA will accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The PHA will still require third-party verification of all deductions such as the health and medical care expense or childcare expense deductions. Further, if the family is eligible for and claims the disability assistance expense or childcare expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.

Prior to using any Safe Harbor determination from another program, the PHA will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the PHA will obtain third-party verification of all sources of income and assets (as applicable).

The PHA will not accept other programs' determinations of income for any new admission or interim reexamination.

With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the PHA will accept Safe Harbor determinations from any of the programs listed above.

In order to be acceptable, the income determination must:

- Be dated within 12 months of the dates listed above;

- State the family size;

- Be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members); and

- Must state the amount of the family's annual income.

The determination need not list each source of income individually. If the PHA does not receive any acceptable income determination documentation or is unable to obtain documentation, then the PHA will revert to third-party verification of income for the family.

When families present multiple verifications from the same or different acceptable Safe Harbor programs, the PHA will use the most recent income determination, unless the family presents acceptable evidence that the PHA should consider an alternative verification from a different Safe Harbor source.

When the PHA uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the PHA. Depending on when the change occurred, the change may or may not impact the PHA's calculation of the family's total annual income. Changes that occur between the time the PHA receives the Safe Harbor documentation, and the effective date of the family's annual reexam will not be considered. If the family has a change in income that occurs after the annual reexam effective date, the PHA will conduct an interim reexam if the change meets the requirements for performing an interim reexamination as outlined in Chapter 9. In this case, the PHA will use third-party verification to verify the change.

**7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c);  
Notice PIH 2023-27]**

HUD permits PHAs to streamline the income determination process for family members with fixed sources of income. While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years, the PHA may determine income from fixed sources by applying a verified cost of living adjustment (COLA) or other inflationary adjustment factor. Streamlining policies are optional. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.

Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.

Two streamlining options are available, depending upon the percentage of the family's income that is received from fixed sources.

When 90 percent or more of a family's unadjusted income is from fixed sources, the PHA may apply the inflationary adjustment factor to the family's fixed-income sources, provided that the family certifies both that 90 percent or more of their unadjusted income is fixed and that their sources of fixed income have not changed from the previous year. Sources of non-fixed income are not required to be adjusted and must not be adjusted by a COLA, but PHAs may choose to adjust sources of non-fixed income based on third-party verification. PHAs have the discretion to either adjust the non-fixed income or carry over the calculation of non-fixed income from the first year to years two and three.

When less than 90 percent of a family's unadjusted income consists of fixed income, PHAs may apply a COLA to each of the family's sources of fixed income. PHAs must determine all other income using standard verification requirements as outlined in Notice PIH 2023-27.

### PHA Policy

When the PHA does not use a Safe Harbor income determination from a federal assistance program to determine the family's annual income as outlined above, then PHA will use a streamlined income determinations where applicable.

If 90 percent or more of a family's unadjusted income is from fixed income sources:

The PHA will streamline the annual reexamination process by applying the verified inflationary adjustment factor to fixed-income sources.

The family will be required to sign a self-certification stating that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year.

The PHA will document in the file how the determination that a source of income was fixed was made.

Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.

If the family's sources of fixed income have changed from the previous year, the PHA will obtain third-party verification of any new sources of fixed income.

When less than 90 percent of a family's unadjusted income consists of fixed income:

The PHA will apply a COLA to each of the family's sources of fixed income.

All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.

In the following circumstances, regardless of the percentage of income received from fixed sources, the PHA will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

Of all assets when net family assets exceed \$50,000;

Of all deductions and allowances from annual income;

If a family member with a fixed source of income is added;

If verification of the COLA or rate of interest is not available;

During the intake process and at least once every three years thereafter.

## 7-I.D. VERIFICATION HIERARCHY [Notice PIH 2023-27]

When the PHA does not use a streamlined determination of income or an income determination from a means-tested federal assistance program, HUD requires the PHA to obtain third-party verification of:

- Reported family annual income;
- The value of net family assets when the net value exceeds \$50,000 (as adjusted annually);
- Expenses related to deductions from annual income; and
- Other factors that affect the determination of adjusted income.

HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general, HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

HUD developed a hierarchy that described verification documentation from most acceptable to least acceptable. The PHA must demonstrate efforts to obtain third party verification prior to accepting self-certification except instances when self-certification is explicitly allowed.

In order of priority, the hierarchy is:

- Highest: Level 6: Up-front Income Verification (UIV) using HUD’s Enterprise Income Verification (EIV) system
- Highest: Level 5: Up-front Income Verification (UIV) using a non-EIV system
- High: Level 4:
  - Written third-party verification from the source, also known as “tenant-provided verification”
  - Or EIV plus self-certification
- Medium: Level 3: Written third-party verification form
- Medium: Level 2: Oral third-party verification
- Low: Level 1: Self-certification (not third-party verification)

Each of the verification methods is discussed in subsequent sections below.

### **File Documentation**

The PHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family’s file in sufficient detail to demonstrate that the PHA has followed all of the verification policies set forth in this ACOP. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.

## **7-I.E. LEVEL 5 AND 6 VERIFICATION: UP-FRONT INCOME VERIFICATION (UIV)**

Up-front income verification (UIV) refers to the PHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits for a number of individuals. PHAs may use UIV sources before or during a family reexamination.

UIV will be used to the extent that these systems are available to the PHA.

There may be legitimate differences between the information provided by the family and UIV-generated information. If the family disputes the accuracy of UIV data, no adverse action can be taken until the PHA has independently verified the UIV information and the family has been granted the opportunity to contest any adverse findings through the PHA's informal review/hearing processes.

### **Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System**

PHAs must use HUD's EIV system in its entirety as a third-party source to verify tenant employment and income information during annual and streamlined reexaminations of family composition and income in accordance with 24 CFR 5.236 and Notice PIH 2023-27.

HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families.

The income validation tool (IVT) in EIV provides projections of discrepant income for wages, unemployment compensation, and SSA benefits pursuant to HUD's data sharing agreements with other departments.

The following policies apply to the use of HUD's EIV system.

#### ***EIV Income and IVT Reports***

PHAs are required to obtain an EIV Income and IVT report for each family any time the PHA conducts an annual reexamination. However, PHAs are not required to use the EIV Income and IVT reports:

- At annual reexamination if the PHA used Safe Harbor verification from another means-test federal assistance program to determine the family's income; or
- During any interim reexaminations.

The EIV Income and IVT Reports are also not available for program applicants at admission.

When required to use the EIV Income Report, in order for the report to be considered current, the PHA must pull the report within 120 days of the effective date of the annual reexamination.

The EIV Income Report may be used to verify and calculate income at annual reexamination if the family self-certifies that the amount is accurate and representative of current income. The family must be provided with the information in EIV.

#### OHA Policy

Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine the family's annual income, OHA will obtain EIV Income and IVT reports for all annual reexaminations for all families on a monthly basis. Reports will be generated as part of the regular reexamination process. OHA will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

Income and IVT reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV.

Income and IVT reports will be retained in resident files with the applicable annual documents or interim reexamination documents (if applicable) for the duration of tenancy.

When OHA determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

#### ***New Hires Report [Notice PIH 2023-27]***

The New Hires Report identifies participant families who have new employment within the last six months. The report is updated monthly.

PHAs must review this information at annual reexamination except when the PHA uses Safe Harbor verification from another means-tested federal assistance program to determine the family's income.

PHAs that do not require families to undergo interim reexaminations for earned income increases after an interim decrease are not required to review this report between a family's annual reexamination. If the PHA requires an interim for increases in earned income after an interim decrease, then the PHA must review the report quarterly after the family's interim decrease.

#### OHA Policy

~~In accordance with the OHA policies in Chapter 9, the PHA does not process interim reexaminations for families who have increases in earned income. Except for instances in which the PHA uses Safe Harbor income determinations to determine a family's annual income, the PHA will only review the New Hires Report at annual reexamination.~~

Until additional HOTMA changes are implemented, OHA will continue to process interims for reported changes. OHA will New Hires Report prior to annual reexamination and quarterly after the family's interim decrease going forward.

### ***No Income Reported by HHS or SSA Report***

This report is a tool for PHAs to identify participants who passed the SSA identity test, but no income information was reported by either HHS or SSA records. This scenario does not mean that they tenant does not have any income. PHAs obtain written, third-party verification of any income reported by the tenant. The PHA must identify in its policies and procedures when this report will be pulled [Notice PIH 2023-27].

#### OHA Policy

OHA will generate the No Income Reported by HHS or SSA Report once it is available quarterly and will retain the report.

OHA will re-verify the status of tenants identified on the report quarterly. Based on the information provided by the family and in EIV, OHA may require that family members provide verifications or sign release forms in order to obtain additional verification.

When OHA determines through this report and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

### ***EIV Identity Verification Report***

The EIV system verifies resident identities against Social Security Administration (SSA) records. These records are compared to HUD data for a match on social security numbers, name, and date of birth.

PHAs are required to use EIV's *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH 2023-27].

When identity verification for a resident fails, a message will be displayed within the EIV system, and no income information will be displayed.

#### OHA Policy

OHA will identify residents whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis.

OHA will attempt to resolve discrepancies by obtaining appropriate documentation from the tenant. When OHA determines that discrepancies exist as a result of OHA errors, such as spelling errors or incorrect birth dates, it will correct the errors promptly.

### ***Deceased Tenants Reports [Notice PIH 2012-4 and Notice PIH 2023-27]***

The Deceased Tenant Report identifies residents that have been reported by the SSA as deceased. The PHA is required to review the report at least quarterly.

#### OHA Policy

OHA will review the Deceased Tenants Report on a monthly basis.

When the Deceased Tenants Report identifies an individual as being deceased, PHAs must immediately contact the head of household or emergency contact person (if the head of household is deceased and there is no other adult household member) to confirm the death of the listed household member. The PHA must conduct a home visit to determine if anyone is residing in the unit.

PHAs are required to list the move-out date for the family as of the date on which the family or designee of the deceased tenant's estate returned the keys and signed a vacate notice; the date the public housing lease was terminated; or the date the PHA legally regained possession of the unit, whichever occurs first.

When the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for continued occupancy. The PHA may not designate the live-in aide as the new head of household or change the relation code on the Form HUD-50058.

### ***Other EIV Reports [Notice PIH 2023-27]***

The PHA is required to review the Multiple Subsidy Report at least quarterly and the Failed EIV Pre-Screening and Failed Verification (Failed SSA Identity Test) reports at least monthly.

### **Upfront Income Verification Using Non-HUD Systems**

HUD encourages PHAs to utilize other upfront verification sources such as the Work Number and web-based state benefits systems.

#### OHA Policy

OHA will inform all applicants and residents of its use of the following UIV resources, but not limited to:

Thomas and Co., Veri-Safe Jobs, CCC Verify, Experian Verify, Confirmation, Bank VOD, Nebraska Dept of Health and Human Services iCHARTS (Child Support), Nebraska Dept of Labor NETWORKS (Unemployment)

### **7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]**

HUD identifies two types of Level 4 verification: written-third party verification from the source and EIV + self-certification.

#### **EIV + Self-Certification**

EIV may be used as written third-party verification and may be used to calculate income if the family agrees with the information in EIV and self-certifies that the amount is accurate and representative of current income. This practice is known as *EIV + self-certification*. When calculating income using this method, the PHA may use its discretion to determine which

method of calculation is reasonable: the last four quarters combined or an average of any number of quarters. The family must be provided with the information from EIV.

#### OHA Policy

At annual reexamination, if OHA is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, OHA will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

OHA will use an average of the last two quarters of income listed in EIV to determine income from employment as long as they are employed for the entire quarter. OHA will provide the family with information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, OHA will use written third-party verification from the source as outlined below.

OHA will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

#### **Written Third-Party Verification from the Source**

Written, third-party verification from the source is also known as “tenant-provided verification.” In order to qualify as written-third party verification from the source, the documents must be original or authentic and (generally) dated within 120 days of the date received by the PHA. For fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation. Documents may be supplied by the family or received from a third-party source.

Examples of acceptable tenant-provided documents include, but are not limited to pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices. Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer’s transmittal receipt, summary of transmittal from online source, etc.) are an acceptable form of written, third-party verification.

The PHA is required to obtain, at minimum, two current and consecutive pay stubs when calculating income using third-party verification from the source. For new income sources or when two pay stubs are not available, the PHA should determine income based on the information from a traditional written, third-party verification form or the best available information.

When the family disputes EIV-reported employment income, the PHA uses written third-party verification.

When verification of assets is required, PHAs are required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts.

#### OHA Policy

In general, OHA will use third-party verification from the source in the following circumstances:

- At annual reexamination when EIV + self-certification is not used;
- For all new admissions; and
- For all interim reexaminations.

OHA will not use this method if OHA is able to use an income determination from a means-tested federal assistance program or if OHA uses EIV + self-certification as outlined above.

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by OHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

OHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If OHA determines that third-party documents provided by the family are not acceptable, OHA will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, OHA will obtain one statement that reflects the current balance of the account.

When pay stubs are used, OHA will require the family to provide the two most current, consecutive pay stubs as long as employed for the entire pay period. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), OHA may request additional paystubs or a payroll record.

### **7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM** **[Notice PIH 2023-27]**

This type of verification is a form developed by the PHA and used uniformly for all families when needed to collect information from a third-party source. This is known as “traditional third-party verification.” PHAs send a PHA-developed form directly to the third-party source by mail, fax, or email and the source completes the form by hand (in writing or typeset).

The PHA may use this method when higher forms are unavailable or are rejected by the PHA or when the family is unable to provide acceptable verification. The PHA may skip this level of verification and may instead substitute oral third-party verification before moving to self-certification.

#### OHA Policy

Typically, OHA will attempt to send written third-party verification forms to the verification source whenever higher forms of verification are unavailable.

However, on a case-by-case basis, OHA may choose to obtain oral third-party verification without first attempting, and in lieu of, a written-third party verification form.

## **7-I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]**

For third-party oral verification, PHAs contact sources, identified by UIV techniques or by the family, by telephone or in person.

Third-party oral verification may be used when requests for written third-party verification forms have not been returned within a reasonable time—e.g., 10 business days.

PHAs must document in the file the date and time of the telephone call or visit, the name of the person contacted, the telephone number, as well as the information confirmed.

The PHA may skip this level of verification if they attempted written third-party verification via a form and the source did not respond and move directly to self-certification.

### OHA Policy

In general, OHA will attempt to obtain written third-party verification via a form from the verification source. If written third-party verification forms are not returned within 10 business days, OHA will accept self-certification from the family without attempting to obtain oral third-party verification.

However, if OHA chooses to obtain oral third-party verification, OHA will document in the file the date and time of the telephone call or visit, the name of the person contacted and the telephone number, as well as the information confirmed.

## **When Third-Party Verification is Not Required [Notice PIH 2023-27]**

Third-party verification may not be available in all situations. HUD has acknowledged that it may not be cost-effective or reasonable to obtain third-party verification of income, assets, or expenses when these items would have a minimal impact on the family's total tenant payment.

### OHA Policy

If the family cannot provide original documents, OHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family. The Work Number has been determined not to be cost effective at OHA.

The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p. 18].

### ***Primary Documents***

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

### **7-I.I. LEVEL 1: NON-THIRD-PARTY VERIFICATION TECHNIQUE: SELF-CERTIFICATION [Notice PIH 2023-27]**

Non-third-party verification consists of a signed statement of reported income and/or expenses. This verification method should be used as a last resort when the PHA has not been successful in obtaining information via all other required verification techniques.

Self-certification, however, is an acceptable form of verification when:

- A source of income is fully excluded;
- Net family assets total \$50,000 or less and the PHA has adopted a policy to accept self-certification;
- The family declares that they do not have any present ownership in any real property;
- A family states that they have non-recurring income that will not be repeated in the coming year; and/or
- The PHA has adopted a policy to implement streamlined annual recertifications for fixed sources of income.

When the PHA was required to obtain third-party verification but instead relies on self-certification, the family's file must be documented to explain why third-party verification was not available.

HUD does not require that a self-certification be notarized; however, HUD recommends including language on any self-certification to ensure the certifier understands the consequences of knowingly providing false information.

#### OHA Policy

When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to OHA.

OHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to OHA and must be signed by the family member whose information or status is being verified.

All self-certifications will include the following language:

“I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. **WARNING:** Anyone who knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802).”



## PART II: VERIFYING FAMILY INFORMATION

### 7-II.A. VERIFICATION OF LEGAL IDENTITY

#### PHA Policy

The PHA will require families to furnish verification of legal identity for each household member.

<b>Verification of Legal Identity for Adults</b>	<b>Verification of Legal Identity for Children</b>
Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicle identification card U.S. military discharge (DD 214) Current U.S. passport Current government employer identification card with picture	Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records

If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and be signed by the family member whose information or status is being verified.

Legal identity will be verified for all applicants at the time of eligibility determination and in cases where the PHA has reason to doubt the identity of a person representing themselves to be a tenant or a member of a tenant family.

## **7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and Notice PIH 2023-27]**

The family must provide documentation of a valid Social Security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include, existing residents who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

The PHA must accept the following documentation as acceptable evidence of the social security number:

- An original SSN card issued by the Social Security Administration (SSA)
- An original SSA-issued document, which contains the name and SSN of the individual
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

While PHAs must attempt to gather third-party verification of SSNs prior to admission as listed above, PHAs also have the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if the PHA has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, the PHA must document why the other SSN documentation was not available.

If the tenant's SSN becomes verified in EIV, then no further verification is required. If the tenant's SSN fails the SSA identity match, then the PHA must obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual. The tenant's assistance must be terminated if they fail to provide the required documentation.

### OHA Policy

OHA will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.

The PHA may only reject documentation of an SSN provided by an applicant or resident if the document is not an original document, if the original document has been altered, mutilated, is illegible, or if the document appears to be forged.

### OHA Policy

OHA will explain to the applicant or resident the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to OHA within 90 days.

If an applicant family includes a child under 6 years of age who joined the household within the 6 months prior to the date of program admission, an otherwise eligible family may be admitted and must provide documentation of the child's SSN within 90 days. A 90-day extension will be granted if the PHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control.

#### OHA Policy

OHA will grant one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

When a resident requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the resident must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.

When a resident requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the resident must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control. During the period the PHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

#### OHA Policy

OHA will grant one additional 90-day extension if needed for reasons beyond the resident's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

Social security numbers must be verified only once during continuously assisted occupancy.

#### OHA Policy

OHA will verify each disclosed SSN by:

Obtaining documentation from applicants and residents that is acceptable as evidence of social security numbers

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder

Once the individual's verification status is classified as "verified," the PHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.

#### OHA Policy

Once an individual's status is classified as "verified" in HUD's EIV system, OHA will not remove and destroy copies of documentation accepted as evidence of social security numbers.

## **7-II.C. DOCUMENTATION OF AGE**

A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable.

### OHA Policy

If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

Age must be verified only once during continuously assisted occupancy.

## **7-II.D. FAMILY RELATIONSHIPS**

Applicants and tenants are required to identify the relationship of each household member to the head of household. Definitions of the primary household relationships are provided in the Eligibility chapter.

### OHA Policy

Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

### **Marriage**

#### OHA Policy

Certification by the head of household is normally sufficient verification. If the OHA has reasonable doubts about a marital relationship, OHA will require the family to document the marriage with a marriage certificate or other documentation to verify that the couple is married.

In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

### **Separation or Divorce**

#### OHA Policy

Certification by the head of household is normally sufficient verification. If OHA has reasonable doubts about a divorce or separation, OHA will require the family to provide documentation of the divorce or separation with a certified copy of a divorce decree, signed by a court officer; a copy of a court-ordered maintenance or other court record; or other documentation that shows a couple is divorced or separated.

If no court document is available, documentation from a community-based agency will be accepted.

### **Absence of Adult Member**

#### OHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill), if OHA so requests.

### **Foster Children and Foster Adults**

#### OHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

## 7-II.E. VERIFICATION OF STUDENT STATUS

### OHA Policy

The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family claims full-time student status for an adult other than the head, spouse, or cohead, or

The family claims a childcare deduction to enable a family member to further their education.

## 7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The PHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA will not place this information in the tenant file. Under no circumstances will the PHA request a resident's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' Web site at [www.os.dhhs.gov](http://www.os.dhhs.gov).

The PHA may make the following inquiries, provided it makes them of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiry about whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance
- Inquiry about whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

### **Family Members Receiving SSA Disability Benefits**

Verification of receipt of disability benefits from the Social Security Administration (SSA) is sufficient for verification of disability for the purpose of qualification for waiting list preferences or certain income disallowances and deductions [VG, p. 23].

#### PHA Policy

For family members claiming disability who receive disability payments from the SSA, the PHA will attempt to obtain information about disability benefits through HUD's Enterprise Income Verification (EIV) system. If documentation is not available through HUD's EIV system, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, the PHA will ask the family to obtain a benefit verification letter either by calling SSA at 1-800-772-1213 or by requesting one from [www.ssa.gov](http://www.ssa.gov). Once the family receives the benefit verification letter, they will be required to provide the letter to the PHA.

### **Family Members Not Receiving SSA Disability Benefits**

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403, necessary to qualify for waiting list preferences or certain income disallowances and deductions.

#### PHA Policy

For family members claiming disability who do not receive SSI or other disability payments from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

## **7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]**

### **Overview**

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. See the Eligibility chapter for detailed discussion of eligibility requirements. This chapter (7) discusses HUD and PHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously assisted occupancy [24 CFR 5.508(g)(5)]

### **U.S. Citizens and Nationals**

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

The PHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

#### PHA Policy

Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

## **Eligible Immigrants**

### ***Documents Required***

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

### ***PHA Verification*** [HCV GB, pp 5-3 and 5-7]

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this ACOP. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the U.S. Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

## **7-II.H. VERIFICATION OF PREFERENCE STATUS**

The PHA must verify any preferences claimed by an applicant that determined their placement on the waiting list.

### PHA Policy

The PHA offers a preference for working families, described in Section 4-III.B.

The PHA may verify that the family qualifies for the working family preference based on the family's submission of the working member's most recent paycheck stub indicating that the working member works at least 20 hours per week. The paycheck stub must have been issued to the working member within the last thirty days.

The PHA may also seek third party verification from the employer of the head, spouse, cohead or sole member of a family requesting a preference as a working family.

The PHA also offers a preference for victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking as described in Section 4-III.B. To verify that applicants qualify for the preference, the PHA will follow documentation requirements outlined in Section 16-VII.D.

## **PART III: VERIFYING INCOME AND ASSETS**

Chapter 6 of this ACOP describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

### OHA Policy

The following policies do not apply when the PHA uses a safe harbor income determination from a means-tested federal assistance program. Earned income is defined as income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. Unearned income means any annual income that is not earned income.

### **7-III.A. EARNED INCOME**

#### **Tips**

##### OHA Policy

Unless tip income is included in a family member's ~~W-2~~ by the paystubs, employer provided verification or in UIV verification sources, persons who work in industries where tips are standard will be required to sign a self-certified estimate of tips received for the prior year or tips anticipated to be received in the coming year.

#### **Wages**

##### OHA Policy

When the PHA requires third-party verification of wages, for wages other than tips, the family must provide originals of the two most current, consecutive pay stubs. Public Housing/Low Income Housing Tax Credit (LIHTC) dual program may require 4-6 paystubs to meet LIHTC requirements.

### **7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME**

The PHA must obtain written, third-party verification when the income type is not available in EIV. This includes income from self-employment.

#### OHA Policy

Business owners and self-employed persons will be required to provide:

Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.) if applicable.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

For self-employed individuals who claim they do not have to file tax returns, OHA will obtain a completed copy of IRS Form 4506-T in order to verify that no return has been filed from the IRS.

For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), OHA will provide a format for the individual to declare their income and expenses. OHA will also review the printed statement of monthly income from the applicable app for all hours worked and pay received as well as Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.

OHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations. At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, OHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months, OHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

### **7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS**

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 9.

#### **Social Security/SSI Benefits**

Verification requirements for Social Security (SS) and Supplemental Security Income (SSI) benefits differ for applicants and participants.

For applicants, since EIV does not contain SS or SSI benefit information, the PHA must ask applicants to provide a copy of their current SS and/or SSI benefit letter (dated within the last 120 calendar days) for each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the applicant request a benefit verification letter from SSA's website at [www.ssa.gov](http://www.ssa.gov) or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter from the applicant, make a photocopy of the document for the file, and return the original to the family.

For participants, the PHA must obtain information through the HUD EIV system and confirm with the participants that the current listed benefit amount is correct.

- If the participant agrees with the amount reported in EIV, the PHA must use the EIV-reported gross benefit amount to calculate annual income from Social Security. PHAs are required to use the EIV-reported SS and SSI benefit amounts when calculating income unless the tenant disputes the EIV-reported amount. For example, an SSA benefit letter may list the monthly benefit amount as \$450.80 and EIV displays the amount as \$450.00. The PHA must use the EIV-reported amount unless the participant disputes the amount.
- If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in EIV, the PHA must request a current SSA benefit verification letter (dated within the last 120 calendar days) from each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the participant request a benefit verification letter from SSA's website at [www.ssa.gov](http://www.ssa.gov) or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter from the participant, make a photocopy of the document for the file, and return the original to the family.
- Photocopies of social security checks or bank statements are not acceptable forms of verification for SS/SSI benefits.

### 7-III.D. ALIMONY OR CHILD SUPPORT [Notice PIH 2023-27]

Annual income includes “all amounts received,” not the amount that a family may be legally entitled to receive but which they do not receive. For example, a family’s child support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders. A copy of a court order or other written payment agreement alone may not be sufficient verification of amounts received by a family.

#### OHA Policy

The methods the OHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it *receives regular payments*, verification will be obtained in the following order of priority:

Copies of the receipts and/or payment stubs for the 12 months prior to PHA request

Third-party verification form from the state or local child support enforcement agency

Third-party verification form from the person paying the support

Family's self-certification of amount received

*Note:* Families are not required to undertake independent enforcement action.

### 7-III.E. NONRECURRING INCOME [Notice PIH 2023-27]

Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income. PHAs may accept a self-certification from the family stating that the income will not be repeated in the coming year.

#### OHA Policy

OHA will accept self-certification from the family stating that income will not be repeated in the coming year. However, OHA may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.

## **7-III.F. ASSETS AND INCOME FROM ASSETS**

### **Net Family Assets [24 CFR 5.603]**

At admission and reexam, for families with net assets totaling \$50,000 or less (adjusted annually), the PHA may, but is not required to, accept the family's self-certification that the family's assets do not exceed \$50,000 without taking any additional steps to verify the accuracy of the declaration. The declaration must include the amount of income the family expects to receive from assets which must be included in the family's income. This includes declaring income from checking and savings accounts which, although excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not exceed \$50,000), may generate asset income. PHAs must clarify during the self-certification process which assets are included/excluded from net family assets.

For PHAs that choose to accept self-certification, the PHA is required to obtain third-party verification of all assets, regardless of the amount, at least once every three years.

PHAs who choose not to accept self-certifications of assets must verify all families' assets on an annual basis.

When net family assets have a total value over \$50,000, the PHA may not rely on the family's self-certification. Third-party verification of assets is required when net family assets exceed \$50,000, adjusted annually by HUD.

When verification of assets is required, PHAs are required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts.

#### PHA Policy

For families with net assets totaling \$50,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual income. The family will be required to provide third-party verification of net family assets every three years.

When verification is required, in determining the value of checking or savings accounts, the PHA will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, the PHA will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

## **Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2)]**

The PHA must determine whether a family has present ownership in real property that is suitable for occupancy for purposes of determining whether the family is compliant with the asset limitation described in Chapters 3 and 13. At admission and reexam, the PHA may accept a self-certification from the family that the family does not have any present ownership in any real property that is suitable for occupancy. If the family declares they have present ownership in real property, the PHA must obtain third-party verification.

### PHA Policy

Both at admission and reexam, the PHA will accept self-certification from the family that the family does not have any present ownership in any real property. The certification will state that the family does not have any present ownership interest in any real property and must be signed by all family members 18 years of age and older. The PHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question.

If the family declares they have a present ownership in real property, the PHA will obtain third-party verification of the following factors: whether the family has the legal right to reside in the property; whether the family has effective legal authority to sell the property; and whether the property is suitable for occupancy by the family as a residence. However, in cases where a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

### **7-III.G. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE**

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. HUD permits PHAs to accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28]. The PHA needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28].

#### OHA Policy

OHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.

OHA will verify the value of assets disposed of only if:

OHA does not already have a reasonable estimation of its value from previously collected information, or

The amount reported by the family in the certification appears obviously in error.

Example 1: An elderly resident reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this \$10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.

Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately \$5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

### **7-III.H. NET INCOME FROM RENTAL PROPERTY**

#### OHA Policy

The family must provide:

A current executed lease for the property that shows the rental amount or certification from the current tenant

A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income).

If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

### **7-III.I. FEDERAL TAX REFUNDS OR REFUNDABLE TAX CREDITS**

**[Notice PIH 2023-27]**

PHAs are not required to verify the amount of the family's federal tax refund or refundable tax credit(s) if the family's net assets are equal to or below \$50,000 (adjusted annually for inflation), even in years when full verification of assets is required or if the PHA does not accept self-certification of assets. PHAs must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than \$50,000.

### **7-III.J. RETIREMENT ACCOUNTS**

#### OHA Policy

OHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken and any regular payments.

### 7-III.K. INCOME FROM EXCLUDED SOURCES [Notice PIH 2023-27]

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to verify the income using third-party verification, document why third-party verification is not available, or report the income on the 50058. *Fully excluded income* is defined as income where the entire amount qualifies to be excluded from the annual income determination in accordance with 24 CFR 5.609(b) and any *Federal Register* notice on mandatory exclusions issued by HUD (for example, food stamps, earned income of a minor, or foster care funds).

PHAs may accept a family's signed application or reexamination form as self-certification of fully excluded income. They do not have to require additional documentation. However, if there is any doubt that a source of income qualifies for full exclusion, PHAs have the option of requiring additional verification.

For partially excluded income, the PHA **is** required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is included in annual income (for example, the income of an adult full-time student).

#### OHA Policy

The PHA will accept the family's self-certification as verification of fully excluded income. The PHA may request additional documentation if necessary to document the income source.

The PHA will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

3<sup>rd</sup> party verification will be obtained in order to provide documentation in other areas than annual income, ie community service.

### 7-III.L. ZERO INCOME REVIEWS [Notice PIH 2023-27]

A *zero income review* is an assessment, sometimes periodic, performed by the PHA of the income of a family who claims that they do not receive income from any source, including from assets. During such reviews, it is common for PHAs to request that families complete and sign a worksheet explaining how they pay for the household's expenses. HUD does not require PHAs to conduct periodic zero income reviews. In calculating annual income, PHAs must not assign monetary value to nonmonetary in-kind donations from a food bank or similar organization received by the family [24 CFR 5.609(b)(24)(vi)]. PHAs that perform zero income reviews must update local discretionary policies, procedures, and forms. Families who begin receiving income which does not trigger an interim reexamination should no longer be considered zero income even though the family's income is not reflected on the Form HUD-50058.

#### OHA Policy

OHA will check UIV sources and/or may request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, earned income, child support, etc. are not being received by families claiming to have zero annual income.

OHA will also require that each family member who claims zero income status complete a zero income form. If any sources of income are identified on the form, OHA will verify the income in accordance with the policies in this chapter prior to including the income in the family's annual income.

OHA will only conduct interims in accordance with OHA policy in Chapter 9.

### **7-III.M. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]**

The regulations under HOTMA distinguish between two categories of student financial assistance paid to both full-time and part-time students. Any assistance to students under section 479B of the Higher Education Act of 1965 (Title IV of the HEA) must be excluded from the family's annual income [24 CFR 5.609(b)(9)(i)]. Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education not otherwise excluded by the federally mandated income exclusions are excluded [24 CFR 5.609(b)(9)(ii)].

#### OHA Policy

OHA will request written third-party verification of both the source and the amount of student financial assistance. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, unless the student's only source of assistance is assistance under Title IV of the HEA, OHA will request written verification of the cost of the student's tuition, books, supplies, room and board, and other required fees and charges to the student from the educational institution.

If OHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.

## **PART IV: VERIFYING MANDATORY DEDUCTIONS**

### **7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS**

The dependent and elderly/disabled family deductions require only that the PHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

#### **Dependent Deduction**

See Chapter 6 for a full discussion of this deduction. The PHA will verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse or cohead of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student

#### **Elderly/Disabled Family Deduction**

See the Eligibility chapter for a definition of elderly and disabled families and Chapter 6 for a discussion of the deduction. The PHA will verify that the head, spouse, or cohead is 62 years of age or older or a person with disabilities.

### **7-IV.B. HEALTH AND MEDICAL CARE EXPENSE DEDUCTION**

Policies related to medical expenses are found in Chapter 6. The amount of the deduction will be verified following the standard verification procedures described in Part I.

The PHA must comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation to determine unreimbursed health and medical care expenses. The PHA may not request documentation beyond what is sufficient to determine anticipated health and medical care costs. Before placing bills and documentation in the tenant file, the PHA must redact all personally identifiable information [FR Notice 2/14/23].

#### **Amount of Expense**

##### OHA Policy

Medical expenses will be verified through:

Written third-party documents provided by the family, such as pharmacy printouts or receipts.

The PHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The PHA will also accept evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months.

Written third-party verification forms if the family is unable to provide acceptable documentation.

If third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.

Before placing bills and documentation in the tenant file, the PHA will redact all personally identifiable information.

If OHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, OHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, OHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will OHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].

In addition, the PHA must verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified health and medical care expenses.
- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

## **Eligible Household**

The health and medical care expense deduction is permitted only for households in which the head, spouse, or cohead is at least 62 or a person with disabilities. The PHA will verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter, and as described in Chapter 7 (7-IV.A) of this plan.

## **Qualified Expenses**

To be eligible for the health and medical care expense deduction, the costs must qualify as medical expenses. See Chapter 6 for the PHA's policy on what counts as a medical expense.

## **Unreimbursed Expenses**

To be eligible for the health and medical care expense deduction, the costs must not be reimbursed by another source.

### OHA Policy

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source. If expenses are verified through a third party, the third party must certify that the expenses are not paid or reimbursed from any other source.

## **Expenses Incurred in Past Years**

### OHA Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:

- The anticipated repayment schedule

- The amounts paid in the past, and

- Whether the amounts to be repaid have been deducted from the family's annual income in past years

## 7-IV.C. DISABILITY ASSISTANCE EXPENSES

Policies related to disability assistance expenses are found in 6-II.E. The amount of the deduction will be verified following the standard verification procedures described in Part I.

The PHA must comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation to determine unreimbursed auxiliary apparatus or attendance care costs. The PHA may not request documentation beyond what is sufficient to determine anticipated reasonable attendant care and auxiliary apparatus costs. Before placing bills and documentation in the tenant file, the PHA must redact all personally identifiable information [FR Notice 2/14/23].

### **Amount of Expense**

#### *Attendant Care*

##### OHA Policy

Expenses for attendant care will be verified through:

Written third-party documents provided by the family, such as receipts or cancelled checks.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.

Before placing bills and documentation in the tenant file, OHA will redact all personally identifiable information.

If OHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, OHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, OHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will OHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].

## ***Auxiliary Apparatus***

### OHA Policy

Expenses for auxiliary apparatus will be verified through:

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party or document review is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the PHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in Chapter 6.).
- The expense is not reimbursed from another source (as described in Chapter 6.).

### **Family Member is a Person with Disabilities**

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The PHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

### **Family Member(s) Permitted to Work**

The PHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

### OHA Policy

OHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

## **Unreimbursed Expenses**

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

### OHA Policy

The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

## **7-IV.D. CHILD CARE EXPENSES**

Policies related to childcare expenses are found in Chapter 6. The amount of the deduction will be verified following the standard verification procedures described in Part I. In addition, the PHA must verify that:

- The child is eligible for care (12 or younger).
- The costs claimed are not reimbursed.
- The costs enable a family member to work, actively seek work, or further their education.
- The costs are for an allowable type of childcare.
- The costs are reasonable.

### **Eligible Child**

To be eligible for the childcare deduction, the costs must be incurred for the care of a child under the age of 13. The PHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

### **Unreimbursed Expense**

To be eligible for the childcare deduction, the costs must not be reimbursed by another source.

### OHA Policy

The family and the care provider will be required to certify that the childcare expenses are not paid by or reimbursed to the family from any source.

## **Pursuing an Eligible Activity**

The PHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

### OHA Policy

#### *Information to be Gathered*

OHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

#### *Seeking Work*

Whenever possible OHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases OHA will request family-provided verification from the agency of the member's job seeking efforts to date and require the family to submit to OHA any reports provided to the other agency.

In the event third-party verification is not available, OHA will provide the family with a form on which the family member must record job search efforts. OHA will review this information at each subsequent reexamination for which this deduction is claimed.

#### *Furthering Education*

OHA will request third-party documentation to verify that the person permitted to further their education by the childcare is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.

#### *Gainful Employment*

OHA will seek third-party verification of the work schedule of the person who is permitted to work by the childcare. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.

## **Allowable Type of Child Care**

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

### OHA Policy

OHA will verify that the type of childcare selected by the family is allowable, as described in Chapter 6.

OHA will verify that the fees paid to the childcare provider cover only childcare costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The PHA will verify that the childcare provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

## **Reasonableness of Expenses**

Only reasonable childcare costs can be deducted.

### OHA Policy

The actual costs the family incurs will be compared with OHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, OHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

**Exhibit 7-1: Summary of Documentation Requirements for Noncitizens  
[HCV GB, pp. 5-9 and 5-10]**

- All noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA.
- Except for persons 62 or older, all noncitizens must sign a verification consent form
- Additional documents are required based upon the person's status.

**Elderly Noncitizens**

- A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.

**All other Noncitizens**

- Noncitizens that claim eligible immigration status also must present the applicable USCIS document. Acceptable USCIS documents are listed below.

<ul style="list-style-type: none"> <li>• Form I-551 Alien Registration Receipt Card (for permanent resident aliens)</li> <li>• Form I-94 Arrival-Departure Record annotated with one of the following:             <ul style="list-style-type: none"> <li>• “Admitted as a Refugee Pursuant to Section 207”</li> <li>• “Section 208” or “Asylum”</li> <li>• “Section 243(h)” or “Deportation stayed by Attorney General”</li> <li>• “Paroled Pursuant to Section 221 (d)(5) of the USCIS”</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Form I-94 Arrival-Departure Record with no annotation accompanied by:             <ul style="list-style-type: none"> <li>• A final court decision granting asylum (but only if no appeal is taken);</li> <li>• A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90);</li> <li>• A court decision granting withholding of deportation; or</li> <li>• A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90).</li> </ul> </li> </ul>
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<ul style="list-style-type: none"> <li>• Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”.</li> </ul>	<ul style="list-style-type: none"> <li>• Form I-688B Employment Authorization Card annotated “Provision of Law 274a. 12(11)” or “Provision of Law 274a.12”.</li> </ul>
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- A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant’s entitlement to the document has been verified; or
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*

## Chapter 15

### PROGRAM INTEGRITY

#### INTRODUCTION

The OHA is committed to ensuring that funds made available to OOHA are spent in accordance with HUD requirements.

This chapter covers HUD and OHA policies designed to prevent, detect, investigate and resolve instances of program abuse or fraud. It also describes the actions that will be taken in the case of unintentional errors and omissions.

Part I: Preventing, Detecting, and Investigating Errors and Program Abuse. This part presents OHA policies related to preventing, detecting, and investigating errors and program abuse.

Part II: Corrective Measures and Penalties. This part describes the corrective measures the OHA must and may take when errors or program abuses are found.

## **PART I: PREVENTING, DETECTING, AND INVESTIGATING ERRORS AND PROGRAM ABUSE**

### **15-I.A. PREVENTING ERRORS AND PROGRAM ABUSE**

HUD created the Enterprise Income Verification (EIV) system to provide PHAs with a powerful tool for preventing errors and program abuse. PHAs are required to use the EIV system ~~in its entirety~~ **at annual reexamination** in accordance with HUD administrative guidance [24 CFR 5.233]. PHAs are further required to:

- Provide applicants and residents with form HUD-52675, “Debts Owed to PHAs and Terminations”
- Require all adult members of an applicant or participant family to acknowledge receipt of form HUD-52675 by signing a copy of the form for retention in the family file

OHA anticipates that the vast majority of families and PHA employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.

To ensure that OHA’s program is administered effectively and according to the highest ethical and legal standards, OHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.

- OHA will provide each applicant and resident with a copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse.
- OHA will provide each applicant and resident with a copy of “What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12. In addition, OHA will require the head of each household to acknowledge receipt of the guide by signing a copy for retention in the family file.
- OHA will require orientation sessions for all residents either prior to or upon execution of the lease. OHA will discuss program compliance and integrity issues. At the conclusion of all program orientation sessions, the family representative will be required to sign a acknowledgement of orientation to confirm that all rules and pertinent regulations were explained to them.
- OHA will routinely provide resident counseling as part of every reexamination interview in order to clarify any confusion pertaining to program rules and requirements.
- OHA staff will be required to review and explain the contents of all HUD- and PHA-required forms prior to requesting family member signatures.
- OHA will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key PHA forms and form letters that request information from a family member.
- OHA will provide each OHA employee with the necessary training on program rules and the organization’s standards of conduct and ethics.

- At every regular reexamination OHA staff will explain any changes in HUD regulations or OHA policy that affect residents.

For purposes of this chapter the term *error* refers to an unintentional error or omission. *Program abuse or fraud* refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.

### **15-I.B. DETECTING ERRORS AND PROGRAM ABUSE**

In addition to taking steps to prevent errors and program abuse, OHA will use a variety of activities to detect errors and program abuse.

#### **Quality Control and Analysis of Data**

OHA will employ a variety of methods to detect errors and program abuse, including:

- OHA routinely will use EIV and other non-HUD sources of up-front income verification. This includes any other private or public databases available to OHA.
- At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.
- OHA will compare family-reported income and expenditures to detect possible unreported income.

#### **Independent Audits and HUD Monitoring**

Notice PIH 2015-16 requires all PHAs that expend \$750,000 or more in federal awards annually to have an independent audit (IPA). In addition, HUD conducts periodic on-site and automated monitoring of PHA activities and notifies OHA of errors and potential cases of program abuse.

OHA will use the results reported in any IPA or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of OHA's error detection and abuse prevention efforts.

#### **Individual Reporting of Possible Errors and Program Abuse**

OHA will encourage staff, residents, and the public to report possible program abuse.

### **15-I.C. INVESTIGATING ERRORS AND PROGRAM ABUSE**

#### **When OHA Will Investigate**

OHA will review all referrals, specific allegations, complaints, and tips from any source including other agencies, companies, and individuals, to determine if they warrant investigation. In order for OHA to investigate, the allegation must contain at least one independently-verifiable item of information, such as the name of an employer or the name of an unauthorized household member.

OHA will investigate when inconsistent or contradictory information is detected through file reviews and the verification process.

## **Consent to Release of Information [24 CFR 960.259]**

OHA may investigate possible instances of error or abuse using all available OHA and public records. If necessary, OHA will require families to sign consent forms for the release of additional information.

## **Analysis and Findings**

OHA will base its evaluation on a preponderance of the evidence collected during its investigation.

*Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence that as a whole shows that the fact sought to be proved is more probable than not. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

For each investigation OHA will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed OHA, and (3) what corrective measures or penalties will be assessed.

## **Consideration of Remedies**

All errors and instances of program abuse must be corrected prospectively. Whether OHA will enforce other corrective actions and penalties depends upon the nature of the error or program abuse.

In the case of family-caused errors or program abuse, OHA will take into consideration (1) the seriousness of the offense and the extent of participation or culpability of individual family members, (2) any special circumstances surrounding the case, (3) any mitigating circumstances related to the disability of a family member.

## **Notice and Appeals**

OHA will inform the relevant party in writing of its findings and remedies within 10 business days of the conclusion of the investigation. The notice will include (1) a description of the error or program abuse, (2) the basis on which OHA determined the error or program abuses, (3) the remedies to be employed, and (4) the family's right to appeal the results through an informal hearing or grievance hearing (see Chapter 14).

## **PART II: CORRECTIVE MEASURES AND PENALTIES**

### **15-II.A. UNDER- OR OVERPAYMENT**

An under- or overpayment includes an incorrect tenant rent payment by the family, or an incorrect utility reimbursement to a family.

#### **Corrections**

Whether the incorrect rental determination is an overpayment or underpayment, OHA must promptly correct the tenant rent and any utility reimbursement prospectively.

**Increases in the tenant rent will be implemented on the first of the month following a written 30-day notice.**

**Any decreases in tenant rent will become effective the first of the month following the discovery of the error.**

#### **Reimbursement**

Whether the family is required to reimburse OHA or OHA is required to reimburse the family depends upon which party is responsible for the incorrect payment and whether the action taken was an error or program abuse. Policies regarding reimbursement are discussed in the three sections that follow.

### **15-II.B. FAMILY-CAUSED ERRORS AND PROGRAM ABUSE**

General administrative requirements for participating in the program are discussed throughout the ACOP. This section deals specifically with errors and program abuse by family members.

An incorrect rent determination caused by a family generally would be the result of incorrect reporting of family composition, income, assets, or expenses, but also would include instances in which the family knowingly allows OHA to use incorrect information provided by a third party.

#### **Family Reimbursement to PHA**

In the case of family-caused errors or program abuse, the family will be required to repay any amounts of rent underpaid. OHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the amount owed, OHA will terminate the family's lease in accordance with the policies in Chapter 13.

#### **PHA Reimbursement to Family**

OHA will not reimburse the family for any overpayment of rent when the overpayment clearly is caused by the family.

#### **Prohibited Actions**

An applicant or resident in the public housing program must not knowingly:

- Make a false statement to OHA [Title 18 U.S.C. Section 1001].
- Provide incomplete or false information to OHA [24 CFR 960.259(a)(4)].

- Commit fraud, or make false statements in connection with an application for assistance or with reexamination of income [24 CFR 966.4(1)(2)(iii)(C)].

Any of the following will be considered evidence of family program abuse:

- Offering bribes or illegal gratuities to OHA Board of Commissioners, employees, contractors, or other OHA representatives
- Offering payments or other incentives to a third party as an inducement for the third party to make false or misleading statements to OHA on the family's behalf
- Use of a false name or the use of falsified, forged, or altered documents
- Intentional misreporting of family information or circumstances (e.g., misreporting of income or family composition)
- Omitted facts that were obviously known by a family member (e.g., not reporting employment income)
- Admission of program abuse by an adult family member

OHA may determine other actions to be program abuse based upon a preponderance of the evidence, as defined earlier in this chapter.

### **Penalties for Program Abuse**

In the case of program abuse caused by a family OHA may, at its discretion, impose any of the following remedies.

- OHA may require the family to repay any amounts owed to the program (see 15-II.B., Family Reimbursement to PHA).
- OHA may require, as a condition of receiving or continuing assistance, that a culpable family member not reside in the unit. See policies in Chapter 3 (for applicants) and Chapter 13 (for residents).
- OHA may deny admission or terminate the family's lease following the policies set forth in Chapter 3 and Chapter 13 respectively.
- OHA may refer the family for state or federal criminal prosecution as described in section 15-II.D.

### **15-II.C. PHA-CAUSED ERRORS OR PROGRAM ABUSE**

The responsibilities and expectations of PHA staff with respect to normal program administration are discussed throughout the ACOP. This section specifically addresses actions of a PHA staff member that are considered errors or program abuse related to the public housing program. Additional standards of conduct may be provided in OHA personnel policy.

PHA-caused incorrect rental determinations include (1) failing to correctly apply public housing rules regarding family composition, income, assets, and expenses, and (2) errors in calculation.

The following policy is effective upon the PHA's HOTMA 102/104 compliance date:  
7/31/2025

De Minimis Errors [24 CFR 5.609(c)(4); Notice PIH 2023-27]

The PHA will not be considered out of compliance when making annual income determinations solely due to de minimis errors in calculating family income. A de minimis error is an error where the PHA determination of family income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (\$360 in annual adjusted income) per family.

PHAs must take corrective action to credit or repay a family if the family was overcharged rent, including when PHAs make de minimis errors in the income determination. Families will not be required to repay the PHA in instances where the PHA miscalculated income resulting in a family being undercharged for rent. PHAs state in their policies how they will repay or credit a family the amount they were overcharged as a result of the PHA's de minimis error in income determination.

PHA Policy

The PHA will reimburse a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error, staff program abuse, or a de minimis error.

**Repayment to OHA**

~~The family is not required to repay an underpayment of rent if the error or program abuse is caused by OHA staff.~~

**PHA Reimbursement to Family**

~~OHA will reimburse a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error or staff program abuse.~~

**Prohibited Activities**

Any of the following will be considered evidence of program abuse by OHA staff:

- Failing to comply with any public housing program requirements for personal gain
- Failing to comply with any public housing program requirements as a result of a conflict of interest relationship with any applicant or resident
- Seeking or accepting anything of material value from applicants, residents, vendors, contractors, or other persons who provide services or materials to OHA
- Disclosing confidential or proprietary information to outside parties
- Gaining profit as a result of insider knowledge of OHA activities, policies, or practices
- Misappropriating or misusing public housing funds

- Destroying, concealing, removing, or inappropriately using any records related to the public housing program
- Committing any other corrupt or criminal act in connection with any federal housing program
- Committing sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (~~supervisory harassment~~) or hostile environment
- Allowing sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (~~supervisory harassment~~) or hostile environment, where OHA knew or should have known such harassment was occurring
- Retaliating against any applicant, resident, or staff reporting sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (~~supervisory harassment~~) or hostile environment

#### **15-II.D. CRIMINAL PROSECUTION**

When OHA determines that program abuse by a family or OHA staff member has occurred and the amount of underpaid rent meets or exceeds the threshold for prosecution under local or state law, OHA will refer the matter to the appropriate entity for prosecution. When the amount of underpaid rent meets or exceeds the federal threshold, the case will also be referred to the HUD Office of Inspector General (OIG).

Other criminal violations related to the public housing program will be referred to the appropriate local, state, or federal entity.

#### **15-II.E. FRAUD AND PROGRAM ABUSE RECOVERIES**

PHAs who enter into a repayment agreement with a family to collect rent owed, initiate litigation against the family to recover rent owed, or begin eviction proceedings against a family may retain 100 percent of program funds that OHA recovers [Notice PIH 2007-27 (HA)].

If OHA does none of the above, all amounts that constitute an underpayment of rent must be returned to HUD.

The family must be afforded the opportunity for a hearing through OHA's grievance process.



## Chapter 16

### PROGRAM ADMINISTRATION

#### INTRODUCTION

This chapter discusses administrative policies and practices that are relevant to the activities covered in this ACOP. The policies are discussed in seven parts as described below:

Part I: Setting Utility Allowances. This part describes how utility allowances are established and revised. Also discussed are the requirements to establish surcharges for excess consumption of PHA-furnished utilities.

Part II: Establishing Flat Rents. This part describes the requirements and policies related to establishing and updating flat rent amounts.

Part III: Repayment of Family Debts. This part contains policies for recovery of monies that have been underpaid by families, and describes the circumstances under which OHA will offer repayment agreements to families. Also discussed are the consequences for failure to make payments in accordance with a repayment agreement.

Part IV: Public Housing Assessment System (PHAS). This part describes the PHAS indicators, how PHAs are scored under PHAS, and how those scores affect OHA.

Part V: Record Keeping. All aspects of the program involve certain types of record-keeping. This part outlines the privacy rights of applicants and participants and record retention policies OHA will follow.

Part VI: Reporting and Record Keeping for Children with Elevated Blood Lead Level. This part describes OHA's reporting responsibilities related to children with elevated blood lead levels that are living in public housing.

Part VII: Violence against Women Act (VAWA): Notification, Documentation, and Confidentiality. This part contains key terms used in VAWA and describes requirements related to notifying families about their rights and responsibilities under VAWA; requesting documentation from victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking; and maintaining the confidentiality of information obtained from victims.

Part VIII: Mandated and Discretionary use of HUD's EIV Enterprise Income Verification System

## **PART I: SETTING UTILITY ALLOWANCES [24 CFR 965 Subpart E]**

### **16-I.A. OVERVIEW**

PHAs must establish allowances for PHA-furnished utilities for all check metered utilities and for resident-purchased utilities for all utilities purchased directly by residents from a utility supplier [24 CFR 965.502(a)].

PHAs must also establish surcharges for excess consumption of PHA-furnished utilities [24 CFR 965.506].

OHA must maintain a record that documents the basis on which utility allowances and scheduled surcharges are established and revised, and the record must be made available for inspection by residents [24 CFR 965.502(b)].

### **16-I.B. UTILITY ALLOWANCES**

OHA must establish separate allowances for each utility and for each category of dwelling units OHA determines to be reasonably comparable as to factors affecting utility usage [24 CFR 965.503].

The objective of OHA in establishing utility allowances for each dwelling unit category and unit size is to approximate a reasonable consumption of utilities by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment [24 CFR 965.505].

Utilities include gas, electricity, fuel for heating, water, sewerage, and solid waste disposal for a dwelling unit. In addition, if OHA does not furnish a range and refrigerator, the family must be granted a utility allowance for the range and refrigerator they provide [24 CFR 965.505].

Costs for telephone, cable/satellite TV, and internet services are not considered utilities [PH Occ GB, p. 138].

Utility allowance amounts will vary by the rates in effect, size and type of unit, climatic location and siting of the unit, type of construction, energy efficiency of the dwelling unit, and other factors related to the physical condition of the unit. Utility allowance amounts will also vary by residential demographic characteristics affecting home energy usage [PH Occ GB, p. 138].

Chapter 14 of the *PH Occupancy Guidebook* provides detailed guidance to the PHA about establishing utility allowances.

#### **Air-Conditioning**

“If a PHA installs air conditioning, it shall provide, to the maximum extent economically feasible, systems that give residents the option of choosing to use air conditioning in their units. The design of systems that offer each resident the option to choose air conditioning shall include retail meters or check meters, and residents shall pay for the energy used in its operation. For systems that offer residents the option to choose air conditioning but cannot be check metered, residents are to be surcharged in accordance with 965.506. If an air conditioning system does not provide for resident option, residents are not to be charged, and these systems should be avoided whenever possible.” [24 CFR 965.505(e)]

### **Utility Allowance Revisions [24 CFR 965.507]**

OHA must review at least annually the basis on which utility allowances have been established and must revise the allowances if necessary in order to adhere to the standards for establishing utility allowances that are contained in 24 CFR 965.505. The review must include all changes in circumstances (including completion of modernization and/or other energy conservation measures implemented by OHA) indicating probability of a significant change in reasonable requirements and changes in utility rates [24 CFR 965.507(a)].

OHA may revise its allowances for resident-purchased utilities between annual reviews if there is a rate change, and is required to do so if such change, by itself or together with prior rate changes not adjusted for, results in a change of 10 percent or more from the rate on which the allowance was based. Between annual reviews of utility allowances, OHA will only revise its utility allowances due to a rate change, when required to by the regulation.

Adjustments to resident payments as a result of such changes must be retroactive to the first day of the month following the month in which the last rate change taken into account became effective. Such rate changes are not subject to the 60-day notice [24 CFR 965.507(b)].

### **16-I.C. SURCHARGES FOR PHA-FURNISHED UTILITIES [24 CFR 965.506]**

For dwelling units subject to allowances for PHA-furnished utilities where check meters have been installed, OHA must establish surcharges for utility consumption in excess of the allowances. Surcharges may be computed on a straight per unit of purchase basis or for stated blocks of excess consumption, and must be based on OHA's average utility rate. The basis for calculating the surcharges must be described in OHA's schedule of allowances. Changes in the amount of surcharges based directly on changes in OHA's average utility rate are not subject to the advance notice requirements discussed under 16-I.D.

For dwelling units served by PHA-furnished utilities where check meters have not been installed, OHA must establish schedules of surcharges indicating additional dollar amounts residents will be required to pay by reason of estimated utility consumption attributable to resident-owned major appliances or to optional functions of OHA-furnished equipment. The surcharge schedule must state the resident-owned equipment (or functions of PHA-furnished equipment) for which surcharges will be made and the amounts of such charges. Surcharges must be based on the cost to OHA of the utility consumption estimated to be attributable to reasonable usage of such equipment.

### **16-I.D. NOTICE REQUIREMENTS [965.502]**

OHA must give notice to all residents of proposed allowances and scheduled surcharges, and revisions thereof. The notice must be given in the manner provided in the lease and must:

- Be provided at least 60 days before the proposed effective date of the allowances, scheduled surcharges, or revisions.
- Describe the basis for determination of the allowances, scheduled surcharges, or revisions, including a statement of the specific items of equipment and function whose utility consumption requirements were included in determining the amounts of the allowances and schedule of surcharges.
- Notify residents of the place where OHA's documentation on which allowances and surcharges are based is available for inspection.
- Provide all residents an opportunity to submit written comments during a period expiring not less than 30 days before the proposed effective date of the allowances, scheduled surcharges, or revisions.

### **16-I.E. REASONABLE ACCOMMODATION AND INDIVIDUAL RELIEF [24 CFR 965.508]**

On request from a family that includes a disabled or elderly person, OHA must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family [24 CFR 8 and 100, PH Occ GB, p. 172].

Likewise, residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [24 CFR 8 and 100, PH Occ GB, p. 172]. See Chapter 2 for policies regarding the request and approval of reasonable accommodations.

Further, OHA may grant requests for relief from charges in excess of the utility allowance on reasonable grounds, such as special needs of the elderly, ill, or residents with disabilities, or special factors not within control of the resident, as OHA deems appropriate. The family must request the higher allowance and provide OHA with information about the additional allowance required.

OHA should develop criteria for granting individual relief and to notify residents about the availability of individual relief, and also to notify participants about the availability of individual relief programs (sometimes referred to as "Medical Baseline discounts") offered by the local utility company [Utility Allowance GB, p. 19, 24 CFR 965.508].

## **PART II: ESTABLISHING FLAT RENTS**

### **16-II.A. OVERVIEW**

Flat rents are designed to encourage self-sufficiency and to avoid creating disincentives for continued residency by families who are attempting to become economically self-sufficient.

Flat rents are also used to prorate assistance for a mixed family. A mixed family is one whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigrations status [24 CFR 5.504].

This part discusses how OHA establishes and updates flat rents. Policies related to the use of flat rents, family choice of rent, flat rent hardships, and proration of rent for a mixed family are discussed in Chapter 6.

### **16-II.B. FLAT RENTS [24 CFR 960.253(b) and Notice PIH 2022-33]**

#### **Establishing Flat Rents**

The 2015 Appropriations Act requires that flat rents must be set at no less than 80 percent of the applicable fair market rent (FMR). Alternatively, OHA may set flat rents at no less than 80 percent of the applicable small area FMR(SAFMR) for metropolitan areas, or 80 percent of the applicable unadjusted rents for nonmetropolitan areas.

For areas where HUD has not determined a SAFMR or an unadjusted rent, PHAs must set flat rents at no less than 80 percent of the FMR or apply for an exception flat rent.

The 2015 Appropriations Act permits PHAs to apply for an exception flat rent that is lower than either 80 percent of the FMR or SAFMR/unadjusted rent if OHA can demonstrate, through submission of a market analysis, that these FMRs do not reflect the market value of a particular property or unit and HUD agrees with OHA's analysis.

The market analysis must be submitted using form HUD-5880, "Flat Rent Market Analysis Summary."

PHAs must receive written HUD approval before implementing exception flat rents. PHAs with a previously approved flat rent exception request may submit a written request to extend the approved flat rents for up to two additional years, provided local market conditions remain unchanged. Detailed information on how to request exception flat rents can be found in Notice PIH 2022-33.

PHAs are now required to apply a utility allowance to flat rents as necessary. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.

#### **Review of Flat Rents**

No later than 90 days after the effective date of the new annual FMRs/SAFMRs/unadjusted rent, PHAs must implement new flat rents as necessary based changes to the MR/SAFMR/unadjusted rent or request an exception.

If the FMR falls from year to year, OHA may, but is not required to, lower the flat rent to 80 percent of the current FMR/SAFMR/unadjusted rent.

If the FMR/SAFMR/unadjusted rent is lower than the previous year, OHA will reduce flat rents to 80 percent of the current FMR/SAFMR.

**Applying Flat Rents**

OHA will apply updated flat rents at each family's next annual reexamination or flat rent update after implementation of the new flat rents.

**Posting of Flat Rents**

OHA will publicly post the schedule of flat rents in a conspicuous manner in the applicable OHA or project office.

**Documentation of Flat Rents [24 CFR 960.253(b)(5)]**

OHA must maintain records that document the method used to determine flat rents, and that show how flat rents were determined by OHA in accordance with this method.

## **PART III: FAMILY DEBTS TO OHA**

### **16-III.A. OVERVIEW**

Families are required to reimburse OHA if they were charged less rent than required because the family either underreported or failed to report income. OHA is required to determine retroactive rent amounts as far back as OHA has documentation of family unreported income [Notice PIH 2018-18].

This part describes OHA's policies for recovery of monies owed to OHA by families. When an action or inaction of a resident family results in the underpayment of rent or other amounts, OHA holds the family liable to return any underpayments to OHA.

OHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover ~~overpayments~~underpayments.

### **16-III.B. REPAYMENT POLICY**

#### **Family Debts to OHA**

Any amount owed to OHA by a public housing family must be repaid. If the family is unable to repay the debt within 60 days, OHA may offer to enter into a repayment agreement in accordance with the policies below. Families must have a regular income source to be eligible to enter into a repayment agreement.

#### **Refusal to Enter into An Agreement**

If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, OHA will terminate the family's tenancy. When a family refuses to repay monies owed to OHA, in addition to termination of program assistance, OHA will utilize available collection alternatives.

#### **Repayment Agreement [24 CFR 792.103]**

The term *repayment agreement* refers to a formal written document signed by a tenant or owner and provided to OHA in which a tenant or owner acknowledges a debt in a specific amount and agrees to repay the amount due at specific time periods.

#### **General Repayment Agreement Guidelines**

##### ***Down Payment Requirement***

Before executing a repayment agreement with a family, OHA will generally require a down payment of 10 percent of the total amount owed. If the family can provide evidence satisfactory to OHA that a down payment of 10 percent would impose an undue hardship, OHA may, in its sole discretion, require a lesser percentage or waive the requirement.

##### ***Payment Thresholds***

Notice PIH 2018-18 recommends that the total amount that a family must pay each month—the family's monthly share of rent plus the monthly debt repayment amount—should not exceed 40 percent of the family's monthly adjusted income, which is considered "affordable." Moreover,

Notice PIH 2018-18 acknowledges that PHAs have the discretion to establish “thresholds and policies” for repayment agreements with families [24 CFR 982.552(c)(1)(vii)].

If a family is paying less than 40 percent of its monthly adjusted income (MAI) in rent, the minimum monthly payment amount will be the greater of the following two amounts: 10 percent of the family’s MAI at the time the agreement is executed or \$50

If a family can provide evidence satisfactory to OHA that a monthly payment amount of \$50 would impose an undue hardship, OHA may, in its sole discretion, require a lower monthly payment amount. Repayment agreements should not exceed three years.

If the family’s income increases or decreases during the term of a repayment agreement, either OHA or the family may request that the monthly payment amount be adjusted accordingly.

### ***Execution of the Agreement***

Any repayment agreement between OHA and a family must be signed and dated by OHA and by all adult family members [Notice PIH 2018-18].

### ***Due Dates***

All payments are due by the close of business on the 1st day of the month and late if not paid by the 7th. If the 7th does not fall on a business day, the due date is the close of business on the first business day after the 7th.

### ***Late or Missed Payments***

If a payment is not received by the end of the business day on the date due, OHA will send the family a delinquency notice giving the family 14 business days to make the late payment. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and OHA will terminate tenancy in accordance with the policies in Chapter 13.

### ***No Offer of Repayment Agreement***

OHA generally will not enter into a repayment agreement with a family if there is already a repayment agreement in place with the family, or if the amount owed by the family exceeds the federal or state threshold for criminal prosecution. Extraordinary circumstances will be considered in determining whether to allow a current repayment agreement to be adjusted to include an additional debt.

### **Repayment Agreements Terms**

All repayment agreements must be in writing, dated, signed by both the family and OHA, include the total retroactive rent amount owed, amount of lump sum payment made at time of execution, if applicable, and the monthly repayment amount. Notice PIH 2018-18 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:

- A reference to the items in the public housing lease that state the family’s obligation to provide true and complete information at every reexamination and the grounds on which OHA may terminate assistance because of a family’s action or failure to act
- A statement clarifying that each month the family not only must pay to OHA the monthly payment amount specified in the agreement but must also pay to OHA the monthly tenant rent

- A statement that the terms of the repayment agreement may be renegotiated if the family's income decreases or increases
- A statement that late or missed payments constitute default of the repayment agreement and may result in termination of tenancy

## PART IV: PUBLIC HOUSING ASSESSMENT SYSTEM (PHAS)

### 16-IV.A. OVERVIEW

The purpose of the Public Housing Assessment System (PHAS) is to improve the delivery of services in public housing and enhance trust in the public housing system among PHAs, public housing residents, HUD and the general public by providing a management tool for effectively and fairly measuring the performance of a public housing agency in essential housing operations.

### 16-IV.B. PHAS INDICATORS [24 CFR 902 Subparts A, B, C, D, and E]

The table below lists each of OHAS indicators, the points possible under each indicator, and a brief description of each indicator. A PHA's performance is based on a combination of all four indicators.

#### Indicator 1: Physical condition of OHA's projects

##### Maximum Score: 40

- The objective of this indicator is to determine the level to which a PHA is maintaining its public housing in accordance with the standard of ~~decent, safe, sanitary, and in good repair~~ **safe, habitable dwelling units.**
- To determine the physical condition of a PHA's projects, inspections are performed ~~of the following five major areas of each public housing project: site, building exterior, building systems, dwelling units, and common areas~~ using the National Standards for the Inspection of Real Estate (NSPIRE). The inspections are performed by an independent inspector arranged by HUD and include a statistically valid sample of the units in each project in OHA's public housing portfolio.

#### Indicator 2: Financial condition of OHA's projects

##### Maximum Score: 25

- The objective of this indicator is to measure the financial condition of OHA's public housing projects for the purpose of evaluating whether OHA has sufficient financial resources and is capable of managing those financial resources effectively to support the provision of housing that is decent, safe, sanitary, and in good repair.
- A PHA's financial condition is determined by measuring each public housing project's performance in each of the following subindicators: quick ratio, months expendable net assets ratio, and debt service coverage ratio.

#### Indicator 3: Management operations of OHA's projects

##### Maximum Score: 25

- The objective of this indicator is to measure certain key management operations and responsibilities of a PHA's projects for the purpose of assessing OHA's management operations capabilities.
- Each project's management operations are assessed based on the following sub-indicators: occupancy, tenant accounts receivable, and accounts payable.

- An on-site management review may be conducted as a diagnostic and feedback tool for problem performance areas, and for compliance. Management reviews are not scored.

**Indicator 4: Capital Fund****Maximum Score: 10**

- The objective of this indicator is to measure how long it takes OHA to obligate capital funds and to occupy units.
- OHA's score for this indicator is measured at OHA level and is based on the following sub indicators: timeliness of fund obligation and occupancy rate.

**16-IV.C. PHAS SCORING [24 CFR 902 Subpart F]**

HUD's Real Estate Assessment Center (REAC) issues overall PHAS scores, which are based on the scores of the four PHAS indicators, and the sub-indicators under each indicator. OHA's indicator scores are based on a weighted average of OHA's public housing projects' scores. PHAS scores translate into a designation for each PHA as high performing, standard, substandard, or troubled.

A high performer is a PHA that achieves an overall PHAS score of 90 or greater and achieves a score of at least 60 percent of the points available under the physical, financial, and management indicators and at least 50 percent of the points available under the capital fund indicator.

A standard performer is a PHA that has an overall PHAS score between 60 and 89 and achieves a score of at least 60 percent of the points available under the physical, financial, and management indicators and at least 50 percent of the points available under the capital fund indicator.

A substandard performer is a PHA that has an overall PHAS score of at least 60 percent and achieves a score of less than 60 percent under one or more of the physical, financial, or management indicators.

A troubled performer is a PHA that achieves an overall PHAS score of less than 60 or achieves less than 50 percent of the total points available under the capital fund indicator.

These designations can affect a PHA in several ways:

- High-performing PHAs are eligible for incentives including relief from specific HUD requirements and bonus points in funding competitions [24 CFR 902.71].
- PHAs that are standard performers may be required to submit and operate under a corrective action plan to eliminate deficiencies in OHA's performance [24 CFR 902.73(a)(1)].
- PHAs that are substandard performers will be required to submit and operate under a corrective action plan to eliminate deficiencies in OHA's performance [24 CFR 902.73(a)(2)].
- PHAs with an overall rating of "troubled" are subject to additional HUD oversight and are required to enter into a memorandum of agreement (MOA) with HUD to improve PHA performance [24 CFR 902.75].

- PHAs that fail to execute or meet MOA requirements may be referred to the Assistant Secretary to determine remedial actions, including, but not limited to, remedies available for substantial default [24 CFR 902.75(g) and 24 CFR Part 907].

PHAs must post a notice of its final PHAS score and status in appropriate conspicuous and accessible locations in its offices within two weeks of receipt of its final score and designation [24 CFR 902.64(b)(2)].

## **PART V: RECORD KEEPING**

### **16-V.A. OVERVIEW**

OHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, OHA must ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights, and that comply with VAWA confidentiality requirements.

### **16-V.B. RECORD RETENTION**

OHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].

OHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date [Notice PIH 2018-18].

Notice PIH 2014-20 requires OHA to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.

OHA must keep confidential records of all emergency transfer requested under OHA's Emergency Transfer Plan, and the outcomes of such requests, and retain the records for a period of three years, or for a period of time as specific in program regulations [24 CFR 5.2002(e)(12)].

OHA will keep the last three years of the Form HUD-50058 and supporting documentation, and for at least three years after end of participation all documents related to a family's eligibility, tenancy, and termination.

In addition, OHA will keep the following records for at least three years:

- An application from each ineligible family and notice that the applicant is not eligible
- Lead-based paint records as required by 24 CFR 35, Subpart B
- Documentation supporting the establishment of flat rents
- Documentation supporting the establishment of utility allowances and surcharges
- Documentation related to PHAS
- Accounts and other records supporting PHA budget and financial statements for the program
- Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule, or VAWA

- Confidential records of all emergency transfers related to VAWA requested under OHA's Emergency Transfer Plan and the outcomes of such requests
- Other records as determined by OHA or as required by HUD

If a hearing to establish a family's citizenship status is held, longer retention requirements apply for some types of documents. For specific requirements, see Section 14-II.A.

## **16-V.C. RECORDS MANAGEMENT**

PHAs must maintain applicant and participant files and information in accordance with the regulatory requirements described below.

All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.

PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

### **Privacy Act Requirements [24 CFR 5.212 and Form-9886]**

The collection, maintenance, use, and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers, and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of Federal, State, and local law.

Applicants and participants, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information. This form incorporates the Federal Privacy Act Statement and describes how the information collected using the form may be used, and under what conditions HUD or OHA may release the information collected.

### **Upfront Income Verification (UIV) Records**

PHAs that access UIV data through HUD's Enterprise Income Verification (EIV) system are required to adopt and follow specific security procedures to ensure that all EIV data is protected in accordance with federal laws, regardless of the media on which the data is recorded (e.g. electronic, paper). These requirements are contained in the HUD-issued document, *Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification (UIV) Data*.

OHA staff receive a copy of OHA's Secure Systems Access Control Procedures and sign acknowledgement of receipt form. View and complete DOD Security Awareness Training video and print Certificate. Staff repeats the DOD Security Awareness Training annually in October for the next calendar year before their certification for continued access to EIV is certified by EIV Coordinator. Staff acknowledges Rules of Behavior in EIV system prior to access.

### **Criminal Records**

OHA may only disclose the criminal conviction records which OHA receives from a law enforcement agency to officers or employees of OHA, or to authorized representatives of OHA who have a job-related need to have access to the information [24 CFR 5.903(e)].

OHA must establish and implement a system of records management that ensures that any criminal record received by OHA from a law enforcement agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to OHA action without institution of a challenge or final disposition of any such litigation [24 CFR 5.903(g)].

OHA must establish and implement a system of records management that ensures that any sex offender registration information received by OHA from a State or local agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to OHA action without institution of a challenge or final disposition of any such litigation. However, a record of the screening, including the type of screening and the date performed must be retained [Notice PIH 2012-28]. This requirement does not apply to information that is public information or is obtained by a PHA other than under 24 CFR 5.905.

#### **Medical/Disability Records**

PHAs are not permitted to inquire about the nature or extent of a person's disability. OHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If OHA receives a verification document that provides such information, OHA should not place this information in the tenant file. OHA should destroy the document.

#### **Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking Records**

For requirements and PHA policies related to management of documentation obtained from victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking, see section 16-VII.E.

## **PART VI: REPORTING REQUIREMENTS FOR CHILDREN WITH ELEVATED BLOOD LEAD LEVEL**

### **16-VI.A. REPORTING REQUIREMENTS [24 CFR 35.1130(e); Notice PIH 2017-13]**

OHA has certain responsibilities relative to children with elevated blood lead levels that are living in public housing.

OHA must report the name and address of a child identified as having an elevated blood lead level (EBLL) to the public health department within five business days of being so notified by any other medical health care professional. OHA must also report each known case of a child with an EBLL to the HUD field office.

OHA will provide the public health department written notice of the name and address of any child identified as having an elevated blood lead level. OHA will provide written notice of each

known case of a child with an EBLL to the HUD field office, and to HUD's Office of Lead Hazard Control (OLHCHH), within five business days of receiving the information.

## **PART VII: VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, AND CONFIDENTIALITY**

### **16-VII.A. OVERVIEW**

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

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

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

### **16-VII.B. DEFINITIONS [24 CFR 5.2003, FR Notice 8/6/13]**

As used in VAWA:

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

- The type of relationship
- The frequency of interaction between the persons involved in the relationship
- The term *domestic violence* includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, under the domestic or family violence laws of the jurisdiction receiving grant monies, and in the case of victim services, includes the user or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who is:
  - The current or former spouse or intimate partner of the victim, or person similarly situated to a spouse or intimate partner of the victim
  - A person who is cohabitating or has cohabitated with the victim as a spouse or intimate partner
  - A person with whom the victim shares a child in common
  - A person who commits acts against an youth or adult victim who is protected from those acts under the domestic or family violence laws of the jurisdiction
- The term *economic abuse* means behavior that is coercive, deceptive, or unreasonably controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, and manipulation to:
  - Restrict a person's access to money, assets, credit, or financial information
  - Unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage
- Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or to whom one has a fiduciary duty
- The term *sexual assault* means:
  - Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks the capacity to consent
- The term *stalking* means:
  - To engage in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or suffer substantial emotional distress.
- The term *technological abuse* means an act or pattern of behavior that occurs within domestic violence, dating violence, sexual assault, or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor another person, except as otherwise permitted by law, that occurs using any form of technology, including but not limited to:
  - Internet enabled devices

- Online spaces and platforms
- Computers
- Mobile devices
- Cameras and imaging programs
- Apps
- Location tracking devices
- Communication technologies
- Any other emergency technologies

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

### **Notification to Public**

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

OHA will make the following information readily available to anyone who requests it.

- A notice of occupancy rights under VAWA to public housing program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)
- A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)
- A copy of OHA's emergency transfer plan (Exhibit 16-3)
- A copy of HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)

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

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

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

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

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

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

OHA is not limited to providing VAWA information at the times specified in the above policy. If OHA decides to provide VAWA information to a tenant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases OHA make alternative delivery arrangements that will not put the victim at risk.

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

When discussing VAWA with the victim, OHA will take reasonable precautions to ensure that no one can overhear the conversation such as having conversations in a private room. The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

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

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

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

- (1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.
- (2) A federal, state, tribal, territorial, or local police report or court record, or an administrative record
- (3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault, stalking, or human trafficking or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; a mental health professional; or a medical professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

OHA may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under “Conflicting Documentation,” nor may it require certification in addition to third-party documentation [FR Notice 11/16/16].

#### **Conflicting Documentation [24 CFR 5.2007(e)]**

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

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

OHA has the discretion to provide benefits to an individual based solely on the individual’s statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

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

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

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

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

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

**Omaha Housing Authority**

**Notice of Occupancy Rights under the Violence Against Women Act<sup>1</sup>**

**To all Tenants and Applicants**

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.<sup>2</sup> The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that public housing is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

**Protections for Applicants**

If you otherwise qualify for assistance under public housing, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

**Protections for Tenants**

If you are receiving assistance under public housing, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

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

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

**Removing the Abuser or Perpetrator from the Household**

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

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<sup>1</sup> Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

<sup>2</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

If OHA chooses to remove the abuser or perpetrator, OHA may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, OHA must allow the tenant who is or has been a victim and other household members to remain in the unit for 30 days, in order to establish eligibility under the program or under another HUD housing program covered by VAWA or find alternative housing.

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

### **Moving to Another Unit**

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

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

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

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

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

**OR**

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

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

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

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

OHA can, but is not required to, ask you to provide documentation to “certify” that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from OHA must be in writing, and OHA must give you at least 14 business days (Saturdays, Sundays, and federal holidays do not count) from the day you receive the request to provide the documentation. OHA may, but does not have to, extend the deadline for the submission of documentation upon your request.

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

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

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

If OHA receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), OHA has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, OHA does not have to provide you with the protections contained in this notice.

### **Confidentiality**

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

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

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

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

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

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

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

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

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

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

### **Other Laws**

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

### **Non-Compliance with The Requirements of This Notice**

You may report your PHA for violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with ~~{insert contact information for any intermediary, if applicable}~~ or ~~{insert Omaha HUD field office}~~.

### **For Additional Information**

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

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

For questions regarding VAWA, please contact **your Property Manager**~~insert name of program or rental assistance contact information able to answer questions on VAWA~~.

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

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

For help regarding sexual assault, you may contact ~~{Insert contact information for relevant organizations}~~**Omaha Police Department.**

Victims of stalking seeking help may contact ~~{Insert contact information for relevant organizations}~~**Omaha Police Department.**

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

**EXHIBIT 16-2: CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING AND ALTERNATE DOCUMENTATION, FORM HUD-5382**

**CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION**

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

OMB Approval No. 2577-0286  
Exp. 06/30/2017

**Purpose of Form:** The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

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

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

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

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

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

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

1. Date the written request is received by victim: \_\_\_\_\_
2. Name of victim: \_\_\_\_\_
3. Your name (if different from victim's): \_\_\_\_\_
4. Name(s) of other family member(s) listed on the lease: \_\_\_\_\_  
\_\_\_\_\_
5. Residence of victim: \_\_\_\_\_
6. Name of the accused perpetrator (if known and can be safely disclosed): \_\_\_\_\_  
\_\_\_\_\_
7. Relationship of the accused perpetrator to the victim: \_\_\_\_\_
8. Date(s) and times(s) of incident(s) (if known): \_\_\_\_\_  
\_\_\_\_\_
10. Location of incident(s): \_\_\_\_\_

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

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature \_\_\_\_\_ Signed on (Date) \_\_\_\_\_

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

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

Attachment: Certification form HUD-5382

## **Omaha Housing Authority**

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

#### **Emergency Transfers**

OHA is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),<sup>3</sup> OHA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.<sup>4</sup> The ability of OHA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether OHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

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

#### **Eligibility for Emergency Transfers**

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

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

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<sup>3</sup>Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

<sup>4</sup>Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section. Tenants cannot be denied a transfer request solely because they are not in good standing.

### **Emergency Transfer Request Documentation**

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

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

### **Confidentiality**

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

### **Emergency Transfer Timing and Availability**

OHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. OHA 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. OHA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If OHA has no safe and available units for which a tenant who needs an emergency transfer is eligible, OHA 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, OHA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

## **Emergency Transfers: Public Housing (PH) Program**

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

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

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

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

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

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

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

## **Safety and Security of Tenants**

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

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

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

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

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

**EXHIBIT 16-4: EMERGENCY TRANSFER REQUEST FOR CERTAIN VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, FORM HUD-5383**

**EMERGENCY TRANSFER  
REQUEST FOR CERTAIN  
VICTIMS OF DOMESTIC  
VIOLENCE, DATING VIOLENCE,  
SEXUAL ASSAULT, OR STALKING**

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

OMB Approval No. 2577-0286  
Exp. 06/30/2017

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

**The requirements you must meet are:**

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

If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

**(2) You expressly request the emergency transfer.** Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

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

**OR**

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

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

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

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

1. Name of victim requesting an emergency transfer: \_\_\_\_\_

2. Your name (if different from victim's) \_\_\_\_\_

3. Name(s) of other family member(s) listed on the lease: \_\_\_\_\_

\_\_\_\_\_

4. Name(s) of other family member(s) who would transfer with the victim: \_\_\_\_\_

\_\_\_\_\_

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

6. Address or phone number for contacting the victim: \_\_\_\_\_

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

8. Relationship of the accused perpetrator to the victim: \_\_\_\_\_

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

\_\_\_\_\_

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

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

\_\_\_\_\_

\_\_\_\_\_

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

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

Signature \_\_\_\_\_ Signed on (Date) \_\_\_\_\_

**PART VIII: MANDATED AND DISCRETIONARY USE OF HUD'S EIV  
ENTERPRISE INCOME VERIFICATION SYSTEM [24 CFR 5.233]**

**17-I.A. OVERVIEW**

The regulation clarifies that PHAs must use EIV to verify tenant employment and income information at annual and streamlined reexaminations of family composition and income. However, PHAs are no longer required to use EIV to verify tenant employment and income information during an interim reexamination of family composition and income once HOTMA is implemented.

PHAs are still required to use EIV in its entirety, including using all of the required reports, such as the Existing Tenant Search and Income Reports, to verify tenant employment and income information at all other times.

Table 1 below provides guidance on the frequency with which individual EIV reports must be utilized by a PHA.

**Table 1: Mandatory and Discretionary Use of EIV by PHAs**

<b>Report Title</b>	<b>Report Description</b>	<b>Frequency of Use</b>	<b>PHAs</b>
Debts Owed to PHAs & Terminations	Allows users to access information concerning former tenants who left owing a debt to a PHA or who had their assistance terminated for cause.	At the time of processing an applicant family for admission, and to enter debt information or terminations for families who have ended program participation.	PHAs
Deceased Tenants Report	Identifies tenants reported by Social Security Administration (SSA) as being deceased.	At least quarterly	PHAs
Existing Tenant Search	Identifies applicants who may be receiving assistance at another Multifamily project or PIH location.	At the time of processing an applicant family for admission	PHAs
Failed EIV Prescreening Report	Identifies tenants who have missing or invalid personal identifiers (last name, date of birth, SSN) in PIC. These tenants will not be sent to SSA from EIV for the SSA identity test.	Monthly	PHAs

Failed Verification Report (Failed SSA Identity Test)	*PHAs that admit families using a self-certification of SSN must review the Failed SSN Verification Report monthly to identify and follow up on new issues.	Monthly	PHAs
Identity Verification Report	Identifies tenants that, failed SSA verification, and failed EIV pre-screening.	Monthly	PHAs
Income Information for PIH Programs	Provides employment and income reported by HHS and SSA for each household member that passes the SSA identity test. Identifies tenants who: <ul style="list-style-type: none"> <li><input type="checkbox"/> May not have reported complete and accurate income information; and/or</li> <li><input type="checkbox"/> May be receiving multiple subsidies.</li> </ul>	Must be used at annual reexamination; not required at interim reexaminations. PHAs/Owners may use, if desired. PHAs are not required to use at annual reexamination if they use Safe Harbor verification to determine the family's income.	PHAs
Multiple Subsidy Report	Identifies tenants who may be receiving rental assistance at more than one location.	At least quarterly	PHAs

Income Validation Tool Report for PIH Programs	Provides projections of discrepant income for wages, unemployment compensation, and SSA benefits pursuant to HUD's data sharing agreements with the Department of Health and Human Services (HHS) using the National Directory of New Hires (NDNH) database, and the SSA	PHAs are required to obtain an EIV Income and Income Validation Tool Report for each family any time the PHA conducts an annual reexamination of family income and composition. PHAs may use the report at other intervals, in accordance with the PHA's ACOP. PHA's are not required to use the report at annual reexamination if they used Safe Harbor verification to determine the family's income at the last reexamination.
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New Hires Report	Identifies tenants who have new employment within the last six months. Report is updated monthly.	PHAs must review this information at annual reexamination except when the PHA uses Safe Harbor verification to determine the family's income. PHAs that do not require families to undergo interim reexaminations (IRs) for income increases after an IR decrease do not need to review this report at all between a family's annual reexamination. If the PHA policy is to require an IR for increases in income after an IR decrease, then the PHA must review the report quarterly after the family's IR decrease.	PHAs
No Income Reported by HHS or SSA	Identifies tenants who passed the SSA identity test but where no income was reported by HHS or SSA. This scenario does not mean that the tenant does not have any income. PHAs must obtain written, third party verification of any income reported by the tenant.	As identified in a PHA's ACOP	PHAs

OHA will maintain records of generated reports and action taken. Individual tenant reports will be placed in tenant file and/or electronically attached in tenant records in computer system.

# Memorandum

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To: OHA Board of Commissioners

From: Susan Gilroy, Director of Compliance

Date: February 27, 2025

Re: Revision to Admissions and Continued Occupancy Policies (ACOP)

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## **RECOMMENDATION**

Staff of the Housing Authority of the City of Omaha (OHA) recommends that the Board of Commissioners approve revisions of OHA's Admissions and Continued Occupancy Policy (ACOP) Chapters 6,7, 15 and 16 for the public housing program.

## **BACKGROUND**

The ACOP is reviewed and updated at least annually. The ACOP was last fully updated in June 2023. OHA uses an ACOP policy template purchased from Nan McKay & Associates, which is considered an industry standard and reflects best practices.

As noted in red, ACOP Chapters 6 and 7 have been updated with all recent HUD requirements and guidance in only the areas that are related to the 7/1/25 effective date for the partial HOTMA implementation. Chapters 15 and 16 have been fully updated:

- Income Exclusions [24 CFR 5.609(b)]
- Definitions [24 CFR 5.100, 5.403, 5.603]
- DeMinimis Errors [ Notice PIH 2024-38]
- Mandated and Discretionary use of HUD's Enterprise Income Verification (EIV) System [24CFR 5.233]

Additional revisions will be made in upcoming board meetings to incorporate the remaining HOTMA provisions and policy updates in the rest of the ACOP chapters.

## **SUMMARY**

The Housing Authority of the City of Omaha (hereinafter "OHA") Staff recommends that the Board of Commissioners approve the revisions to the Public Housing ACOP (Admissions and Continued Occupancy Policies).

**SPONSORS:** Susan Gilroy, Director of Compliance

**RECOMMENDED BY:** Joanie Poore, CEO

**RESOLUTION NO. 2025 – 13**  
**REVISIONS TO THE PUBLIC HOUSING ACOP**

**WHEREAS**, staff of the Housing Authority of the City of Omaha (OHA) seeks to make revisions to specific policies in the Admissions and Continued Occupancy Policies (ACOP) for the public housing program;

**WHEREAS**, the revisions proposed in this Resolution include Chapter 6 (Income and Rent Determinations), Chapter 7 (Verification), Chapter 15 (Program Integrity), and Chapter 16 (Program Administration);

**WHEREAS**, certain policy revisions proposed in this Resolution have been updated with all recent HUD requirements and guidance areas related to the 7/1/2025 effective date for the partial HOTMA implementation;

**WHEREAS**, OHA staff recommends that the Board of Commissioners adopt the revised Chapters 6, 7, 15 and 16 of the Admissions and Continued Occupancy Policies;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners hereby adopts the revised Chapters 6, 7, 15 and 16 of the Admissions and Continued Occupancy Policies.

---

David Levy, Chair  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Assistant Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

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Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.10. Resolution 2025-14 Security Camera Usage & Eligibility Policy

## **Omaha Housing Authority Security Camera Usage and Eligibility Policy**

**Purpose:** The purpose of this policy is to establish guidelines for the proper usage, management, and eligibility for accessing security cameras. This ensures that surveillance activities are conducted in a lawful, ethical, and responsible manner while respecting individual privacy rights.

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**Scope:** This policy applies to all employees, contractors, vendors, and authorized personnel involved in the operation, monitoring, or management of security cameras. It covers the placement, access, and use of security camera footage on (and remote) organizational premises or properties.

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### **Usage Guidelines:**

Permitted Uses: Security cameras may only be used for the following purposes:

- Ensuring the safety and security of personnel, visitors, and assets
- Monitoring and deterring unauthorized access to facilities or restricted areas
- Investigating incidents such as theft, vandalism, or workplace misconduct
- Compliance with legal or regulatory requirements

The following activities are not permitted:

- Using cameras to monitor personal activities unrelated to security or organizational operations
- Recording in areas where there is a reasonable expectation of privacy (e.g., restrooms, locker rooms)
- Sharing or distributing footage without proper authorization
- Altering or tampering with recorded footage

Retention of Footage: Security camera recordings will be retained for a period of 30 days unless required for ongoing investigations, legal proceedings, or compliance purposes. Footage exceeding the retention period will be securely deleted.

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### **Eligibility for Access**

Authorized Personnel: Access to security cameras and recorded footage is restricted to the following individuals:

- Approved Security personnel
- Approved Property Management personnel
- Designated IT administrators responsible for system management
- Senior management or HR personnel when required for investigations

Confidentiality Agreement: Individuals with access to security cameras or footage will sign a confidentiality agreement to ensure that data is handled responsibly and in compliance with privacy laws.

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### **Placement of Cameras**

Permissible Locations: Security cameras may be installed in the following locations:

- Building entrances and exits
- Parking lots and garages
- Hallways, stairwells, and common areas
- Restricted access areas (e.g., server rooms, storage rooms)

Security cameras will not be placed in areas where individuals have a reasonable expectation of privacy, including but not limited to:

- Restrooms
- Locker rooms
- Private offices (unless explicitly authorized and justified)

Notification of Surveillance: Signs indicating the presence of security cameras will be prominently displayed in all monitored areas to ensure awareness among employees, visitors, and other stakeholders.

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### **Privacy and Legal Compliance**

Adherence to Laws: all security camera operations will comply with applicable local, state, and federal laws, including those related to privacy and data protection.

Minimizing Intrusion: Every effort will be made to minimize intrusion into individuals' privacy while ensuring effective surveillance for security purposes.

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### **Violations and Enforcement**

Policy Violations: Any violation of this policy may result in disciplinary action, up to and including termination of employment or contract, as well as potential legal action.

Reporting Concerns: Suspected misuse of security cameras or breaches of this policy will be reported to the Director of IT, Director of HR or Chief Operating Officer.

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**Review and Updates:** This policy will be reviewed annually and updated as necessary to ensure compliance with evolving legal and organizational requirements.

**Effective Date:** February 18, 2025

**Last Reviewed:**

**Approved By:**

# Memorandum

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To: OHA Board of Commissioners  
From: Shannon Mahnke, COO  
Date: February 27, 2025  
Re: Security Camera Usage and Eligibility Policy

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## **RECOMMENDATION:**

Staff of the Housing Authority of the City of Omaha (hereinafter “OHA”) recommends that the Board of Commissioners approve OHA’s Security Camera Usage and Eligibility Policy for agency use. This policy will apply to all employees, contractors, vendors, and authorized personnel involved in the operating, monitoring, or management of security cameras.

## **EXPLANATION:**

This policy will be reviewed and updated annually. Currently there is no policy or established guidelines for the proper usage, management, and access to OHA’s security cameras. This will ensure that surveillance activities are conducted in a lawful, ethical, and responsible manner, while respecting individual privacy rights.

## **SUMMARY:**

The Housing Authority of the City of Omaha Staff recommends that the Board of Commissioners approve the Security Camera Usage and Eligibility Policy.

**SPONSORS:** Shannon Mahnke, Chief Operating Officer

**RECOMMENDED BY:** Joanie Balk, CEO

**RESOLUTION NO. 2025 – 14**  
**SECURITY CAMERA USAGE AND ELIGIBILITY POLICY**

**WHEREAS**, staff of the Housing Authority of the City of Omaha (OHA) seeks to implement a Security Camera Usage and Eligibility Policy for agency use;

**WHEREAS**, currently there is no policy or established guidelines in place for the proper usage, management, and access to OHA’s security cameras;

**WHEREAS**, the policy will ensure that surveillance activities are conducted in a lawful, ethical, and responsible manner, while respecting individual privacy rights;

**WHEREAS**, OHA staff recommends that the Board of Commissioners adopt the Security Camera Usage and Eligibility Policy;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners hereby adopts the Security Camera Usage and Eligibility Policy.

---

David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Assistant Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

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Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.11. Resolution 2025-17 Past Due Write Offs

## February 2025 Write-Off Report

Property/Resident List	Column Labels					Explanation of Larger	
Row Labels	late	maint	misc.	nondw	rent	Grand Total	Balances
<b>Bayivew</b>	<b>280</b>	<b>2915</b>			<b>1029.69</b>	<b>3801 \$ 8,025.69</b>	
<b>2/28/2024</b>					<b>1029.69</b>	<b>\$ 1,029.69</b>	Unpaid Taxes
t0073526					1029.69	\$ 1,029.69	
COM012					1029.69	\$ 1,029.69	eviction 8 months rent, full apartment trash/personal
<b>1/13/2025</b>	<b>280</b>	<b>2915</b>				<b>3801 \$ 6,996.00</b>	property removal
t0073727	280	2915				3801 \$ 6,996.00	
8275	280	2915				3801 \$ 6,996.00	
<b>Farnam Building</b>	<b>140</b>	<b>1455</b>				<b>2363 \$ 3,958.00</b>	
<b>1/23/2025</b>	<b>140</b>	<b>1455</b>				<b>2363 \$ 3,958.00</b>	eviction 4 months rent, trash/personal property removal
t0083393	140	1455				2363 \$ 3,958.00	
8286	140	1455				2363 \$ 3,958.00	
<b>Florence Tower</b>	<b>785</b>	<b>210</b>	<b>1634</b>			<b>3580 \$ 6,209.00</b>	
<b>1/15/2025</b>	<b>245</b>					<b>710 \$ 955.00</b>	
t0085022	245					710 \$ 955.00	
2703	245					710 \$ 955.00	
<b>1/31/2025</b>	<b>35</b>	<b>60</b>	<b>849</b>			<b>165 \$ 1,109.00</b>	criminal eviction - 4 months rent, storage fees, personal property removal
t0078236	35	60	849			165 \$ 1,109.00	
2744	35	60	849			165 \$ 1,109.00	
<b>2/7/2025</b>	<b>505</b>	<b>150</b>	<b>785</b>			<b>2705 \$ 4,145.00</b>	criminal eviction - 23 months rent, storage fees, personal property removal
t0074534	400	75	315			1152 \$ 1,942.00	
2692	400	75	315			1152 \$ 1,942.00	
t0080552	105	75	470			1553 \$ 2,203.00	eviction 6 months rent, trash /personal property removal
2760	105	75	470			1553 \$ 2,203.00	
<b>Jackson Tower</b>	<b>35</b>					<b>200 \$ 235.00</b>	
<b>11/5/2024</b>	<b>35</b>					<b>200 \$ 235.00</b>	
t0083429	35					200 \$ 235.00	
2979	35					200 \$ 235.00	
<b>Park South Tower</b>			<b>5365</b>			<b>2255 \$ 7,620.00</b>	
z0066618						819 \$ 819.00	
1861						819 \$ 819.00	
<b>12/2/2024</b>						<b>446 \$ 446.00</b>	
t0066618						446 \$ 446.00	
1861						446 \$ 446.00	
<b>12/16/2024</b>			<b>5365</b>			<b>943 \$ 6,308.00</b>	criminal eviction-4 months rent/ personal property removal/repairs from arson
t0022143			5365			943 \$ 6,308.00	
1887			5365			943 \$ 6,308.00	
<b>1/28/2025</b>						<b>47 \$ 47.00</b>	
t0073152						47 \$ 47.00	
1885						47 \$ 47.00	

<b>Pine Tower</b>	<b>136</b>	<b>2177</b>	<b>4141</b>	<b>\$ 6,454.00</b>		
<b>11/12/2024</b>	<b>66</b>	<b>770</b>	<b>2947</b>	<b>\$ 3,783.00</b>	11 months rent/personal property removal- eviction delayed due to Legal	
t0083208	66	770	2947	\$ 3,783.00	Aid	
2571	66	770	2947	\$ 3,783.00		
<b>12/30/2024</b>		<b>682</b>		<b>\$ 682.00</b>		
t0078068		682		\$ 682.00		
2633		682		\$ 682.00		
					5 months rent/personal property removal	
<b>1/6/2025</b>	<b>70</b>	<b>725</b>	<b>1194</b>	<b>\$ 1,989.00</b>		
t0012184	70	725	1194	\$ 1,989.00		
2580	70	725	1194	\$ 1,989.00		
<b>scsw</b>		<b>2487</b>		<b>\$ 2,487.00</b>		
<b>2/14/2025</b>		<b>2487</b>		<b>\$ 2,487.00</b>		
t0062783		2487		\$ 2,487.00		
4169		2487		\$ 2,487.00		
<b>Scattered Site Southwest</b>			<b>430</b>	<b>\$ 430.00</b>		
					damages to house at moveout including holes in walls/cabinets, garage door/personal property removal	
<b>11/1/2024</b>			<b>430</b>	<b>\$ 430.00</b>		
t0033895			430	\$ 430.00		
7555			430	\$ 430.00		
<b>Southside Terrace</b>	<b>300</b>	<b>6779</b>	<b>1166</b>	<b>\$ 8,245.00</b>		
<b>10/2/2024</b>			<b>100</b>	<b>\$ 100.00</b>		
x0072430			100	\$ 100.00		
0331			100	\$ 100.00		
					6 months rent/personal property removal	
<b>12/19/2024</b>	<b>160</b>	<b>890</b>	<b>277</b>	<b>\$ 1,327.00</b>		
x0075274	160	890	277	\$ 1,327.00		
0170	160	890	277	\$ 1,327.00		
					personal property and disposal of 3 bedroom apartment	
<b>1/15/2025</b>		<b>2090</b>		<b>\$ 2,090.00</b>		
x0078337		2090		\$ 2,090.00		
0080		2090		\$ 2,090.00		
<b>1/16/2025</b>	<b>35</b>	<b>100</b>	<b>282</b>	<b>\$ 417.00</b>		
x0076425	35	100	282	\$ 417.00		
0019	35	100	282	\$ 417.00		
					personal property /trash removal and disposal	
<b>1/27/2025</b>		<b>1317</b>		<b>\$ 1,317.00</b>		
x0013411		1317		\$ 1,317.00		
0187		1317		\$ 1,317.00		
<b>2/7/2025</b>	<b>35</b>	<b>845</b>	<b>101</b>	<b>\$ 981.00</b>		
x0067493	35	845	101	\$ 981.00		
0133	35	845	101	\$ 981.00		
<b>2/13/2025</b>		<b>597</b>		<b>\$ 597.00</b>		
q0061530		597		\$ 597.00		
0088		597		\$ 597.00		
					3 months rent/personal property removal and disposal	
<b>2/19/2025</b>	<b>70</b>	<b>940</b>	<b>406</b>	<b>\$ 1,416.00</b>		
x0070431	70	940	406	\$ 1,416.00		
0109	70	940	406	\$ 1,416.00		
<b>Grand Total</b>	<b>\$ 1,676.00</b>	<b>\$ 14,609.00</b>	<b>\$ 8,413.00</b>	<b>\$ 1,029.69</b>	<b>\$ 17,936.00</b>	<b>\$ 43,663.69</b>

**RESOLUTION No. 2025 -17**  
**AUTHORIZATION TO CHARGE OFF**  
**VACATED TENANT ACCOUNT RECEIVABLES**

**WHEREAS** a list of Charge Off for Vacated Tenant Account Receivables as February 25, 2025, has been presented to the Board of Commissioners of the Housing Authority of the City of Omaha (Board); and

**WHEREAS** the total charge-off for this period is \$43,63.69. which represents 25 tenants:  
and

**WHEREAS** it is necessary to charge off said amounts to comply with the findings of the Office of the Inspector General of the U.S. Department of Housing and Urban Development.

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha that the CEO be authorized to grant approval for the total amount charged for all OHA properties.

This Resolution shall take effect immediately.

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David Levy, Chair  
OHA Board of Commissioners

**ATTEST**

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held on February 27, 2025

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Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.12. Resolution 2025-18 SEMAP

# Memorandum



To: Board of Commissioners  
 From: Philisa Smith  
 Date: February 27, 2025  
 Re: Section 8 Management Assessment Program

Omaha Housing Authority  
 Housing Choice Voucher Program  
 January 1, 2024 - December 31, 2024

SEMAP INDICATOR	Sample Size	Discrepancies	Compliance Rate %	Maximum Points	OHA Score Points
1. Selection from the HCV Waiting List	11	6	55%	15	0
2. Reasonable Rent	34	1	97%	20	15
3. Determination of Adjusted Income	45	8	82%	20	15
4. Utility Allowance	04	0	100%	5	5
5. HQS Quality Control Inspections	108	0	100%	5	5
6. HQS Enforcement	5	0	100%	10	10
7. Expanding Housing Opportunities	N/A	N/A	100%	5	5
8. Payment Standards	N/A	N/A	100%	5	5
9. Annual Re-examination	N/A	N/A	94%	10	0
10. Correct Tenant Calculations	N/A	N/A	100%	5	0
11. Pre-Contract HQS Inspections	N/A	N/A	99%	5	0
12. Annual HQS Inspections	N/A	N/A	97%	10	0
13. Lease-Up	N/A	N/A	94%	20	0
14. Family Self-Sufficiency	N/A	N/A	N/A	N/A	N/A
15. Deconcentration Bonus	N/A	N/A	N/A	N/A	N/A
Total Points Excluding Bonus				135	60

**Score: 60/135**

**Percentage: 44% = Troubled Performer**

**SEMAP Indicator One: Selection from the Waiting List**

The Section 8 Supervisor ensures that OHA has written policies in its administrative plan for selecting applicants from the waiting list and that these policies are being followed when selecting applicants for admission from the waiting list.

This indicator requires two samples. One sample is derived from those applicants who were housed with OHA. The other samples are those applicants who reached the top of the Waiting List.

<b>SEMAP Indicator 1: Selection from the Waiting List</b>
2024
Sample: 11 Discrepancies: 06
Compliance Rate: 55%

**Score: 0/15**

**SEMAP Indicator Two: Reasonable Rent**

The Section 8 Supervisor is responsible for maintaining a written rent reasonableness methodology that complies with HUD regulations and that this methodology is being followed at the time of processing initial leasing (move-in), rental adjustment, or when there is a 5% or more decrease in the published Fair Market Rent. This indicator is worth 20 points if 98% of the files sampled are correct and 15 points if at least 80% of the sample files are correct.

<b>SEMAP Indicator 2: Reasonable Rent</b>
2024
Sample: 34 Compliance Rate: 97 %

**Score: 15/20**

**SEMAP Indicator Three: Determination of Adjusted Income**

Housing Specialists are responsible for verifying and correctly determining annual adjusted income for each assisted family at the time of new admission and continued eligibility for Section 8 assistance. Twenty points are earned if 90% or more of the files sampled do not have an error: Fifteen points are earned if between 80-90% of files sampled are correct.

<b>SEMAP Indicator 3: Determination of Adjusted Income</b>
2024
Sample: 45 Discrepancies: 08
Compliance Rate: 82 %

**Score: 15/20**

**SEMAP Indicator Four: Utility Allowance Schedule**

The Section 8 Director is responsible for reviewing and updating the Utility Allowance Schedule. The Director ensures that the Utility Allowance Schedules are being reviewed annually and that the revised schedules are being implemented in the event of a 10% or more change in any utility rate or when consumption rates increase substantially.

<b>SEMAP Indicator 4: Utility Allowance Schedule</b>
2024
Compliance Rate: 100 %

**Score: 5/5**

**SEMAP Indicator Five: Housing Quality Standards Quality Control (QC) Inspections**

The Inspection Department is responsible for the SEMAP indicator. The Department must ensure that a sample of units under contract receives a QC Inspection. The QC sample must be drawn from recently completed annual inspections and must represent a cross-section of neighborhoods and inspectors. Applying the HUD sampling formula to the number of units under contract during the fiscal year, OHA must conduct at least 60 QC inspections yearly. OHA conducted 104 QC inspections.

<b>SEMAP Indicator Five: Housing Quality Standards Quality Control (QC) Inspections</b>
2024
Sample: 108 Discrepancies: 0
Compliance Rate: 100 %

**Score: 5/5**

**SEMAP Indicator Six: HQS Enforcement**

The Inspections Department is responsible for this SEMAP indicator. The Department must make certain that any cited life-threatening HQS deficiencies are corrected within 24 hours from the inspection; all other cited HQS deficiencies are corrected within no more than 30 calendar days from the inspection or with any OHA-approved extension; and in cases where HQS deficiencies are not corrected promptly, enforcement is initiated (i.e. abate or terminate housing assistance payments beginning no later than the first month following the specified correction period).

<b>SEMAP Indicator 6: HQS Enforcement</b>
2024
Sample: 5 Discrepancies: 0
Compliance Rate: 100%

**Score: 10/10**

**SEMAP Indicator Seven: Expanding Housing Opportunities**

A summary of this indicator’s requirement is listed below:

- Has written policies in the Administrative Plan including actions that it will take to encourage property owners outside minority and poverty concentration; to participate in the program and delineates areas that OHA considers areas of poverty and minority concentration.
- Possess evidence that it implements such actions as stated in the Administrative Plan.
- Provides maps of such properties (within and beyond its jurisdiction) and maps containing neighborhood supportive services.
- A list of such owners is provided in the briefing package.
- Explains portability and provides portability information in the information package; and analyzes and measures applicant and participant success.

OHA provides participants with portability information, maps, and owners interested in participating in the program. This information is given out in briefing packets at the time of the voucher issuance.

<b>SEMAP Indicator Seven: Expanding Housing Opportunities</b>
2024
Compliance Rate: 100 %

**Score: 5/5**

**SEMAP Indicator Eight: Payment Standard**

The Housing Choice Voucher Director is responsible for this indicator. The Director must ensure that OHA implements a payment standard schedule that establishes amounts that do not exceed 110 percent of the current published Fair Market Rents, and which are not less than 90 percent of the current applicable published Fair Market Rents (Except the higher payment standard percentages approved by HUD). Fair Market Rents were published effective October 1, 2023. OHA has reviewed the Fair Market Rents and current Payment Standards and made the necessary adjustments.

\*The Department of Housing and Urban Development (HUD) reviewed Omaha Housing Authority (OHA) request submitted pursuant to **Notice PIH 2023-29, “Certain Regulatory Waivers for the Housing Choice Voucher (including Mainstream) Program and Streamlined Review Process.”** The Notice provided instructions on the streamlined processing of public housing authority (PHA) requests to use specific regulatory waivers for the Housing Choice Voucher (HCV) (including Mainstream) program. By 12/28/2023 approval notice from HUD the PHA may establish exception payment standards up to 120% of their applicable FY2024 FMRs. OHA’s stated justification(s) of good cause, HUD: (1) finds there is good cause to waive, and hereby waives, the regulations and/or requirements listed below through 12/31/2024. OHA implemented the waiver-approved payment standards effective 1/1/2024.

**Score: 5/5**

### **Public and Indian Housing Information Center (PIC) Database**

The following indicators are scored through PIC, where the PHA submits the HUD 50058 forms detailing the Family Report. To be scored, a PHA must have a PIC system reporting rate of at least 95%.

#### **SEMAP Indicator Nine: Annual Re-examinations**

This indicator assesses whether an annual re-examination for each participant's family is completed and successfully submitted to HUD through PIC. These must be submitted for each family at least every 12 months. The compliance rate for this indicator is calculated based on 50058 submissions. Percentage includes all reexaminations more than 2 months overdue. SEMAP scores: under 5% =10 points; 5% -10% = 5 points; greater than 10% = 0 points.

<b>SEMAP Indicator 9: Annual Re-examinations</b>
2024
Compliance Rate: 94%
Percent Overdue: 4%

**Score: 0/10**

Note: For Indicators 9-12 and 14, HUD mandates for SEMAP a Reporting Rate of at least 95 percent by the PHA's fiscal year-end. If this threshold is not met, the PHA will receive zero points for these four indicators.

#### **SEMAP Indicator Ten: Correct Tenant Rent Calculation**

Responsibility for this SEMAP indicator is shared between the Leasing & Recertification Departments. This indicator assesses whether the family's share of the rent to the owner is correctly calculated.

<b>SEMAP Indicator Ten: Correct Tenant Rent Calculation</b>
2024
Compliance Rate: 100%

**Score: 0/5**

#### **SEMAP Indicator Eleven: Pre-Contract Housing Quality Standards**

The Leasing Department is responsible for this indicator. The Department ensures that all newly leased units pass HQS inspection on or before the beginning date of the assisted lease and HAP contract. To receive points for this indicator the reporting rate must be 95%.

<b>SEMAP Indicator Eleven: Pre-Contract Housing Quality Standards</b>
2024
Compliance Rate: 100%
Percent Overdue: 0%

**Score: 0/5**

**SEMAP Indicator Twelve: Annual HQS Inspection**

The Inspection Department is responsible for this indicator. The indicator requires that OHA inspect each unit under contract at least annually. Ten points are awarded if fewer than 5% of annual HQS inspections of units under contract are overdue or 5 points if 5% to 10% of annual HQS are overdue.

<b>SEMAP Indicator 12: Annual HQS Inspections</b>
2024
Compliance Rate: 99%
Percent Overdue: 1%

**Score: 0/10**

**SEMAP Indicator Thirteen: Lease-Up**

The Housing Choice Voucher Director and Finance Department is responsible for monthly monitoring of the dollar and unit utilization. The Housing Choice Voucher Director analyzes all variables that affect utilization rates and starts or stops voucher issuance accordingly.

- If the percentage of units leased during the last PHA fiscal year was 98% or more, or the percent allocated budget authority expending during the last PHA fiscal year was 98% or more the housing authority earns 20 points.
- If the percentage of units leased during the last PHA fiscal year was 95-97%, or the percent of allocated budget authority expended during the last PHA fiscal year was 95-97% the housing authority earns 15 points.
- If the percentage of units leased during the last PHA fiscal year was less than 95% and the percent of the allocated budget authority expended during the last PHA fiscal year was less than 95% the housing authority earns 0 points.

The Housing Choice Voucher allocation is 5101. The program utilized 94% of the vouchers.

<b>SEMAP Indicator 13: Lease-Up</b>
2024
Actual Units Leased: 4152
Compliance Rate: 94%

**Score: 0/20**

**SEMAP Indicator Fourteen: Family-Self Sufficiency Program:**

The FSS Coordinator is responsible for this indicator. It consists of two components which show whether a PHA has enrolled families in the FSS program as required, and the percent of current FSS participants with FSS progress reports entered in PIC that have had increases in earned income which resulted in escrow account balances. The score for this indicator is below.

<b>Enrolled</b>	<b>Escrow Balance</b>	<b>Points</b>
80% or More	30% or more	10
60%-79%	30% 79 79%	8
80% or More	Less than 30%	5
Less than 60%	30% or more	5
60%-79%	Less than 30%	3
Less than 60%	Less than 30%	0

**SEMAP Indicator Fourteen: Family-Self Sufficiency Program:**

2024- Not Applicable

The mandatory number of participants for OHA is 51. OHA had 135 families enrolled for FYE 2024.

Compliance Rate: OHA has a higher than 80% enrollment and more than 30% of families have escrow balances.

**Score: N/A**

**SEMAP Indicator Fifteen: Deconcentration Bonus**

The indicator requirements are listed below:

- Half or more of all voucher families with children assisted by the PHA in its principal operating area at the end of the last completed PHA fiscal year do not reside in low-poverty census tracts; and
- Either the percentage of voucher mover families with children who moved to low-poverty census tracts in the PHA fiscal year is at least 2% points higher than the percent of all voucher families with children who reside in low-poverty census tracts at the end of the second to the last complete PHA fiscal year.
- Or the percentage of voucher families with children who moved to low-poverty census tracts in the PHA’s principal operating area over the last 2 completed PHA fiscal year is at least 2 percentage points higher than the percent of all voucher families with children who reside in low poverty census tracts at the end of the second to the last completed PHA.

**SEMAP Indicator Fifteen: Deconcentration Bonus**

2024

The Housing Choice Voucher Department did not pursue the Deconcentration Bonus.

# Memorandum

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To: Board of Commissioners

From: Philisa Smith

Date: February 27, 2025

Re: Section 8 Management Assessment Program (SEMAP Certification)

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## **RECOMMENDED ACTION:**

That the Board of Commissioners approved the Section 8 Management Assessment Program (SEMAP Certification) submitted for Review.

## **PREVIOUS ACTION:**

OHA Section 8 Management Assessment (SEMAP Certification) was approved by the Board of Commissioners on February 28, 2024. OHA received the finalized HUD approval on June 17, 2024. OHA received 90 points out of 135 points.

## **EXPLANATION:**

OHA is required to submit the HUD SEMAP Certification form within 60 calendar days of the end of the fiscal year. The certification has been completed for 2024 with the Housing Authority receiving 60 points out of 135 points.

## **PROJECT COST:**

None.

## **SOURCE OF FUNDS:**

N/A.

## **ONGOING FISCAL IMPACT:**

N/A.

## **METHOD OF PROCUREMENT:**

N/A.

## **RECOMMENDED BY:**

\_\_\_\_\_  
*(Signature of HCV Director)*

## **RECOMMENDED BY:**

\_\_\_\_\_  
*(Signature of CEO)*

**Date Signed:** February 26, 2025

# Section 8 Management Assessment Program (SEMAP) Certification

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0215  
(exp. 12/31/2026)

Public reporting burden for this collection of information is estimated to average 12 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. This agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid OMB control number.

This collection of information is required by 24 CFR sec 985.101 which requires a Public Housing Agency (PHA) administering a Section 8 tenant-based assistance program to submit an annual SEMAP Certification within 60 days after the end of its fiscal year. The information from the PHA concerns the performance of the PHA and provides assurance that there is no evidence of seriously deficient performance. HUD uses the information and other data to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to the PHA. Responses are mandatory and the information collected does not lend itself to confidentiality.

**Instructions** Respond to this certification form using the PHA's actual data for the fiscal year just ended.

PHA Name	For PHA FY Ending (mm/dd/yyyy)	Submission Date (mm/dd/yyyy)
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**Check here if the PHA expends less than \$300,000 a year in Federal awards**

Indicators 1 - 7 will not be rated if the PHA expends less than \$300,000 a year in Federal awards and its Section 8 programs are not audited for compliance with regulations by an independent auditor. A PHA that expends less than \$300,000 in Federal awards in a year must still complete the certification for these indicators.

## Performance Indicators

1. Selection from the Waiting List. (24 CFR 982.54(d)(1) and 982.204(a))

(a) The PHA has written policies in its administrative plan for selecting applicants from the waiting list.

**PHA Response** Yes  No

(b) The PHA's quality control samples of applicants reaching the top of the waiting list and of admissions show that at least 98% of the families in the samples were selected from the waiting list for admission in accordance with the PHA's policies and met the selection criteria that determined their places on the waiting list and their order of selection.

**PHA Response** Yes  No

2. Reasonable Rent. (24 CFR 982.4, 982.54(d)(15), 982.158(f)(7) and 982.507)

(a) The PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units (i) at the time of initial leasing, (ii) before any increase in the rent to owner, and (iii) at the HAP contract anniversary if there is a 5 percent decrease in the published FMR in effect 60 days before the HAP contract anniversary. The PHA's method takes into consideration the location, size, type, quality, and age of the program unit and of similar unassisted units, and any amenities, housing services, maintenance or utilities provided by the owners.

**PHA Response** Yes  No

(b) The PHA's quality control sample of tenant files for which a determination of reasonable rent was required shows that the PHA followed its written method to determine reasonable rent and documented its determination that the rent to owner is reasonable as required for (check one):

**PHA Response**  At least 98% of units sampled  80 to 97% of units sampled  Less than 80% of units sampled

3. Determination of Adjusted Income. (24 CFR part 5, subpart F and 24 CFR 982.516)

The PHA's quality control sample of tenant files shows that at the time of admission and reexamination, the PHA properly obtained third party verification of adjusted income or documented why third party verification was not available; used the verified information in determining adjusted income; properly attributed allowances for expenses; and, where the family is responsible for utilities under the lease, the PHA used the appropriate utility allowances for the unit leased in determining the gross rent for (check one):

**PHA Response**  At least 90% of files sampled  80 to 89% of files sampled  Less than 80% of files sampled

4. Utility Allowance Schedule. (24 CFR 982.517)

The PHA maintains an up-to-date utility allowance schedule. The PHA reviewed utility rate data that it obtained within the last 12 months, and adjusted its utility allowance schedule if there has been a change of 10% or more in a utility rate since the last time the utility allowance schedule was revised.

**PHA Response** Yes  No

5. HQS Quality Control Inspections. (24 CFR 982.405(b))

A PHA supervisor (or other qualified person) reinspected a sample of units during the PHA fiscal year, which met the minimum sample size required by HUD (see 24 CFR 985.2), for quality control of HQS inspections. The PHA supervisor's reinspected sample was drawn from recently completed HQS inspections and represents a cross section of neighborhoods and the work of a cross section of inspectors.

**PHA Response** Yes  No

6. HQS Enforcement. (24 CFR 982.404)

The PHA's quality control sample of case files with failed HQS inspections shows that, for all cases sampled, any cited life-threatening HQS deficiencies were corrected within 24 hours from the inspection and, all other cited HQS deficiencies were corrected within no more than 30 calendar days from the inspection or any PHA-approved extension, or, if HQS deficiencies were not corrected within the required time frame, the PHA stopped housing assistance payments beginning no later than the first of the month following the correction period, or took prompt and vigorous action to enforce the family obligations for (check one):

**PHA Response**  At least 98% of cases sampled  Less than 98% of cases sampled

7. Expanding Housing Opportunities. (24 CFR 982.54(d)(5), 982.153(b)(3) and (b)(4), 982.301(a) and 983.301(b)(4) and (b)(12)).

**Applies only to PHAs with jurisdiction in metropolitan FMR areas.**

**Check here if not applicable**

(a) The PHA has a written policy to encourage participation by owners of units outside areas of poverty or minority concentration which clearly delineates areas in its jurisdiction that the PHA considers areas of poverty or minority concentration, and which includes actions the PHA will take to encourage owner participation.

**PHA Response** Yes  No

(b) The PHA has documentation that shows that it took actions indicated in its written policy to encourage participation by owners outside areas of poverty and minority concentration.

**PHA Response** Yes  No

(c) The PHA has prepared maps that show various areas, both within and neighboring its jurisdiction, with housing opportunities outside areas of poverty and minority concentration; the PHA has assembled information about job opportunities, schools and services in these areas; and the PHA uses the maps and related information when briefing voucher holders.

**PHA Response** Yes  No

(d) The PHA's information packet for voucher holders contains either a list of owners who are willing to lease, or properties available for lease, under the voucher program, or a list of other organizations that will help families find units and the list includes properties or organizations that operate outside areas of poverty or minority concentration.

**PHA Response** Yes  No

(e) The PHA's information packet includes an explanation of how portability works and includes a list of neighboring PHAs with the name, address and telephone number of a portability contact person at each.

**PHA Response** Yes  No

(f) The PHA has analyzed whether voucher holders have experienced difficulties in finding housing outside areas of poverty or minority concentration and, where such difficulties were found, the PHA has considered whether it is appropriate to seek approval of exception payment standard amounts in any part of its jurisdiction and has sought HUD approval when necessary.

**PHA Response** Yes  No

8. Payment Standards. The PHA has adopted payment standards schedule(s) in accordance with § 982.503.

**PHA Response** Yes  No

Enter FMRs and payment standards (PS)

0-BR FMR \_\_\_\_\_ 1-BR FMR \_\_\_\_\_ 2-BR FMR \_\_\_\_\_ 3-BR FMR \_\_\_\_\_ 4-BR FMR \_\_\_\_\_  
PS \_\_\_\_\_ PS \_\_\_\_\_ PS \_\_\_\_\_ PS \_\_\_\_\_ PS \_\_\_\_\_

**If the PHA has jurisdiction in more than one FMR area, and/or if the PHA has established separate payment standards for a PHA-designated part of an FMR area, attach similar FMR and payment standard comparisons for each FMR area and designated area.**

9. Annual Reexaminations. The PHA completes a reexamination for each participating family at least every 12 months. (24 CFR 982.516)

**PHA Response** Yes  No

10. Correct Tenant Rent Calculations. The PHA correctly calculates tenant rent in the rental certificate program and the family rent to owner in the rental voucher program. (24 CFR 982, Subpart K)

**PHA Response** Yes  No

11. Initial HQS Inspections. Newly leased units pass HQS inspection within the time period required. This includes both initial and turnover inspections for the PBV program. (24 CFR 982.305; 983.103(b)-(d)).

**PHA Response** Yes  No

12. Periodic HQS Inspections. The PHA has met its periodic inspection requirement for its units under contract (982.405 and 983.103(e)).

**PHA Response** Yes  No

13. Lease-Up. The PHA executes housing assistance contracts for the PHA's number of baseline voucher units, or expends its annual allocated budget authority.

**PHA Response** Yes  No

14a. Family Self-Sufficiency Enrollment. The PHA has enrolled families in FSS as required. (24 CFR 984.105)

**Applies only to PHAs required to administer an FSS program.**

**Check here if not applicable**

**PHA Response**

a. Number of mandatory FSS slots (Count units funded under the FY 1992 FSS incentive awards and in FY 1993 and later through 10/20/1998. Exclude units funded in connection with Section 8 and Section 23 project-based contract terminations; public housing demolition, disposition and replacement; HUD multifamily property sales; prepaid or terminated mortgages under section 236 or section 221(d)(3); and Section 8 renewal funding. Subtract the number of families that successfully completed their contracts on or after 10/21/1998.)

or, Number of mandatory FSS slots under HUD-approved exception

b. Number of FSS families currently enrolled

c. Portability: If you are the **initial** PHA, enter the number of families currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

Percent of FSS slots filled (b + c divided by a)

14b. Percent of FSS Participants with Escrow Account Balances. The PHA has made progress in supporting family self-sufficiency as measured by the percent of currently enrolled FSS families with escrow account balances. (24 CFR 984.305)

**Applies only to PHAs required to administer an FSS program .**

**Check here if not applicable**

**PHA Response**      **Yes**       **No**

Portability: If you are the **initial** PHA, enter the number of families with FSS escrow accounts currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

**Deconcentration Bonus Indicator** (Optional and only for PHAs with jurisdiction in metropolitan FMR areas).

The PHA is submitting with this certification data which show that:

- (1) Half or more of all Section 8 families with children assisted by the PHA in its principal operating area resided in low poverty census tracts at the end of the last PHA FY;
  - (2) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area during the last PHA FY is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the last PHA FY;
- or**
- (3) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area over the last two PHA FYs is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last PHA FY.

**PHA Response**      **Yes**       **No**       **If yes, attach completed deconcentration bonus indicator addendum.**

I hereby certify under penalty of perjury that, to the best of my knowledge, the above responses are true and correct for the PHA fiscal year indicated above. I also certify that, to my present knowledge, there is not evidence to indicate seriously deficient performance that casts doubt on the PHA's capacity to administer Section 8 rental assistance in accordance with Federal law and regulations.

**Warning:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Executive Director, signature

Chairperson, Board of Commissioners, signature

\_\_\_\_\_  
Date (mm/dd/yyyy) \_\_\_\_\_

\_\_\_\_\_  
Date (mm/dd/yyyy) \_\_\_\_\_

The PHA may include with its SEMAP certification any information bearing on the accuracy or completeness of the information used by the PHA in providing its certification.

# SEMAP Certification - Addendum for Reporting Data for Deconcentration Bonus Indicator

Date (mm/dd/yyyy) \_\_\_\_\_

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

Principal Operating Area of PHA \_\_\_\_\_  
(The geographic entity for which the Census tabulates data)

**Special Instructions for State or regional PHAs** Complete a copy of this addendum for each metropolitan area or portion of a metropolitan area (i.e., principal operating areas) where the PHA has assisted 20 or more Section 8 families with children in the last completed PHA FY. HUD will rate the areas separately and the separate ratings will then be weighted by the number of assisted families with children in each area and averaged to determine bonus points.

2020 Census Poverty Rate of Principal Operating Area \_\_\_\_\_

## Criteria to Obtain Deconcentration Indicator Bonus Points

To qualify for bonus points, a PHA must complete the requested information and answer yes for only one of the 3 criteria below. However, State and regional PHAs must always complete line 1) b for each metropolitan principal operating area.

- 1) \_\_\_\_\_ a. Number of Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY who live in low poverty census tracts. A low poverty census tract is a tract with a poverty rate at or below the overall poverty rate for the principal operating area of the PHA, or at or below 10% whichever is greater.  
\_\_\_\_\_ b. Total Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY.  
\_\_\_\_\_ c. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the last PHA FY (line a divided by line b).  
Is line c 50% or more? Yes  No
- 2) \_\_\_\_\_ a. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the last completed PHA FY.  
\_\_\_\_\_ b. Number of Section 8 families with children who moved to low poverty census tracts during the last completed PHA FY.  
\_\_\_\_\_ c. Number of Section 8 families with children who moved during the last completed PHA FY.  
\_\_\_\_\_ d. Percent of all Section 8 mover families with children who moved to low poverty census tracts during the last PHA fiscal year (line b divided by line c).  
Is line d at least two percentage points higher than line a? Yes  No
- 3) \_\_\_\_\_ a. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the second to last completed PHA FY.  
\_\_\_\_\_ b. Number of Section 8 families with children who moved to low poverty census tracts during the last two completed PHA FYs.  
\_\_\_\_\_ c. Number of Section 8 families with children who moved during the last two completed PHA FYs.  
\_\_\_\_\_ d. Percent of all Section 8 mover families with children who moved to low poverty census tracts over the last two completed PHA FYs (line b divided by line c).  
Is line d at least two percentage points higher than line a? Yes  No

**If one of the 3 criteria above is met, the PHA may be eligible for 5 bonus points.**

**See instructions above concerning bonus points for State and regional PHAs.**

**RESOLUTION NO. 2025 - 18**

**SECTION 8 MANAGEMENT ASSESSMENT PROGRAM CERTIFICATION**

**WHEREAS** the U.S Department of Housing and Urban Development (HUD) requires that the Board of Commissioners of the Housing Authority of the City of Omaha (OHA) approve the Section 8 Management Assessment Program (SEMAP) Certification before submission to HUD; and

**WHEREAS** the certification has been completed with OHA receiving 60 points out of the maximum 135; and

**WHEREAS** the OHA staff recommends that the OHA Board of Commissioners approve the attached Section 8 Management Assessment Program Certification.

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves the attached Section 8 Management Certification.

This resolution shall take effect immediately.

---

David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the regular meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

---

Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.13. Resolution 2025-19 OHA Board Bylaw Amendments

**HOUSING AUTHORITY OF THE CITY OF OMAHA  
AMENDED AND RESTATED BYLAWS**

ADOPTED ~~February 27, 2025~~ ~~September 5, 2019~~

**ARTICLE I. THE HOUSING AUTHORITY OF THE CITY OF OMAHA**

**SECTION 1. NAME**

The legal name of the agency shall be the "Housing Authority of the City of Omaha." The agency may also be referred to as the "Omaha Housing Authority," "OHA," or the "Authority."

**SECTION 2. SEAL**

The seal of OHA shall be in the form of a circle and shall bear the name of OHA and words "Corporate Seal." OHA may dispense with the use of the seal in any or all instances by affirmative action.

**SECTION 3. OFFICE**

The principal office of OHA shall be at 1823 Harney Street, Omaha, Nebraska, but OHA may have offices at such other place or places as the Board of Commissioners (the "Board") may from time to time designate by affirmative action.

**SECTION 4. BOARD OF COMMISSIONERS**

Pursuant to the Nebraska Housing Agency Act, at least ~~seven~~ nine adult persons shall be appointed as Commissioners by the Mayor of the City of Omaha and approved by the ~~City of~~ Omaha City Council. All appointments shall be made in accordance with all applicable state and federal laws. The duly appointed Commissioners shall constitute the Board of Commissioners of the Housing Authority of the City of Omaha. The powers of the agency shall be vested in the Commissioners in office from time to time as set forth in the Nebraska Housing Agency Act or other applicable federal, state, or law or regulation.

**ARTICLE II. OFFICERS**

**SECTION 1. OFFICERS**

The officers of the Board shall be a Chair and a Vice Chair, as provided by law. The Board shall appoint a Chief Executive Officer ~~Executive Director~~, who shall also serve as Ex-Officio Secretary, and may select an Assistant Secretary and a Treasurer or at its option combine both such offices.

## SECTION 2. CHAIR

The Chair shall preside at all meetings of the Board. Except as otherwise authorized or limited by resolution, the Chair shall sign all contracts, deeds, and other instruments when required by federal or state regulations, and perform all duties incident to the office of Chair and such other duties as may be prescribed by the Board from time to time.

## SECTION 3. VICE CHAIR

The Vice Chair shall perform the duties of the Chair in the absence or incapacitation of the Chair, and in case of resignation or death of the Chair, the Vice Chair shall assume the role of the Chair. Unless altered by resolution of the Board of Commissioners, the Vice Chair shall serve as the Chair in the year following the current Chair's term.

## SECTION 4. SECRETARY

The Chief Executive Officer~~Executive Director~~ shall act as Ex-Officio Secretary, and shall act as Secretary of the meetings of all proceedings of the Board, shall be responsible for all records of OHA, and shall perform all other duties incidental to the office. The Secretary shall keep in safe custody the seal of OHA, and shall have the power to affix such seal to all contracts and instruments authorized and executed by OHA. The Secretary shall prepare the agenda for the meetings of OHA and keep the same continually current.

## SECTION 5. ASSISTANT SECRETARY

The Board may in its discretion elect an Assistant Secretary. The Assistant Secretary shall perform the duties of the Secretary in the absence or incapacitation of the Secretary and may also be delegated any or all duties performed by the Secretary.

## SECTION 6. TREASURER

The Board may in its discretion elect a Treasurer. The Treasurer shall have the care and custody of all funds of OHA and shall deposit same in the name of OHA in such bank or banks as the Board selects. The Treasurer shall keep regular books of accounts showing receipts and expenditures and shall render to OHA at each regular meeting, or more frequently when requested, an account of transactions and also of the financial condition of OHA. The Treasurer shall give such bond for the faithful performance of duties assigned to him as the Board may determine.

Authorized signers for all checks issued by OHA shall be the Chair, Treasurer, Director of Finance, and Chief Executive Officer~~Executive Director~~. The person holding the position of Chief Operating Officer~~Deputy Director~~ shall be designated as their alternate. All checks issued for sums of \$20,000 or under shall require one signature. Such signature may be that of either an authorized signer or an alternate. All checks issued

for amounts over \$20,000 shall require two signatures. Such signatures may be those of any two authorized signers, or one authorized signer and one alternate.

## **SECTION 7. CHIEF EXECUTIVE OFFICER~~EXECUTIVE DIRECTOR~~**

The Chief Executive Officer~~Executive Director~~, also referred to as the Executive Director~~Chief Executive Officer~~, shall have general supervision over the administration of the business affairs and policies of OHA, subject to the direction of the Board of Commissioners, and shall be charged with the management of all housing projects. The Executive Director~~Chief Executive Officer~~ shall be responsible to the Board and, subject to the policies and directions of the Board, shall exercise control over the administration of OHA and the execution of Board policies. The Executive Director~~Chief Executive Officer~~ shall sign, on behalf of OHA, all contracts and other documents approved by the Board unless federal or state regulations require otherwise; appoint, remove, discipline, and supervise the Board's personnel; supply the Board with such information and recommendations as necessary or as may be requested by the Board; authorize and certify payrolls, requisitions, and other documents relating to the financial affairs of the Board; and perform such other duties as may from time to time be prescribed for the Executive Director~~Chief Executive Officer~~ by the Board. The Executive Director~~Chief Executive Officer~~ may delegate such administrative duties as are consistent with these Bylaws and such other rules and regulations as may from time to time be approved by the Board. The Executive Director~~Chief Executive Officer~~ shall also serve as Ex-Officio Secretary of OHA with the duties described in Section 4 of this Article. The Executive Director~~Chief Executive Officer~~ shall be employed by and serve at the pleasure of the Board, with such compensation and for such term as the Board of Commissioners in its discretion determines.

## **SECTION 8. ADDITIONAL DUTIES**

The officers of the Board shall perform such other duties and functions as may from time to time be required by the Board or its Bylaws, rules, regulations, or resolutions.

## **SECTION 9. ELECTION OR APPOINTMENT**

The Chair and Vice Chair shall be elected at the annual meeting of the Board from among the members of the Board of Commissioners and shall hold office for one year or until their successors are elected and qualified.

The Executive Director~~Chief Executive Officer~~ shall serve as Ex-Officio Secretary of the Board until his death, resignation, or termination of employment for whatever reason, and, in such event, until a new Executive Director~~Chief Executive Officer~~ is employed by OHA, the duties of the Secretary and of the Executive Director~~Chief Executive Officer~~ shall be delegated to such other officers or persons as the Board may designate at any meeting called for such purpose.

The Assistant Secretary and Treasurer, if desired, shall be elected at the annual meeting of the Board and shall hold office until their successors are elected and qualified. Such positions may be filled from among members of the Board of Commissioners, or by persons other than the Commissioners.

If a Board of Commissioners' member fails to attend three consecutive meetings during a one-year calendar period, or commits a criminal felonious act or engages in acts that bring disrepute on OHA, the Board may call a meeting to discuss and determine whether the Board will submit the Commissioner's name with a recommendation for termination to the Mayor's office.

### **SECTION 10. VACANCIES**

Should any office become vacant, OHA may elect or appoint a successor at the next regular meeting, and such election or appointment shall be for the unexpired term of said office.

### **SECTION 11. ADDITIONAL PERSONNEL**

OHA may from time to time employ legal counsel, technical experts, and such other officers, agents, and employees as it deems necessary to exercise its powers, duties and functions as prescribed by the Nebraska Housing Agency Law and all other laws of the State of Nebraska applicable thereto. The selection and term of employ of such personnel shall be determined by the Board, subject to the laws of the State of Nebraska as herein referred to.

### **ARTICLE III. CONFLICT OF INTEREST**

- A (1) In addition to any other applicable conflict of interest requirements, neither OHA nor any of its contractors or their subcontractors may enter into any contract, subcontract, or arrangement in connection with a housing development project or contract in which any of the following classes of people has an interest, direct or indirect, during his or her tenure or for one (1) year thereafter:
- (a) Any present or former member or officer of the Board of Commissioners or any member of the Commissioner's immediate family;
  - (b) Any employee of OHA who formulates policy or who influences decisions with respect to the project(s) or any member of the employee's immediate family or the employee's partner;
  - (c) Any public official, member of the Omaha City Council, or State or local legislator, or any member of such individual's immediate family who exercises functions or responsibilities with respect to the project(s) or OHA;

- (2) Any member of these classes of persons must disclose the member's interest or prospective interest to OHA;
  - (3) The conflict of interest requirements may be waived by HUD for good cause, if permitted under State and local law. No person for whom a waiver is requested may exercise responsibilities or functions with respect to the contract to which the waiver pertains; and
  - (4) Nothing in this section shall prohibit a tenant of OHA from serving on the Board of Commissioners.
- B.
- (1) OHA may not hire or contract with an employee in connection with a project if the prospective employee is an immediate family member of any person belonging to one of the following classes:
    - (a) Any present or former member or officer of the governing body of the OHA;
    - (b) Any employee of OHA who formulates policy or who influences decisions with respect to the project(s); and
    - (c) Any public official, member of the local governing body, or State or local legislator who exercises functions or responsibilities with respect to the project(s) or OHA.
  - (2) The prohibition referred to in Subsection B(1) shall remain in effect throughout the class member's tenure and for one (1) year thereafter.
  - (3) The class member shall disclose to OHA and HUD the member's familial relationship to the prospective employee.
  - (4) The requirements of this Article III may be waived by the OHA Board of Commissioners for good cause, provided that such waiver is permitted and/or approved by HUD or allowed by State and local law.
- C. For purposes of this Article, the term "immediate family member" means the spouse, mother, father, brother, sister or child of a covered class member (whether related as full blood relative or as a "half" or "step" relative, e.g., a half-brother or stepchild).
- D. For purposes of this Article, the term "project" means public housing developed, acquired, or assisted by HUD and the improvement of such housing. The term shall include all real and personal property, tangible and intangible, which is acquired or held by OHA in connection with a project.

## **ARTICLE IV. MEETINGS**

### **SECTION 1. POLICIES GOVERNING MEETINGS**

Advance notice of the time and place of all meetings, except emergency meetings, shall be published in a local newspaper of general circulation, not less than 24 hours preceding the meeting date. Such notice shall be simultaneously transmitted to all members of the Board of Commissioners.

All meetings of the Board shall be open to the public, except when the Board of Commissioners, in open by affirmative vote, deems it appropriate, pursuant to the Nebraska Open Meetings Act, to hold a closed session. All formal official actions shall be considered adopted if approved by at least a majority of the Commissioners. Any such actions taken in closed session, unless allowed by the Open Meetings Act, shall be considered void.

Unless allowed by the Nebraska Open Meetings Act telephonic or video participation by a Commissioner is not allowed.

All above policies and others not stated herein relating to OHA meetings shall be in compliance with Nebraska's Open Meetings Act and/or the Nebraska Housing Agency Act.

## **SECTION 2. REGULAR MEETINGS**

The Board shall meet at least once a month at such time and place as may from time to time be determined by resolution of the Board. The regular meetings of the Board shall be the first Thursday of each month at 8:30 a.m. However, if a majority of the Commissioners determines that it is desirable that the Board meet on another date and/or time then the meeting shall be held on such date and/or time.

## **SECTION 3. ANNUAL MEETINGS**

The Annual Meeting shall ~~be~~ held during the month of December immediately following adjournment of the regular monthly meeting. Notices regarding the annual meeting, along with a proposed agenda of items of business to be conducted, shall be mailed to each Commissioner by the Secretary at least ten days prior to the Annual Meeting.

## **SECTION 4. SPECIAL MEETINGS**

The Chair of the Board may, when it is deemed desirable and expedient, and shall, upon the written request of two Commissioners, call a special meeting for the purpose of transacting any business designated in the call. The call for a special meeting shall be delivered or mailed to Commissioners at least twenty-four (24) hours prior to the date of such special meeting unless all members waive such notice in writing. At such special meeting, no business shall be considered other than designated in the call unless all members are present.

## **SECTION 5. EMERGENCY MEETINGS**

When the Chair, or in his absence the Vice Chair, of the Board determines that it is necessary to call an emergency meeting of the Board, he shall give the members of the Board such advance notice as is possible considering the exigencies of the situation, and the nature of the emergency shall be stated in the minutes. Any formal action taken in such meetings shall pertain only to the emergency. Such emergency meetings may be held by means of electronic or telecommunication equipment.

## SECTION 6. QUORUM

At all meetings of the Board a majority of the duly constituted Commissioners shall constitute a quorum for the purpose of conducting its business and exercising its powers, and for all other purposes. A small number shall not meet and must adjourn until such time as a quorum is obtained. When only ~~five~~four Commissioners are present at any meeting, a unanimous vote is required in order to approve and adopt any action.

## SECTION 7. ORDER OF BUSINESS

At regular meetings of the Board, the following shall be the order of business:

- ~~1. Roll call;~~
- ~~2. Reading and approval of the minutes of the previous meeting;~~
- ~~3. Bills and communications;~~
- ~~4. Report of the treasurer;~~
- ~~5. Reports of committees;~~
- ~~6. Unfinished business;~~
- ~~7. New business;~~
- ~~8. Adjournment.~~
1. Announcement of Open Meetings Act;
2. Roll call;
3. Public comments;
4. Report of the Chief Executive Officer;
5. Transaction of business requiring Board approval;
6. Department reports;
7. New business;
8. Executive session;
9. Adjournment.

At special meetings of the Board the following shall be the order of business:

1. Roll call;
2. Transactions of business ~~designated in the call~~requiring Board approval;
3. Any other transactions of business that may come before the ~~Board meeting~~ in the event all members are present;
4. Adjournment.

At annual meetings of the Board, the following shall be the order of business:

1. Roll call;
2. Election of Chair;
3. Election of Vice Chair;
4. Election of Assistant Secretary, if desired;
5. Election of Treasurer, if desired;
6. New business;
7. Adjournment.

At emergency meetings of the Board, the following shall be the order of business:

1. Roll call;
2. Transaction of that business pertaining solely to the emergency;
3. Adjournment.

### **SECTION 8. MANNER OF VOTING**

The voting on all questions coming before the Board shall be by roll call vote, and all Commissioners present, including the Chair or other presiding Commissioner, shall announce their votes, and such votes shall be entered into the minutes of the meeting. The approval of at least ~~fivefour~~ (45) Commissioners is required before any action can be adopted.

### **SECTION 9. PARLIAMENTARY PROCEDURE**

In the event of a question of procedure, the Board shall follow the principles of *Robert's Rules of Order*. The Chair, with the advice of the legal counsel, is the final arbiter of any procedural matter. The Chair or other presiding Commissioner at any meeting of OHA shall have the right, not in contradiction of any policy passed by the Board and in effect, to place reasonable limits upon participation by the public at such meeting, including, but not limited to, the right to limit the number of speakers on any pending matter, the order in which said persons may speak, and the length of time allotted to each said speaker. ~~He~~The Chair shall also have the right to take such action ~~as he deems~~ necessary to quell any disorder at or disruption of any such meeting, including, but not limited to, the right to call for the removal of any person creating said disturbance from the meeting.

### **SECTION 10. COMMITTEES**

When it is deemed advisable or expedient, the Board may, at its discretion, establish committees which shall have such members, such powers, and such duties as the Board may, by resolution, determine.

To facilitate consideration of the business and management of OHA, Standing Committees are established as hereinafter set forth. Any matters appropriate for consideration by a Standing Committee first shall be referred thereto.

Unless otherwise specifically delegated and except as otherwise provided herein, authority to act on all matters is reserved to the Board, and the duty of each Standing Committee shall be only to consider and to make recommendations to the Board upon matters referred to it.

The Standing Committees are charged specifically with the immediate care and supervision of the subject matters respectively indicated by and properly relating to their titles.

The following shall be the Standing Committees of the Board:

### **Operations / Finance / Procurement / Operations Committee**

The Committee will oversee OHA's financial reporting and practices, procurement practices, and general operations.

The Committee oversees the work of OHA's financial reporting and internal audit processes. The Committee should be directly responsible, in conjunction with the ~~Executive Director~~Chief Executive Officer, for the appointment, retention, and oversight of OHA's independent auditors. Oversees development of the budget; ensures accurate tracking/monitoring/accountability for funds; and ensures adequate financial controls. Plans and supports audit of major functions, e.g., finances, programs, or organization.

The Committee ensures consistent and correct application of procurement practices. The Committee shall:

1. Approve all proposed changes to OHA's Procurement Policy Procurement Procedures; and
2. Approve all solicitations for professional services, requests for qualifications or, request for proposals.

The Committee conducts topical research and makes recommendations on relevant issues impacting the operation, planning and implementation issues of OHA policies, including, but not limited to, periodically, with the ~~Executive Director~~Chief Executive Officer, reviewing and considering OHA's organizational structure and internal operations, including property management, personnel policy issues, public safety, resident relations, community relations, and self-sufficiency. The Committee shall oversee all operation policies necessary to ensure effective asset management of OHA's properties.

### **Development / External Affairs / Public Relations Committee**

The Committee oversees OHA's real estate development planning, purchasing and selling of real estate, and conversion of public housing properties under Rental Assistance Demonstration or any other local, state or federal program.

The Committee supervises OHA's external communications and public relations, including, but not limited to, branding, press releases, media relations and engagement with the greater Omaha non-profit and philanthropy community.

### **Executive Committee**

Oversee operations of the Board; comprised of the Board Chair, Vice Chair, and a member of the Board who is not the Board Chair or Vice Chair; often performs

evaluation of ~~Executive Director~~Chief Executive Officer and assists the ~~Executive Director~~Chief Executive Officer with leadership and management development at senior staff levels. Consults weekly with the ~~Executive Director~~Chief Executive Officer to discuss and be briefed on issues or items of significance to OHA operations.

## **Special Committees**

Special Committees shall be appointed by the Chair of the Board upon authority of the Board with such powers and duties as the Board may determine, provided that no Special Committee shall be created to act upon any matter appropriate to be acted upon by a Standing Committee. A Special Committee shall act for no more than one year from the date of appointment and shall be considered discharged upon the expiration of said year, unless specifically authorized by the Board at the time of its appointment, or from year to year, to act for a longer period.

## **Subcommittees**

Each Committee shall have such Subcommittees as may be required for the effective conduct of the business of the Committee, provided, however, that Subcommittees shall be created only in response to need and to serve a specific purpose. Members of each Subcommittee shall be appointed by the Chair of the Committee of which it is a part.

The Chair of each Committee shall be an ex-officio member of each Subcommittee of that Committee.

# **ARTICLE V. AMENDMENTS AND RESOLUTIONS**

## **SECTION 1. AMENDMENT TO BYLAWS**

The Bylaws of the Board shall be amended only with the approval of a majority of the Board. Any recommendation of a Bylaw change shall be brought before the Commissioners by the ~~Executive Director~~Chief Executive Officer. The recommendation must be submitted to the Board in its entirety for review at a meeting for consideration at the next scheduled meeting.

## **SECTION 2. RESOLUTIONS**

All resolutions shall be memorialized in writing and those having received an affirmative vote of the Board shall be signed by the Chair of the Board or in his absence any other officer of the Board.

I, Joanie ~~Peere~~Balk, the duly appointed, qualified, and acting Secretary of the Housing Authority of the City of Omaha, do hereby certify that the above and foregoing is a true and correct copy of the Amended and Restated Bylaws which were duly adopted on the \_\_\_\_\_ day of \_\_\_\_\_, 20~~19~~25.

\_\_\_\_\_  
Joanie ~~Peere~~Balk

IN TESTIMONY WHEREOF, I have hereunto set my hand and notarial seal this \_\_\_\_\_ day of \_\_\_\_\_, 20~~19~~25.

\_\_\_\_\_  
NOTARY PUBLIC

**RESOLUTION NO. 2025 – 19**  
**AMENDMENTS TO OHA AMENDED AND RESTATED BYLAWS**

**WHEREAS**, the Housing Authority of the City of Omaha (OHA) seeks to amend OHA’s Amended and Restated Bylaws; and

**WHEREAS**, the proposed amendments will revise the number of Commissioners to be consistent with state law, revise certain language to be consistent with OHA’s operating practices and make edits to grammar and punctuation; and

**WHEREAS**, OHA staff recommends that the OHA Board of Commissioners adopt the Amended and Restated Bylaws, as amended, which are provided with the memorandum in support of this resolution;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby adopts the Amended and Restated Bylaws, as amended, which are provided with the memorandum in support of this resolution.

\_\_\_\_\_  
David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the regular meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.14. Resolution 2025-20 DocuSign Contract, Renewal

# Memorandum

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To: The Board of Commissioners

From: Susan Gilroy, Director of Compliance; Philisa Smith, HCV Director,  
Sarah Nothhorn, Director of Property Management Operations

Date: March 7, 2025

Re: Recommendation for contract – DocuSign eSignature Services

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## **RECOMMENDED ACTION:**

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract with DocuSign Enterprise Pro for Government for a one-year term in an amount not to exceed \$60,190.42.

## **EXPLANATION:**

DocuSign has a strong footprint in the Public and Affordable Housing marketplace, with more than 415 Housing Authorities currently using the cloud-based software and is the preferred e-signature service of HUD. OHA investment in this software began in 2019 as a business account for the Procurement Department speeding up contract signing. DocuSign is the most popular eSignature solution on the market. The software is intuitive and easy-to-use providing secured signing agreements digitally while maintaining a complete audit trail of activity on each document. The contract includes 7,000 electronic envelopes and Enterprise level Support. DocuSign has provided this pricing based on our historical data of volume usage.

## **METHOD OF PROCUREMENT:**

DocuSign is a NASPO Carahsoft awarded vendor with a State of Nebraska Purchasing Agreement. This purchasing agreement allows OHA the ability to utilize the contract by way of piggy-backing in place of issuing a formal procurement solicitation. DocuSign’s current OHA pricing reflects a discount of over 5% from the Carahsoft and State options.

**MBE/WBE Section 3 Status:** None

**PROJECT COST:** This contract will not exceed \$60,190.42.

**SOURCE OF FUNDS:** Capital Improvements funds and Operating budgets of Departments utilizing the product.

**SPONSOR(S):** Sarah Nothhorn, Director of Public Housing Operations  
Philisa Smith, HCV Director  
Susan Gilroy, Director of Compliance

**RECOMMENDED BY:** Joanie Balk, CEO



DocuSign, Inc.  
221 Main Street, Suite 1550  
San Francisco, CA 94105

**Offer Valid Through:** Mar 21, 2025

**Prepared By:** Whitney Miller  
**Quote Number:** Q-01715451

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## ORDER FORM

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### Address Information

**Bill To:**

Omaha Housing Authority  
1823 Harney St,  
Omaha, NE, 68102  
United States

**Ship To:**

Omaha Housing Authority  
1823 Harney St,  
Omaha, NE, 68102  
United States

**Billing Contact Name:**

Nicole Molina

**Billing Email Address:**

nmolina@ohauthority.org

**Billing Phone:**

402.444.6900 x2260

**Shipping Contact Name:**

Nicole Molina

**Shipping Email Address:**

nmolina@ohauthority.org

**Shipping Phone:**

402.444.6900 x2260

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### Order Details

**Order Start Date:** Mar 25, 2025

**Order End Date:** Mar 24, 2026

**Billing Frequency:** Annual

**Payment Method:** Check

**Payment Terms:** Net 30

**Currency:** USD

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### Products

Product Name	Subscription No.	Start Date	End Date	Quantity	Net Price
Document Generation for eSignature	SUB-3023692-1	Mar 25, 2025	Mar 24, 2026	5,000	\$1,000.00
Multi-Channel Delivery	SUB-3023692-1	Mar 25, 2025	Mar 24, 2026	5,000	\$2,000.00
eSignature Enterprise Pro for State and Local Government - Envelope	SUB-3023692-1	Mar 25, 2025	Mar 24, 2026	7,000	\$49,339.50
Premier Support - eSign	SUB-3023692-1	Mar 25, 2025	Mar 24, 2026	1	\$7,850.92

**Grand Total: \$60,190.42**

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### Product Details

eSignature Envelope Allowance: 7,000

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## Overage/Usage Fees

Document Generation for eSignature: \$0.40

Multi-Channel Delivery: \$0.50

eSignature Enterprise Pro for State and Local Government - Envelope: \$11.70

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## Order Special Terms

Customer agrees to allow DocuSign to publish, use and/or reproduce the Customer's name and logo in marketing materials and investor-related content.

Customer is willing to partner with DocuSign to: (a) produce a written case study and/or video testimonial on Customer's use of DocuSign and associated business results to be featured on DocuSign website and in marketing campaigns; and (b) share Customer's name and DocuSign use case and associated business results with press, in media publications and in thought leadership content. DocuSign will reach out to Customer during the Term regarding these opportunities.

Customer is willing to partner with DocuSign to: (a) act as a reference for DocuSign and speak with DocuSign customers and prospects about Customer's use of DocuSign and associated results; (b) speak with analysts about their company's use of DocuSign and associated results for use in analyst reports and whitepapers; and (c) speak at DocuSign 1st and 3rd party events about Customer's use of DocuSign and associated results. DocuSign will reach out to Customer during the Term regarding these opportunities.

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## Terms & Conditions

This Order Form is governed by the terms Master Services Agreement available online at: <https://www.docuSign.com/legal/terms-and-conditions/msa> and the applicable Service Schedule(s) and Attachments for the DocuSign Services described herein available online at <https://www.docuSign.com/legal/terms-and-conditions/msa-service-schedules>.

Customer Data uploaded into a DocuSign eSignature Government Product will be hosted within DocuSign's FedRAMP Moderate authorized boundary. "FedRAMP" means the Federal Risk and Authorization Management Program.

DocuSign eSignature Government Products (but not CLM Government Products) include features and functionality that allow Customers to connect to other DocuSign products or to third-party products or services for interoperability purposes. Interoperability refers to multiple computer systems that are connected in a manner that allows them to exchange information. DocuSign eSignature Government Product features allowing for interoperability currently include DocuSign Payments, Comments and Agreement Actions. A complete list of interoperable eSignature Government Product features can be found at

<https://www.docusign.com/legal/terms-and-conditions/esignature-interoperable-features>. These features are disabled by default for new customers but can be enabled by Customer request. Customers may also use “connectors” to connect DocuSign eSignature Government Products or CLM Government Products to other systems to exchange information. For example, a DocuSign/Salesforce Connector can be used to connect DocuSign eSignature Government Products to a Salesforce product so that information may be exchanged between the two connected systems.

If Customer chooses to connect DocuSign eSignature Government Products to any other DocuSign product or to any third-party products or services, Customer authorizes DocuSign to export Customer Data outside of DocuSign’s FedRAMP Moderate authorized boundary for the processing and use of Customer Data by Customer, DocuSign, and/or such third parties (as applicable). For clarity, where Customers connect DocuSign eSignature Government Products with any other products or services (including but not limited to by use of Payments, Comments, Connector or Agreement Action functionality), DocuSign disclaims all liability for FedRAMP control compliance or Customer’s obligations relating to Customer Data exported from DocuSign’s FedRAMP Moderate authorized boundary.

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## Billing Information

Prices shown above do not include any sales, use, value added (VAT), goods and services (GST), and/or any other similar taxes, duties, levies and or charges of any nature that might be imposed or required to be collected (collectively “taxes”) by DocuSign. Any such taxes are the responsibility of the Customer and will appear on the final invoice(s), as applicable. Taxes are calculated based on the ship-to location listed on your order form.

Invoice(s) for this order will be emailed automatically from [invoicing@erp.docusign.com](mailto:invoicing@erp.docusign.com).

Please make sure this email address is on an approved setting or safe senders list, so notifications do not go to a junk folder or get caught in a spam filter.

### For U.S. Customers

Is the contracting entity exempt from sales tax?

Please select Yes or No:

If yes, please send the required tax exemption documents immediately to

[taxexempt@docusign.com](mailto:taxexempt@docusign.com).

### For Non U.S. Customers

Verify that the VAT, GST, TIN, or similar tax identification number below is correct, or provide the correct number to your DocuSign contact. If the VAT, GST, or TIN identification number is not populated below, it will be assumed that you are not a VAT/GST registered taxpayer.

VAT, GST, TIN or similar tax identification number:

**For other tax exemption requests, please email the applicable tax exemption documentation to [taxexempt@docusign.com](mailto:taxexempt@docusign.com).**

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**Purchase Order Information**

Is a Purchase Order (“PO”) required for the purchase or payment of the products on this Order Form?

Please select:      Yes              No

By marking “No”, Customer agrees to process payment for any invoices issued pursuant to this Order Form without a PO Number.

If yes, please complete the following information, and attach your PO (if available), and the invoice will be issued referencing such PO Number:

PO Number:

Please attach PO Attachment here:

If “Yes” is marked, but a PO Number is not provided or a PO document is not attached, then Customer agrees to provide the PO information or PO document to Docusign at its earliest convenience by sending to [POSubmission@docusign.com](mailto:POSubmission@docusign.com) referencing this Quote Number, but agrees to still process payment per the agreed upon terms.

If Customer has attached a PO (or other document) to this Order Form, Customer acknowledges and agrees that any additional or conflicting terms appearing in such PO (or any other document) are invalid.

---

**By signing this Agreement, I certify that I am authorized to sign on behalf of the Customer and agree to the Terms and Conditions of this Order Form and any documents incorporated herein.**

**Customer**

Signature:

Name:

Job Title:

Date:

**Docusign,  
Inc.**

Signature:

Name:

Job Title:

Date:



**RESOLUTION NO. 2025 - 20**  
**CONTRACT WITH DOCUSIGN**

**WHEREAS**, the Housing Authority of the City of Omaha (OHA) desires to have electronic document signature services to facilitate documents with staff, clients, and vendors, which is particularly valuable because most document work can be conducted electronically, which reduces staff work and reduces burdens on our tenants and contractors;

**WHEREAS**, DocuSign is a GSA-approved vendor; and

**WHEREAS**, staff recommends that the OHA Board of Commissioners approve a contract with DocuSign for a one-year term in an amount not to exceed \$60,190.42;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a contract with DocuSign for a one- year term in an amount not to exceed \$60,190.42.

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David Levy, Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

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Joanie Balk, Secretary  
Housing Authority of the City of Omaha

5.2.15. Resolution 2025-21 Workers Compensation Insurance Policy Renewal

**RESOLUTION NO. 2025 – 21**  
**RENEWAL FOR WORKERS COMPENSATION INSURANCE**

**WHEREAS**, the Housing Authority of the City of Omaha (OHA) is required to hold a policy of workers compensation insurance;

**WHEREAS**, OHA has a contract with Berkshire Hathaway Homestate Insurance Company effective beginning April 1, 2021 to provide workers compensation insurance for a one-year term with the option to renew for four additional one-year terms;

**WHEREAS**, on February 29, 2024, the Board approved renewal of this contract for a one-year term, which contract will expire on March 31, 2025;

**WHEREAS**, the annual premium costs for workers compensation insurance are based on multiple factors including prior claims, as well as current staffing levels and payroll levels, which may change throughout the year, and are estimated at \$229,260, based on current staffing and payroll;

**WHEREAS**, OHA staff recommends that the OHA Board of Commissioners approve renewal of the contract with Berkshire Hathaway Homestate Insurance Company to provide workers compensation insurance for a one-year term;

**NOW, THEREFORE, BE IT RESOLVED THAT** the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves renewal of the contract with Berkshire Hathaway Homestate Insurance Company to provide workers compensation insurance for a one-year term.

\_\_\_\_\_  
David Levy Chairman  
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held February 27, 2025.

\_\_\_\_\_  
Joanie Balk, Secretary

# Memorandum



To: The Board of Commissioners  
From: Jennifer Dexter, Procurement Manager  
Date: February 27, 2025  
Re: Recommendation for Contract Renewal – Workers Compensation Insurance

## RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract renewal with Berkshire Hathaway Homestate Insurance Company (BHHC) to provide OHA’s workers compensation insurance policy. The quote for the 2025-2026 premium is \$229,260, which reflects a 25.78 % decrease over the 2024 rate. The renewal would be the fourth and final one-year renewal.

## PREVIOUS ACTION:

	Resolution	Effective Date	Annual Premium	Renewals available	No. of Vendors	Expire Date
Contract 21-WORCOM-INS	2021-26	4/1/2021	\$299,872	4	1	3/31/2022
First Renewal	2022-21	4/1/2022	\$322,977	3	1	3/31/2023
Second Renewal	2023-31	4/1/2023	\$315,744	2	1	3/31/2024
Third Renewal	2024-31	4/1/2024	\$308,918	1	1	3/31/2025

## PROPOSED ACTION:

	Resolution	Effective Date	2025 Premium	Renewals available	No. of Vendors	Expire Date
Fourth Renewal	2025-TBD	4/1/2025	\$229,260	0	1	3/31/2026

**DBE/MBE SECTION 3 STATUS:** None

**PROJECT COST:** \$229,260.00

**METHOD OF PROCUREMENT:** Renewal

**SOURCE OF FUNDS:** All OHA Agency Department Budgets

**SPONSOR(S):** Latina Jackson, Director of Human Resources  
Denise Burmood, Senior Legal Assistant  
Brian Hansen, General Counsel

**RECOMMENDED BY:** Joanie Balk, CEO

5.2.16. Resolution 2025-22 Settlement Agreement

6. DEPARTMENT REPORTS AND DISCUSSION ITEMS

6.1. Housing Choice Voucher Program

# Memorandum



To: Board of Commissioners  
 From: Philisa Smith HCV Director  
 Date: February 27, 2025  
 Re: Monthly Utilization Report

**PERIOD ENDING JANUARY 31, 2025**

**VOUCHER UTILIZATION SUMMARY**

<b>All Vouchers</b>	<b>Utilization 2024</b>	<b>Allocation</b>	<b>Issued Current Month</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Current Mo % Leased</b>
	All Other Vouchers	5258	0	3669	3640	3634	69%
	Emergency Vouchers	142	0	110	105	100	77%
	Fair Share Vouchers	24	0	16	17	17	66%
	HA Owned Vouchers	26	0	24	26	26	100%
	Home Ownership Vouchers	63	0	65	64	63	100%
	Incremental Vouchers	20	0	2	2	2	10%
	Mainstream Vouchers	115	0	94	93	93	82%
	Portable Vouchers	92	0	91	87	92	100%
	Project Based Vouchers	262	32	237	231	239	94%
	Tenant Protection Vouchers	214	47	180	207	214	100%
	VASH Vouchers	157	10	106	139	138	91%
	VASH Vouchers (PBV)	36	0	32	36	36	100%
<b>Total Vouchers</b>	<b>6409</b>	<b>89</b>	<b>4626</b>	<b>4647</b>	<b>4654</b>	<b>73%</b>	

<b>Other Housing</b>	<b>Utilization 2024</b>	<b>Allocation</b>	<b>Issued</b>	<b>Nov</b>	<b>Dec</b>	<b>Dec</b>	<b>Current Mo % Leased</b>
	HOME TBRA	30	0	27	27	27	95%
	Mod Rehab	32	0	26	27	13	41%

<b>HUD Delinquency Rate</b>	<b>SEMAP</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>
	95%	89.20%	91.88%	93.60%

# Memorandum



To: Board of Commissioners  
 From: Philisa Smith HCV Director  
 Date: February 27, 2025  
 Re: Monthly Utilization Report

**PERIOD ENDING JANUARY 31, 2025**

**NSPIRE INSPECTION SUMMARY**

<b>2025</b>	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Section 8 Pass	251											
Section 8 Fail	179											
Section 8 Follow ups	221											
Quality Control Pass	6											
Quality Control Fail	1											
Special, Complaint, Inconclusive	44											
<b>Monthly Total S8 Inspections Conducted</b>	<b>702</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<b>2024 Public Housing</b>	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Monthly Total PH Inspections Conducted	-											

<b>2024</b>	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Section 8 Pass	213	235	249	285	251	247	222	266	253	232	220	262
Section 8 Fail	156	139	162	176	126	145	168	156	144	136	132	191
Section 8 Follow ups	186	163	162	183	256	156	163	205	164	198	150	152
Quality Control Pass	12	10	5	9	0	13	9	11	9	0	7	0
Quality Control Fail	0	2	3	3	0	4	0	2	6	0	2	0
Special, Complaint, Inconclusive	7	13	10	7	6	13	10	6	7	15	5	10
<b>Monthly Total S8 Inspections Conducted</b>	<b>574</b>	<b>562</b>	<b>591</b>	<b>663</b>	<b>639</b>	<b>578</b>	<b>572</b>	<b>646</b>	<b>583</b>	<b>581</b>	<b>516</b>	<b>615</b>

<b>2024 Public Housing</b>	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Monthly Total PH Inspections Conducted					77	34	86	65	79	72	61	11

<b>5/20/2024 Weather Extension Results</b>	<b>May</b>											
Pass					55*							
Fail					21*							

\* included in monthly totals

# Memorandum



To: Board of Commissioners  
From: Philisa Smith HCV Director  
Date: February 27, 2025  
Re: Monthly Utilization Report

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**PERIOD ENDING JANUARY 31, 2025**

## **HCV 2024 ANNUAL RECERTIFICATION SUMMARY**

<b>Annual Recertifications 2024</b>	<b>Annals Due Monthly</b>	<b>Annals Incomplete</b>
1	411	0
2	381	0
3	349	1
4	416	0
5	366	1
6	346	1
7	331	1
8	337	0
9	362	1
10	390	0
11	371	1
12	412	1
<b>Totals</b>	<b>4472</b>	<b>7</b>

# Memorandum



To: Board of Commissioners  
From: Philisa Smith HCV Director  
Date: February 27, 2025  
Re: Monthly Utilization Report

**PERIOD ENDING JANUARY 31, 2025**

## **HCV 2025 ANNUAL RECERTIFICATION SUMMARY**

<b>Annual Recertifications 2025</b>	<b>Annuals Due Monthly</b>	<b>Annuals Incomplete</b>
1	374	169
2	376	202
3	358	259
4	410	321
5	360	309
6	354	324
7	346	306
8	325	302
9	374	354
10	399	387
11	389	364
12	383	369
<b>Totals</b>	<b>4448</b>	<b>3666</b>

## 6.2. Asset Management (Public Housing)



6.3. Housing in Omaha, Inc.

6.4. River City Housing Connections

6.5. Compliance

# Memorandum

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To: The Board of Commissioners  
From: Susan Gilroy, Director of Compliance  
Date: February 27, 2025  
Re: Compliance Department Update- December 2024

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## Intake Department

In December, the Public Housing waiting list continued to be open for one-bedroom applicants only. There were 307 applications received for the month. A total of 26 applications were approved in December for twenty-four 1 bedrooms, two 2 bedrooms. In addition, there was one application approved for a one-bedroom at Chambers Court- (LIHTC -non-Public Housing apartment)

There were 119 applications withdrawn from the waiting list during December with 58 for no response, 10 for applicant requests, 30 for the wait list not open, 5 for not eligible to apply, 8 for failed background checks and 9 refused housing offers.

Intake staff continue to process one-bedroom senior applications along with other applications for vacancies at non-senior towers. The Intake Manager and Leasing Coordinators work to balance out the number of files that Intake processes with the number of vacant units that are ready to be filled.

Outreach is continuing for our non-public housing properties for our straight LIHTC apartments at Chambers Court where we have openings and at our affordable property Villas North.

The Intake area is fully staffed now in February, so all staff can work in their regular job duties. Intake Manager is providing training for our recently hired Housing Clerk and our newly hired Administrative Clerk.

Effective January 1<sup>st</sup>, only one-bedroom senior applicants (62+) will be eligible to apply for public housing.

## Reexaminations

HUD's monthly Reexamination Delinquency Report for December dipped down to 77.52% from 78.44%. Supervisors continue to work with staff to help and provide additional training for them to be successful in meeting the weekly goal for inputting reexamination files. We continue to request Property Management to serve 14/30 eviction notices to residents who fail to respond to our request for information or attend scheduled appointments. Staff attending all court dates is proving successful with assisting residents in completing their late reexaminations. The interim completion rate increased from 82% to 84% for the interims reported between 2023 through September 2024. Staff are completing interims at the same time as they work on annual reexaminations.

Staff turnover continues as their workload continues to be monitored and staff held accountable. Human Resources are processing a selected Housing Compliance Specialist applicant along with scheduling in person interviews for other candidates for the 2<sup>nd</sup> open position.

During the month of January, we implemented the revised Verification Hierarchy process that was previously approved by the Board. In February, we re-structured our staff to work in 3-person teams where they can work to their strengths in the areas of processing verifications, handling the appointments and then inputting/approving ready files. We anticipate that we will see better results in the reexamination process with file completion with these 2 major changes.

Process Improvements

During the month of December, Nicole worked with staff from Section 8, Intensive Services, FSS, Legal and Compliance with these projects and initiatives:

Section 8- Small Area Fair Market Rents reports and email/mail out to residents and landlords, updated recertification letters and reminders and updated request approvals in rent café portal.

Intensive Services- Apricot program implementation for CNI grants with provider. Updated move in/move out data and reporting metrics for Spencer and Southside.

FSS- uploaded MCC Earn as you Learn flyer and emailed to specified properties.

Legal- created a report for Southside with resident data and a report for specific properties with work order data.

Compliance- uploaded MCC Earn as you Learn flyer and emailed to tax credit properties and updated recertification letters and reminders in rent café portal.

Training classes were held for new staff in Intake areas for both Section 8 and Public Housing for YardiOne Basics and Rent Café.

There were 11 cases submitted to Yardi. There were 73 requests from staff for assistance:

Requests by department:		Requests by Product:	
Capital Improvements	1	Adobe	3
Compliance	7	DocuSign	4
Executive	3	Market Place	0
Finance	6	Mobile Maintenance	5
Family Self Sufficiency	0	OHA Website	2
HR	8	P2P	0
Inspections	0	Rent Café	27
Intensive Services	0	SharePoint	3
IT	2	Voyager	17
Legal	1	Yardi One	12
Maintenance	5		
PH Intake	7		

Procurement	0
Property Management	10
Public Safety	1
Quality Improvement	1
Section 8	21

# Memorandum



To: The Board of Commissioners  
 From: Susan Gilroy, Director of Compliance  
 Date: February 27, 2025  
 Re: Intake Approved Applications December 2024

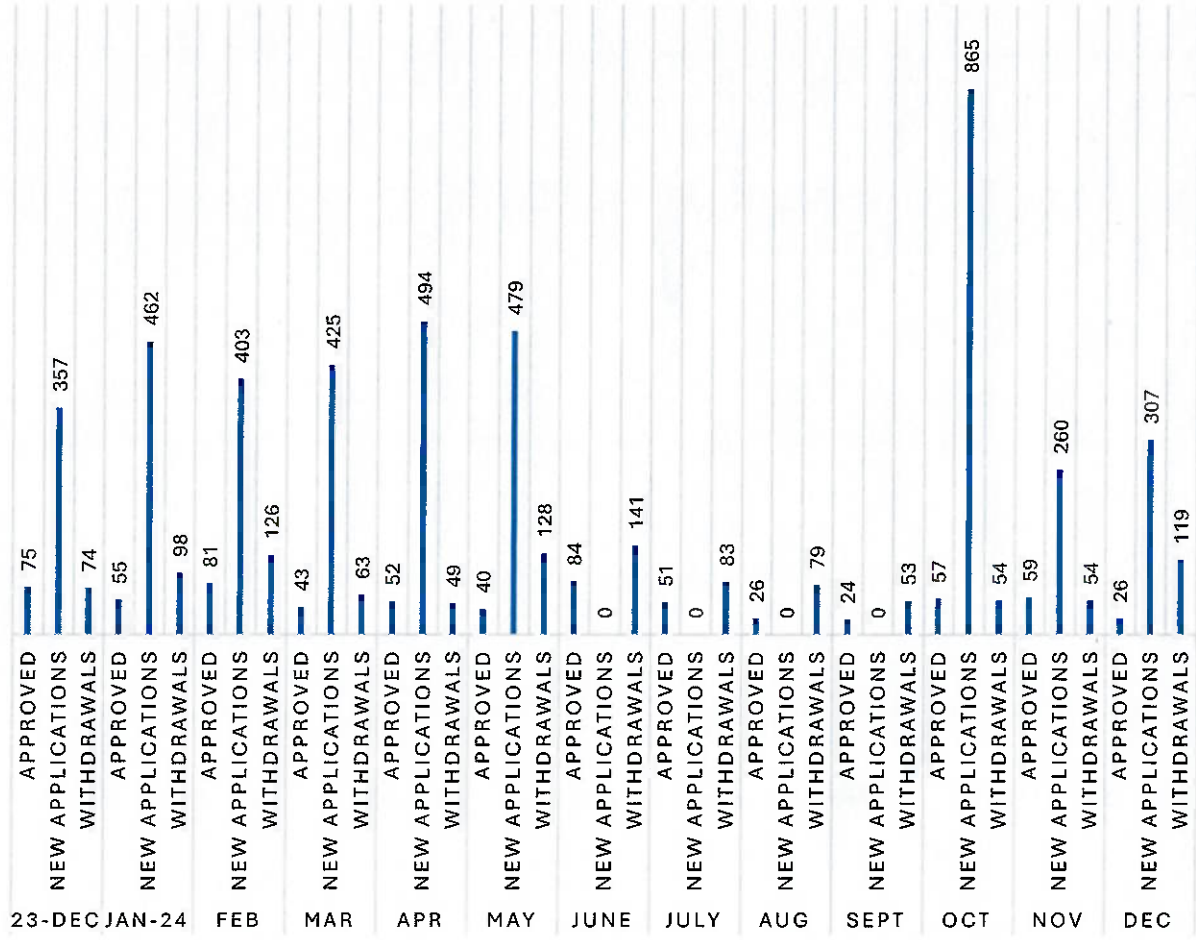
**Intake Department  
 Month of December 2024**

New Public Housing Applications	<b>307</b>
New Villas Housing Applications	<b>0</b>
New Farnam Straight Tax Credit Housing Applications	<b>0</b>
New Chambers Straight Tax Credit Housing Applications	<b>0</b>
Approved Public Housing Applications	<b>26</b>
Approved Applications for Villas	<b>0</b>
Approved Applications for Chambers Straight Tax Credit	<b>1</b>
Approved Applications for Farnam Apts Straight Tax Credit	<b>0</b>

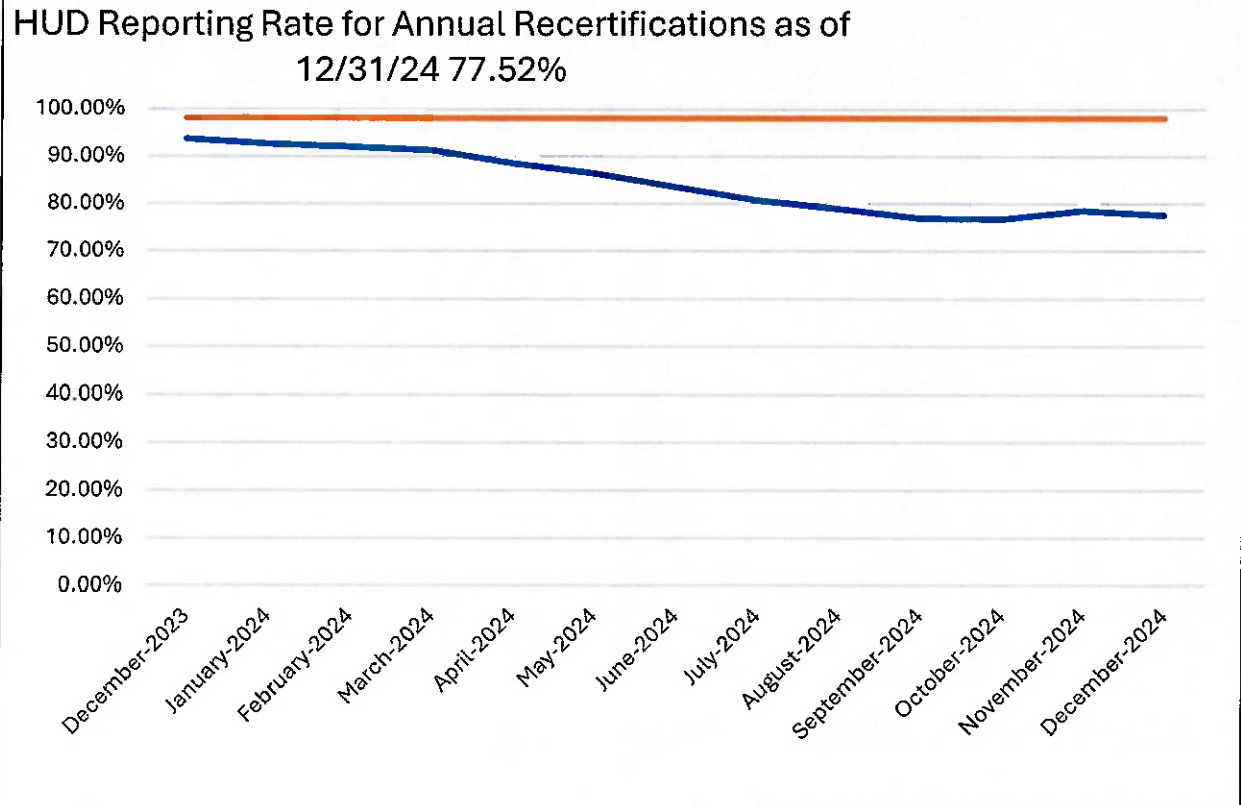
Public Housing Applications Approved by Bedroom Size	One	Two	Three	Four
		24	2	0
<b>Villas Applications Approved</b>	Two	Three		
North Villas	0	0		
Arbor Villa	0	0		
<b>Chambers Court Straight Tax Credit Applications Approved</b>	One	Two	Three	Four
	0	0	0	0
<b>Farnam Apartments Straight Tax Credit Applications Approved</b>	Two	Three		
	0	0		

<b>Applications Withdrawn from PH Wait List</b>	<b>119</b>	
<b>No Response During Full Application Process</b>	<b>58</b>	
Owe monies to PHA	0	
Not Eligible to Apply	4	
Failed Background Check	8	
Applicant Request	10	
Refused Offer	9	
Wait list closed for bedroom size requested	30	

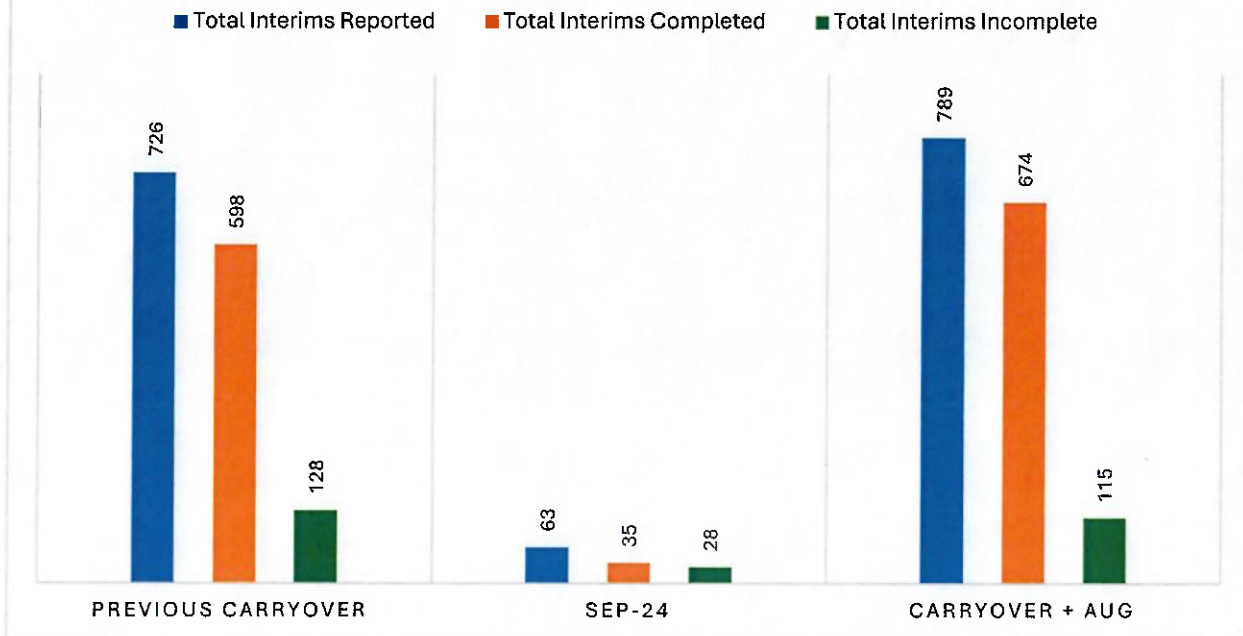
## PUBLIC HOUSING INTAKE WAITING LIST DECEMBER 2024



	HUD Goal
	Actual



## INTERIM COMPLETION RATE THROUGH SEPTEMBER 2024



63 residents reported new changes during the month of September. Housing Compliance Staff worked to complete the new and outstanding interims during this month. Overall, staff processed a total 76 interim files.

## 6.6. Financials

New Agency Structure after FMR (7agency2)

**Balance Sheet -With YTD**

Period = Dec 2024

Book = Accrual ; Tree = ysi\_bs

	December 31, 2024	December 1, 2024	Net Change	January 1, 2024	YTD Net Change
<b>ASSETS</b>					
CASH AND CASH EQUIVALENTS	10,758,839	11,287,452	-528,613	13,113,122	-2,354,282
OTHER ACCOUNTS RECEIVABLE	-80,523	-176,857	96,334	97,484	-178,007
A/R INTER-PROPERTY	1,130,953	1,050,411	80,542	704,837	426,115
A/R - TENANT	841,312	839,457	1,855	590,121	251,191
A/R PROMISSORY NOTES	3,132,423	3,131,176	1,247	3,136,004	-3,581
ACCRUED INTEREST RECEIVABLE	5,146,148	5,146,148	0	5,146,148	0
PREPAID ASSETS	338,168	893,960	-555,792	326,898	11,269
INTER-FUND DUE FROM	2,485,695	2,408,600	77,095	2,510,450	-24,755
<b>TOTAL CURRENT ASSETS</b>	<b>23,753,014</b>	<b>24,580,347</b>	<b>-827,333</b>	<b>25,625,064</b>	<b>-1,872,050</b>
FIXED ASSETS	32,657,237	32,333,739	323,498	31,959,545	697,692
NOTES RECEIVABLE	7,315,266	7,315,266	0	7,315,266	0
LT INTER-FUND DUE FROM	2,390,435	2,390,435	0	2,390,435	0
A/R P-NOTES - LONG TERM	-665,630	-665,630	0	-665,630	0
TAX CREDIT FEES	71,655	71,655	0	71,655	0
PREPAID LEASE COSTS	4,640,570	4,640,570	0	4,640,570	0
LEASES RECEIVABLE	2,708,702	2,885,186	-176,485	5,916,460	-3,207,759
ACCUMULATED AMORTIZATION	-4,416,383	-4,416,383	0	-4,416,383	0
LT INTER-PROPERTY	913,265	913,265	0	913,265	0
INVESTMENT IN JOINT VENTURES	2,296,065	2,296,065	0	2,296,065	0
<b>TOTAL NON-CURRENT ASSETS</b>	<b>47,911,181</b>	<b>47,764,168</b>	<b>147,013</b>	<b>50,421,248</b>	<b>-2,510,067</b>
<b>TOTAL ASSETS</b>	<b>71,664,195</b>	<b>72,344,515</b>	<b>-680,320</b>	<b>76,046,312</b>	<b>-4,382,117</b>
<b>LIABILITIES AND EQUITY</b>					
<b>LIABILITIES</b>					
ACCOUNTS PAYABLE					
ACCOUNTS PAYABLE	499,050	179,727	319,322	704,131	-205,081
A/P OTHER	-3,198	-3,198	0	-3,198	0
ACCRUED FEES	1,090,487	1,009,946	80,542	664,372	426,115
ACCR WAGES & WITHHOLDINGS					
ACCR WAGES & WITHHOLDINGS	335,264	12,906	322,357	217,386	117,877
TOTAL ACCRUED INTEREST	4,701,225	4,701,225	0	4,701,225	0
TENANT SECURITY DEPOSIT	709,589	664,710	44,879	789,108	-79,519
UNEARNED REVENUE	3,685,504	3,957,964	-272,461	4,759,629	-1,074,125
CURRENT PORTION OF DEBT	50,727	50,918	-191	0	50,727
OTHER CURRENT LIABILITIES	-147,322	-147,322	0	-147,322	0
INTER-PROGRAM PAYABLES	50,000	50,000	0	50,000	0
INTER-FUND DUE TO	1,329,526	1,346,579	-17,053	1,417,841	-88,316
<b>TOTAL CURRENT LIABILITIES</b>	<b>12,300,850</b>	<b>11,823,454</b>	<b>477,396</b>	<b>13,154,743</b>	<b>-853,893</b>
LONG TERM DEBT	11,772,791	11,819,884	-47,093	11,870,802	-98,011
LT LIABILITIES - OTHER	0	0	0	0	0
FSS ESCROW	592,823	596,463	-3,640	574,211	18,613
TOTAL LT ACRUED FEES	913,264	913,264	0	913,264	0
COMP ABSENCES-LONG TERM	612,087	719,815	-107,728	719,815	-107,728
LT INTER-FUND DUE TO	2,390,435	2,390,435	0	2,390,435	0
<b>TOTAL NON-CURRENT LIABILITIES</b>	<b>16,281,400</b>	<b>16,439,861</b>	<b>-158,461</b>	<b>16,468,526</b>	<b>-187,126</b>
<b>TOTAL LIABILITIES</b>	<b>28,582,250</b>	<b>28,263,316</b>	<b>318,934</b>	<b>29,623,269</b>	<b>-1,041,019</b>
<b>EQUITY</b>					
NET INVEST IN CAPITAL ASSETS	27,758,697	27,758,697	0	27,758,697	0
RESTRICTED NET ASSETS	-5,591,846	-5,591,846	0	-5,591,846	0
RETAINED EARNINGS	11,516,692	12,515,947	-999,255	14,857,790	-3,341,097
UNRESTRICTED NET POSITION	7,898,802	7,898,802	0	7,898,802	0
RE - EQUITY TRANSFERS	1,499,600	1,499,600	0	1,499,600	0
<b>TOTAL EQUITY</b>	<b>43,081,945</b>	<b>44,081,200</b>	<b>-999,255</b>	<b>46,423,043</b>	<b>-3,341,097</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>71,664,195</b>	<b>72,344,515</b>	<b>-680,320</b>	<b>76,046,312</b>	<b>-4,382,117</b>
<b>TOTAL OF ALL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

New Agency Structure after FMR (7agency2)

## Balance Sheet -With YTD

Period = Dec 2024

Book = Accrual ; Tree = ysi\_bs

	December 31, 2024	December 1, 2024	Net Change	January 1, 2024	YTD Net Change
<b>ASSETS</b>					
CASH - OPERATING	4,929,858	5,269,104	-339,246	6,572,820	-1,642,962
CASH - PAYROLL	91,117	95,297	-4,180	496,196	-405,079
CASH - OTHER	44,563	44,530	33	48,168	-3,605
PETTY CASH	560	560	0	560	0
LEGAL FILINGS FUND	0	54	-54	0	0
CASH - VENDOR PAYMENTS	-372,979	-411,821	38,841	-126,669	-246,311
CASH - RESTRICTED	3,656,098	3,887,231	-231,133	3,869,166	-213,068
CASH - RESTRICTED MODERNIZATION AND DEV	38,716	38,682	34	38,205	510
REPLACEMENT RESERVE	71,543	71,399	144	69,673	1,870
CASH - FSS ESCROW	623,733	625,105	-1,372	574,458	49,275
CASH - FSS FORFEITURES	54,538	54,538	0	21,209	33,328
OPERATING RESERVE	274,954	274,427	527	268,157	6,797
OHA HUD OPERATING RESERVE	305,908	299,758	6,150	299,758	6,150
CASH - SECURITY DEPOSIT	669,896	668,641	1,255	616,269	53,626
HOMEOWNERSHIP FUNDS	370,336	369,948	388	365,150	5,185
<b>CASH AND CASH EQUIVALENTS</b>	<b>10,758,839</b>	<b>11,287,452</b>	<b>-528,613</b>	<b>13,113,122</b>	<b>-2,354,282</b>
A/R HUD	-152,344	-60,145	-92,199	-151,641	-703
A/R OTHER GOVERNMENTS	697,751	518,716	179,034	888,060	-190,309
A/R OTHER	1,800	1,800	0	1,800	0
A/R NON DWELLING RENT	25,532	16,034	9,499	12,527	13,005
A/R HOMEOWNERSHIP MORTGAGES	592,700	592,700	0	592,700	0
ALLOWANCE FOR HOME MORTGAGES	-592,700	-592,700	0	-592,700	0
ALLOWANCE FOR DOUBTFUL OTHER A/R	-653,262	-653,262	0	-653,262	0
<b>OTHER ACCOUNTS RECEIVABLE</b>	<b>-80,523</b>	<b>-176,857</b>	<b>96,334</b>	<b>97,484</b>	<b>-178,007</b>
INTER-PROPERTY {COCC}	50,000	50,000	0	50,000	0
INTER-PROPERTY {9EC}	223,090	209,176	13,915	126,499	96,591
INTER-PROPERTY {9KCC}	101,241	96,997	4,244	68,159	33,083
INTER-PROPERTY {9NOAH}	63,183	60,414	2,769	41,509	21,674
INTER-PROPERTY {9FAR}	125,867	120,089	5,778	83,367	42,500
INTER-PROPERTY {9BV}	32,735	31,144	1,591	20,840	11,894
INTER-PROPERTY {9CR1}	48,194	46,348	1,846	33,738	14,456
INTER-PROPERTY {9CR2}	31,612	30,228	1,384	20,775	10,837
INTER-PROPERTY {VILLAS}	56,050	52,664	3,387	31,049	25,001
INTER-PROPERTY {HCV}	526,290	526,290	0	838,690	-312,400
INTER-PROPERTY {HCV ADM}	-436,045	-436,045	0	-831,320	395,275
INTER-PROPERTY {MOD REHAB}	1,774	1,774	0	1,774	0
INTER-PROPERTY {PUB HSG}	306,961	261,333	45,628	219,758	87,203
<b>A/R INTER-PROPERTY</b>	<b>1,130,953</b>	<b>1,050,411</b>	<b>80,542</b>	<b>704,837</b>	<b>426,115</b>
ACCOUNTS RECEIVABLE TENANTS	904,221	902,366	1,855	653,030	251,191
ALLOWANCE FOR A/R TENANTS	-62,909	-62,909	0	-62,909	0
<b>A/R - TENANT</b>	<b>841,312</b>	<b>839,457</b>	<b>1,855</b>	<b>590,121</b>	<b>251,191</b>
P-NOTES OUTSTANDING	571,160	569,913	1,247	574,741	-3,581
ALLOWANCE FOR P-NOTES	-64,229	-64,229	0	-64,229	0
A/R BAYVIEW	387,861	387,861	0	387,861	0
A/R FARNAM	1,375,882	1,375,882	0	1,375,882	0
A/R STREHLOW	812,448	812,448	0	812,448	0
A/R NOAH	49,301	49,301	0	49,301	0
<b>A/R PROMISSORY NOTES</b>	<b>3,132,423</b>	<b>3,131,176</b>	<b>1,247</b>	<b>3,136,004</b>	<b>-3,581</b>
ACCRUED INTEREST RECEIVABLE	5,146,148	5,146,148	0	5,146,148	0
<b>ACCRUED INTEREST RECEIVABLE</b>	<b>5,146,148</b>	<b>5,146,148</b>	<b>0</b>	<b>5,146,148</b>	<b>0</b>
PREPAID INSURANCE	25,815	303,188	-277,373	142,025	-116,211
PREPAID SOFTWARE EXP	167,313	396,438	-229,125	152,744	14,569
PREPAID MED FSA SEC 125	6,239	288	5,951	1,160	5,079
PREPAID CREDIT CARDS	1,218	48,391	-47,174	118	1,100
PREPAID OTHER	137,583	145,655	-8,072	30,851	106,732
<b>PREPAID ASSETS</b>	<b>338,168</b>	<b>893,960</b>	<b>-555,792</b>	<b>326,898</b>	<b>11,269</b>
INTERFUND BALANCE	-1,700	-1,700	0	-1,700	0
INTER-FUND DUE FROM {COCC}	451,048	443,094	7,954	436,574	14,474
INTER-FUND DUE FROM {HIOOPER}	-201,683	-201,683	0	-201,648	-35
INTER-FUND DUE FROM {9EC}	222,633	219,194	3,439	160,591	62,042
INTER-FUND DUE FROM {9KCC}	57,515	55,660	1,855	25,683	31,832
INTER-FUND DUE FROM {9NOAH}	117,991	120,707	-2,716	42,452	75,539
INTER-FUND DUE FROM {9SEC}	20,382	20,382	0	22,106	-1,725
INTER-FUND DUE FROM {9FAR}	23,938	14,376	9,561	16,456	7,481
INTER-FUND DUE FROM {9BV}	5,541	8,220	-2,678	16,101	-10,560
INTER-FUND DUE FROM {9CR1}	11,230	12,475	-1,245	15,375	-4,145

INTER-FUND DUE FROM {9CR2}	10,630	10,142	488	11,038	-408
INTER-FUND DUE FROM {VILLAS}	9,891	5,192	4,699	22,213	-12,322
INTER-FUND DUE FROM {HCV ADM}	-150,325	-154,513	4,188	-375,820	225,495
INTER-FUND DUE FROM {HCV MV}	-14,564	-14,455	-109	-15,295	732
INTER-FUND DUE FROM {HCV CITY}	37,650	37,650	0	239,963	-202,313
INTER-FUND DUE FROM {MOD REHAB}	5,345	4,744	602	44,668	-39,323
INTER-FUND DUE FROM {FOUND}	169,603	109,706	59,898	109,222	60,382
INTER-FUND DUE FROM {PUB HSG}	281,930	309,232	-27,303	833,579	-551,650
INTER-FUND DUE FROM {ROSS GRANT}	-78,386	-50,224	-28,161	100,710	-179,096
INTER-FUND DUE FROM {FSS GRANT}	-77,441	-114,536	37,095	-18,788	-58,653
INTER-FUND DUE FROM {CNI GRANT}	562,504	562,427	77	562,427	77
INTER-FUND DUE FROM {CNP GRANT}	15,794	15,794	0	15,794	0
INTER-FUND DUE FROM {EHV}	1,006,055	996,716	9,339	448,747	557,308
INTER-FUND DUE FROM {6SCDEV18}	113	0	113	0	113
<b>INTER-FUND DUE FROM</b>	<b>2,485,695</b>	<b>2,408,600</b>	<b>77,095</b>	<b>2,510,450</b>	<b>-24,755</b>
<b>TOTAL CURRENT ASSETS</b>	<b>23,753,014</b>	<b>24,580,347</b>	<b>-827,333</b>	<b>25,625,064</b>	<b>-1,872,050</b>
LAND	8,299,143	8,299,143	0	8,299,143	0
BUILDINGS	158,131,147	158,131,147	0	158,131,147	0
BUILDINGS - COMMERCIAL	400,000	400,000	0	400,000	0
BUILDINGS - ACQUISITION	457,700	457,700	0	457,700	0
BUILDINGS - INELIGIBLE	88,112	88,112	0	88,112	0
BUILDING IMPROVEMENTS	43,792,415	43,749,573	42,842	42,351,958	1,440,456
CONTRACT WORK IN PROCESS	161,894	117,675	44,219	56,804	105,090
WIP - PREDEVELOPMENT	1,272,432	1,044,700	227,732	480,876	791,556
WIP - INS PROCEEDS/REPAIRS	735,508	695,629	39,879	537,614	197,893
DWELLING EQUIPMENT	3,673,740	3,615,721	58,018	2,957,028	716,711
SITE IMPROVEMENTS	5,129,677	4,962,653	167,024	4,892,718	236,959
OFFICE EQUIPMENT	238,588	238,588	0	238,588	0
MAINTENANCE EQUIPMENT	365,170	365,170	0	298,320	66,850
COMMUNITY SPACE EQUIPMENT	75,004	75,004	0	75,004	0
COMPUTER EQUIPMENT	527,559	527,559	0	527,559	0
AUTOMOTIVE EQUIPMENT	2,587,934	2,608,074	-20,140	2,418,518	169,416
SECURITY EQUIPMENT	1,183,024	1,183,024	0	1,183,024	0
ACCUM DEPR - BUILDINGS	-151,274,253	-151,198,021	-76,232	-150,359,463	-914,789
ACCUM DEPR - COMMERCIAL	-374,825	-374,522	-303	-371,189	-3,636
ACCUM DEPR - BUILDING ACQUISITION	-450,000	-450,000	0	-450,000	0
ACCUM DEPR - INELIGIBLE BLDG	-80,407	-80,140	-267	-77,203	-3,204
ACCUM DEPR - BUILDING IMPROVEMENTS	-33,075,759	-32,965,336	-110,423	-31,778,814	-1,296,945
ACCUM DEPR - DWELLING EQUIPMENT	-1,898,506	-1,874,841	-23,665	-1,678,448	-220,058
ACCUM DEPR - SITE IMPROVE	-3,399,085	-3,376,287	-22,798	-3,141,710	-257,376
ACCUM DEPR - OFFICE EQUIPMENT	-234,099	-233,809	-290	-228,903	-5,196
ACCUM DEPR - MAINTENANCE EQUIPMENT	-289,969	-289,327	-642	-281,385	-8,584
ACCUM DEPR - COMMUNITY SPACE EQUIPMENT	-75,004	-75,004	0	-75,004	0
ACCUM DEPR - COMPUTER EQUIPMENT	-527,035	-527,000	-35	-524,456	-2,578
ACCUM DEPR - AUTOMOTIVE EQUIPMENT	-2,242,552	-2,250,926	8,373	-2,045,225	-197,327
ACCUM DEPR - SECURITY EQUIPMENT	-540,314	-530,520	-9,795	-422,768	-117,547
<b>FIXED ASSETS</b>	<b>32,657,237</b>	<b>32,333,739</b>	<b>323,498</b>	<b>31,959,545</b>	<b>697,692</b>
N/R BAYVIEW	208,156	208,156	0	208,156	0
N/R FARNAM	553,079	553,079	0	553,079	0
N/R CROWN I	241,542	241,542	0	241,542	0
N/R CROWN II	161,563	161,563	0	161,563	0
N/R NOAH	893,253	893,253	0	893,253	0
N/R STREHLOW	2,907,673	2,907,673	0	2,907,673	0
N/R KEYSTONE	2,350,000	2,350,000	0	2,350,000	0
<b>NOTES RECEIVABLE</b>	<b>7,315,266</b>	<b>7,315,266</b>	<b>0</b>	<b>7,315,266</b>	<b>0</b>
LT INTER-FUND DUE FROM {HIOOPER}	124,751	124,751	0	124,751	0
LT INTER-FUND DUE FROM {9EC}	826,853	826,853	0	826,853	0
LT INTER-FUND DUE FROM {9KCC}	248,036	248,036	0	248,036	0
LT INTER-FUND DUE FROM {9NOAH}	66,840	66,840	0	66,840	0
LT INTER-FUND DUE FROM {9FAR}	462,869	462,869	0	462,869	0
LT INTER-FUND DUE FROM {9BV}	241,026	241,026	0	241,026	0
LT INTER-FUND DUE FROM {9CR1}	83,438	83,438	0	83,438	0
LT INTER-FUND DUE FROM {9CR2}	121,904	121,904	0	121,904	0
LT INTER-FUND DUE FROM {VILLAS}	214,719	214,719	0	214,719	0
<b>LT INTER-FUND DUE FROM</b>	<b>2,390,435</b>	<b>2,390,435</b>	<b>0</b>	<b>2,390,435</b>	<b>0</b>
A/R P-NOTES - LONG TERM	-665,630	-665,630	0	-665,630	0
<b>A/R P-NOTES - LONG TERM</b>	<b>-665,630</b>	<b>-665,630</b>	<b>0</b>	<b>-665,630</b>	<b>0</b>
TAX CREDIT FEES	71,655	71,655	0	71,655	0
<b>TAX CREDIT FEES</b>	<b>71,655</b>	<b>71,655</b>	<b>0</b>	<b>71,655</b>	<b>0</b>
PREPAID LEASE COSTS	4,640,570	4,640,570	0	4,640,570	0
<b>PREPAID LEASE COSTS</b>	<b>4,640,570</b>	<b>4,640,570</b>	<b>0</b>	<b>4,640,570</b>	<b>0</b>
LEASES RECEIVABLE	2,708,702	2,885,186	-176,485	5,916,460	-3,207,759
<b>LEASES RECEIVABLE</b>	<b>2,708,702</b>	<b>2,885,186</b>	<b>-176,485</b>	<b>5,916,460</b>	<b>-3,207,759</b>

ACCUMULATED AMORTIZATION	-4,416,383	-4,416,383	0	-4,416,383	0
<b>ACCUMULATED AMORTIZATION</b>	<b>-4,416,383</b>	<b>-4,416,383</b>	<b>0</b>	<b>-4,416,383</b>	<b>0</b>
LT INTER-PROPERTY {9EC}	381,436	381,436	0	381,436	0
LT INTER-PROPERTY {9NOAH}	1	1	0	1	0
LT INTER-PROPERTY {9FAR}	157,612	157,612	0	157,612	0
LT INTER-PROPERTY {9BV}	21,169	21,169	0	21,169	0
LT INTER-PROPERTY {9CR1}	103,467	103,467	0	103,467	0
LT INTER-PROPERTY {9CR2}	22,326	22,326	0	22,326	0
LT INTER-PROPERTY {VILLAS}	227,254	227,254	0	227,254	0
<b>LT INTER-PROPERTY</b>	<b>913,265</b>	<b>913,265</b>	<b>0</b>	<b>913,265</b>	<b>0</b>
INVESTMENT IN JOINT VENTURES	2,296,065	2,296,065	0	2,296,065	0
<b>INVESTMENT IN JOINT VENTURES</b>	<b>2,296,065</b>	<b>2,296,065</b>	<b>0</b>	<b>2,296,065</b>	<b>0</b>
<b>TOTAL NON-CURRENT ASSETS</b>	<b>47,911,181</b>	<b>47,764,168</b>	<b>147,013</b>	<b>50,421,248</b>	<b>-2,510,067</b>
<b>TOTAL ASSETS</b>	<b>71,664,195</b>	<b>72,344,515</b>	<b>-680,320</b>	<b>76,046,312</b>	<b>-4,382,117</b>
<b>LIABILITIES AND EQUITY</b>					
<b>LIABILITIES</b>					
<b>ACCOUNTS PAYABLE</b>					
ACCOUNTS PAYABLE	499,050	179,727	319,322	704,131	-205,081
<b>ACCOUNTS PAYABLE</b>	<b>499,050</b>	<b>179,727</b>	<b>319,322</b>	<b>704,131</b>	<b>-205,081</b>
A/P OTHER	-3,198	-3,198	0	-3,198	0
<b>A/P OTHER</b>	<b>-3,198</b>	<b>-3,198</b>	<b>0</b>	<b>-3,198</b>	<b>0</b>
ACCRUED MGMT & BKKPPI FEE	146,296	146,296	0	63,421	82,875
ACCRUED FRONT-LINE FEES	944,191	863,650	80,542	600,951	343,240
<b>ACCRUED FEES</b>	<b>1,090,487</b>	<b>1,009,946</b>	<b>80,542</b>	<b>664,372</b>	<b>426,115</b>
<b>ACCR WAGES &amp; WITHHOLDINGS</b>					
COURT ORDERED WITHHOLDING	5	5	0	5	0
STATE WITHHOLDING	0	-15	15	-15	15
OTHER WITHHOLDING	0	2,509	-2,509	1,985	-1,985
DEFERRED COMPENSATION WITHHOLDING	-3,097	0	-3,097	0	-3,097
ACCRUED PAYROLL	301,732	1,515	300,217	187,718	114,015
ACCRUED PAYROLL TAXES	27,549	0	27,549	13,149	14,400
EE INS DEDUCTIONS	9,075	8,893	182	14,545	-5,471
<b>ACCR WAGES &amp; WITHHOLDINGS</b>	<b>335,264</b>	<b>12,906</b>	<b>322,357</b>	<b>217,386</b>	<b>117,877</b>
ACCRUED INTEREST BRIDGE	798,130	798,130	0	798,130	0
ACCRUED INTEREST HIO	3,212,995	3,212,995	0	3,212,995	0
ACCRUED INTEREST OTHER	690,100	690,100	0	690,100	0
<b>TOTAL ACCRUED INTEREST</b>	<b>4,701,225</b>	<b>4,701,225</b>	<b>0</b>	<b>4,701,225</b>	<b>0</b>
TENANT SECURITY DEPOSIT	663,166	618,297	44,869	615,954	47,211
PET DEPOSIT	6,730	6,730	0	7,614	-884
DEPOSIT REFUND ACCOUNT	39,693	39,683	10	165,539	-125,846
<b>TENANT SECURITY DEPOSIT</b>	<b>709,589</b>	<b>664,710</b>	<b>44,879</b>	<b>789,108</b>	<b>-79,519</b>
DEFERRED REVENUE	2,020,887	1,826,005	194,882	4,067,162	-2,046,275
Deferred Revenue - HUD Funds	1,330,437	1,809,900	-479,463	379,969	950,468
TENANT PREPAID RENT	324,856	312,686	12,170	304,199	20,657
NO UNIT HOLDING ACCT	9,324	9,374	-50	8,299	1,025
<b>UNEARNED REVENUE</b>	<b>3,685,504</b>	<b>3,957,964</b>	<b>-272,461</b>	<b>4,759,629</b>	<b>-1,074,125</b>
MORTGAGE PAYABLE - CURRENT	50,727	50,918	-191	0	50,727
<b>CURRENT PORTION OF DEBT</b>	<b>50,727</b>	<b>50,918</b>	<b>-191</b>	<b>0</b>	<b>50,727</b>
<b>CURRENT PORTION OF LT DEBT</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,572</b>	<b>-1,572</b>
OTHER CURRENT LIABILITIES	-213,641	-213,641	0	-213,641	0
CONTRACT RETAINAGE	66,319	66,319	0	66,319	0
<b>OTHER CURRENT LIABILITIES</b>	<b>-147,322</b>	<b>-147,322</b>	<b>0</b>	<b>-147,322</b>	<b>0</b>
A/P OTHER - INTER-PROPERTY	50,000	50,000	0	50,000	0
<b>INTER-PROGRAM PAYABLES</b>	<b>50,000</b>	<b>50,000</b>	<b>0</b>	<b>50,000</b>	<b>0</b>
INTER-FUND DUE TO {COCC}	482,498	476,587	5,911	1,130,802	-648,304
INTER-FUND DUE TO {9EC}	30,583	30,583	0	25,923	4,659
INTER-FUND DUE TO {9KCC}	19,877	19,877	0	39,501	-19,624
INTER-FUND DUE TO {9NOAH}	4,675	4,675	0	4,707	-32
INTER-FUND DUE TO {9SEC}	173,462	173,462	0	173,538	-76
INTER-FUND DUE TO {9FAR}	11,651	11,651	0	17,530	-5,879
INTER-FUND DUE TO {9BV}	10,214	10,214	0	10,547	-334
INTER-FUND DUE TO {9CR1}	4,390	4,390	0	-14,901	19,291
INTER-FUND DUE TO {9CR2}	2,903	2,903	0	2,955	-52
INTER-FUND DUE TO {VILLAS}	-49,174	-49,174	0	-171,079	121,904
INTER-FUND DUE TO {HCV ADM}	610,815	603,068	7,747	74,780	536,035
INTER-FUND DUE TO {PUB HSG}	8,667	39,379	-30,712	86,569	-77,902
INTER-FUND DUE TO {ROSS GRANT}	6,426	6,426	0	33,721	-27,296
INTER-FUND DUE TO {FSS GRANT}	11,626	11,626	0	1,825	9,801
INTER-FUND DUE TO {EHV}	914	914	0	1,422	-508
<b>INTER-FUND DUE TO</b>	<b>1,329,526</b>	<b>1,346,579</b>	<b>-17,053</b>	<b>1,417,841</b>	<b>-88,316</b>
<b>TOTAL CURRENT LIABILITIES</b>	<b>12,300,850</b>	<b>11,823,454</b>	<b>477,396</b>	<b>13,154,743</b>	<b>-853,893</b>

MORTGAGE PAYABLE	1,439,053	1,486,146	-47,093	1,537,064	-98,011
LOAN PAYABLE CDBG	502,000	502,000	0	502,000	0
LOAN PAYABLE OHA	4,924,142	4,924,142	0	4,924,142	0
ACCRUED INTEREST LONG TERM	4,000	4,000	0	4,000	0
ACCR INT L-T CDBG LOAN	64,373	64,373	0	64,373	0
EC, NOAH, Bayview, Farnam Loans	2,625,492	2,625,492	0	2,625,492	0
MORTGAGE-HIO	1,349,569	1,349,569	0	1,349,569	0
MORTGAGE-OHA # 2	539,949	539,949	0	539,949	0
LONG TERM LIABILITIES - OPERATING	324,213	324,213	0	324,213	0
<b>LONG TERM DEBT</b>	<b>11,772,791</b>	<b>11,819,884</b>	<b>-47,093</b>	<b>11,870,802</b>	<b>-98,011</b>
NONCURRENT LIABILITIES - OTHER	0	0	0	0	0
<b>LT LIABILITIES - OTHER</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
FSS ESCROW	592,823	596,463	-3,640	574,211	18,613
<b>FSS ESCROW</b>	<b>592,823</b>	<b>596,463</b>	<b>-3,640</b>	<b>574,211</b>	<b>18,613</b>
LT ACCRUED MGMT & BKKPING FEE	792,272	792,272	0	792,272	0
LT ACCRUED FRONT-LINE FEES	100,534	100,534	0	100,534	0
LT ACCRUED FEES	20,458	20,458	0	20,458	0
<b>TOTAL LT ACRUED FEES</b>	<b>913,264</b>	<b>913,264</b>	<b>0</b>	<b>913,264</b>	<b>0</b>
COMPENSATED ABSENCES-LONG TERM	612,087	719,815	-107,728	719,815	-107,728
<b>COMP ABSENCES-LONG TERM</b>	<b>612,087</b>	<b>719,815</b>	<b>-107,728</b>	<b>719,815</b>	<b>-107,728</b>
LT INTER-FUND DUE TO {COCC}	643,500	643,500	0	643,500	0
LT INTER-FUND DUE TO {HIOOPER}	420,241	420,241	0	420,241	0
LT INTER-FUND DUE TO {9EC}	17,565	17,565	0	17,565	0
LT INTER-FUND DUE TO {9KCC}	228,907	228,907	0	228,907	0
LT INTER-FUND DUE TO {9NOAH}	176,615	176,615	0	176,615	0
LT INTER-FUND DUE TO {9FAR}	37,389	37,389	0	37,389	0
LT INTER-FUND DUE TO {9BV}	100,215	100,215	0	100,215	0
LT INTER-FUND DUE TO {9CR1}	257,391	257,391	0	257,391	0
LT INTER-FUND DUE TO {9CR2}	92,233	92,233	0	92,233	0
LT INTER-FUND DUE TO {VILLAS}	416,378	416,378	0	416,378	0
<b>LT INTER-FUND DUE TO</b>	<b>2,390,435</b>	<b>2,390,435</b>	<b>0</b>	<b>2,390,435</b>	<b>0</b>
<b>TOTAL NON-CURRENT LIABILITIES</b>	<b>16,281,400</b>	<b>16,439,861</b>	<b>-158,461</b>	<b>16,468,526</b>	<b>-187,126</b>
<b>TOTAL LIABILITIES</b>	<b>28,582,250</b>	<b>28,263,316</b>	<b>318,934</b>	<b>29,623,269</b>	<b>-1,041,019</b>
<b>EQUITY</b>					
CAPITAL ACCOUNT GENERAL PARTNER	1,600,653	1,600,653	0	1,600,653	0
CAPITAL ACCOUNT LIMITED PARTNER	1,808,269	1,808,269	0	1,808,269	0
CAPITAL ACCOUNT SPECIAL LIMITED PARTNER	30	30	0	30	0
NET INVESTED IN CAPITAL ASSETS	24,349,745	24,349,745	0	24,349,745	0
<b>NET INVEST IN CAPITAL ASSETS</b>	<b>27,758,697</b>	<b>27,758,697</b>	<b>0</b>	<b>27,758,697</b>	<b>0</b>
RESTRICTED NET ASSETS	-5,591,846	-5,591,846	0	-5,591,846	0
<b>RESTRICTED NET ASSETS</b>	<b>-5,591,846</b>	<b>-5,591,846</b>	<b>0</b>	<b>-5,591,846</b>	<b>0</b>
RETAINED EARNINGS	11,516,692	12,515,947	-999,255	14,857,790	-3,341,097
<b>RETAINED EARNINGS</b>	<b>11,516,692</b>	<b>12,515,947</b>	<b>-999,255</b>	<b>14,857,790</b>	<b>-3,341,097</b>
CONTRA EQUITY	6,821,512	6,821,512	0	6,821,512	0
UNRESTRICTED NET ASSETS	14,720,314	14,720,314	0	14,720,314	0
<b>UNRESTRICTED NET POSITION</b>	<b>7,898,802</b>	<b>7,898,802</b>	<b>0</b>	<b>7,898,802</b>	<b>0</b>
RE - EQUITY TRANSFERS	1,499,600	1,499,600	0	1,499,600	0
<b>RE - EQUITY TRANSFERS</b>	<b>1,499,600</b>	<b>1,499,600</b>	<b>0</b>	<b>1,499,600</b>	<b>0</b>
<b>TOTAL EQUITY</b>	<b>43,081,945</b>	<b>44,081,200</b>	<b>-999,255</b>	<b>46,423,043</b>	<b>-3,341,097</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>71,664,195</b>	<b>72,344,515</b>	<b>-680,320</b>	<b>76,046,312</b>	<b>-4,382,117</b>
<b>TOTAL OF ALL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

New Agency Structure after FMR (7agency2)

**Budget Comparison**

Period = Dec 2024

Book = Accrual ; Tree = ysi\_is

	December 2024			December 2023		YTD Final	YTD	YTD	YTD	YTD
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
REVENUES	7,382,169	6,692,565	689,604	7,922,515	-540,346	81,817,668	79,649,871	2,167,797	78,440,335	3,377,333
EXPENSES	8,109,990	6,685,920	-1,424,071	7,276,903	-833,087	84,302,538	80,209,652	-4,092,886	78,719,277	-5,583,261
TRANSFERS	0	51,829	51,829	0	0	0	211,009	211,009	0	0
PRIOR PERIOD ADJUSTMENT	306,557	0	-306,557	-1,851,401	-2,157,957	891,225	0	-891,225	-1,854,217	-2,745,441
NET OPERATING INCOME (LOSS)	-1,034,378	6,645	-1,041,024	2,497,012	-3,531,390	-3,376,095	-559,781	-3,935,876	1,575,275	4,951,370
ADJUSTED NET OPERATING INCOME (LOSS)	-778,161	244,216	-1,022,377	2,811,394	-3,589,555	-328,714	2,290,960	-2,619,673	4,707,556	-5,036,270

New Agency Structure after FMR (7agency2)

### Budget Comparison

Period = Dec 2024

Book = Accrual ; Tree = ysi\_is

	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
<b>REVENUES</b>										
<b>TENANT REVENUES</b>										
DWELLING RENTS	661,257	618,994	42,264	653,664	7,593	7,612,659	7,427,894	184,765	7,780,422	-167,764
DWELLING RENTS SUBSIDY	35,984	30,228	5,756	30,323	5,661	428,564	362,770	65,794	465,150	-36,585
TPA - DAMAGE	0	0	0	0	0	-50	0	-50	0	-50
LATE FEES	19,275	11,664	7,610	12,070	7,205	204,401	140,024	64,377	145,441	58,960
LATE FEES {P-NOTES}	0	0	0	0	0	550	0	550	-100	650
LEGAL FEES	6,173	22,562	-16,389	700	5,473	63,368	270,745	-207,377	231,278	-167,910
MAINTENANCE FEES	10,826	23,395	-12,570	14,339	-3,514	223,860	280,546	-56,686	322,336	-98,476
OTHER TENANT REVENUE	25,089	5,259	19,830	2,334	22,755	81,615	63,134	18,481	80,197	1,418
BAD DEBT RECOVERY	0	0	0	0	0	0	0	0	177	-177
FRAUD RECOVERY REVENUE	325	300	25	2,504	-2,179	2,031	3,600	-1,569	27,363	-25,332
<b>TOTAL TENANT REVENUES</b>	<b>758,929</b>	<b>712,403</b>	<b>46,526</b>	<b>715,934</b>	<b>42,995</b>	<b>8,616,997</b>	<b>8,548,713</b>	<b>68,284</b>	<b>9,052,264</b>	<b>-435,267</b>
<b>HUD GRANTS AND SUBSIDY</b>										
REVENUES-HUD SUBSIDY	667,408	786,728	-119,320	734,669	-67,261	9,159,154	9,440,733	-281,579	8,859,903	299,251
HOUSING ASST PAYMENTS	3,752,352	3,463,703	288,649	3,878,514	-126,162	44,264,806	41,564,322	2,700,484	39,867,352	4,397,454
ONGOING ADMIN FEES EARNED	246,384	345,866	-99,482	404,134	-157,750	3,645,556	4,150,282	-504,726	3,855,589	-210,033
REVENUES - HUD CAPITAL - HARD COSTS	305,366	132,594	172,772	214,744	90,622	2,691,907	1,591,122	1,100,785	2,036,267	655,640
REVENUES - HUD CAPITAL - SOFT COSTS	502,326	562,698	-60,372	778,989	-276,664	4,592,769	6,752,376	-2,159,607	5,729,025	-1,136,256
<b>TOTAL HUD GRANTS AND SUBSIDY</b>	<b>5,473,836</b>	<b>5,291,588</b>	<b>182,248</b>	<b>6,011,050</b>	<b>-537,214</b>	<b>64,354,192</b>	<b>63,498,835</b>	<b>855,357</b>	<b>60,348,136</b>	<b>4,006,056</b>
<b>TOTAL FEE REVENUE</b>										
MANAGEMENT FEE	177,153	150,433	26,720	182,937	-5,784	2,180,365	1,805,133	375,232	1,961,745	218,620
BOOKKEEPING FEE	50,348	96,404	-46,056	48,840	1,508	605,175	1,156,781	-551,606	569,580	35,595
FRONT LINE SERVICE FEE	342,698	228,900	113,798	227,470	115,228	2,636,916	2,746,800	-109,884	2,783,512	-146,597
FRONT LINE SERVICE FEE {IT}	7,885	7,364	521	12,483	-4,598	105,423	88,368	17,055	113,227	-7,803
OTHER FEES FOR SERVICE	573	0	573	5,400	-4,827	20,319	0	20,319	5,400	14,919
<b>TOTAL FEE REVENUE</b>	<b>578,657</b>	<b>483,101</b>	<b>95,556</b>	<b>477,130</b>	<b>101,527</b>	<b>5,548,198</b>	<b>5,797,082</b>	<b>-248,884</b>	<b>5,433,464</b>	<b>114,734</b>
OTHER GOV'T GRANTS/DONATIONS	417,038	140,595	276,442	327,415	89,623	1,803,583	1,026,821	776,762	1,748,289	55,295

New Agency Structure after FMR (7agency2)

### Budget Comparison

Period = Dec 2024

Book = Accrual ; Tree = ysi\_is

	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
<b>TOTAL OTHER GOV'T GRANTS DONATIONS</b>	<b>417,038</b>	<b>140,595</b>	<b>276,442</b>	<b>327,415</b>	<b>89,623</b>	<b>1,803,583</b>	<b>1,026,821</b>	<b>776,762</b>	<b>1,748,289</b>	<b>55,295</b>
<b>INVESTMENT INCOME</b>										
INTEREST INCOME - MAIN	110,235	2,925	107,310	116,447	-6,211	142,373	35,100	107,273	147,210	-4,837
<b>TOTAL INTEREST INCOME - MAIN</b>	<b>110,235</b>	<b>2,925</b>	<b>107,310</b>	<b>116,447</b>	<b>-6,211</b>	<b>142,373</b>	<b>35,100</b>	<b>107,273</b>	<b>147,210</b>	<b>-4,837</b>
INTEREST INCOME - OTHER	0	828	-828	55,475	-55,475	108,043	9,980	98,063	157,228	-49,185
<b>TOTAL NON-CASH INT INCOME {HIO}</b>	<b>0</b>	<b>828</b>	<b>-828</b>	<b>55,475</b>	<b>-55,475</b>	<b>108,043</b>	<b>9,980</b>	<b>98,063</b>	<b>157,228</b>	<b>-49,185</b>
INTEREST INCOME - RESTRICTED FUNDS	4,750	91	4,659	2,392	2,357	18,020	1,081	16,939	14,213	3,807
<b>INT INCOME - RESTRICT FUNDS</b>	<b>4,750</b>	<b>91</b>	<b>4,659</b>	<b>2,392</b>	<b>2,357</b>	<b>18,020</b>	<b>1,081</b>	<b>16,939</b>	<b>14,213</b>	<b>3,807</b>
<b>OTHER INCOME</b>										
NON-DWELLING RENTS	-61,994	37,570	-99,564	194,912	-256,906	128,448	450,799	-322,351	576,107	-447,660
MISCELLANEOUS INCOME	50	110	-60	13,389	-13,339	1,513	1,320	193	66,500	-64,987
COMMISSION INCOME	7,276	6,647	629	5,763	1,513	78,249	79,660	-1,411	81,045	-2,796
ADMINISTRATIVE FEES	1,562	40	1,522	-6,870	8,432	20,566	480	20,086	20,363	203
DONATIONS - GENERAL	5,026	0	5,026	5,002	24	5,634	0	5,634	32,695	-27,062
MISCELLANEOUS GRANT REVENUE	8,600	0	8,600	0	8,600	76,000	0	76,000	0	76,000
DEVELOPERS FEES	0	16,667	-16,667	0	0	544,932	200,000	344,932	98,539	446,393
GAIN/LOSS ON SALE OF FIXED ASSET	617	0	617	4,475	-3,858	73,882	0	73,882	488,881	-414,999
INSURANCE PROCEEDS	77,588	0	77,588	0	77,588	297,039	0	297,039	175,403	121,636
<b>TOTAL OTHER INCOME</b>	<b>38,725</b>	<b>61,034</b>	<b>-22,309</b>	<b>216,671</b>	<b>-177,947</b>	<b>1,226,262</b>	<b>732,259</b>	<b>494,003</b>	<b>1,539,533</b>	<b>-313,271</b>
<b>TOTAL REVENUES</b>	<b>7,382,169</b>	<b>6,692,565</b>	<b>689,604</b>	<b>7,922,515</b>	<b>-540,346</b>	<b>81,817,668</b>	<b>79,649,871</b>	<b>2,167,797</b>	<b>78,440,335</b>	<b>3,377,333</b>

**EXPENSES**

**OPERATING EXPENSES**

**ADMINISTRATIVE EXPENSES**

**ADMINISTRATIVE SALARIES**

TOTAL OPERATING ADMINISTRATIVE	0	0	0	0	0	0	0	0	31	31
ADMIN SALARIES	825,496	550,905	-274,592	1,186,157	360,660	6,989,086	6,610,732	-378,354	7,111,632	122,546

New Agency Structure after FMR (7agency2)

### Budget Comparison

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	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
ADMIN CASUAL LABOR	0	0	0	0	0	119,411	0	-119,411	0	-119,411
ALLOC ADMIN SALARIES	-29,591	16,200	45,791	0	29,591	-189,650	194,400	384,050	0	189,650
<b>TOTAL ADMIN SALARIES</b>	<b>795,906</b>	<b>567,105</b>	<b>-228,801</b>	<b>1,186,157</b>	<b>390,251</b>	<b>6,918,847</b>	<b>6,805,132</b>	<b>-113,715</b>	<b>7,111,663</b>	<b>192,816</b>
AUDIT EXPENSE	0	7,120	7,120	27,222	27,222	152,855	88,971	-63,884	131,529	-21,327
MANAGEMENT FEE	177,153	156,650	-20,503	189,372	12,219	2,180,365	1,879,804	-300,561	1,968,179	-212,186
BOOKKEEPING FEE	50,348	96,502	46,155	49,673	-675	605,175	1,157,866	552,691	570,413	-34,763
NIFA MONITORING FEE	0	393	393	0	0	4,020	6,145	2,125	6,045	2,025
<b>TOTAL ADMINISTRATIVE FEE</b>	<b>227,500</b>	<b>260,665</b>	<b>33,165</b>	<b>266,267</b>	<b>38,766</b>	<b>2,942,415</b>	<b>3,132,786</b>	<b>190,371</b>	<b>2,676,165</b>	<b>-266,250</b>
COMPENSATED ABSENCE EXPENSE	-93,562	0	93,562	-594,219	-500,657	-93,562	0	93,562	-594,219	-500,657
COMPENSATED ABSENCE - EMP BENEFIT	-14,166	0	14,166	0	14,166	-14,166	0	14,166	0	14,166
<b>TOTAL COMPENSATED ABSENCE</b>	<b>-107,728</b>	<b>0</b>	<b>107,728</b>	<b>-594,219</b>	<b>-486,491</b>	<b>-107,728</b>	<b>0</b>	<b>107,728</b>	<b>-594,219</b>	<b>-486,491</b>
ADMIN EMPLOYEE BENEFITS	7,694	5,026	-2,668	7,359	-335	71,062	61,626	-9,436	91,655	20,592
ALLOC ADMIN EMP BENEFITS	0	3,461	3,461	0	0	0	41,414	41,414	0	0
ER MEDICAL/DENTAL INS - ADMIN	128,685	123,916	-4,768	119,777	-8,907	1,484,062	1,487,172	3,110	1,440,161	-43,902
ER PENSION - ADMIN	29,835	31,821	1,985	86,191	56,356	220,149	381,990	161,841	363,394	143,246
ER TAXES-ADMIN	62,480	43,373	-19,108	-174,562	-237,043	779,058	520,646	-258,412	304,834	-474,224
<b>TOTAL ADMIN EMPLOYEE BENEFITS</b>	<b>228,694</b>	<b>207,596</b>	<b>-21,098</b>	<b>38,765</b>	<b>-189,929</b>	<b>2,554,331</b>	<b>2,492,848</b>	<b>-61,483</b>	<b>2,200,043</b>	<b>-354,288</b>
LEGAL SERVICES - OUTSIDE	27,806	7,252	-20,554	11,931	-15,875	185,263	86,938	-98,325	91,114	-94,149
ALLOC OUTSIDE LEGAL	0	0	0	0	0	0	0	0	2,375	2,375
TRAINING/CONFERENCE	11,773	7,606	-4,166	3,964	-7,809	99,159	59,399	-39,760	72,987	-26,171
BOARD MEETING/RETREAT	0	0	0	0	0	5	0	-5	0	-5
STAFF MEETING/RETREAT	1,523	493	-1,030	120	-1,403	5,152	5,581	429	5,918	766
TRAVEL	14,321	2,547	-11,773	-1,485	-15,806	40,673	30,601	-10,072	50,209	9,535
MILEAGE	493	627	134	1,875	1,382	8,964	7,390	-1,574	9,232	267
ADMIN VEHICLE - FUEL	51	142	92	30	-21	393	1,753	1,360	-821	-1,214
ADMIN VEHICLE - MTCE & REPAIR	1,018	310	-708	0	-1,018	3,154	3,720	566	8,453	5,299
ADMIN VEHICLE - LICENSE	0	8	8	0	0	63	30	-33	30	-33
PUBLICATIONS	0	30	30	239	239	2,192	365	-1,827	598	-1,594
MEMBERSHIPS	4,650	3,114	-1,536	2,707	-1,943	34,562	37,332	2,770	46,857	12,295
PAYROLL PROCESSING FEE	5,680	4,840	-841	6,348	667	60,527	58,109	-2,418	69,060	8,533

New Agency Structure after FMR (7agency2)

**Budget Comparison**

Period = Dec 2024

Book = Accrual ; Tree = ysi\_is

	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
TELEPHONE	21,724	7,775	-13,950	35,505	13,781	195,233	93,122	-102,111	204,372	9,140
SAFETY EXPENSE	0	0	0	0	0	1,039	0	-1,039	388	-651
SAFETY EQUIPMENT/SUPPLIES	53	302	249	1,442	1,389	19,084	3,624	-15,460	15,180	-3,903
SAFETY CERTIFICATIONS	0	0	0	0	0	0	0	0	90	90
SAFETY TRAINING	0	10	10	-117	-117	117	120	3	60	-57
LEGAL SERVICES - INTERNAL	29,591	614	-28,976	144	-29,447	189,726	7,350	-182,376	13,832	-175,894
ALLOC INTERNAL LEGAL EXP	4,911	12,354	7,443	0	-4,911	54,952	148,245	93,293	141,602	86,650
PRINTER SUPPLIES AND EXP	1,868	1,426	-442	1,579	-289	22,215	17,161	-5,054	29,977	7,762
SOFTWARE EXP	138,690	26,164	-112,526	81,609	-57,082	344,083	314,060	-30,023	381,002	36,919
FORMS AND PRINTING	0	192	192	0	0	3,005	2,289	-716	3,150	145
OFFICE EXPENSE	2,221	187	-2,034	2,343	122	12,029	2,200	-9,829	12,217	188
OFFICE FURNISHINGS	148	307	159	1,857	1,709	22,041	3,629	-18,412	6,275	-15,766
POSTAGE	6,390	4,233	-2,157	6,226	-164	78,206	50,617	-27,589	70,202	-8,004
OFFICE SUPPLIES	8,418	5,263	-3,156	7,375	-1,043	59,139	63,043	3,904	71,852	12,713
OFFICE EQUIPMENT LEASES	2,744	2,394	-350	2,779	35	42,376	28,714	-13,662	23,073	-19,303
COMPUTER SUPPLIES	144	118	-26	1,713	1,569	257	1,405	1,148	7,243	6,986
COMPUTER EQUIPMENT	4,134	4,390	256	9,286	5,152	107,592	52,686	-54,906	81,716	-25,876
NETWORK COMMUNICATION	7,079	6,834	-245	3,422	-3,658	90,261	81,870	-8,391	104,725	14,464
ADVERTISING /NEWSPAPER ADS	155	168	13	100	-55	4,052	2,061	-1,991	3,681	-371
CABLE TV	708	0	-708	0	-708	8,449	0	-8,449	246	-8,203
EMPLOYEE HIRING & ADMIN EXP	3,972	2,114	-1,858	2,712	-1,260	38,168	25,451	-12,717	26,292	-11,877
CONSULTING	8,915	37,302	28,387	49,816	40,901	453,556	455,688	2,132	246,058	-207,499
BANK FEE	2,675	739	-1,936	-508	-3,183	17,962	8,141	-9,821	9,160	-8,802
SECT 8 PORT OUT ADMIN FEES	2,137	0	-2,137	3,326	1,188	27,775	0	-27,775	21,932	-5,843
LATE FEES	433	6	-427	747	315	60,113	28	-60,085	3,337	-56,776
MISCELLANEOUS EXPENSE	238,638	881	-237,757	-188,845	-427,483	260,879	10,571	-250,308	-3,784	-264,663
FEES - PERMITS	54	40	-14	0	-54	2,609	425	-2,184	1,188	-1,421
PROPERTY TAX	-912	1,751	2,663	21,860	22,772	18,456	20,963	2,507	44,351	25,895
RENTAL EXPENSE	3,336	1,658	-1,677	18,646	15,310	41,139	19,912	-21,227	67,767	26,629
LAND ACQUISITION EXPENSE	0	31	31	0	0	0	372	372	372	372

New Agency Structure after FMR (7agency2)

### Budget Comparison

Period = Dec 2024

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	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
IT SUPPORT - CONTR SERV	31,795	20,456	-11,339	17,539	-14,255	225,524	245,467	19,943	247,223	21,698
PROFESSIONAL FEES	0	2,500	2,500	494	494	1,100	30,000	28,900	66,185	65,085
PROFESSIONAL/CONTR SERV	0	0	0	0	0	381	0	-381	2,300	1,919
DEVELOPER'S FEE	0	0	0	0	0	0	0	0	2,175	2,175
<b>TOTAL OTHER ADMIN EXPENSES</b>	<b>587,333</b>	<b>167,177</b>	<b>-420,157</b>	<b>106,776</b>	<b>-480,557</b>	<b>2,841,627</b>	<b>1,980,432</b>	<b>-861,195</b>	<b>2,261,450</b>	<b>-580,177</b>
FRONT LINE SERVICE FEES	0	0	0	0	0	0	0	0	63,445	63,445
FEE FOR SERVICE	7,885	8,527	642	12,819	4,934	105,423	102,376	-3,047	113,563	8,139
<b>TOTAL FEE FOR SERVICE</b>	<b>7,885</b>	<b>8,527</b>	<b>642</b>	<b>12,819</b>	<b>4,934</b>	<b>105,423</b>	<b>102,376</b>	<b>-3,047</b>	<b>177,008</b>	<b>71,585</b>
<b>TOTAL ADMINISTRATIVE EXPENSES</b>	<b>1,739,591</b>	<b>1,211,069</b>	<b>-528,522</b>	<b>1,016,565</b>	<b>-723,026</b>	<b>15,254,915</b>	<b>14,513,574</b>	<b>-741,341</b>	<b>13,832,111</b>	<b>-1,422,804</b>
<b>RESIDENT SERVICES SALARIES</b>										
RESIDENT SERVICES SALARIES	7,761	4,067	-3,694	5,776	-1,985	56,550	48,805	-7,745	52,637	-3,913
RESIDENT SERVICE CASUAL LABOR	6,475	7,450	975	6,600	125	77,975	89,400	11,425	76,550	-1,426
<b>TOTAL RESIDENT SERV SALARIES</b>	<b>14,236</b>	<b>11,517</b>	<b>-2,719</b>	<b>12,376</b>	<b>-1,860</b>	<b>134,525</b>	<b>138,205</b>	<b>3,680</b>	<b>129,186</b>	<b>-5,339</b>
RELOCATION EXPENSES	-17,271	12,142	29,412	38,168	55,439	517,597	145,713	-371,884	152,301	-365,295
RELOCATION - SECURITY DEPOSITS	0	0	0	793	793	7,019	0	-7,019	12,216	5,197
RELOCATION - MOVING EXPENSE	1,664	358	-1,306	347	-1,317	11,330	4,287	-7,043	30,289	18,959
RELOCATION - UTILITY DEPOSITS	0	0	0	0	0	0	0	0	340	340
<b>TOTAL RELOCATION EXPENSE</b>	<b>-15,606</b>	<b>12,500</b>	<b>28,106</b>	<b>39,309</b>	<b>54,915</b>	<b>535,945</b>	<b>150,000</b>	<b>-385,945</b>	<b>195,145</b>	<b>-340,800</b>
ER MEDICAL/DENTAL INS - RES SERV	1,816	280	-1,536	1,752	-64	22,110	3,360	-18,750	20,718	-1,392
ER PENSION - RES SERV	328	216	-112	482	154	2,075	2,617	542	2,942	867
ER TAXES-RES SERV	574	324	-251	-1,577	-2,151	6,010	3,884	-2,126	2,201	-3,809
<b>TOTAL RESIDENT SERV EMP BENEFITS</b>	<b>2,719</b>	<b>820</b>	<b>-1,899</b>	<b>657</b>	<b>-2,061</b>	<b>30,195</b>	<b>9,861</b>	<b>-20,334</b>	<b>25,861</b>	<b>-4,334</b>
YOUTH ACTIVITIES	0	0	0	0	0	0	0	0	3,888	3,888
YOUTH ACTIVITIES - SCHOLARSHIPS	0	0	0	5,072	5,072	4,782	0	-4,782	22,885	18,103
<b>TOTAL YOUTH ACTIVITIES</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5,072</b>	<b>5,072</b>	<b>4,782</b>	<b>0</b>	<b>-4,782</b>	<b>26,773</b>	<b>21,991</b>
RESIDENT SERVICES EXPENSE	1,462	3,218	1,756	73,432	71,971	2,439	38,488	36,049	96,511	94,072
RESIDENT SERVICES EVENTS & ACTIVITIES	6,209	0	-6,209	-70	-6,279	20,692	0	-20,692	24,323	3,631
RESIDENT SERV DIRECT FUNDING	0	0	0	0	0	-130	0	130	740	870

New Agency Structure after FMR (7agency2)

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	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
RESIDENT FUND - STIPENDS	5,024	1,773	-3,251	-8,625	-13,649	42,596	21,204	-21,392	23,125	-19,470
RESIDENT FUND - MEETING EXPENSES	707	183	-524	2,264	1,557	7,213	2,200	-5,013	16,399	9,187
RESIDENT FUND - OTHER	0	0	0	-475	-475	10,651	0	-10,651	17,186	6,535
<b>TOTAL RESIDENT FUND</b>	<b>13,401</b>	<b>5,174</b>	<b>-8,227</b>	<b>66,526</b>	<b>53,125</b>	<b>83,460</b>	<b>61,892</b>	<b>-21,568</b>	<b>178,284</b>	<b>94,824</b>
FRONT LINE SERVICE FEE	286,827	156,631	-130,196	180,113	-106,714	2,189,361	1,879,538	-309,823	2,045,119	-144,242
<b>TOTAL FEE FOR SERVICE</b>	<b>286,827</b>	<b>156,631</b>	<b>-130,196</b>	<b>180,113</b>	<b>-106,714</b>	<b>2,189,361</b>	<b>1,879,538</b>	<b>-309,823</b>	<b>2,045,119</b>	<b>-144,242</b>
<b>TOTAL OTHER RESIDENT SERVICES</b>	<b>301,577</b>	<b>186,642</b>	<b>-114,935</b>	<b>304,053</b>	<b>2,476</b>	<b>2,978,268</b>	<b>2,239,496</b>	<b>-738,772</b>	<b>2,600,368</b>	<b>-377,900</b>
<b>TOTAL RESIDENT SERVICE EXPENSES</b>	<b>301,577</b>	<b>186,642</b>	<b>-114,935</b>	<b>304,053</b>	<b>2,476</b>	<b>2,978,268</b>	<b>2,239,496</b>	<b>-738,772</b>	<b>2,600,368</b>	<b>-377,900</b>
<b>UTILITY EXPENSES</b>										
UTILITY - WATER	19,998	42,352	22,354	66,433	46,434	433,277	508,406	75,129	472,764	39,488
UTILITY - ELECTRIC	168,422	141,294	-27,128	144,687	-23,735	1,794,382	1,695,499	-98,883	1,709,691	-84,691
UTILITY - GAS	68,075	45,953	-22,121	107,407	39,332	349,411	551,462	202,051	582,538	233,127
UTILITY - SEWER	32,968	54,594	21,626	98,382	65,414	567,904	655,049	87,145	641,491	73,587
ALLOC SEWER	0	88	88	0	0	0	1,056	1,056	0	0
<b>TOTAL UTILITY EXPENSES</b>	<b>289,464</b>	<b>284,281</b>	<b>-5,182</b>	<b>416,909</b>	<b>127,446</b>	<b>3,144,975</b>	<b>3,411,472</b>	<b>266,497</b>	<b>3,406,485</b>	<b>261,511</b>
<b>TOTAL MAINTENANCE</b>										
<b>MAINTENANCE SALARIES</b>										
MAINTENANCE SALARIES	359,072	250,804	-108,267	491,218	132,146	3,099,978	3,009,598	-90,380	3,447,554	347,575
MAINTENANCE CASUAL LABOR	990	15,556	14,566	7,845	6,855	221,619	186,666	-34,953	116,179	-105,439
ALLOC MAINT SALARIES	0	1,713	1,713	0	0	-45	20,494	20,539	0	45
<b>TOTAL MAINTENANCE SALARIES</b>	<b>360,062</b>	<b>268,073</b>	<b>-91,989</b>	<b>499,062</b>	<b>139,001</b>	<b>3,321,552</b>	<b>3,216,758</b>	<b>-104,794</b>	<b>3,563,733</b>	<b>242,181</b>
APPLIANCES	20,660	17,910	-2,750	11,970	-8,690	233,085	214,958	-18,127	282,912	49,827
DWELLING EQUIPMENT	0	0	0	0	0	675	0	-675	0	-675
PAINT	6,654	7,309	655	3,811	-2,843	84,027	87,747	3,720	113,753	29,726
CLEANING SUPPLIES	4,319	3,252	-1,067	1,968	-2,351	30,668	39,019	8,351	50,677	20,009
HVAC MATERIALS	9,043	6,153	-2,889	4,524	-4,518	42,361	35,953	-6,408	43,766	1,405
LANDSCAPING MATERIALS	0	401	401	0	0	1,031	4,814	3,783	120	-911
PLUMBING MATERIALS	14,834	14,629	-205	23,353	8,520	171,009	175,545	4,536	201,308	30,300

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	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
ELECTRICAL MATERIALS	4,455	2,504	-1,951	10,426	5,971	66,104	30,070	-36,034	38,938	-27,165
GASOLINE USAGE FOR MAINT VEHICLES	2,843	3,583	740	2,545	-298	54,909	43,020	-11,889	70,731	15,822
MAINTENANCE VEHICLE - LICENSE	0	0	0	0	0	0	0	0	8	8
PEST CONTROL SUPPLIES	223	1,688	1,465	5,280	5,057	32,135	20,229	-11,906	26,695	-5,440
MAINTENANCE TOOLS	1,584	2,371	786	4,885	3,301	18,339	28,503	10,164	84,371	66,033
MAINTENANCE MATERIALS	33,577	38,211	4,633	39,023	5,445	405,569	458,542	52,973	588,957	183,388
MAINTENANCE EQUIPMENT	609	683	73	2,309	1,699	3,713	8,128	4,415	15,908	12,195
Early Pay Discount	0	0	0	-127	-127	-17,590	0	17,590	-24,995	-7,406
<b>TOTAL MAINTENANCE MATERIALS</b>	<b>98,801</b>	<b>98,692</b>	<b>-108</b>	<b>109,966</b>	<b>11,166</b>	<b>1,126,035</b>	<b>1,146,528</b>	<b>20,493</b>	<b>1,493,148</b>	<b>367,113</b>
ELEVATORS - CONTRACTED SERV	8,013	12,687	4,673	29,766	21,753	127,174	152,220	25,046	169,578	42,404
HVAC - CONTRACTED SERV	49,276	90,824	41,548	24,005	-25,272	354,848	1,089,901	735,053	461,816	106,969
LAWNS - CONTRACTED SERV	34,010	13,335	-20,675	122,620	88,610	257,896	382,767	124,871	410,964	153,068
MATS/UNIFORMS - CONTRACTED SVCE	2,918	588	-2,330	113	-2,805	17,792	6,923	-10,869	10,502	-7,290
PEST CONTROL - CONTRACTED SERV	2,010	0	-2,010	0	-2,010	25,067	0	-25,067	311	-24,756
SNOW REMOVAL - CONTRACTED SERV	0	27,049	27,049	0	0	60,093	138,721	78,628	58,228	-1,866
TRASH - CONTRACTED SERV	-126,417	19,419	145,836	47,254	173,671	230,344	233,057	2,713	304,647	74,303
LANDFILL FEES - CONTRACTED SERV	121	456	335	295	174	2,162	5,478	3,316	4,203	2,041
CLEANING - CONTRACTED SERV	80,909	59,670	-21,239	69,656	-11,253	641,264	716,084	74,820	712,547	71,283
PAINTING - CONTRACTED SERV	7,037	11,008	3,971	27,260	20,223	215,003	132,049	-82,954	273,677	58,674
ARBORIST - CONTRACTED SERV	45,655	8,270	-37,385	10,550	-35,105	139,685	99,285	-40,400	82,308	-57,377
FLOORING REPL - CONTRACTED SERV	19,954	25,329	5,374	71,605	51,651	517,913	303,911	-214,002	627,701	109,788
OUTDOOR CLEANING - CONTRACTED SERV	5,700	33	-5,667	1,800	-3,900	37,597	391	-37,206	4,061	-33,536
CONCRETE WORK - CONTRACTED SERV	0	4,646	4,646	25,302	25,302	7,570	55,750	48,180	91,439	83,869
ELECTRICAL - CONTRACTED SERV	13,248	10,605	-2,642	19,890	6,642	219,698	127,218	-92,480	144,603	-75,095
LANDSCAPE - CONTRACTED SERV	0	23,098	23,098	0	0	32,595	277,151	244,556	96,122	63,527
PLUMBING - CONTRACTED SERV	15,814	21,530	5,716	36,592	20,778	352,078	258,338	-93,740	210,674	-141,404
ROOF REPAIRS - CONTRACTED SERV	2,565	48,695	46,130	-14,290	-16,855	37,539	584,338	546,799	30,955	-6,584
EXTERIOR REPAIRS - CONTRACTED SERV	14,337	44,039	29,702	66,834	52,497	72,389	528,450	456,061	248,180	175,791
VEHICLE MAINTENANCE & REPAIR	9,498	4,951	-4,546	6,754	-2,744	69,120	59,361	-9,759	84,567	15,447
MAINTENANCE EQUIPMENT REPAIR	442	830	388	0	-442	8,367	9,966	1,599	10,696	2,329

New Agency Structure after FMR (7agency2)

### Budget Comparison

Period = Dec 2024

Book = Accrual ; Tree = ysi\_is

	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
WINDOWS/DOORS REPL - CONTRACTED SERV	12,043	45,831	33,788	12,051	8	195,984	549,978	353,994	374,460	178,476
VACANT TURNOVER - CONTRACTED SERV	0	270	270	0	0	26,776	3,240	-23,536	18,150	-8,626
VACANCY REDUCTION - CONTRACTED SERV	0	0	0	10,107	10,107	1,700	0	-1,700	10,932	9,232
INSPECTIONS - CONTRACTED SERV	820	2,588	1,768	7,472	6,652	25,639	31,118	5,479	158,857	133,217
INTERIOR REPAIRS - CONTRACTED SERV	124,020	93,147	-30,873	174,370	50,350	740,006	1,117,767	377,761	564,451	-175,555
Fire Safety - Contracted Services	36,639	12,889	-23,751	26,869	-9,770	332,796	154,719	-178,077	212,261	-120,535
OTHER - OUTSIDE MAINT	0	0	0	0	0	0	0	0	105	105
HAZMAT - CONTRACTED SERV	5,316	36,337	31,020	27,548	22,232	590,366	436,043	-154,323	416,815	-173,551
RADON - CONTRACTED SERV	500	0	-500	0	-500	11,255	0	-11,255	43,220	31,965
DWELLING/MECHANICAL UPGRADES - CONTR S	0	0	0	0	0	974	0	-974	0	-974
ALLOC INSPECTIONS EXPENSE	573	2,173	1,600	5,400	4,827	20,319	26,079	5,760	5,400	-14,919
<b>TOTAL MAINT SERVICES AND CONTRACTS</b>	<b>365,003</b>	<b>620,296</b>	<b>255,294</b>	<b>809,824</b>	<b>444,821</b>	<b>5,372,009</b>	<b>7,480,303</b>	<b>2,108,294</b>	<b>5,842,431</b>	<b>470,422</b>
MAINTENANCE EMPLOYEE BENEFITS	-1,350	74	1,424	702	2,052	-1,075	855	1,930	-8,523	-7,448
ALLOC MAINT EMP BENEFITS	0	-2,655	-2,655	0	0	-19	-31,952	-31,933	0	19
ER MED/DENTAL INS - MAINT	57,940	63,390	5,450	60,972	3,032	708,779	760,677	51,898	849,025	140,246
ER PENSION - MAINT	11,719	13,211	1,492	37,925	26,206	94,415	158,542	64,127	185,380	90,965
ER TAXES - MAINT	28,087	17,547	-10,541	-98,240	-126,327	367,031	210,239	-156,792	142,160	-224,871
ER MED/DENTAL INS - GROUND CREW	0	3,700	3,700	0	0	0	44,400	44,400	0	0
ER PENSION - GROUND CREW	0	560	560	0	0	0	6,665	6,665	0	0
ER TAXES - GROUND CREW	0	10,882	10,882	0	0	0	130,628	130,628	0	0
<b>TOTAL MAINT EMPLOYEE BENEFITS</b>	<b>96,396</b>	<b>106,708</b>	<b>10,312</b>	<b>1,359</b>	<b>-95,037</b>	<b>1,169,130</b>	<b>1,280,054</b>	<b>110,924</b>	<b>1,168,042</b>	<b>-1,087</b>
<b>TOTAL MAINTENANCE EXPENSES</b>	<b>920,261</b>	<b>1,093,769</b>	<b>173,509</b>	<b>1,420,211</b>	<b>499,951</b>	<b>10,988,726</b>	<b>13,123,643</b>	<b>2,134,917</b>	<b>12,067,354</b>	<b>1,078,628</b>
<b>PROTECTIVE SERVICE EXPENSES</b>										
<b>PROTECTIVE SERVICE SALARIES</b>										
SECURITY SALARY	27,884	34,000	6,116	21,729	-6,155	202,531	408,000	205,469	283,899	81,368
SECURITY CASUAL LABOR	0	0	0	15,080	15,080	0	0	0	15,080	15,080
<b>TOTAL PROTECTIVE SERV SALARIES</b>	<b>27,884</b>	<b>34,000</b>	<b>6,116</b>	<b>36,809</b>	<b>8,925</b>	<b>202,531</b>	<b>408,000</b>	<b>205,469</b>	<b>298,979</b>	<b>96,448</b>
FRONT LINE SERVICE FEES	55,871	50,524	-5,347	55,334	-538	447,555	606,290	158,735	682,925	235,370
<b>TOTAL FEE FOR SERVICE</b>	<b>55,871</b>	<b>50,524</b>	<b>-5,347</b>	<b>55,334</b>	<b>-538</b>	<b>447,555</b>	<b>606,290</b>	<b>158,735</b>	<b>682,925</b>	<b>235,370</b>

New Agency Structure after FMR (7agency2)

### Budget Comparison

Period = Dec 2024

Book = Accrual ; Tree = ysi\_is

	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
GUARDS - CONTRACTED SECURITY	12,480	0	-12,480	0	-12,480	37,884	0	-37,884	36,993	-892
SECURITY & MONITORING	1,420	1,528	108	52,447	51,027	35,425	18,401	-17,024	314,354	278,929
SECURITY - CONTRACTED SERV	525	4,242	3,717	333	-192	22,312	50,900	28,588	15,135	-7,177
SECURITY EQUIPMENT & MATERIALS	70,374	4,356	-66,018	11,938	-58,436	227,891	52,127	-175,764	162,517	-65,374
<b>TOTAL SECURITY EXPENSE</b>	<b>84,799</b>	<b>10,126</b>	<b>-74,673</b>	<b>64,718</b>	<b>-20,081</b>	<b>323,512</b>	<b>121,428</b>	<b>-202,084</b>	<b>528,999</b>	<b>205,487</b>
ER MEDICAL/DENTAL INS - SECURITY	832	5,000	4,168	3,514	2,683	21,451	60,000	38,549	62,031	40,580
ER PENSION - SECURITY	1,001	1,870	869	1,552	551	5,352	22,440	17,088	9,263	3,911
ER TAXES - SECURITY	2,282	2,720	438	-9,153	-11,435	26,661	32,640	5,979	13,244	-13,417
<b>TOTAL SECURITY EMPLOYEE BENEFITS</b>	<b>4,115</b>	<b>9,590</b>	<b>5,476</b>	<b>-4,087</b>	<b>-8,201</b>	<b>53,464</b>	<b>115,080</b>	<b>61,616</b>	<b>84,537</b>	<b>31,074</b>
<b>TOTAL PROTECT SERVICE EXPENSES</b>	<b>172,669</b>	<b>104,240</b>	<b>-68,429</b>	<b>152,774</b>	<b>-19,894</b>	<b>1,027,061</b>	<b>1,250,798</b>	<b>223,737</b>	<b>1,595,440</b>	<b>568,379</b>
<b>GENERAL EXPENSES</b>										
<b>INSURANCE EXPENSES</b>										
INSURANCE - LIABILITY	31,161	27,070	-4,092	-33,305	-64,466	373,927	324,691	-49,236	274,039	-99,888
INSURANCE - PROPERTY	71,471	64,630	-6,841	69,519	-1,952	857,651	775,513	-82,138	806,305	-51,346
INSURANCE - WORKERS COMP	34,901	23,793	-11,108	43,451	8,550	279,024	285,484	6,460	310,986	31,961
ALLOC INSURANCE EXPENSES	0	0	0	0	0	0	0	0	0	0
<b>TOTAL INSURANCE EXP</b>	<b>137,533</b>	<b>115,492</b>	<b>-22,041</b>	<b>79,666</b>	<b>-57,867</b>	<b>1,510,602</b>	<b>1,385,688</b>	<b>-124,914</b>	<b>1,391,330</b>	<b>-119,273</b>
OTHER GENERAL	0	0	0	25,035	25,035	0	0	0	25,035	25,035
BAD DEBT EXPENSE	85,289	20,270	-65,019	34,481	-50,808	592,231	243,239	-348,992	560,721	-31,510
<b>TOTAL BAD DEBT EXPENSE</b>	<b>85,289</b>	<b>20,270</b>	<b>-65,019</b>	<b>34,481</b>	<b>-50,808</b>	<b>592,231</b>	<b>243,239</b>	<b>-348,992</b>	<b>560,721</b>	<b>-31,510</b>
CLOSING COSTS	0	0	0	0	0	126	0	-126	0	-126
MORTGAGE INTEREST	5,474	0	-5,474	58,367	52,893	72,204	0	-72,204	127,144	54,940
<b>TOTAL LOAN INTEREST</b>	<b>5,474</b>	<b>0</b>	<b>-5,474</b>	<b>58,367</b>	<b>52,893</b>	<b>72,204</b>	<b>0</b>	<b>-72,204</b>	<b>127,144</b>	<b>54,940</b>
<b>TOTAL GENERAL EXPENSES</b>	<b>228,297</b>	<b>135,762</b>	<b>-92,535</b>	<b>172,514</b>	<b>-55,783</b>	<b>2,175,038</b>	<b>1,628,927</b>	<b>-546,111</b>	<b>2,079,195</b>	<b>-95,843</b>
<b>OTHER EXPENSES</b>										
<b>CASUALTY LOSS</b>										
CASUALTY LOSS PROCEEDS	0	0	0	0	0	68	0	68	0	68
THEFT LOSS	119,176	0	-119,176	0	-119,176	119,176	0	-119,176	0	-119,176

New Agency Structure after FMR (7agency2)

**Budget Comparison**

Period = Dec 2024

Book = Accrual ; Tree = ysi\_is

	December 2024			December 2023		YTD Final	YTD	YTD		
	Final	PTD Budget	Change	Actual	Change	2024	Budget	Change	2023	Change
<b>NET CASUALTY LOSS</b>	<b>119,176</b>	<b>0</b>	<b>-119,176</b>	<b>0</b>	<b>-119,176</b>	<b>119,108</b>	<b>0</b>	<b>-119,108</b>	<b>0</b>	<b>-119,108</b>
<b>TOTAL OTHER EXPENSES</b>	<b>119,176</b>	<b>0</b>	<b>-119,176</b>	<b>0</b>	<b>-119,176</b>	<b>119,108</b>	<b>0</b>	<b>-119,108</b>	<b>0</b>	<b>-119,108</b>
<b>TOTAL OPERATING EXPENSES</b>	<b>3,771,033</b>	<b>3,015,764</b>	<b>-755,269</b>	<b>3,483,027</b>	<b>-288,007</b>	<b>35,688,091</b>	<b>36,167,910</b>	<b>479,819</b>	<b>35,580,953</b>	<b>-107,137</b>
<b>NON-OPERATING EXPENSES</b>										
<b>HAP EXPENSES</b>										
HAP EXPENSE	3,859,055	3,250,854	-608,201	3,255,907	-603,148	42,973,148	39,010,162	-3,962,986	37,714,126	-5,259,022
HAP EXPENSE - PORTABLE	56,152	38,333	-17,819	65,953	9,801	564,590	460,000	-104,590	490,740	-73,850
UTILITY REIMBURSEMENT	167,533	143,398	-24,135	157,635	-9,898	2,029,328	1,720,839	-308,489	1,801,176	-228,152
<b>TOTAL HAP EXPENSES</b>	<b>4,082,740</b>	<b>3,432,585</b>	<b>-650,155</b>	<b>3,479,495</b>	<b>-603,245</b>	<b>45,567,067</b>	<b>41,191,001</b>	<b>-4,376,066</b>	<b>40,006,042</b>	<b>-5,561,025</b>
DEPRECIATION EXPENSE	256,217	237,570	-18,647	314,381	58,164	3,047,381	2,850,741	-196,640	3,132,281	84,901
<b>TOTAL DEPR &amp; AMORT EXPENSE</b>	<b>256,217</b>	<b>237,570</b>	<b>-18,647</b>	<b>314,381</b>	<b>58,164</b>	<b>3,047,381</b>	<b>2,850,741</b>	<b>-196,640</b>	<b>3,132,281</b>	<b>84,901</b>
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>4,338,957</b>	<b>3,670,156</b>	<b>-668,801</b>	<b>3,793,876</b>	<b>-545,081</b>	<b>48,614,447</b>	<b>44,041,742</b>	<b>-4,572,705</b>	<b>43,138,323</b>	<b>-5,476,124</b>
<b>TOTAL EXPENSES</b>	<b>8,109,990</b>	<b>6,685,920</b>	<b>-1,424,071</b>	<b>7,276,903</b>	<b>-833,087</b>	<b>84,302,538</b>	<b>80,209,652</b>	<b>-4,092,886</b>	<b>78,719,277</b>	<b>-5,583,261</b>
INTERPROJECT EXCESS CASH TRANSFER IN	0	1,439	-1,439	0	0	0	17,271	-17,271	0	0
TRANSFERS BET PROGRAMS & PROJECTS - IN	43,746	269,681	-225,935	43,431	315	3,810,551	3,647,113	163,438	2,458,250	1,352,301
TRANSFERS BET PROGRAMS & PROJECTS - OUT	43,746	322,949	279,203	43,431	-315	3,810,551	3,875,394	64,843	2,458,250	-1,352,301
OPERATING TRANSFER - IN	24,285	0	24,285	0	24,285	48,899	0	48,899	0	48,899
OPERATING TRANSFER - OUT	24,285	0	-24,285	0	-24,285	48,899	0	-48,899	0	-48,899
<b>TOTAL TRANSFERS</b>	<b>0</b>	<b>51,829</b>	<b>51,829</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>211,009</b>	<b>211,009</b>	<b>0</b>	<b>0</b>
PRIOR PERIOD ADJUSTMENT	306,557	0	-306,557	-1,851,401	-2,157,957	891,225	0	-891,225	-1,854,217	-2,745,441
<b>TOTAL PRIOR PERIOD ADJUSTMENT</b>	<b>306,557</b>	<b>0</b>	<b>-306,557</b>	<b>-1,851,401</b>	<b>-2,157,957</b>	<b>891,225</b>	<b>0</b>	<b>-891,225</b>	<b>-1,854,217</b>	<b>-2,745,441</b>
<b>NET OPERATING INCOME (LOSS)</b>	<b>-1,034,378</b>	<b>6,645</b>	<b>-1,041,024</b>	<b>2,497,012</b>	<b>-3,531,390</b>	<b>-3,376,095</b>	<b>-559,781</b>	<b>-3,935,876</b>	<b>1,575,275</b>	<b>4,951,370</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>-778,161</b>	<b>244,216</b>	<b>-1,022,377</b>	<b>2,811,394</b>	<b>-3,589,555</b>	<b>-328,714</b>	<b>2,290,960</b>	<b>-2,619,673</b>	<b>4,707,556</b>	<b>-5,036,270</b>

# Memorandum

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To: Board of Commissioners  
From: Ashley Hatheway, CFO  
Date: February 14, 2025  
Re: Finance Report

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## AGENCY BALANCE SHEET

### **December 2024:**

**Cash** position decreased **\$2,354,282** YTD

- Public Housing & capital funds had a decrease of **\$2,250,902**
- HIO: had an increase of **\$63,295**
- Section 8 Programs: had a decrease of **\$352,615**
- Central Office: had an increase of **\$98,115**

**Accounts Receivable** had an increase of **\$495,718** YTD

- Operating A/R had a decrease of **\$178,007**
- A/R Inter-property had an increase of **\$426,115**
- Tenant Receivables had an increase of **\$251,191**
- A/R Promissory Notes had a decrease of **\$3,581**

**Prepaid Assets** had an increase of **\$11,269** YTD

**Total Assets** decreased **\$4,382,117**

**Total Liabilities** decreased **\$1,041,019** YTD

**Current Liabilities** decreased **\$853,893** YTD

- Unearned Revenue (HUD operating subsidy) decreased **\$1,074,125**
- Accounts Payable decreased **\$205,081**
- Accrued Fees increased **\$426,115**
- Inter-fund Payables decreased **\$88,316**

# Memorandum



To: Board of Commissioners  
From: Ashley Hatheway, CFO  
Date: February 14, 2025  
Re: Finance Report

## AGENCY INCOME STATEMENT

**Total Revenue** is **\$3,377,332** more than PYTD revenue, bolstered by increased HAP payments of \$4.4M.

**Total Operating Expenses** are up **\$107k** YTD.

**Section 8 Expenses** are **\$5.6M** more than PYTD.

**Adjusted Net Operating Loss** was **\$328,714** YTD compared to ANOI of **\$4,707,556** PYTD. December 2024 had an adjusted net operating loss of **\$778,161** vs. adjusted net operating income of **\$2,811,394** during December 2023.

**The largest items (generally one-time items) impacting our \$5M swing in ANOI 2024 YTD vs. 2023 YTD are:**

Adjusted Net Operating Income/(Loss) Variance 2023 vs. 2024	5,036,270
Variance of Prior Period Adjustments 2023 vs. 2024	2,745,441
Difference of Section 8 (HCV) net income 2023 vs. 2024	1,163,570
Gain on sale impact 2023 vs. 2024	415,000
Compensated absences impact 2023 vs. 2024	500,657
IRS tax refund (2023) & subsequent repayment (2024)	468,000
Normalized Adjusted Net Operating Income/(Loss) Variance 2023 vs. 2024	(256,398)

# Memorandum

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To: Board of Commissioners  
From: Ashley Hatheway, CFO  
Date: February 14, 2025  
Re: Finance Report

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## AGENCY BALANCE SHEET

### January 2025:

**Cash** position decreased **\$776,844** YTD

- Public Housing & capital funds had a decrease of **\$446,721**
- HIO: had an increase of **\$3,764**
- Section 8 Programs: had a decrease of **\$170,092**
- Central Office: had a decrease of **\$118,757**

**Accounts Receivable** had a decrease of **\$111,293** YTD

- Operating A/R had a decrease of **\$46,451**
- A/R Inter-property had a decrease of **\$92,393**
- Tenant Receivables had a decrease of **\$7,658**
- A/R Promissory Notes had an increase of **\$35,209**

**Prepaid Assets** had a decrease of **\$18,235** YTD

**Total Assets** decreased **\$915,584** YTD

**Total Liabilities** decreased **\$706,748** YTD

**Current Liabilities** decreased **\$721,070** YTD

- Unearned Revenue (HUD operating subsidy) decreased **\$237,566**
- Accounts Payable decreased **\$57,058**
- Accrued Fees decreased **\$92,393**
- Inter-fund Payables decreased **\$2,992**

# Memorandum

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To: Board of Commissioners  
From: Ashley Hatheway, CFO  
Date: February 14, 2025  
Re: Finance Report

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## AGENCY INCOME STATEMENT

**Total Revenue** is **\$1,312,154** more than PYTD revenue. Revenue is better to budget by **\$192k**.

**Total Operating Expenses** are **\$163k** higher than PYTD, better than budget by **\$170k**.

**HAP Expenses** are **\$626k** more than PYTD, worse to budget by **\$326k**.

**Adjusted Net Operating Income (ANOI)** was **\$37,494** compared to budget ANOI of **\$2,310** and PY ANOL of **\$1,069,795**

New Agency Structure after FMR (7agency2)

## Balance Sheet -With YTD

Period = Jan 2025

Book = Accrual ; Tree = ysi\_bs

	January 31, 2025	January 1, 2025	Net Change
<b>ASSETS</b>			
CASH AND CASH EQUIVALENTS	9,981,995	10,758,839	-776,844
OTHER ACCOUNTS RECEIVABLE	-34,073	-80,523	-46,451
A/R INTER-PROPERTY	1,038,560	1,130,953	-92,393
A/R - TENANT	833,654	841,312	-7,658
A/R PROMISSORY NOTES	3,167,632	3,132,423	35,209
ACCRUED INTEREST RECEIVABLE	5,146,148	5,146,148	0
PREPAID ASSETS	319,933	338,168	-18,235
INTER-FUND DUE FROM	2,482,703	2,485,695	-2,992
<b>TOTAL CURRENT ASSETS</b>	<b>22,936,552</b>	<b>23,753,014</b>	<b>-816,462</b>
FIXED ASSETS	32,558,115	32,657,237	-99,122
NOTES RECEIVABLE	7,315,266	7,315,266	0
LT INTER-FUND DUE FROM	2,390,435	2,390,435	0
A/R P-NOTES - LONG TERM	-665,630	-665,630	0
TAX CREDIT FEES	71,655	71,655	0
PREPAID LEASE COSTS	4,640,570	4,640,570	0
LEASES RECEIVABLE	2,708,702	2,708,702	0
ACCUMULATED AMORTIZATION	-4,416,383	-4,416,383	0
LT INTER-PROPERTY	913,265	913,265	0
INVESTMENT IN JOINT VENTURES	2,296,065	2,296,065	0
<b>TOTAL NON-CURRENT ASSETS</b>	<b>47,812,059</b>	<b>47,911,181</b>	<b>-99,122</b>
<b>TOTAL ASSETS</b>	<b>70,748,611</b>	<b>71,664,195</b>	<b>-915,584</b>
<b>LIABILITIES AND EQUITY</b>			
<b>LIABILITIES</b>			
ACCOUNTS PAYABLE	441,991	499,050	-57,058
A/P OTHER	-3,198	-3,198	0
ACCRUED FEES	998,095	1,090,487	-92,393
ACCR WAGES & WITHHOLDINGS	10,105	335,264	-325,159
TOTAL ACCRUED INTEREST	4,701,225	4,701,225	0
TENANT SECURITY DEPOSIT	703,480	709,589	-6,109
UNEARNED REVENUE	3,447,938	3,685,504	-237,566
CURRENT PORTION OF DEBT	50,933	50,727	206
OTHER CURRENT LIABILITIES	-147,322	-147,322	0
INTER-PROGRAM PAYABLES	50,000	50,000	0
INTER-FUND DUE TO	1,326,534	1,329,526	-2,992
<b>TOTAL CURRENT LIABILITIES</b>	<b>11,579,780</b>	<b>12,300,850</b>	<b>-721,070</b>
LONG TERM DEBT	11,768,563	11,772,791	-4,227
LT LIABILITIES - OTHER	0	0	0
FSS ESCROW	611,372	592,823	18,549
TOTAL LT ACRUED FEES	913,264	913,264	0
COMP ABSENCES-LONG TERM	612,087	612,087	0
LT INTER-FUND DUE TO	2,390,435	2,390,435	0
<b>TOTAL NON-CURRENT LIABILITIES</b>	<b>16,295,722</b>	<b>16,281,400</b>	<b>14,322</b>
<b>TOTAL LIABILITIES</b>	<b>27,875,502</b>	<b>28,582,250</b>	<b>-706,748</b>
<b>EQUITY</b>			
NET INVEST IN CAPITAL ASSETS	27,758,697	27,758,697	0
RESTRICTED NET ASSETS	-5,591,846	-5,591,846	0
RETAINED EARNINGS	11,307,857	11,516,692	-208,836
UNRESTRICTED NET POSITION	7,898,802	7,898,802	0
RE - EQUITY TRANSFERS	1,499,600	1,499,600	0

<b>TOTAL EQUITY</b>	<b>42,873,109</b>	<b>43,081,945</b>	<b>-208,836</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>70,748,611</b>	<b>71,664,195</b>	<b>-915,584</b>
<b>TOTAL OF ALL</b>	<b>0</b>	<b>0</b>	<b>0</b>

New Agency Structure after FMR (7agency2)

## Balance Sheet -With YTD

Period = Jan 2025

Book = Accrual ; Tree = ysi\_bs

	January 31, 2025	January 1, 2025	Net Change
<b>ASSETS</b>			
CASH - OPERATING	4,181,670	4,929,858	-748,187
CASH - PAYROLL	94,672	91,117	3,555
CASH - OTHER	44,595	44,563	32
PETTY CASH	560	560	0
CASH - VENDOR PAYMENTS	-250,880	-372,979	122,100
CASH - RESTRICTED	3,560,574	3,656,098	-95,525
CASH - RESTRICTED MODERNIZATION AND DEV	38,748	38,716	33
REPLACEMENT RESERVE	71,685	71,543	142
CASH - FSS ESCROW	572,855	623,733	-50,878
CASH - FSS FORFEITURES	56,660	54,538	2,122
OPERATING RESERVE	275,477	274,954	523
OHA HUD OPERATING RESERVE	305,908	305,908	0
CASH - SECURITY DEPOSIT	658,758	669,896	-11,138
HOMEOWNERSHIP FUNDS	370,713	370,336	377
<b>CASH AND CASH EQUIVALENTS</b>	<b>9,981,995</b>	<b>10,758,839</b>	<b>-776,844</b>
A/R HUD	-97,334	-152,344	55,010
A/R OTHER GOVERNMENTS	699,186	697,751	1,436
A/R OTHER	1,800	1,800	0
A/R NON DWELLING RENT	15,538	25,532	-9,994
A/R HOMEOWNERSHIP MORTGAGES	592,700	592,700	0
ALLOWANCE FOR HOME MORTGAGES	-592,700	-592,700	0
ALLOWANCE FOR DOUBTFUL OTHER A/R	-653,262	-653,262	0
<b>OTHER ACCOUNTS RECEIVABLE</b>	<b>-34,073</b>	<b>-80,523</b>	<b>46,451</b>
INTER-PROPERTY {COCC}	50,000	50,000	0
INTER-PROPERTY {9EC}	233,463	223,090	10,373
INTER-PROPERTY {9KCC}	103,304	101,241	2,063
INTER-PROPERTY {9NOAH}	64,535	63,183	1,352
INTER-PROPERTY {9FAR}	128,347	125,867	2,480
INTER-PROPERTY {9BV}	33,417	32,735	683
INTER-PROPERTY {9CR1}	49,096	48,194	902
INTER-PROPERTY {9CR2}	32,289	31,612	676
INTER-PROPERTY {VILLAS}	57,507	56,050	1,457
INTER-PROPERTY {HCV}	817,464	526,290	291,174
INTER-PROPERTY {HCV ADM}	-727,219	-436,045	-291,174
INTER-PROPERTY {MOD REHAB}	1,774	1,774	0
INTER-PROPERTY {PUB HSG}	194,582	306,961	-112,378
<b>A/R INTER-PROPERTY</b>	<b>1,038,560</b>	<b>1,130,953</b>	<b>-92,393</b>
ACCOUNTS RECEIVABLE TENANTS	896,563	904,221	-7,658
ALLOWANCE FOR A/R TENANTS	-62,909	-62,909	0
<b>A/R - TENANT</b>	<b>833,654</b>	<b>841,312</b>	<b>-7,658</b>
P-NOTES OUTSTANDING	606,369	571,160	35,209
ALLOWANCE FOR P-NOTES	-64,229	-64,229	0
A/R BAYVIEW	387,861	387,861	0
A/R FARNAM	1,375,882	1,375,882	0
A/R STREHLOW	812,448	812,448	0
A/R NOAH	49,301	49,301	0
<b>A/R PROMISSORY NOTES</b>	<b>3,167,632</b>	<b>3,132,423</b>	<b>35,209</b>
ACCRUED INTEREST RECEIVABLE	5,146,148	5,146,148	0
<b>ACCRUED INTEREST RECEIVABLE</b>	<b>5,146,148</b>	<b>5,146,148</b>	<b>0</b>
PREPAID INSURANCE	5,501	25,815	-20,314
PREPAID SOFTWARE EXP	164,130	167,313	-3,183
PREPAID MED FSA SEC 125	10,173	6,239	3,934
PREPAID CREDIT CARDS	2,546	1,218	1,328
PREPAID OTHER	137,583	137,583	0

<b>PREPAID ASSETS</b>	<b>319,933</b>	<b>338,168</b>	<b>-18,235</b>
INTERFUND BALANCE	-1,700	-1,700	0
INTER-FUND DUE FROM {COCC}	455,666	451,048	4,618
INTER-FUND DUE FROM {HIOOPER}	-201,683	-201,683	0
INTER-FUND DUE FROM {9EC}	229,832	222,633	7,199
INTER-FUND DUE FROM {9KCC}	56,947	57,515	-568
INTER-FUND DUE FROM {9NOAH}	124,153	117,991	6,163
INTER-FUND DUE FROM {9SEC}	20,382	20,382	0
INTER-FUND DUE FROM {9FAR}	16,093	23,938	-7,845
INTER-FUND DUE FROM {9BV}	9,421	5,541	3,880
INTER-FUND DUE FROM {9CR1}	11,713	11,230	483
INTER-FUND DUE FROM {9CR2}	10,756	10,630	125
INTER-FUND DUE FROM {VILLAS}	5,318	9,891	-4,572
INTER-FUND DUE FROM {HCV ADM}	-154,389	-150,325	-4,064
INTER-FUND DUE FROM {HCV MV}	-21,623	-14,564	-7,059
INTER-FUND DUE FROM {HCV CITY}	37,650	37,650	0
INTER-FUND DUE FROM {MOD REHAB}	4,404	5,345	-942
INTER-FUND DUE FROM {FOUND}	171,983	169,603	2,380
INTER-FUND DUE FROM {PUB HSG}	254,511	281,930	-27,419
INTER-FUND DUE FROM {ROSS GRANT}	-62,767	-78,386	15,619
INTER-FUND DUE FROM {FSS GRANT}	-60,935	-77,441	16,506
INTER-FUND DUE FROM {CNI GRANT}	562,427	562,504	-77
INTER-FUND DUE FROM {CNP GRANT}	15,794	15,794	0
INTER-FUND DUE FROM {EHV}	998,751	1,006,055	-7,304
INTER-FUND DUE FROM {6SCDEV18}	0	113	-113
<b>INTER-FUND DUE FROM</b>	<b>2,482,703</b>	<b>2,485,695</b>	<b>-2,992</b>
<b>TOTAL CURRENT ASSETS</b>	<b>22,936,552</b>	<b>23,753,014</b>	<b>-816,462</b>
LAND	8,299,143	8,299,143	0
BUILDINGS	158,131,147	158,131,147	0
BUILDINGS - COMMERCIAL	400,000	400,000	0
BUILDINGS - ACQUISITION	457,700	457,700	0
BUILDINGS - INELIGIBLE	88,112	88,112	0
BUILDING IMPROVEMENTS	43,843,620	43,792,415	51,206
CONTRACT WORK IN PROCESS	161,894	161,894	0
WIP - PREDEVELOPMENT	1,289,632	1,272,432	17,200
WIP - INS PROCEEDS/REPAIRS	757,518	735,508	22,010
DWELLING EQUIPMENT	3,730,532	3,673,740	56,792
SITE IMPROVEMENTS	5,129,677	5,129,677	0
OFFICE EQUIPMENT	238,588	238,588	0
MAINTENANCE EQUIPMENT	365,170	365,170	0
COMMUNITY SPACE EQUIPMENT	75,004	75,004	0
COMPUTER EQUIPMENT	527,559	527,559	0
AUTOMOTIVE EQUIPMENT	2,587,934	2,587,934	0
SECURITY EQUIPMENT	1,183,024	1,183,024	0
ACCUM DEPR - BUILDINGS	-151,350,485	-151,274,253	-76,232
ACCUM DEPR - COMMERCIAL	-375,128	-374,825	-303
ACCUM DEPR - BUILDING ACQUISITION	-450,000	-450,000	0
ACCUM DEPR - INELIGIBLE BLDG	-80,674	-80,407	-267
ACCUM DEPR - BUILDING IMPROVEMENTS	-33,182,392	-33,075,759	-106,633
ACCUM DEPR - DWELLING EQUIPMENT	-1,919,407	-1,898,506	-20,901
ACCUM DEPR - SITE IMPROVE	-3,420,741	-3,399,085	-21,656
ACCUM DEPR - OFFICE EQUIPMENT	-234,389	-234,099	-290
ACCUM DEPR - MAINTENANCE EQUIPMENT	-290,610	-289,969	-642
ACCUM DEPR - COMMUNITY SPACE EQUIPMENT	-75,004	-75,004	0
ACCUM DEPR - COMPUTER EQUIPMENT	-527,070	-527,035	-35
ACCUM DEPR - AUTOMOTIVE EQUIPMENT	-2,252,129	-2,242,552	-9,576
ACCUM DEPR - SECURITY EQUIPMENT	-550,110	-540,314	-9,796
<b>FIXED ASSETS</b>	<b>32,558,115</b>	<b>32,657,237</b>	<b>-99,122</b>
N/R BAYVIEW	208,156	208,156	0
N/R FARNAM	553,079	553,079	0
N/R CROWN I	241,542	241,542	0

N/R CROWN II	161,563	161,563	0
N/R NOAH	893,253	893,253	0
N/R STREHLOW	2,907,673	2,907,673	0
N/R KEYSTONE	2,350,000	2,350,000	0
<b>NOTES RECEIVABLE</b>	<b>7,315,266</b>	<b>7,315,266</b>	<b>0</b>
LT INTER-FUND DUE FROM {HIOOPER}	124,751	124,751	0
LT INTER-FUND DUE FROM {9EC}	826,853	826,853	0
LT INTER-FUND DUE FROM {9KCC}	248,036	248,036	0
LT INTER-FUND DUE FROM {9NOAH}	66,840	66,840	0
LT INTER-FUND DUE FROM {9FAR}	462,869	462,869	0
LT INTER-FUND DUE FROM {9BV}	241,026	241,026	0
LT INTER-FUND DUE FROM {9CR1}	83,438	83,438	0
LT INTER-FUND DUE FROM {9CR2}	121,904	121,904	0
LT INTER-FUND DUE FROM {VILLAS}	214,719	214,719	0
<b>LT INTER-FUND DUE FROM</b>	<b>2,390,435</b>	<b>2,390,435</b>	<b>0</b>
A/R P-NOTES - LONG TERM	-665,630	-665,630	0
<b>A/R P-NOTES - LONG TERM</b>	<b>-665,630</b>	<b>-665,630</b>	<b>0</b>
TAX CREDIT FEES	71,655	71,655	0
<b>TAX CREDIT FEES</b>	<b>71,655</b>	<b>71,655</b>	<b>0</b>
PREPAID LEASE COSTS	4,640,570	4,640,570	0
<b>PREPAID LEASE COSTS</b>	<b>4,640,570</b>	<b>4,640,570</b>	<b>0</b>
LEASES RECEIVABLE	2,708,702	2,708,702	0
<b>LEASES RECEIVABLE</b>	<b>2,708,702</b>	<b>2,708,702</b>	<b>0</b>
ACCUMULATED AMORTIZATION	-4,416,383	-4,416,383	0
<b>ACCUMULATED AMORTIZATION</b>	<b>-4,416,383</b>	<b>-4,416,383</b>	<b>0</b>
LT INTER-PROPERTY {9EC}	381,436	381,436	0
LT INTER-PROPERTY {9NOAH}	1	1	0
LT INTER-PROPERTY {9FAR}	157,612	157,612	0
LT INTER-PROPERTY {9BV}	21,169	21,169	0
LT INTER-PROPERTY {9CR1}	103,467	103,467	0
LT INTER-PROPERTY {9CR2}	22,326	22,326	0
LT INTER-PROPERTY {VILLAS}	227,254	227,254	0
<b>LT INTER-PROPERTY</b>	<b>913,265</b>	<b>913,265</b>	<b>0</b>
INVESTMENT IN JOINT VENTURES	2,296,065	2,296,065	0
<b>INVESTMENT IN JOINT VENTURES</b>	<b>2,296,065</b>	<b>2,296,065</b>	<b>0</b>
<b>TOTAL NON-CURRENT ASSETS</b>	<b>47,812,059</b>	<b>47,911,181</b>	<b>-99,122</b>
<b>TOTAL ASSETS</b>	<b>70,748,611</b>	<b>71,664,195</b>	<b>-915,584</b>
<b>LIABILITIES AND EQUITY</b>			
<b>LIABILITIES</b>			
<b>ACCOUNTS PAYABLE</b>			
ACCOUNTS PAYABLE	441,991	499,050	-57,058
<b>ACCOUNTS PAYABLE</b>	<b>441,991</b>	<b>499,050</b>	<b>-57,058</b>
A/P OTHER	-3,198	-3,198	0
<b>A/P OTHER</b>	<b>-3,198</b>	<b>-3,198</b>	<b>0</b>
ACCRUED MGMT & BKPPING FEE	146,296	146,296	0
ACCRUED FRONT-LINE FEES	851,799	944,191	-92,393
<b>ACCRUED FEES</b>	<b>998,095</b>	<b>1,090,487</b>	<b>-92,393</b>
<b>ACCR WAGES &amp; WITHHOLDINGS</b>			
COURT ORDERED WITHHOLDING	5	5	0
OTHER WITHHOLDING	-100	0	-100
DEFERRED COMPENSATION WITHHOLDING	-3,097	-3,097	0
ACCRUED PAYROLL	0	301,732	-301,732
ACCRUED PAYROLL TAXES	-247	27,549	-27,796
EE INS DEDUCTIONS	13,545	9,075	4,470
<b>ACCR WAGES &amp; WITHHOLDINGS</b>	<b>10,105</b>	<b>335,264</b>	<b>-325,159</b>
ACCRUED INTEREST BRIDGE	798,130	798,130	0
ACCRUED INTEREST HIO	3,212,995	3,212,995	0
ACCRUED INTEREST OTHER	690,100	690,100	0
<b>TOTAL ACCRUED INTEREST</b>	<b>4,701,225</b>	<b>4,701,225</b>	<b>0</b>

TENANT SECURITY DEPOSIT	656,933	663,166	-6,233
PET DEPOSIT	6,730	6,730	0
DEPOSIT REFUND ACCOUNT	39,817	39,693	124
<b>TENANT SECURITY DEPOSIT</b>	<b>703,480</b>	<b>709,589</b>	<b>-6,109</b>
DEFERRED REVENUE	2,020,887	2,020,887	0
Deferred Revenue - HUD Funds	1,099,373	1,330,437	-231,064
TENANT PREPAID RENT	317,854	324,856	-7,002
NO UNIT HOLDING ACCT	9,824	9,324	500
<b>UNEARNED REVENUE</b>	<b>3,447,938</b>	<b>3,685,504</b>	<b>-237,566</b>
MORTGAGE PAYABLE - CURRENT	50,933	50,727	206
<b>CURRENT PORTION OF DEBT</b>	<b>50,933</b>	<b>50,727</b>	<b>206</b>
OTHER CURRENT LIABILITIES	-213,641	-213,641	0
CONTRACT RETAINAGE	66,319	66,319	0
<b>OTHER CURRENT LIABILITIES</b>	<b>-147,322</b>	<b>-147,322</b>	<b>0</b>
A/P OTHER - INTER-PROPERTY	50,000	50,000	0
<b>INTER-PROGRAM PAYABLES</b>	<b>50,000</b>	<b>50,000</b>	<b>0</b>
INTER-FUND DUE TO {COCC}	456,993	482,498	-25,505
INTER-FUND DUE TO {9EC}	30,583	30,583	0
INTER-FUND DUE TO {9KCC}	19,877	19,877	0
INTER-FUND DUE TO {9NOAH}	4,675	4,675	0
INTER-FUND DUE TO {9SEC}	180,663	173,462	7,201
INTER-FUND DUE TO {9FAR}	11,651	11,651	0
INTER-FUND DUE TO {9BV}	10,214	10,214	0
INTER-FUND DUE TO {9CR1}	4,579	4,390	189
INTER-FUND DUE TO {9CR2}	2,903	2,903	0
INTER-FUND DUE TO {VILLAS}	-49,174	-49,174	0
INTER-FUND DUE TO {HCV ADM}	594,937	610,815	-15,877
INTER-FUND DUE TO {PUB HSG}	27,096	8,667	18,429
INTER-FUND DUE TO {ROSS GRANT}	6,426	6,426	0
INTER-FUND DUE TO {FSS GRANT}	24,198	11,626	12,572
INTER-FUND DUE TO {EHV}	914	914	0
<b>INTER-FUND DUE TO</b>	<b>1,326,534</b>	<b>1,329,526</b>	<b>-2,992</b>
<b>TOTAL CURRENT LIABILITIES</b>	<b>11,579,780</b>	<b>12,300,850</b>	<b>-721,070</b>
MORTGAGE PAYABLE	1,434,826	1,439,053	-4,227
LOAN PAYABLE CDBG	502,000	502,000	0
LOAN PAYABLE OHA	4,924,142	4,924,142	0
ACCRUED INTEREST LONG TERM	4,000	4,000	0
ACCR INT L-T CDBG LOAN	64,373	64,373	0
EC, NOAH, Bayview, Farnam Loans	2,625,492	2,625,492	0
MORTGAGE-HIO	1,349,569	1,349,569	0
MORTGAGE-OHA # 2	539,949	539,949	0
LONG TERM LIABILITIES - OPERATING	324,213	324,213	0
<b>LONG TERM DEBT</b>	<b>11,768,563</b>	<b>11,772,791</b>	<b>-4,227</b>
NONCURRENT LIABILITIES - OTHER	0	0	0
<b>LT LIABILITIES - OTHER</b>	<b>0</b>	<b>0</b>	<b>0</b>
FSS ESCROW	611,372	592,823	18,549
<b>FSS ESCROW</b>	<b>611,372</b>	<b>592,823</b>	<b>18,549</b>
LT ACCRUED MGMT & BKKPING FEE	792,272	792,272	0
LT ACCRUED FRONT-LINE FEES	100,534	100,534	0
LT ACCRUED FEES	20,458	20,458	0
<b>TOTAL LT ACRUED FEES</b>	<b>913,264</b>	<b>913,264</b>	<b>0</b>
COMPENSATED ABSENCES-LONG TERM	612,087	612,087	0
<b>COMP ABSENCES-LONG TERM</b>	<b>612,087</b>	<b>612,087</b>	<b>0</b>
LT INTER-FUND DUE TO {COCC}	643,500	643,500	0
LT INTER-FUND DUE TO {HIOOPER}	420,241	420,241	0
LT INTER-FUND DUE TO {9EC}	17,565	17,565	0
LT INTER-FUND DUE TO {9KCC}	228,907	228,907	0
LT INTER-FUND DUE TO {9NOAH}	176,615	176,615	0
LT INTER-FUND DUE TO {9FAR}	37,389	37,389	0
LT INTER-FUND DUE TO {9BV}	100,215	100,215	0
LT INTER-FUND DUE TO {9CR1}	257,391	257,391	0

LT INTER-FUND DUE TO {9CR2}	92,233	92,233	0
LT INTER-FUND DUE TO {VILLAS}	416,378	416,378	0
<b>LT INTER-FUND DUE TO</b>	<b>2,390,435</b>	<b>2,390,435</b>	<b>0</b>
<b>TOTAL NON-CURRENT LIABILITIES</b>	<b>16,295,722</b>	<b>16,281,400</b>	<b>14,322</b>
<b>TOTAL LIABILITIES</b>	<b>27,875,502</b>	<b>28,582,250</b>	<b>-706,748</b>
<b>EQUITY</b>			
CAPITAL ACCOUNT GENERAL PARTNER	1,600,653	1,600,653	0
CAPITAL ACCOUNT LIMITED PARTNER	1,808,269	1,808,269	0
CAPITAL ACCOUNT SPECIAL LIMITED PARTNER	30	30	0
NET INVESTED IN CAPITAL ASSETS	24,349,745	24,349,745	0
<b>NET INVEST IN CAPITAL ASSETS</b>	<b>27,758,697</b>	<b>27,758,697</b>	<b>0</b>
RESTRICTED NET ASSETS	-5,591,846	-5,591,846	0
<b>RESTRICTED NET ASSETS</b>	<b>-5,591,846</b>	<b>-5,591,846</b>	<b>0</b>
RETAINED EARNINGS	11,307,857	11,516,692	-208,836
<b>RETAINED EARNINGS</b>	<b>11,307,857</b>	<b>11,516,692</b>	<b>-208,836</b>
CONTRA EQUITY	6,821,512	6,821,512	0
UNRESTRICTED NET ASSETS	14,720,314	14,720,314	0
<b>UNRESTRICTED NET POSITION</b>	<b>7,898,802</b>	<b>7,898,802</b>	<b>0</b>
RE - EQUITY TRANSFERS	1,499,600	1,499,600	0
<b>RE - EQUITY TRANSFERS</b>	<b>1,499,600</b>	<b>1,499,600</b>	<b>0</b>
<b>TOTAL EQUITY</b>	<b>42,873,109</b>	<b>43,081,945</b>	<b>-208,836</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>70,748,611</b>	<b>71,664,195</b>	<b>-915,584</b>
<b>TOTAL OF ALL</b>	<b>0</b>	<b>0</b>	<b>0</b>

New Agency Structure after FMR (7agency2)

**Budget Comparison**

Period = Jan 2025

Book = Accrual ; Tree = ysi\_is

	January 2025			January 2024	
	Actual	Budget	Variance	Actual	Change
<b>REVENUES</b>	<b>6,560,442</b>	<b>6,368,666</b>	<b>191,776</b>	<b>5,248,288</b>	<b>1,312,154</b>
<b>EXPENSES</b>	<b>6,769,278</b>	<b>6,614,991</b>	<b>-154,287</b>	<b>5,981,326</b>	<b>-787,952</b>
<b>TRANSFERS</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>PRIOR PERIOD ADJUSTMENT</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>584,367</b>	<b>584,367</b>
<b>NET OPERATING INCOME (LOSS)</b>	<b>-208,836</b>	<b>-246,325</b>	<b>37,489</b>	<b>-1,317,405</b>	<b>1,108,569</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>37,494</b>	<b>2,310</b>	<b>35,184</b>	<b>-1,069,795</b>	<b>1,107,289</b>

New Agency Structure after FMR (7agency2)

## Budget Comparison

Period = Jan 2025

Book = Accrual ; Tree = ysi\_is

	January 2025			January 2024	
	Actual	Budget	Variance	Actual	Change
<b>REVENUES</b>					
<b>TENANT REVENUES</b>					
DWELLING RENTS	647,117	581,232	65,884	656,928	-9,811
DWELLING RENTS SUBSIDY	35,418	28,030	7,387	42,936	-7,519
LATE FEES	19,104	16,916	2,188	14,777	4,327
LATE FEES (P-NOTES)	0	78	-78	0	0
LEGAL FEES	10,858	4,151	6,707	1,050	9,808
MAINTENANCE FEES	32,708	17,511	15,197	6,299	26,409
OTHER TENANT REVENUE	20,555	4,231	16,324	7,520	13,035
FRAUD RECOVERY REVENUE	400	235	165	50	350
<b>TOTAL TENANT REVENUES</b>	<b>766,159</b>	<b>652,385</b>	<b>113,774</b>	<b>729,561</b>	<b>36,598</b>
<b>HUD GRANTS AND SUBSIDY</b>					
REVENUES-HUD SUBSIDY	633,139	697,284	-64,146	567,622	65,517
HOUSING ASST PAYMENTS	3,748,073	3,608,624	139,449	3,111,313	636,760
ONGOING ADMIN FEES EARNED	301,488	292,372	9,116	294,257	7,231
REVENUES - HUD CAPITAL - HARD COSTS	104,498	0	104,498	112,110	-7,612
REVENUES - HUD CAPITAL - SOFT COSTS	345,798	281,491	64,307	160,079	185,719
<b>TOTAL HUD GRANTS AND SUBSIDY</b>	<b>5,132,996</b>	<b>4,879,771</b>	<b>253,225</b>	<b>4,245,381</b>	<b>887,616</b>
<b>TOTAL FEE REVENUE</b>					
MANAGEMENT FEE	181,849	176,765	5,084	180,322	1,527
BOOKKEEPING FEE	48,270	47,701	569	48,592	-322
FRONT LINE SERVICE FEE	160,175	227,244	-67,069	166,244	-6,069
FRONT LINE SERVICE FEE {IT}	6,881	6,892	-11	14,950	-8,069
OTHER FEES FOR SERVICE	0	5,240	-5,240	0	0
<b>TOTAL FEE REVENUE</b>	<b>397,175</b>	<b>463,841</b>	<b>-66,666</b>	<b>410,109</b>	<b>-12,934</b>
OTHER GOV'T GRANTS/DONATIONS	71,935	246,315	-174,380	12,827	59,108
<b>TOTAL OTHER GOV'T GRANTS DONATIONS</b>	<b>71,935</b>	<b>246,315</b>	<b>-174,380</b>	<b>12,827</b>	<b>59,108</b>
<b>INVESTMENT INCOME</b>					
INTEREST INCOME - MAIN	2,974	2,990	-16	2,761	212
<b>TOTAL INTEREST INCOME - MAIN</b>	<b>2,974</b>	<b>2,990</b>	<b>-16</b>	<b>2,761</b>	<b>212</b>
INTEREST INCOME - OTHER	0	8,988	-8,988	0	0
<b>TOTAL NON-CASH INT INCOME {HIO}</b>	<b>0</b>	<b>8,988</b>	<b>-8,988</b>	<b>0</b>	<b>0</b>
INTEREST INCOME - RESTRICTED FUNDS	1,075	1,257	-182	1,237	-162
<b>INT INCOME - RESTRICT FUNDS</b>	<b>1,075</b>	<b>1,257</b>	<b>-182</b>	<b>1,237</b>	<b>-162</b>
<b>OTHER INCOME</b>					
NON-DWELLING RENTS	34,706	37,563	-2,857	-161,887	196,594
MISCELLANEOUS INCOME	100	146	-46	125	-25
COMMISSION INCOME	4,717	6,058	-1,340	6,889	-2,171
ADMINISTRATIVE FEES	1,692	1,802	-110	1,283	410
DONATIONS - GENERAL	3	2	1	3	0
MISCELLANEOUS GRANT REVENUE	0	7,000	-7,000	0	0
DEVELOPERS FEES	0	60,548	-60,548	0	0
INSURANCE PROCEEDS	146,909	0	146,909	0	146,909
<b>TOTAL OTHER INCOME</b>	<b>188,128</b>	<b>113,119</b>	<b>75,009</b>	<b>-153,588</b>	<b>341,716</b>
<b>TOTAL REVENUES</b>	<b>6,560,442</b>	<b>6,368,666</b>	<b>191,776</b>	<b>5,248,288</b>	<b>1,312,154</b>
<b>EXPENSES</b>					
<b>OPERATING EXPENSES</b>					
<b>ADMINISTRATIVE EXPENSES</b>					
<b>ADMINISTRATIVE SALARIES</b>					
ADMIN SALARIES	373,189	606,344	233,155	388,663	15,473
ADMIN CASUAL LABOR	-854	32,119	32,972	0	854
ALLOC ADMIN SALARIES	-17,618	0	17,618	-24,736	-7,118
<b>TOTAL ADMIN SALARIES</b>	<b>354,717</b>	<b>638,463</b>	<b>283,746</b>	<b>363,926</b>	<b>9,209</b>
AUDIT EXPENSE	2,875	9,504	6,629	39,750	36,875
MANAGEMENT FEE	181,849	176,765	-5,084	180,322	-1,527
BOOKKEEPING FEE	48,270	47,701	-569	48,592	322
NIFA MONITORING FEE	4,020	592	-3,428	4,020	0

<b>TOTAL ADMINISTRATIVE FEE</b>	<b>237,014</b>	<b>234,561</b>	<b>-2,453</b>	<b>272,685</b>	<b>35,671</b>
ADMIN EMPLOYEE BENEFITS	313	5,293	4,980	5,691	5,379
ALLOC ADMIN EMP BENEFITS	0	0	0	0	0
ER MEDICAL/DENTAL INS - ADMIN	136,642	131,926	-4,716	124,931	-11,712
ER PENSION - ADMIN	28,176	33,349	5,173	25,646	-2,530
ER TAXES-ADMIN	33,820	46,385	12,565	33,844	24
<b>TOTAL ADMIN EMPLOYEE BENEFITS</b>	<b>198,950</b>	<b>216,953</b>	<b>18,003</b>	<b>190,112</b>	<b>-8,839</b>
LEGAL SERVICES - OUTSIDE	25,464	12,683	-12,781	7,189	-18,274
TRAINING/CONFERENCE	3,616	7,187	3,571	3,730	114
BOARD MEETING/RETREAT	0	0	0	0	0
STAFF MEETING/RETREAT	939	378	-560	918	-20
TRAVEL	484	2,399	1,915	382	-102
MILEAGE	340	727	387	302	-37
ADMIN VEHICLE - FUEL	0	45	45	28	28
ADMIN VEHICLE - MTCE & REPAIR	510	269	-241	144	-366
ADMIN VEHICLE - LICENSE	0	8	8	0	0
PUBLICATIONS	0	148	148	0	0
MEMBERSHIPS	2,166	2,503	338	452	-1,714
PAYROLL PROCESSING FEE	6,539	5,311	-1,228	5,202	-1,337
TELEPHONE	10,906	14,402	3,496	3,458	-7,448
SAFETY EQUIPMENT/SUPPLIES	14	1,434	1,420	1,992	1,978
SAFETY TRAINING	0	17	17	0	0
LEGAL SERVICES - INTERNAL	17,618	16,862	-757	24,805	7,186
ALLOC INTERNAL LEGAL EXP	9,908	3,375	-6,533	315	-9,593
PRINTER SUPPLIES AND EXP	1,464	1,968	504	1,478	13
SOFTWARE EXP	6,714	18,267	11,553	24,005	17,291
OFFICE EXPENSE	805	906	101	0	-805
OFFICE FURNISHINGS	117	703	586	2,376	2,260
POSTAGE	8,700	6,170	-2,530	8,000	-700
OFFICE SUPPLIES	3,186	4,844	1,658	5,836	2,650
OFFICE EQUIPMENT LEASES	2,744	3,835	1,091	1,936	-808
COMPUTER EQUIPMENT	5,589	6,564	975	6,727	1,137
NETWORK COMMUNICATION	3,333	6,279	2,946	4,177	844
ADVERTISING /NEWSPAPER ADS	118	163	45	0	-118
CABLE TV	708	433	-275	0	-708
EMPLOYEE HIRING & ADMIN EXP	3,227	3,409	182	281	-2,946
CONSULTING	7,636	12,239	4,603	-15,066	-22,702
BANK FEE	3,031	1,217	-1,814	2,284	-747
SECT 8 PORT OUT ADMIN FEES	1,856	0	-1,856	581	-1,275
LATE FEES	487	6,345	5,859	0	-487
MISCELLANEOUS EXPENSE	6,580	324	-6,256	-500	-7,080
FEES - PERMITS	5	349	344	0	-5
PROPERTY TAX	0	2,802	2,802	0	0
RENTAL EXPENSE	7,922	2,309	-5,613	-2,185	-10,107
IT SUPPORT - CONTR SERV	14,098	18,601	4,503	18,834	4,736
PROFESSIONAL FEES	0	122	122	0	0
PROFESSIONAL/CONTR SERV	0	50	50	189	189
<b>TOTAL OTHER ADMIN EXPENSES</b>	<b>156,823</b>	<b>165,648</b>	<b>8,825</b>	<b>107,870</b>	<b>-48,953</b>
FEE FOR SERVICE	6,881	6,892	11	14,950	8,069
<b>TOTAL FEE FOR SERVICE</b>	<b>6,881</b>	<b>6,892</b>	<b>11</b>	<b>14,950</b>	<b>8,069</b>
<b>TOTAL ADMINISTRATIVE EXPENSES</b>	<b>954,386</b>	<b>1,262,517</b>	<b>308,131</b>	<b>949,543</b>	<b>-4,842</b>
<b>RESIDENT SERVICES SALARIES</b>					
RESIDENT SERVICES SALARIES	2,747	4,629	1,882	3,152	405
RESIDENT SERVICE CASUAL LABOR	6,575	0	-6,575	6,475	-100
<b>TOTAL RESIDENT SERV SALARIES</b>	<b>9,322</b>	<b>4,629</b>	<b>-4,693</b>	<b>9,627</b>	<b>305</b>
RELOCATION EXPENSES	73,428	75,966	2,538	79,212	5,785
RELOCATION - SECURITY DEPOSITS	0	1,033	1,033	0	0
RELOCATION - MOVING EXPENSE	1,100	378	-722	129	-970
<b>TOTAL RELOCATION EXPENSE</b>	<b>74,528</b>	<b>77,377</b>	<b>2,849</b>	<b>79,342</b>	<b>4,814</b>
ER MEDICAL/DENTAL INS - RES SERV	1,891	1,980	89	1,816	-74
ER PENSION - RES SERV	235	255	20	228	-7
ER TAXES-RES SERV	240	354	115	262	23
<b>TOTAL RESIDENT SERV EMP BENEFITS</b>	<b>2,365</b>	<b>2,588</b>	<b>223</b>	<b>2,307</b>	<b>-58</b>
YOUTH ACTIVITIES	400	0	-400	0	-400
YOUTH ACTIVITIES - SCHOLARSHIPS	0	704	704	4,032	4,032
<b>TOTAL YOUTH ACTIVITIES</b>	<b>400</b>	<b>704</b>	<b>304</b>	<b>4,032</b>	<b>3,632</b>
RESIDENT SERVICES EXPENSE	55	7,823	7,768	0	-55

RESIDENT SERVICES EVENTS & ACTIVITIES	3,272	1,510	-1,762	343	-2,929
RESIDENT FUND - STIPENDS	0	7,316	7,316	4,057	4,057
RESIDENT FUND - MEETING EXPENSES	15	600	585	1,443	1,428
RESIDENT FUND - OTHER	-2,100	2,936	5,036	0	2,100
<b>TOTAL RESIDENT FUND</b>	<b>1,242</b>	<b>20,185</b>	<b>18,943</b>	<b>5,843</b>	<b>4,601</b>
FRONT LINE SERVICE FEE	136,452	182,918	46,466	130,959	-5,493
<b>TOTAL FEE FOR SERVICE</b>	<b>136,452</b>	<b>182,918</b>	<b>46,466</b>	<b>130,959</b>	<b>-5,493</b>
<b>TOTAL OTHER RESIDENT SERVICES</b>	<b>224,308</b>	<b>288,401</b>	<b>64,092</b>	<b>232,109</b>	<b>7,801</b>
<b>TOTAL RESIDENT SERVICE EXPENSES</b>	<b>224,308</b>	<b>288,401</b>	<b>64,092</b>	<b>232,109</b>	<b>7,801</b>
<b>UTILITY EXPENSES</b>					
UTILITY - WATER	32,855	35,559	2,704	38,478	5,624
UTILITY - ELECTRIC	216,126	136,431	-79,694	194,709	-21,417
UTILITY - GAS	94,672	23,507	-71,166	64,286	-30,387
UTILITY - SEWER	50,109	47,406	-2,703	54,859	4,750
<b>TOTAL UTILITY EXPENSES</b>	<b>393,762</b>	<b>242,903</b>	<b>-150,859</b>	<b>352,332</b>	<b>-41,430</b>
<b>TOTAL MAINTENANCE</b>					
<b>MAINTENANCE SALARIES</b>					
MAINTENANCE SALARIES	170,243	238,059	67,816	196,581	26,338
MAINTENANCE CASUAL LABOR	0	0	0	4,333	4,333
ALLOC MAINT SALARIES	0	0	0	-44	-44
<b>TOTAL MAINTENANCE SALARIES</b>	<b>170,243</b>	<b>238,059</b>	<b>67,816</b>	<b>200,870</b>	<b>30,626</b>
APPLIANCES	13,915	20,340	6,425	11,582	-2,332
DWELLING EQUIPMENT	174	99	-75	0	-174
PAINT	6,394	6,414	20	3,690	-2,703
CLEANING SUPPLIES	1,857	2,569	711	2,172	315
HVAC MATERIALS	4,741	2,906	-1,835	3,285	-1,457
LANDSCAPING MATERIALS	0	76	76	0	0
PLUMBING MATERIALS	10,517	14,757	4,240	17,140	6,623
ELECTRICAL MATERIALS	4,494	6,408	1,914	9,040	4,546
GASOLINE USAGE FOR MAINT VEHICLES	3,655	3,489	-166	3,811	157
PEST CONTROL SUPPLIES	0	2,642	2,642	3,443	3,443
MAINTENANCE TOOLS	4,130	1,665	-2,464	2,076	-2,054
MAINTENANCE MATERIALS	29,562	32,870	3,308	34,346	4,783
MAINTENANCE EQUIPMENT	150	400	251	1,450	1,300
Early Pay Discount	0	-2,587	-2,587	-19	-19
<b>TOTAL MAINTENANCE MATERIALS</b>	<b>79,588</b>	<b>92,049</b>	<b>12,461</b>	<b>92,017</b>	<b>12,429</b>
ELEVATORS - CONTRACTED SERV	6,372	9,993	3,621	-10,061	-16,433
HVAC - CONTRACTED SERV	26,453	18,580	-7,874	21,817	-4,636
LAWNS - CONTRACTED SERV	4,379	9,971	5,592	0	-4,379
MATS/UNIFORMS - CONTRACTED SVCE	1,082	483	-600	120	-962
PEST CONTROL - CONTRACTED SERV	8,200	1,548	-6,652	0	-8,200
SNOW REMOVAL - CONTRACTED SERV	6,090	8,273	2,183	5,528	-562
TRASH - CONTRACTED SERV	26,133	30,831	4,698	42,541	16,408
LANDFILL FEES - CONTRACTED SERV	143	152	9	167	23
CLEANING - CONTRACTED SERV	54,605	55,772	1,167	65,475	10,870
PAINTING - CONTRACTED SERV	12,827	19,130	6,303	6,970	-5,857
ARBORIST - CONTRACTED SERV	700	4,609	3,909	0	-700
FLOORING REPL - CONTRACTED SERV	85,970	34,561	-51,409	15,444	-70,527
OUTDOOR CLEANING - CONTRACTED SERV	6,000	1,555	-4,445	4,650	-1,350
CONCRETE WORK - CONTRACTED SERV	177	356	179	0	-177
ELECTRICAL - CONTRACTED SERV	12,247	12,929	681	4,172	-8,076
LANDSCAPE - CONTRACTED SERV	0	4,574	4,574	0	0
PLUMBING - CONTRACTED SERV	12,005	36,648	24,644	12,086	82
ROOF REPAIRS - CONTRACTED SERV	2,860	22	-2,838	0	-2,860
EXTERIOR REPAIRS - CONTRACTED SERV	9,131	113	-9,018	8,402	-729
VEHICLE MAINTENANCE & REPAIR	3,065	4,390	1,325	5,350	2,285
MAINTENANCE EQUIPMENT REPAIR	0	608	608	0	0
WINDOWS/DOORS REPL - CONTRACTED SERV	10,219	7,739	-2,480	2,950	-7,269
VACANT TURNOVER - CONTRACTED SERV	0	427	427	11,900	11,900
INSPECTIONS - CONTRACTED SERV	7,900	1,468	-6,432	2,210	-5,690
INTERIOR REPAIRS - CONTRACTED SERV	49,946	6,519	-43,427	700	-49,246
Fire Safety - Contracted Services	23,669	19,166	-4,503	16,093	-7,576
HAZMAT - CONTRACTED SERV	9,450	483	-8,967	14,770	5,320
DWELLING/MECHANICAL UPGRADES - CONTR SERV	0	143	143	0	0
ALLOC INSPECTIONS EXPENSE	0	1,292	1,292	0	0
<b>TOTAL MAINT SERVICES AND CONTRACTS</b>	<b>379,624</b>	<b>292,336</b>	<b>-87,288</b>	<b>231,283</b>	<b>-148,341</b>
MAINTENANCE EMPLOYEE BENEFITS	82	75	-7	44	-39

ALLOC MAINT EMP BENEFITS	0	0	0	-19	-19
ER MED/DENTAL INS - MAINT	66,272	62,150	-4,122	62,992	-3,279
ER PENSION - MAINT	12,208	13,093	885	12,373	164
ER TAXES - MAINT	15,727	18,212	2,484	17,052	1,324
<b>TOTAL MAINT EMPLOYEE BENEFITS</b>	<b>94,289</b>	<b>93,530</b>	<b>-759</b>	<b>92,441</b>	<b>-1,848</b>
<b>TOTAL MAINTENANCE EXPENSES</b>	<b>723,744</b>	<b>715,973</b>	<b>-7,771</b>	<b>616,611</b>	<b>-107,134</b>
<b>PROTECTIVE SERVICE EXPENSES</b>					
<b>PROTECTIVE SERVICE SALARIES</b>					
SECURITY SALARY	13,416	25,366	11,950	11,321	-2,095
<b>TOTAL PROTECTIVE SERV SALARIES</b>	<b>13,416</b>	<b>25,366</b>	<b>11,950</b>	<b>11,321</b>	<b>-2,095</b>
FRONT LINE SERVICE FEES	23,724	44,327	20,603	35,285	11,562
<b>TOTAL FEE FOR SERVICE</b>	<b>23,724</b>	<b>44,327</b>	<b>20,603</b>	<b>35,285</b>	<b>11,562</b>
GUARDS - CONTRACTED SECURITY	0	42	42	8,970	8,970
SECURITY & MONITORING	5,494	3,311	-2,183	-21,715	-27,208
SECURITY - CONTRACTED SERV	472	919	447	0	-472
SECURITY EQUIPMENT & MATERIALS	72,428	8,339	-64,089	5,011	-67,417
<b>TOTAL SECURITY EXPENSE</b>	<b>78,394</b>	<b>12,611</b>	<b>-65,783</b>	<b>-7,734</b>	<b>-86,128</b>
ER MEDICAL/DENTAL INS - SECURITY	907	2,685	1,777	4,613	3,706
ER PENSION - SECURITY	1,036	1,395	359	680	-356
ER TAXES - SECURITY	1,305	1,941	635	978	-327
<b>TOTAL SECURITY EMPLOYEE BENEFITS</b>	<b>3,249</b>	<b>6,020</b>	<b>2,772</b>	<b>6,272</b>	<b>3,023</b>
<b>TOTAL PROTECT SERVICE EXPENSES</b>	<b>118,783</b>	<b>88,325</b>	<b>-30,458</b>	<b>45,144</b>	<b>-73,639</b>
<b>GENERAL EXPENSES</b>					
<b>INSURANCE EXPENSES</b>					
INSURANCE - LIABILITY	6,642	12,658	6,016	26,610	19,968
INSURANCE - PROPERTY	13,672	38,119	24,447	111,153	97,482
INSURANCE - WORKERS COMP	26,908	21,648	-5,260	0	-26,908
<b>TOTAL INSURANCE EXP</b>	<b>47,222</b>	<b>72,426</b>	<b>25,204</b>	<b>137,763</b>	<b>90,542</b>
BAD DEBT EXPENSE	84,649	46,809	-37,840	50,498	-34,151
<b>TOTAL BAD DEBT EXPENSE</b>	<b>84,649</b>	<b>46,809</b>	<b>-37,840</b>	<b>50,498</b>	<b>-34,151</b>
CLOSING COSTS	0	19	19	0	0
MORTGAGE INTEREST	6,042	5,854	-188	5,837	-206
<b>TOTAL LOAN INTEREST</b>	<b>6,042</b>	<b>5,854</b>	<b>-188</b>	<b>5,837</b>	<b>-206</b>
<b>TOTAL GENERAL EXPENSES</b>	<b>137,914</b>	<b>125,108</b>	<b>-12,806</b>	<b>194,099</b>	<b>56,185</b>
<b>TOTAL OPERATING EXPENSES</b>	<b>2,552,897</b>	<b>2,723,227</b>	<b>170,330</b>	<b>2,389,838</b>	<b>-163,059</b>
<b>NON-OPERATING EXPENSES</b>					
<b>HAP EXPENSES</b>					
HAP EXPENSE	3,766,742	3,435,727	-331,015	3,190,477	-576,265
HAP EXPENSE - PORTABLE	45,909	44,191	-1,718	4,842	-41,067
UTILITY REIMBURSEMENT	157,400	163,210	5,810	148,559	-8,841
<b>TOTAL HAP EXPENSES</b>	<b>3,970,051</b>	<b>3,643,128</b>	<b>-326,923</b>	<b>3,343,878</b>	<b>-626,173</b>
DEPRECIATION EXPENSE	246,330	248,635	2,306	247,610	1,280
<b>TOTAL DEPR &amp; AMORT EXPENSE</b>	<b>246,330</b>	<b>248,635</b>	<b>2,306</b>	<b>247,610</b>	<b>1,280</b>
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>4,216,381</b>	<b>3,891,764</b>	<b>-324,617</b>	<b>3,591,488</b>	<b>-624,893</b>
<b>TOTAL EXPENSES</b>	<b>6,769,278</b>	<b>6,614,991</b>	<b>-154,287</b>	<b>5,981,326</b>	<b>-787,952</b>
TRANSFERS BET PROGRAMS & PROJECTS - IN	29,889	252,534	-222,645	31,634	-1,745
TRANSFERS BET PROGRAMS & PROJECTS - OUT	29,889	252,534	222,645	31,634	1,745
OPERATING TRANSFER - IN	0	0	0	24,614	-24,614
OPERATING TRANSFER - OUT	0	0	0	24,614	24,614
<b>TOTAL TRANSFERS</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
PRIOR PERIOD ADJUSTMENT	0	0	0	584,367	584,367
<b>TOTAL PRIOR PERIOD ADJUSTMENT</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>584,367</b>	<b>584,367</b>
<b>NET OPERATING INCOME (LOSS)</b>	<b>-208,836</b>	<b>-246,325</b>	<b>37,489</b>	<b>-1,317,405</b>	<b>1,108,569</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>37,494</b>	<b>2,310</b>	<b>35,184</b>	<b>-1,069,795</b>	<b>1,107,289</b>

Property = 7pubhsg 7cap  
**Budget Comparison**  
 Period = Jan 2025  
 Book = Accrual ; Tree = ysi\_is

	January 2025			January 2024	
	Actual	Budget	Variance	Actual	Change
<b>REVENUES</b>					
<b>TENANT REVENUES</b>					
DWELLING RENTS	574,879	532,102	42,777	592,554	-17,675
LATE FEES	16,445	15,169	1,276	12,617	3,828
LATE FEES {P-NOTES}	0	70	-70	0	0
LEGAL FEES	950	515	435	1,050	-100
MAINTENANCE FEES	27,974	14,225	13,749	5,509	22,465
OTHER TENANT REVENUE	20,317	4,063	16,254	7,287	13,030
FRAUD RECOVERY REVENUE	250	82	168	50	200
<b>TOTAL TENANT REVENUES</b>	<b>640,815</b>	<b>566,226</b>	<b>74,589</b>	<b>619,067</b>	<b>21,748</b>
<b>HUD GRANTS AND SUBSIDY</b>					
REVENUES-HUD SUBSIDY	633,139	686,782	-53,643	567,622	65,517
REVENUES - HUD CAPITAL - HARD COSTS	104,498	0	104,498	112,110	-7,612
REVENUES - HUD CAPITAL - SOFT COSTS	345,798	281,491	64,307	160,079	185,719
<b>TOTAL HUD GRANTS AND SUBSIDY</b>	<b>1,083,435</b>	<b>968,273</b>	<b>115,162</b>	<b>839,811</b>	<b>243,625</b>
<b>INVESTMENT INCOME</b>					
INTEREST INCOME - MAIN	2,045	2,456	-411	2,553	-509
<b>TOTAL INTEREST INCOME - MAIN</b>	<b>2,045</b>	<b>2,456</b>	<b>-411</b>	<b>2,553</b>	<b>-509</b>
INTEREST INCOME - OTHER	0	8,392	-8,392	0	0
<b>TOTAL NON-CASH INT INCOME {HIO}</b>	<b>0</b>	<b>8,392</b>	<b>-8,392</b>	<b>0</b>	<b>0</b>
INTEREST INCOME - RESTRICTED FUNDS	410	503	-92	495	-85
<b>INT INCOME - RESTRICT FUNDS</b>	<b>410</b>	<b>503</b>	<b>-92</b>	<b>495</b>	<b>-85</b>
<b>OTHER INCOME</b>					
NON-DWELLING RENTS	22,149	25,876	-3,727	-173,127	195,276
MISCELLANEOUS INCOME	100	135	-35	125	-25
COMMISSION INCOME	4,660	5,954	-1,295	6,320	-1,660
INSURANCE PROCEEDS	146,909	0	146,909	0	146,909
<b>TOTAL OTHER INCOME</b>	<b>173,818</b>	<b>31,965</b>	<b>141,852</b>	<b>-166,682</b>	<b>340,499</b>
<b>TOTAL REVENUES</b>	<b>1,900,523</b>	<b>1,577,814</b>	<b>322,708</b>	<b>1,295,245</b>	<b>605,278</b>
<b>EXPENSES</b>					
<b>OPERATING EXPENSES</b>					
<b>ADMINISTRATIVE EXPENSES</b>					
<b>ADMINISTRATIVE SALARIES</b>					
ADMIN SALARIES	59,976	98,783	38,807	47,830	-12,146
ALLOC ADMIN SALARIES	0	0	0	3,782	3,782
<b>TOTAL ADMIN SALARIES</b>	<b>59,976</b>	<b>98,783</b>	<b>38,807</b>	<b>51,612</b>	<b>-8,364</b>
AUDIT EXPENSE	0	4,234	4,234	20,804	20,804
MANAGEMENT FEE	120,151	119,589	-561	120,216	66
BOOKKEEPING FEE	15,142	15,402	259	16,208	1,065
<b>TOTAL ADMINISTRATIVE FEE</b>	<b>135,293</b>	<b>139,225</b>	<b>3,932</b>	<b>157,228</b>	<b>21,935</b>
ADMIN EMPLOYEE BENEFITS	139	1,819	1,680	2,285	2,146
ALLOC ADMIN EMP BENEFITS	-13	0	13	1,196	1,209
ER MEDICAL/DENTAL INS - ADMIN	18,276	18,318	42	15,626	-2,650
ER PENSION - ADMIN	4,184	5,433	1,249	3,369	-815
ER TAXES-ADMIN	5,570	7,557	1,987	4,255	-1,315
<b>TOTAL ADMIN EMPLOYEE BENEFITS</b>	<b>28,155</b>	<b>33,127</b>	<b>4,972</b>	<b>26,731</b>	<b>-1,424</b>
LEGAL SERVICES - OUTSIDE	2,131	1,208	-923	204	-1,927
TRAINING/CONFERENCE	788	346	-442	0	-788
STAFF MEETING/RETREAT	498	85	-413	324	-174
TRAVEL	484	0	-484	0	-484
MILEAGE	1	230	228	246	245
ADMIN VEHICLE - FUEL	0	25	25	0	0
ADMIN VEHICLE - MTCE & REPAIR	510	210	-300	0	-510
ADMIN VEHICLE - LICENSE	0	8	8	0	0
PUBLICATIONS	0	21	21	0	0
MEMBERSHIPS	0	24	24	0	0
PAYROLL PROCESSING FEE	2,245	1,749	-496	1,792	-453
TELEPHONE	4,625	3,149	-1,477	958	-3,667

SAFETY EQUIPMENT/SUPPLIES	14	1,298	1,284	750	736
LEGAL SERVICES - INTERNAL	16,455	15,891	-564	23,296	6,842
ALLOC INTERNAL LEGAL EXP	8,963	3,022	-5,941	315	-8,648
PRINTER SUPPLIES AND EXP	158	197	39	141	-17
SOFTWARE EXP	3,778	5,385	1,607	7,706	3,928
OFFICE EXPENSE	48	4	-44	0	-48
OFFICE FURNISHINGS	0	5	5	0	0
POSTAGE	690	0	-690	0	-690
OFFICE SUPPLIES	78	1,254	1,176	1,368	1,290
OFFICE EQUIPMENT LEASES	962	1,179	217	751	-211
COMPUTER EQUIPMENT	2,713	745	-1,968	221	-2,492
NETWORK COMMUNICATION	1,286	3,617	2,331	2,514	1,228
CABLE TV	636	444	-191	0	-636
EMPLOYEE HIRING & ADMIN EXP	537	150	-387	66	-471
BANK FEE	0	451	451	-340	-340
LATE FEES	102	2,365	2,263	0	-102
MISCELLANEOUS EXPENSE	0	75	75	0	0
PROPERTY TAX	0	27	27	0	0
IT SUPPORT - CONTR SERV	375	7,014	6,639	7,618	7,243
PROFESSIONAL/CONTR SERV	0	40	40	138	138
<b>TOTAL OTHER ADMIN EXPENSES</b>	<b>48,075</b>	<b>50,217</b>	<b>2,142</b>	<b>48,067</b>	<b>-8</b>
FEE FOR SERVICE	6,246	6,387	140	13,571	7,325
<b>TOTAL FEE FOR SERVICE</b>	<b>6,246</b>	<b>6,387</b>	<b>140</b>	<b>13,571</b>	<b>7,325</b>
<b>TOTAL ADMINISTRATIVE EXPENSES</b>	<b>277,746</b>	<b>327,738</b>	<b>49,992</b>	<b>297,208</b>	<b>19,462</b>
<b>RESIDENT SERVICES SALARIES</b>					
RESIDENT SERVICES SALARIES	2,747	4,629	1,882	3,152	405
RESIDENT SERVICE CASUAL LABOR	6,400	0	-6,400	6,475	75
<b>TOTAL RESIDENT SERV SALARIES</b>	<b>9,147</b>	<b>4,629</b>	<b>-4,518</b>	<b>9,627</b>	<b>480</b>
RELOCATION EXPENSES	350	0	-350	0	-350
RELOCATION - MOVING EXPENSE	950	81	-869	0	-950
<b>TOTAL RELOCATION EXPENSE</b>	<b>1,300</b>	<b>81</b>	<b>-1,219</b>	<b>0</b>	<b>-1,300</b>
ER MEDICAL/DENTAL INS - RES SERV	1,891	1,980	89	1,816	-74
ER PENSION - RES SERV	235	255	20	228	-7
ER TAXES-RES SERV	240	354	115	262	23
<b>TOTAL RESIDENT SERV EMP BENEFITS</b>	<b>2,365</b>	<b>2,588</b>	<b>223</b>	<b>2,307</b>	<b>-58</b>
RESIDENT SERVICES EXPENSE	0	18	18	0	0
RESIDENT SERVICES EVENTS & ACTIVITIES	0	1	1	0	0
RESIDENT FUND - STIPENDS	0	1,424	1,424	1,932	1,932
RESIDENT FUND - MEETING EXPENSES	15	600	585	1,443	1,428
RESIDENT FUND - OTHER	0	-3	-3	0	0
<b>TOTAL RESIDENT FUND</b>	<b>15</b>	<b>2,040</b>	<b>2,025</b>	<b>3,374</b>	<b>3,360</b>
FRONT LINE SERVICE FEE	124,961	169,505	44,544	120,051	-4,910
<b>TOTAL FEE FOR SERVICE</b>	<b>124,961</b>	<b>169,505</b>	<b>44,544</b>	<b>120,051</b>	<b>-4,910</b>
<b>TOTAL OTHER RESIDENT SERVICES</b>	<b>137,788</b>	<b>178,844</b>	<b>41,055</b>	<b>135,360</b>	<b>-2,429</b>
<b>TOTAL RESIDENT SERVICE EXPENSES</b>	<b>137,788</b>	<b>178,844</b>	<b>41,055</b>	<b>135,360</b>	<b>-2,429</b>
<b>UTILITY EXPENSES</b>					
UTILITY - WATER	25,932	33,659	7,727	35,559	9,627
UTILITY - ELECTRIC	204,825	129,652	-75,173	181,482	-23,344
UTILITY - GAS	91,316	22,848	-68,468	63,404	-27,911
UTILITY - SEWER	39,151	44,413	5,262	49,968	10,817
<b>TOTAL UTILITY EXPENSES</b>	<b>361,224</b>	<b>230,573</b>	<b>-130,651</b>	<b>330,412</b>	<b>-30,811</b>
<b>TOTAL MAINTENANCE</b>					
<b>MAINTENANCE SALARIES</b>					
MAINTENANCE SALARIES	145,598	200,186	54,588	168,825	23,227
ALLOC MAINT SALARIES	-11,398	-7,611	3,787	-3,015	8,383
<b>TOTAL MAINTENANCE SALARIES</b>	<b>134,200</b>	<b>192,574</b>	<b>58,374</b>	<b>165,811</b>	<b>31,611</b>
APPLIANCES	13,915	18,529	4,614	11,578	-2,336
DWELLING EQUIPMENT	0	99	99	0	0
PAINT	4,547	5,650	1,103	3,339	-1,208
CLEANING SUPPLIES	1,310	1,873	563	1,942	632
HVAC MATERIALS	3,970	2,513	-1,458	2,855	-1,115
PLUMBING MATERIALS	9,914	12,063	2,149	14,930	5,016
ELECTRICAL MATERIALS	4,494	5,733	1,239	8,487	3,993
GASOLINE USAGE FOR MAINT VEHICLES	2,724	3,066	342	2,985	261
PEST CONTROL SUPPLIES	0	2,603	2,603	3,270	3,270
MAINTENANCE TOOLS	4,130	1,342	-2,787	2,076	-2,054

MAINTENANCE MATERIALS	27,352	29,379	2,027	33,057	5,705
MAINTENANCE EQUIPMENT	118	371	253	1,352	1,235
Early Pay Discount	0	-18	-18	-19	-19
<b>TOTAL MAINTENANCE MATERIALS</b>	<b>72,473</b>	<b>83,202</b>	<b>10,728</b>	<b>85,853</b>	<b>13,380</b>
ELEVATORS - CONTRACTED SERV	6,079	8,799	2,721	-10,839	-16,918
HVAC - CONTRACTED SERV	17,925	16,336	-1,589	20,815	2,890
LAWNS - CONTRACTED SERV	2,694	8,470	5,776	0	-2,694
MATS/UNIFORMS - CONTRACTED SVCE	512	331	-181	120	-392
PEST CONTROL - CONTRACTED SERV	5,140	1,187	-3,953	0	-5,140
SNOW REMOVAL - CONTRACTED SERV	4,650	7,792	3,142	4,988	338
TRASH - CONTRACTED SERV	24,054	26,744	2,689	35,637	11,583
LANDFILL FEES - CONTRACTED SERV	0	136	136	163	163
CLEANING - CONTRACTED SERV	49,140	50,573	1,433	61,410	12,270
PAINTING - CONTRACTED SERV	12,827	18,869	6,042	6,470	-6,357
ARBORIST - CONTRACTED SERV	700	4,336	3,636	0	-700
FLOORING REPL - CONTRACTED SERV	85,970	33,077	-52,893	11,853	-74,117
OUTDOOR CLEANING - CONTRACTED SERV	6,000	1,458	-4,542	4,650	-1,350
CONCRETE WORK - CONTRACTED SERV	177	356	179	0	-177
ELECTRICAL - CONTRACTED SERV	10,723	10,504	-219	1,355	-9,368
LANDSCAPE - CONTRACTED SERV	0	4,574	4,574	0	0
PLUMBING - CONTRACTED SERV	10,850	35,635	24,785	11,273	423
ROOF REPAIRS - CONTRACTED SERV	2,660	0	-2,660	0	-2,660
EXTERIOR REPAIRS - CONTRACTED SERV	9,131	113	-9,018	8,402	-729
VEHICLE MAINTENANCE & REPAIR	1,725	2,352	627	3,323	1,598
MAINTENANCE EQUIPMENT REPAIR	0	608	608	0	0
WINDOWS/DOORS REPL - CONTRACTED SERV	9,960	6,504	-3,456	2,950	-7,010
VACANT TURNOVER - CONTRACTED SERV	0	129	129	11,900	11,900
INSPECTIONS - CONTRACTED SERV	5,172	992	-4,180	1,585	-3,587
INTERIOR REPAIRS - CONTRACTED SERV	49,946	6,239	-43,707	700	-49,246
Fire Safety - Contracted Services	22,543	17,362	-5,180	14,557	-7,985
HAZMAT - CONTRACTED SERV	9,450	483	-8,967	14,770	5,320
DWELLING/MECHANICAL UPGRADES - CONTR SERV	0	143	143	0	0
ALLOC INSPECTIONS EXPENSE	0	986	986	0	0
<b>TOTAL MAINT SERVICES AND CONTRACTS</b>	<b>348,027</b>	<b>265,087</b>	<b>-82,940</b>	<b>206,082</b>	<b>-141,945</b>
MAINTENANCE EMPLOYEE BENEFITS	-104	2	106	-172	-68
ALLOC MAINT EMP BENEFITS	-5,851	-3,046	2,805	-1,457	4,394
ER MED/DENTAL INS - MAINT	54,120	52,290	-1,829	52,078	-2,042
ER PENSION - MAINT	10,638	11,010	372	10,656	18
ER TAXES - MAINT	13,480	15,314	1,834	14,674	1,194
<b>TOTAL MAINT EMPLOYEE BENEFITS</b>	<b>72,283</b>	<b>75,571</b>	<b>3,288</b>	<b>75,779</b>	<b>3,495</b>
<b>TOTAL MAINTENANCE EXPENSES</b>	<b>626,983</b>	<b>616,434</b>	<b>-10,549</b>	<b>533,524</b>	<b>-93,459</b>
<b>PROTECTIVE SERVICE EXPENSES</b>					
FRONT LINE SERVICE FEES	15,863	40,166	24,303	32,539	16,677
<b>TOTAL FEE FOR SERVICE</b>	<b>15,863</b>	<b>40,166</b>	<b>24,303</b>	<b>32,539</b>	<b>16,677</b>
GUARDS - CONTRACTED SECURITY	0	0	0	8,970	8,970
SECURITY & MONITORING	510	2,322	1,812	-22,000	-22,510
SECURITY - CONTRACTED SERV	472	904	431	0	-472
SECURITY EQUIPMENT & MATERIALS	68,784	6,910	-61,874	4,141	-64,643
<b>TOTAL SECURITY EXPENSE</b>	<b>69,766</b>	<b>10,136</b>	<b>-59,630</b>	<b>-8,889</b>	<b>-78,655</b>
<b>TOTAL PROTECT SERVICE EXPENSES</b>	<b>85,629</b>	<b>50,302</b>	<b>-35,327</b>	<b>23,650</b>	<b>-61,978</b>
<b>GENERAL EXPENSES</b>					
<b>INSURANCE EXPENSES</b>					
INSURANCE - LIABILITY	0	7,462	7,462	16,143	16,143
INSURANCE - PROPERTY	205	23,265	23,060	55,721	55,515
INSURANCE - WORKERS COMP	8,875	7,203	-1,672	0	-8,875
ALLOC INSURANCE EXPENSES	0	175	175	155	155
<b>TOTAL INSURANCE EXP</b>	<b>9,081</b>	<b>38,105</b>	<b>29,024</b>	<b>72,019</b>	<b>62,939</b>
BAD DEBT EXPENSE	83,455	40,158	-43,297	46,929	-36,526
<b>TOTAL BAD DEBT EXPENSE</b>	<b>83,455</b>	<b>40,158</b>	<b>-43,297</b>	<b>46,929</b>	<b>-36,526</b>
<b>TOTAL GENERAL EXPENSES</b>	<b>92,536</b>	<b>78,263</b>	<b>-14,273</b>	<b>118,949</b>	<b>26,413</b>
<b>TOTAL OPERATING EXPENSES</b>	<b>1,581,905</b>	<b>1,482,153</b>	<b>-99,753</b>	<b>1,439,103</b>	<b>-142,802</b>
<b>NON-OPERATING EXPENSES</b>					
<b>HAP EXPENSES</b>					
HAP EXPENSE	794	2,856	2,062	2,507	1,713
UTILITY REIMBURSEMENT	14,615	11,881	-2,734	8,421	-6,194

<b>TOTAL HAP EXPENSES</b>	<b>15,409</b>	<b>14,737</b>	<b>-672</b>	<b>10,928</b>	<b>-4,481</b>
DEPRECIATION EXPENSE	178,301	183,117	4,815	168,549	-9,752
<b>TOTAL DEPR &amp; AMORT EXPENSE</b>	<b>178,301</b>	<b>183,117</b>	<b>4,815</b>	<b>168,549</b>	<b>-9,752</b>
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>193,710</b>	<b>197,854</b>	<b>4,143</b>	<b>179,477</b>	<b>-14,233</b>
<b>TOTAL EXPENSES</b>	<b>1,775,616</b>	<b>1,680,006</b>	<b>-95,609</b>	<b>1,618,580</b>	<b>-157,035</b>
TRANSFERS BET PROGRAMS & PROJECTS - IN	0	148,805	-148,805	0	0
TRANSFERS BET PROGRAMS & PROJECTS - OUT	29,889	252,534	222,645	31,634	1,745
OPERATING TRANSFER - IN	0	0	0	24,614	-24,614
OPERATING TRANSFER - OUT	0	0	0	24,614	24,614
<b>TOTAL TRANSFERS</b>	<b>29,889</b>	<b>103,730</b>	<b>73,841</b>	<b>31,634</b>	<b>1,745</b>
PRIOR PERIOD ADJUSTMENT	0	0	0	584,367	584,367
<b>TOTAL PRIOR PERIOD ADJUSTMENT</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>584,367</b>	<b>584,367</b>
<b>NET OPERATING INCOME (LOSS)</b>	<b>95,018</b>	<b>-205,921</b>	<b>300,940</b>	<b>-939,337</b>	<b>1,034,355</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>273,319</b>	<b>-22,804</b>	<b>296,123</b>	<b>-770,788</b>	<b>1,044,107</b>

### Budget Comparison

Period = Jan 2025

Book = Accrual ; Tree = ysi\_is

	PTD Actual	PTD Budget	Variance	PTD Last Year	Change
<b>REVENUES</b>					
<b>TENANT REVENUES</b>					
DWELLING RENTS	0	0	0	930	-930
FRAUD RECOVERY REVENUE	150	110	40	0	150
<b>TOTAL TENANT REVENUES</b>	<b>150</b>	<b>110</b>	<b>40</b>	<b>930</b>	<b>-780</b>
<b>HUD GRANTS AND SUBSIDY</b>					
HOUSING ASST PAYMENTS	3,585,990	3,440,392	145,598	3,016,744	569,246
ONGOING ADMIN FEES EARNED	291,174	270,324	20,850	276,953	14,221
<b>TOTAL HUD GRANTS AND SUBSIDY</b>	<b>3,877,164</b>	<b>3,710,716</b>	<b>166,448</b>	<b>3,293,697</b>	<b>583,467</b>
<b>TOTAL FEE REVENUE</b>					
OTHER FEES FOR SERVICE	0	5,240	-5,240	0	0
<b>TOTAL FEE REVENUE</b>	<b>0</b>	<b>5,240</b>	<b>-5,240</b>	<b>0</b>	<b>0</b>
<b>OTHER INCOME</b>					
<b>TOTAL OTHER INCOME</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL REVENUES</b>	<b>3,877,314</b>	<b>3,716,066</b>	<b>161,248</b>	<b>3,294,627</b>	<b>582,687</b>

**EXPENSES**

**OPERATING EXPENSES**

**ADMINISTRATIVE EXPENSES**

**ADMINISTRATIVE SALARIES**

ADMIN SALARIES 63,220 112,237 49,017 78,269 15,049

**TOTAL ADMIN SALARIES 63,220 112,237 49,017 78,269 15,049**

AUDIT EXPENSE 0 2,733 2,733 13,325 13,325

MANAGEMENT FEE 47,578 48,419 841 47,904 326

BOOKKEEPING FEE 29,736 30,262 526 29,940 204

**TOTAL ADMINISTRATIVE FEE 77,315 81,414 4,100 91,169 13,855**

ADMIN EMPLOYEE BENEFITS -181 575 756 675 856

ER MEDICAL/DENTAL INS - ADMIN 23,805 26,879 3,074 23,668 -137

ER PENSION - ADMIN 5,087 6,173 1,086 4,880 -207

ER TAXES-ADMIN 5,765 8,586 2,821 6,732 967

**TOTAL ADMIN EMPLOYEE BENEFITS 34,477 42,214 7,737 35,955 1,478**

TRAINING/CONFERENCE 0 385 385 0 0

STAFF MEETING/RETREAT 0 53 53 0 0

TRAVEL 0 82 82 0 0

MILEAGE 0 79 79 0 0

ADMIN VEHICLE - MTCE & REPAIR 0 18 18 129 129

PAYROLL PROCESSING FEE 838 803 -35 761 -77

TELEPHONE 1,138 926 -213 0 -1,138

PRINTER SUPPLIES AND EXP 506 550 44 211 -295

SOFTWARE EXP 275 9,222 8,947 12,294 12,019

OFFICE EXPENSE 0 21 21 0 0

OFFICE FURNISHINGS 0 194 194 0 0

POSTAGE 4,811 3,449 -1,362 4,656 -155

OFFICE SUPPLIES 564 1,200 636 2,373 1,810

OFFICE EQUIPMENT LEASES 509 490 -18 274 -235

COMPUTER EQUIPMENT 418 716 298 932 514

NETWORK COMMUNICATION 189 84 -105 88 -100

CABLE TV 17 10 -8 0 -17

EMPLOYEE HIRING & ADMIN EXP 81 73 -8 34 -47

CONSULTING 0 72 72 503 503

BANK FEE 0 35 35 -79 -79

SECT 8 PORT OUT ADMIN FEES 1,856 0 -1,856 581 -1,275

LATE FEES 0 1,152 1,152 0 0

PROPERTY TAX 0 3 3 0 0

RENTAL EXPENSE 1,115 732 -383 0 -1,115

IT SUPPORT - CONTR SERV 231 1,667 1,436 1,794 1,563

<b>TOTAL OTHER ADMIN EXPENSES</b>	<b>12,547</b>	<b>22,015</b>	<b>9,468</b>	<b>24,551</b>	<b>12,004</b>
<b>TOTAL ADMINISTRATIVE EXPENSES</b>	<b>187,558</b>	<b>257,880</b>	<b>70,322</b>	<b>229,945</b>	<b>42,387</b>
RESIDENT SERVICES EXPENSE	0	168	168	0	0
RESIDENT FUND - OTHER	-2,100	283	2,383	0	2,100
<b>TOTAL RESIDENT FUND</b>	<b>-2,100</b>	<b>451</b>	<b>2,551</b>	<b>0</b>	<b>2,100</b>
<b>TOTAL OTHER RESIDENT SERVICES</b>	<b>-2,100</b>	<b>451</b>	<b>2,551</b>	<b>0</b>	<b>2,100</b>
<b>TOTAL RESIDENT SERVICE EXPENSES</b>	<b>-2,100</b>	<b>451</b>	<b>2,551</b>	<b>0</b>	<b>2,100</b>
<b>TOTAL MAINTENANCE</b>					
<b>MAINTENANCE SALARIES</b>					
MAINTENANCE SALARIES	8,853	25,778	16,926	9,992	1,139
<b>TOTAL MAINTENANCE SALARIES</b>	<b>8,853</b>	<b>25,778</b>	<b>16,926</b>	<b>9,992</b>	<b>1,139</b>
ELECTRICAL MATERIALS	0	5	5	0	0
GASOLINE USAGE FOR MAINT VEHICLES	0	79	79	62	62
<b>TOTAL MAINTENANCE MATERIALS</b>	<b>0</b>	<b>84</b>	<b>84</b>	<b>62</b>	<b>62</b>
CLEANING - CONTRACTED SERV	0	12	12	0	0
VEHICLE MAINTENANCE & REPAIR	424	563	139	515	91
<b>TOTAL MAINT SERVICES AND CONTRACTS</b>	<b>424</b>	<b>574</b>	<b>151</b>	<b>515</b>	<b>91</b>
MAINTENANCE EMPLOYEE BENEFITS	181	73	-108	201	20
ER MED/DENTAL INS - MAINT	5,985	4,218	-1,767	3,635	-2,351
ER PENSION - MAINT	743	1,418	675	763	20
ER TAXES - MAINT	781	1,972	1,191	876	95
<b>TOTAL MAINT EMPLOYEE BENEFITS</b>	<b>7,690</b>	<b>7,681</b>	<b>-9</b>	<b>5,474</b>	<b>-2,216</b>
<b>TOTAL MAINTENANCE EXPENSES</b>	<b>16,967</b>	<b>34,117</b>	<b>17,151</b>	<b>16,043</b>	<b>-924</b>
<b>GENERAL EXPENSES</b>					
<b>INSURANCE EXPENSES</b>					
INSURANCE - LIABILITY	0	177	177	844	844
INSURANCE - PROPERTY	0	0	0	272	272
INSURANCE - WORKERS COMP	3,747	3,387	-360	0	-3,747
<b>TOTAL INSURANCE EXP</b>	<b>3,747</b>	<b>3,564</b>	<b>-183</b>	<b>1,116</b>	<b>-2,631</b>
<b>TOTAL GENERAL EXPENSES</b>	<b>3,747</b>	<b>3,564</b>	<b>-183</b>	<b>1,116</b>	<b>-2,631</b>
<b>TOTAL OPERATING EXPENSES</b>	<b>206,172</b>	<b>296,013</b>	<b>89,841</b>	<b>247,104</b>	<b>40,932</b>
<b>NON-OPERATING EXPENSES</b>					
<b>HAP EXPENSES</b>					
HAP EXPENSE	3,588,440	3,254,638	-333,802	3,014,505	-573,935
HAP EXPENSE - PORTABLE	45,909	44,191	-1,718	4,842	-41,067
UTILITY REIMBURSEMENT	134,504	142,159	7,655	131,627	-2,877
<b>TOTAL HAP EXPENSES</b>	<b>3,768,853</b>	<b>3,440,989</b>	<b>-327,864</b>	<b>3,150,974</b>	<b>-617,879</b>
DEPRECIATION EXPENSE	0	1,293	1,293	1,292	1,292
<b>TOTAL DEPR &amp; AMORT EXPENSE</b>	<b>0</b>	<b>1,293</b>	<b>1,293</b>	<b>1,292</b>	<b>1,292</b>
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>3,768,853</b>	<b>3,442,281</b>	<b>-326,572</b>	<b>3,152,266</b>	<b>-616,587</b>
<b>TOTAL EXPENSES</b>	<b>3,975,025</b>	<b>3,738,294</b>	<b>-236,731</b>	<b>3,399,371</b>	<b>-575,654</b>
<b>NET OPERATING INCOME (LOSS)</b>	<b>-97,711</b>	<b>-22,228</b>	<b>-75,483</b>	<b>-104,744</b>	<b>7,033</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>-97,711</b>	<b>-20,935</b>	<b>-76,776</b>	<b>-103,452</b>	<b>5,741</b>

HIO, Inc. (7hoinc)  
**Budget Comparison**  
 Period = Jan 2025  
 Book = Accrual ; Tree = ysi\_is

	PTD Actual	PTD Budget	Variance	PTD Last Year	Change
<b>REVENUES</b>					
<b>TENANT REVENUES</b>					
DWELLING RENTS	71,958	49,130	22,827	63,076	8,882
DWELLING RENTS SUBSIDY	33,608	28,030	5,578	36,144	-2,536
LATE FEES	2,659	1,747	912	2,160	499
LATE FEES {P-NOTES}	0	7	-7	0	0
LEGAL FEES	0	52	-52	0	0
MAINTENANCE FEES	4,734	3,286	1,448	790	3,944
OTHER TENANT REVENUE	238	169	69	233	5
FRAUD RECOVERY REVENUE	0	43	-43	0	0
<b>TOTAL TENANT REVENUES</b>	<b>113,197</b>	<b>82,465</b>	<b>30,732</b>	<b>102,403</b>	<b>10,794</b>
<b>HUD GRANTS AND SUBSIDY</b>					
REVENUES-HUD SUBSIDY	0	10,503	-10,503	0	0
<b>TOTAL HUD GRANTS AND SUBSIDY</b>	<b>0</b>	<b>10,503</b>	<b>-10,503</b>	<b>0</b>	<b>0</b>
INTEREST INCOME - RESTRICTED FUNDS	665	755	-90	742	-77
<b>INT INCOME - RESTRICT FUNDS</b>	<b>665</b>	<b>755</b>	<b>-90</b>	<b>742</b>	<b>-77</b>
<b>OTHER INCOME</b>					
NON-DWELLING RENTS	12,558	11,687	870	11,240	1,318
MISCELLANEOUS INCOME	0	11	-11	0	0
COMMISSION INCOME	58	53	5	464	-407
<b>TOTAL OTHER INCOME</b>	<b>12,615</b>	<b>11,751</b>	<b>864</b>	<b>11,704</b>	<b>911</b>
<b>TOTAL REVENUES</b>	<b>126,477</b>	<b>105,473</b>	<b>21,004</b>	<b>114,849</b>	<b>11,628</b>

**EXPENSES**

**OPERATING EXPENSES**

**ADMINISTRATIVE EXPENSES**

**ADMINISTRATIVE SALARIES**

ADMIN SALARIES	6,067	5,648	-419	357	-5,710
ADMIN CASUAL LABOR	0	2	2	0	0

<b>TOTAL ADMIN SALARIES</b>	<b>6,067</b>	<b>5,650</b>	<b>-417</b>	<b>357</b>	<b>-5,710</b>
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AUDIT EXPENSE	0	315	315	1,361	1,361
MANAGEMENT FEE	10,890	7,009	-3,881	10,570	-321
BOOKKEEPING FEE	1,372	945	-428	1,425	52
NIFA MONITORING FEE	4,020	592	-3,428	4,020	0

<b>TOTAL ADMINISTRATIVE FEE</b>	<b>16,283</b>	<b>8,861</b>	<b>-7,422</b>	<b>17,376</b>	<b>1,093</b>
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ADMIN EMPLOYEE BENEFITS	2	177	175	167	165
ALLOC ADMIN EMP BENEFITS	13	0	-13	7	-6
ER MEDICAL/DENTAL INS - ADMIN	1,867	752	-1,115	2,213	346
ER PENSION - ADMIN	234	311	77	96	-138
ER TAXES-ADMIN	576	432	-144	49	-528

<b>TOTAL ADMIN EMPLOYEE BENEFITS</b>	<b>2,693</b>	<b>1,672</b>	<b>-1,021</b>	<b>2,532</b>	<b>-161</b>
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LEGAL SERVICES - OUTSIDE	188	64	-124	0	-188
TRAINING/CONFERENCE	0	0	0	0	0
STAFF MEETING/RETREAT	0	5	5	0	0
MILEAGE	12	0	-12	0	-12
ADMIN VEHICLE - FUEL	0	8	8	28	28
ADMIN VEHICLE - MTCE & REPAIR	0	38	38	0	0
MEMBERSHIPS	0	59	59	100	100
PAYROLL PROCESSING FEE	388	159	-229	168	-219
TELEPHONE	1,066	458	-609	426	-640
SAFETY EQUIPMENT/SUPPLIES	0	136	136	1,242	1,242
LEGAL SERVICES - INTERNAL	1,164	970	-194	1,508	344
ALLOC INTERNAL LEGAL EXP	945	353	-592	0	-945
PRINTER SUPPLIES AND EXP	10	34	24	0	-10
SOFTWARE EXP	369	377	7	636	267
OFFICE SUPPLIES	13	70	57	0	-13
OFFICE EQUIPMENT LEASES	179	176	-3	0	-179
COMPUTER EQUIPMENT	329	192	-137	6	-323

NETWORK COMMUNICATION	355	454	99	443	88
ADVERTISING /NEWSPAPER ADS	0	6	6	0	0
EMPLOYEE HIRING & ADMIN EXP	374	22	-352	36	-339
BANK FEE	0	443	443	545	545
LATE FEES	0	299	299	0	0
MISCELLANEOUS EXPENSE	0	-382	-382	0	0
PROPERTY TAX	0	2,736	2,736	0	0
RENTAL EXPENSE	0	567	567	-2,185	-2,185
IT SUPPORT - CONTR SERV	0	617	617	887	887
PROFESSIONAL/CONTR SERV	0	10	10	51	51
<b>TOTAL OTHER ADMIN EXPENSES</b>	<b>5,393</b>	<b>7,872</b>	<b>2,479</b>	<b>3,893</b>	<b>-1,500</b>
FEE FOR SERVICE	635	505	-130	1,379	744
<b>TOTAL FEE FOR SERVICE</b>	<b>635</b>	<b>505</b>	<b>-130</b>	<b>1,379</b>	<b>744</b>
<b>TOTAL ADMINISTRATIVE EXPENSES</b>	<b>31,070</b>	<b>24,559</b>	<b>-6,511</b>	<b>25,538</b>	<b>-5,533</b>
<b>RESIDENT SERVICES SALARIES</b>					
RESIDENT SERVICE CASUAL LABOR	175	0	-175	0	-175
<b>TOTAL RESIDENT SERV SALARIES</b>	<b>175</b>	<b>0</b>	<b>-175</b>	<b>0</b>	<b>-175</b>
RELOCATION EXPENSES	6,244	0	-6,244	0	-6,244
<b>TOTAL RELOCATION EXPENSE</b>	<b>6,244</b>	<b>0</b>	<b>-6,244</b>	<b>0</b>	<b>-6,244</b>
<b>TOTAL RESIDENT FUND</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
FRONT LINE SERVICE FEE	11,490	13,412	1,922	10,907	-583
<b>TOTAL FEE FOR SERVICE</b>	<b>11,490</b>	<b>13,412</b>	<b>1,922</b>	<b>10,907</b>	<b>-583</b>
<b>TOTAL OTHER RESIDENT SERVICES</b>	<b>17,909</b>	<b>13,412</b>	<b>-4,496</b>	<b>10,907</b>	<b>-7,002</b>
<b>TOTAL RESIDENT SERVICE EXPENSES</b>	<b>17,909</b>	<b>13,412</b>	<b>-4,496</b>	<b>10,907</b>	<b>-7,002</b>
<b>UTILITY EXPENSES</b>					
UTILITY - WATER	6,772	1,785	-4,987	2,839	-3,933
UTILITY - ELECTRIC	5,113	2,484	-2,629	8,230	3,117
UTILITY - GAS	3,357	659	-2,698	881	-2,475
UTILITY - SEWER	10,734	2,827	-7,908	4,754	-5,981
<b>TOTAL UTILITY EXPENSES</b>	<b>25,976</b>	<b>7,754</b>	<b>-18,222</b>	<b>16,704</b>	<b>-9,272</b>
<b>TOTAL MAINTENANCE</b>					
<b>MAINTENANCE SALARIES</b>					
MAINTENANCE SALARIES	15,440	12,095	-3,345	17,500	2,060
MAINTENANCE CASUAL LABOR	0	0	0	4,333	4,333
ALLOC MAINT SALARIES	11,112	7,274	-3,838	2,667	-8,445
<b>TOTAL MAINTENANCE SALARIES</b>	<b>26,552</b>	<b>19,369</b>	<b>-7,183</b>	<b>24,500</b>	<b>-2,052</b>
APPLIANCES	0	1,794	1,794	4	4
DWELLING EQUIPMENT	174	0	-174	0	-174
PAINT	1,732	748	-983	318	-1,413
CLEANING SUPPLIES	0	34	34	81	81
HVAC MATERIALS	771	394	-377	429	-342
LANDSCAPING MATERIALS	0	76	76	0	0
PLUMBING MATERIALS	603	2,479	1,876	2,210	1,607
ELECTRICAL MATERIALS	0	297	297	553	553
GASOLINE USAGE FOR MAINT VEHICLES	720	303	-417	760	40
PEST CONTROL SUPPLIES	0	39	39	174	174
MAINTENANCE TOOLS	0	317	317	0	0
MAINTENANCE MATERIALS	2,210	2,871	661	1,289	-921
MAINTENANCE EQUIPMENT	32	30	-2	97	65
<b>TOTAL MAINTENANCE MATERIALS</b>	<b>6,242</b>	<b>9,382</b>	<b>3,140</b>	<b>5,915</b>	<b>-327</b>
ELEVATORS - CONTRACTED SERV	438	868	430	652	214
HVAC - CONTRACTED SERV	8,528	1,195	-7,333	526	-8,002
LAWNS - CONTRACTED SERV	1,685	1,479	-206	0	-1,685
MATS/UNIFORMS - CONTRACTED SVCE	452	90	-362	0	-452
PEST CONTROL - CONTRACTED SERV	3,060	360	-2,700	0	-3,060
SNOW REMOVAL - CONTRACTED SERV	1,440	481	-959	540	-900
TRASH - CONTRACTED SERV	1,646	3,574	1,928	6,223	4,577
LANDFILL FEES - CONTRACTED SERV	143	17	-127	4	-139
CLEANING - CONTRACTED SERV	4,630	2,582	-2,048	1,865	-2,765
PAINTING - CONTRACTED SERV	0	261	261	500	500
ARBORIST - CONTRACTED SERV	0	273	273	0	0
FLOORING REPL - CONTRACTED SERV	0	1,391	1,391	3,591	3,591
OUTDOOR CLEANING - CONTRACTED SERV	0	97	97	0	0
ELECTRICAL - CONTRACTED SERV	1,524	398	-1,126	0	-1,524

PLUMBING - CONTRACTED SERV	1,155	940	-215	814	-341
ROOF REPAIRS - CONTRACTED SERV	200	22	-178	0	-200
VEHICLE MAINTENANCE & REPAIR	258	279	21	81	-177
WINDOWS/DOORS REPL - CONTRACTED SERV	259	1,205	945	0	-259
VACANT TURNOVER - CONTRACTED SERV	0	298	298	0	0
INSPECTIONS - CONTRACTED SERV	2,728	477	-2,252	625	-2,103
INTERIOR REPAIRS - CONTRACTED SERV	0	280	280	0	0
Fire Safety - Contracted Services	847	1,680	833	1,378	531
ALLOCS INSPECTIONS EXPENSE	0	307	307	0	0
<b>TOTAL MAINT SERVICES AND CONTRACTS</b>	<b>28,995</b>	<b>18,555</b>	<b>-10,440</b>	<b>16,798</b>	<b>-12,196</b>
MAINTENANCE EMPLOYEE BENEFITS	-2	0	2	0	2
ALLOCS MAINT EMP BENEFITS	5,691	2,925	-2,766	1,288	-4,403
ER MED/DENTAL INS - MAINT	5,928	5,641	-286	2,581	-3,347
ER PENSION - MAINT	798	665	-133	905	107
ER TAXES - MAINT	1,435	925	-510	1,476	41
<b>TOTAL MAINT EMPLOYEE BENEFITS</b>	<b>13,850</b>	<b>10,157</b>	<b>-3,693</b>	<b>6,249</b>	<b>-7,601</b>
<b>TOTAL MAINTENANCE EXPENSES</b>	<b>75,638</b>	<b>57,463</b>	<b>-18,175</b>	<b>53,462</b>	<b>-22,176</b>
<b>PROTECTIVE SERVICE EXPENSES</b>					
FRONT LINE SERVICE FEES	7,861	4,161	-3,700	2,746	-5,115
<b>TOTAL FEE FOR SERVICE</b>	<b>7,861</b>	<b>4,161</b>	<b>-3,700</b>	<b>2,746</b>	<b>-5,115</b>
GUARDS - CONTRACTED SECURITY	0	42	42	0	0
SECURITY & MONITORING	0	408	408	75	75
SECURITY EQUIPMENT & MATERIALS	3,644	702	-2,943	840	-2,804
<b>TOTAL SECURITY EXPENSE</b>	<b>3,644</b>	<b>1,152</b>	<b>-2,492</b>	<b>915</b>	<b>-2,729</b>
<b>TOTAL PROTECT SERVICE EXPENSES</b>	<b>11,505</b>	<b>5,313</b>	<b>-6,193</b>	<b>3,661</b>	<b>-7,844</b>
<b>GENERAL EXPENSES</b>					
<b>INSURANCE EXPENSES</b>					
INSURANCE - LIABILITY	2,627	1,799	-828	6,135	3,508
INSURANCE - PROPERTY	13,466	14,854	1,387	52,996	39,530
INSURANCE - WORKERS COMP	1,536	692	-844	0	-1,536
<b>TOTAL INSURANCE EXP</b>	<b>17,629</b>	<b>17,345</b>	<b>-285</b>	<b>59,131</b>	<b>41,502</b>
BAD DEBT EXPENSE	1,194	6,651	5,457	3,569	2,375
<b>TOTAL BAD DEBT EXPENSE</b>	<b>1,194</b>	<b>6,651</b>	<b>5,457</b>	<b>3,569</b>	<b>2,375</b>
<b>TOTAL GENERAL EXPENSES</b>	<b>18,823</b>	<b>23,996</b>	<b>5,173</b>	<b>62,701</b>	<b>43,877</b>
<b>TOTAL OPERATING EXPENSES</b>	<b>180,921</b>	<b>132,497</b>	<b>-48,424</b>	<b>172,973</b>	<b>-7,948</b>
<b>NON-OPERATING EXPENSES</b>					
<b>HAP EXPENSES</b>					
HAP EXPENSE	0	195	195	664	664
UTILITY REIMBURSEMENT	4,942	3,736	-1,206	2,870	-2,072
<b>TOTAL HAP EXPENSES</b>	<b>4,942</b>	<b>3,932</b>	<b>-1,010</b>	<b>3,534</b>	<b>-1,408</b>
DEPRECIATION EXPENSE	55,369	50,135	-5,234	58,443	3,073
<b>TOTAL DEPR &amp; AMORT EXPENSE</b>	<b>55,369</b>	<b>50,135</b>	<b>-5,234</b>	<b>58,443</b>	<b>3,073</b>
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>60,311</b>	<b>54,067</b>	<b>-6,245</b>	<b>61,977</b>	<b>1,665</b>
<b>TOTAL EXPENSES</b>	<b>241,232</b>	<b>186,564</b>	<b>-54,669</b>	<b>234,949</b>	<b>-6,283</b>
TRANSFERS BET PROGRAMS & PROJECTS - IN	29,889	40,396	-10,507	31,634	-1,745
<b>TOTAL TRANSFERS</b>	<b>-29,889</b>	<b>-40,396</b>	<b>-10,507</b>	<b>-31,634</b>	<b>-1,745</b>
<b>NET OPERATING INCOME (LOSS)</b>	<b>-84,866</b>	<b>-40,694</b>	<b>-44,172</b>	<b>-88,466</b>	<b>3,600</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>-29,497</b>	<b>9,441</b>	<b>-38,938</b>	<b>-30,023</b>	<b>526</b>

C/O - after FMR 2016 (7fdscent)

**Budget Comparison**

Period = Jan 2025

Book = Accrual ; Tree = ysi\_is

	PTD Actual	PTD Budget	Variance	PTD Last Year	Change
<b>REVENUES</b>					
<b>TENANT REVENUES</b>					
DWELLING RENTS	280	0	280	368	-88
DWELLING RENTS SUBSIDY	1,809	0	1,809	6,792	-4,983
LEGAL FEES	9,908	3,584	6,324	0	9,908
<b>TOTAL TENANT REVENUES</b>	<b>11,997</b>	<b>3,584</b>	<b>8,414</b>	<b>7,160</b>	<b>4,837</b>
<b>TOTAL FEE REVENUE</b>					
MANAGEMENT FEE	181,849	176,765	5,084	180,322	1,527
BOOKKEEPING FEE	48,270	47,701	569	48,592	-322
FRONT LINE SERVICE FEE	160,175	227,244	-67,069	166,244	-6,069
FRONT LINE SERVICE FEE {IT}	6,881	6,892	-11	14,950	-8,069
<b>TOTAL FEE REVENUE</b>	<b>397,175</b>	<b>458,601</b>	<b>-61,426</b>	<b>410,109</b>	<b>-12,934</b>
OTHER GOV'T GRANTS/DONATIONS	0	168,274	-168,274	0	0
<b>TOTAL OTHER GOV'T GRANTS DONATIONS</b>	<b>0</b>	<b>168,274</b>	<b>-168,274</b>	<b>0</b>	<b>0</b>
<b>INVESTMENT INCOME</b>					
INTEREST INCOME - MAIN	32	34	-2	36	-4
<b>TOTAL INTEREST INCOME - MAIN</b>	<b>32</b>	<b>34</b>	<b>-2</b>	<b>36</b>	<b>-4</b>
INTEREST INCOME - OTHER	0	596	-596	0	0
<b>TOTAL NON-CASH INT INCOME {HIO}</b>	<b>0</b>	<b>596</b>	<b>-596</b>	<b>0</b>	<b>0</b>
<b>OTHER INCOME</b>					
COMMISSION INCOME	0	51	-51	104	-104
MISCELLANEOUS GRANT REVENUE	0	7,000	-7,000	0	0
<b>TOTAL OTHER INCOME</b>	<b>0</b>	<b>7,051</b>	<b>-7,051</b>	<b>104</b>	<b>-104</b>
<b>TOTAL REVENUES</b>	<b>409,204</b>	<b>638,140</b>	<b>-228,935</b>	<b>417,410</b>	<b>-8,205</b>
<b>EXPENSES</b>					
<b>OPERATING EXPENSES</b>					
<b>ADMINISTRATIVE EXPENSES</b>					
<b>ADMINISTRATIVE SALARIES</b>					
ADMIN SALARIES	216,838	351,395	134,557	234,029	17,191
ADMIN CASUAL LABOR	-854	32,117	32,971	0	854
ALLOC ADMIN SALARIES	-21,503	0	21,503	-28,518	-7,015
<b>TOTAL ADMIN SALARIES</b>	<b>194,481</b>	<b>383,512</b>	<b>189,031</b>	<b>205,510</b>	<b>11,030</b>
AUDIT EXPENSE	0	713	713	3,228	3,228
<b>TOTAL ADMINISTRATIVE FEE</b>	<b>0</b>	<b>713</b>	<b>713</b>	<b>3,228</b>	<b>3,228</b>
ADMIN EMPLOYEE BENEFITS	360	2,477	2,117	2,336	1,976
ALLOC ADMIN EMP BENEFITS	0	0	0	-1,203	-1,203
ER MEDICAL/DENTAL INS - ADMIN	81,592	78,193	-3,399	75,028	-6,564
ER PENSION - ADMIN	16,366	19,327	2,961	15,333	-1,032
ER TAXES-ADMIN	19,432	26,882	7,449	20,319	887
<b>TOTAL ADMIN EMPLOYEE BENEFITS</b>	<b>117,751</b>	<b>126,879</b>	<b>9,128</b>	<b>111,815</b>	<b>-5,936</b>
LEGAL SERVICES - OUTSIDE	23,145	9,442	-13,703	6,985	-16,159
TRAINING/CONFERENCE	99	3,950	3,851	2,730	2,631
STAFF MEETING/RETREAT	441	150	-291	594	154
TRAVEL	0	334	334	0	0
MILEAGE	326	258	-68	56	-270
ADMIN VEHICLE - FUEL	0	4	4	0	0
ADMIN VEHICLE - MTCE & REPAIR	0	2	2	15	15
PUBLICATIONS	0	110	110	0	0
MEMBERSHIPS	2,166	2,319	153	202	-1,964
PAYROLL PROCESSING FEE	2,749	2,322	-427	2,258	-492
TELEPHONE	3,913	9,421	5,508	2,074	-1,839

LEGAL SERVICES - INTERNAL	0	1	1	0	0
PRINTER SUPPLIES AND EXP	771	1,035	264	1,110	339
SOFTWARE EXP	2,281	2,745	465	2,460	180
OFFICE EXPENSE	757	876	119	0	-757
OFFICE FURNISHINGS	117	490	373	2,376	2,260
POSTAGE	3,010	2,492	-518	3,000	-10
OFFICE SUPPLIES	2,510	2,105	-404	1,921	-589
OFFICE EQUIPMENT LEASES	1,074	1,779	705	896	-178
COMPUTER EQUIPMENT	1,979	4,858	2,880	5,532	3,553
NETWORK COMMUNICATION	1,496	2,059	563	938	-558
ADVERTISING /NEWSPAPER ADS	118	157	39	0	-118
CABLE TV	54	-22	-76	0	-54
EMPLOYEE HIRING & ADMIN EXP	2,232	3,151	920	142	-2,089
CONSULTING	7,636	12,159	4,523	-15,606	-23,242
BANK FEE	3,031	158	-2,873	2,024	-1,007
LATE FEES	385	2,170	1,786	0	-385
MISCELLANEOUS EXPENSE	6,580	411	-6,169	-500	-7,080
FEES - PERMITS	5	349	344	0	-5
PROPERTY TAX	0	33	33	0	0
RENTAL EXPENSE	6,807	960	-5,847	0	-6,807
IT SUPPORT - CONTR SERV	13,483	8,761	-4,722	8,140	-5,343
<b>TOTAL OTHER ADMIN EXPENSES</b>	<b>87,163</b>	<b>75,041</b>	<b>-12,122</b>	<b>27,349</b>	<b>-59,814</b>
<b>TOTAL ADMINISTRATIVE EXPENSES</b>	<b>399,394</b>	<b>586,145</b>	<b>186,751</b>	<b>347,902</b>	<b>-51,492</b>
RELOCATION EXPENSES	66,834	75,966	9,132	79,212	12,378
RELOCATION - MOVING EXPENSE	150	260	110	0	-150
<b>TOTAL RELOCATION EXPENSE</b>	<b>66,984</b>	<b>76,226</b>	<b>9,242</b>	<b>79,212</b>	<b>12,228</b>
YOUTH ACTIVITIES	400	0	-400	0	-400
<b>TOTAL YOUTH ACTIVITIES</b>	<b>400</b>	<b>0</b>	<b>-400</b>	<b>0</b>	<b>-400</b>
RESIDENT SERVICES EXPENSE	55	8,064	8,009	0	-55
RESIDENT SERVICES EVENTS & ACTIVIT	0	-2	-2	0	0
RESIDENT FUND - STIPENDS	0	4,080	4,080	2,125	2,125
RESIDENT FUND - OTHER	0	2,429	2,429	0	0
<b>TOTAL RESIDENT FUND</b>	<b>55</b>	<b>14,572</b>	<b>14,517</b>	<b>2,125</b>	<b>2,070</b>
<b>TOTAL OTHER RESIDENT SERVICES</b>	<b>67,439</b>	<b>90,798</b>	<b>23,359</b>	<b>81,337</b>	<b>13,898</b>
<b>TOTAL RESIDENT SERVICE EXPENSES</b>	<b>67,439</b>	<b>90,798</b>	<b>23,359</b>	<b>81,337</b>	<b>13,898</b>
<b>UTILITY EXPENSES</b>					
UTILITY - WATER	151	115	-36	80	-71
UTILITY - ELECTRIC	6,188	4,296	-1,892	4,998	-1,190
UTILITY - SEWER	224	166	-58	138	-86
<b>TOTAL UTILITY EXPENSES</b>	<b>6,563</b>	<b>4,577</b>	<b>-1,986</b>	<b>5,216</b>	<b>-1,347</b>
<b>TOTAL MAINTENANCE</b>					
<b>MAINTENANCE SALARIES</b>					
MAINTENANCE SALARIES	0	0	0	-382	-382
ALLOC MAINT SALARIES	286	337	51	303	17
<b>TOTAL MAINTENANCE SALARIES</b>	<b>286</b>	<b>337</b>	<b>51</b>	<b>-79</b>	<b>-365</b>
APPLIANCES	0	16	16	0	0
PAINT	115	16	-99	34	-82
CLEANING SUPPLIES	547	661	114	149	-398
PLUMBING MATERIALS	0	215	215	0	0
ELECTRICAL MATERIALS	0	373	373	0	0
GASOLINE USAGE FOR MAINT VEHICLE:	72	9	-63	0	-72
PEST CONTROL SUPPLIES	0	0	0	0	0
MAINTENANCE TOOLS	0	6	6	0	0
MAINTENANCE MATERIALS	1	620	620	0	-1
Early Pay Discount	0	-2,568	-2,568	0	0
<b>TOTAL MAINTENANCE MATERIALS</b>	<b>735</b>	<b>-652</b>	<b>-1,386</b>	<b>183</b>	<b>-552</b>
ELEVATORS - CONTRACTED SERV	-145	326	471	126	271
HVAC - CONTRACTED SERV	0	1,049	1,049	476	476
LAWNS - CONTRACTED SERV	0	22	22	0	0
MATS/UNIFORMS - CONTRACTED SVCE	118	61	-56	0	-118

PEST CONTROL - CONTRACTED SERV	0	0	0	0	0
TRASH - CONTRACTED SERV	432	513	80	681	249
CLEANING - CONTRACTED SERV	835	2,573	1,738	2,200	1,365
FLOORING REPL - CONTRACTED SERV	0	93	93	0	0
ELECTRICAL - CONTRACTED SERV	0	2,026	2,026	2,816	2,816
PLUMBING - CONTRACTED SERV	0	74	74	0	0
VEHICLE MAINTENANCE & REPAIR	642	1,126	484	1,397	756
WINDOWS/DOORS REPL - CONTRACTEI	0	31	31	0	0
Fire Safety - Contracted Services	280	124	-156	158	-122
<b>TOTAL MAINT SERVICES AND CONTR.</b>	<b>2,162</b>	<b>8,017</b>	<b>5,855</b>	<b>7,855</b>	<b>5,693</b>
ALLOC MAINT EMP BENEFITS	160	121	-39	150	-10
ER MED/DENTAL INS - MAINT	0	0	0	4,464	4,464
ER TAXES - MAINT	0	0	0	-31	-31
<b>TOTAL MAINT EMPLOYEE BENEFITS</b>	<b>160</b>	<b>121</b>	<b>-39</b>	<b>4,584</b>	<b>4,423</b>
<b>TOTAL MAINTENANCE EXPENSES</b>	<b>3,343</b>	<b>7,824</b>	<b>4,481</b>	<b>12,542</b>	<b>9,199</b>
<b>PROTECTIVE SERVICE EXPENSES</b>					
<b>PROTECTIVE SERVICE SALARIES</b>					
SECURITY SALARY	13,416	25,366	11,950	11,321	-2,095
<b>TOTAL PROTECTIVE SERV SALARIES</b>	<b>13,416</b>	<b>25,366</b>	<b>11,950</b>	<b>11,321</b>	<b>-2,095</b>
SECURITY & MONITORING	4,984	581	-4,403	210	-4,774
SECURITY - CONTRACTED SERV	0	15	15	0	0
SECURITY EQUIPMENT & MATERIALS	0	727	727	30	30
<b>TOTAL SECURITY EXPENSE</b>	<b>4,984</b>	<b>1,324</b>	<b>-3,660</b>	<b>240</b>	<b>-4,744</b>
ER MEDICAL/DENTAL INS - SECURITY	907	2,685	1,777	4,613	3,706
ER PENSION - SECURITY	1,036	1,395	359	680	-356
ER TAXES - SECURITY	1,305	1,941	635	978	-327
<b>TOTAL SECURITY EMPLOYEE BENEFIT</b>	<b>3,249</b>	<b>6,020</b>	<b>2,772</b>	<b>6,272</b>	<b>3,023</b>
<b>TOTAL PROTECT SERVICE EXPENSES</b>	<b>21,649</b>	<b>32,711</b>	<b>11,062</b>	<b>17,833</b>	<b>-3,816</b>
<b>GENERAL EXPENSES</b>					
<b>INSURANCE EXPENSES</b>					
INSURANCE - LIABILITY	4,015	3,209	-806	3,488	-527
INSURANCE - PROPERTY	0	0	0	2,164	2,164
INSURANCE - WORKERS COMP	11,180	9,311	-1,869	0	-11,180
ALLOC INSURANCE EXPENSES	0	-175	-175	-155	-155
<b>TOTAL INSURANCE EXP</b>	<b>15,195</b>	<b>12,345</b>	<b>-2,850</b>	<b>5,497</b>	<b>-9,699</b>
CLOSING COSTS	0	19	19	0	0
MORTGAGE INTEREST	6,042	5,854	-188	5,837	-206
<b>TOTAL LOAN INTEREST</b>	<b>6,042</b>	<b>5,854</b>	<b>-188</b>	<b>5,837</b>	<b>-206</b>
<b>TOTAL GENERAL EXPENSES</b>	<b>21,237</b>	<b>18,218</b>	<b>-3,019</b>	<b>11,333</b>	<b>-9,904</b>
<b>TOTAL OPERATING EXPENSES</b>	<b>519,626</b>	<b>740,273</b>	<b>220,647</b>	<b>476,163</b>	<b>-43,462</b>
<b>NON-OPERATING EXPENSES</b>					
DEPRECIATION EXPENSE	12,598	14,030	1,432	19,265	6,667
<b>TOTAL DEPR &amp; AMORT EXPENSE</b>	<b>12,598</b>	<b>14,030</b>	<b>1,432</b>	<b>19,265</b>	<b>6,667</b>
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>12,598</b>	<b>14,030</b>	<b>1,432</b>	<b>19,265</b>	<b>6,667</b>
<b>TOTAL EXPENSES</b>	<b>532,224</b>	<b>754,303</b>	<b>222,079</b>	<b>495,428</b>	<b>-36,795</b>
TRANSFERS BET PROGRAMS & PROJECTS -	0	63,333	-63,333	0	0
<b>TOTAL TRANSFERS</b>	<b>0</b>	<b>-63,333</b>	<b>-63,333</b>	<b>0</b>	<b>0</b>
<b>NET OPERATING INCOME (LOSS)</b>	<b>-123,019</b>	<b>-52,830</b>	<b>-70,189</b>	<b>-78,019</b>	<b>-45,001</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>-110,421</b>	<b>-38,800</b>	<b>-71,621</b>	<b>-58,754</b>	<b>-51,667</b>

## Omaha Housing Authority Income Statement

	YTD 2024	YTD 2023	Change
<b>REVENUES</b>			
TOTAL TENANT REVENUES	\$ 8,616,997	\$ 9,052,264	\$ (435,267)
TOTAL HUD GRANTS AND SUBSIDY	64,354,192	60,348,136	4,006,056
TOTAL FEE REVENUE	5,548,198	5,433,464	114,734
TOTAL OTHER GOV'T GRANTS DONATIONS	1,803,583	1,748,289	55,295
TOTAL INTEREST INCOME - MAIN	142,373	147,210	(4,837)
TOTAL NON-CASH INT INCOME {HIO}	108,043	157,228	(49,185)
INT INCOME - RESTRICT FUNDS	18,020	14,213	3,807
TOTAL OTHER INCOME	1,226,262	1,539,533	(313,271)
<b>TOTAL REVENUES</b>	<b>\$ 81,817,668</b>	<b>\$ 78,440,335</b>	<b>\$ 3,377,333</b>
<b>OPERATING EXPENSES</b>			
TOTAL ADMINISTRATIVE EXPENSES	\$ 15,254,915	\$ 13,832,111	\$ 1,422,804
TOTAL RESIDENT SERVICE EXPENSES	2,978,268	2,600,368	377,900
TOTAL UTILITY EXPENSES	3,144,975	3,406,485	(261,511)
TOTAL MAINTENANCE EXPENSES	10,988,726	12,067,354	(1,078,628)
TOTAL PROTECT SERVICE EXPENSES	1,027,061	1,595,440	(568,379)
TOTAL GENERAL EXPENSES	2,175,038	2,079,195	95,843
TOTAL OTHER EXPENSES	119,108	-	119,108
<b>TOTAL OPERATING EXPENSES</b>	<b>\$ 35,688,091</b>	<b>\$ 35,580,953</b>	<b>\$ 107,137</b>
<b>NON-OPERATING EXPENSES</b>			
TOTAL HAP EXPENSES	\$ 45,567,067	\$ 40,006,042	\$ 5,561,025
TOTAL DEPR & AMORT EXPENSE	3,047,381	3,132,281	(84,901)
<b>TOTAL NON-OPERATING EXPENSES</b>	<b>\$ 48,614,447</b>	<b>\$ 43,138,323</b>	<b>\$ 5,476,124</b>
<b>TOTAL EXPENSES</b>	<b>\$ 84,302,538</b>	<b>\$ 78,719,277</b>	<b>\$ 5,583,261</b>
TOTAL PRIOR PERIOD ADJUSTMENT	\$ 891,225	\$ (1,854,217)	\$ (2,745,441)
<b>NET OPERATING INCOME (LOSS)</b>	<b>\$ (3,376,095)</b>	<b>\$ 1,575,275</b>	<b>\$ (4,951,370)</b>
<b>ADJUSTED NET OPERATING INCOME (LOSS)</b>	<b>\$ (328,714)</b>	<b>\$ 4,707,556</b>	<b>\$ (5,036,270)</b>
<b>Adjustment for One-time/Unusual Items:</b>			
Effect of Prior Period Adjustments 2024 vs. 2023	\$ 891,225	\$ (1,854,217)	\$ (2,745,441)
Difference of Section 8 (HCV) Net Loss 2024 vs. 2023	1,302,261	138,690	1,163,571
Gain on sale impact 2024 vs. 2023		(415,000)	415,000
Compensated absences impact 2024 vs. 2023	93,562	(594,218)	500,657
IRS tax refund (2023) & subsequent repayment (2024)	468,000	(468,000)	936,000
<b>Normalized Adjusted Net Operating Income</b>	<b>\$ 2,426,334</b>	<b>\$ 1,514,812</b>	<b>\$ 911,522</b>

## 6.7. Development

# Memorandum

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To: OHA Board of Commissioners  
From: Brian Hansen, General Counsel  
Date: February 24, 2025  
Re: Development Report

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## **Choice Neighborhoods Implementation Grant – Spencer Homes**

Construction of MLK Square is anticipated to be completed on April 30, 2025. Building plans are on file with OHA staff and available upon request.

Malcom’s Place is currently being leased and OHA staff have been coordinating with Spencer tenants who are interested in returning and tenants have started moving into units as they are completed.

OHA staff has been meeting to discuss the OHA community space at Malcom’s Place. Certain OHA staff will have a presence at the community space to engage with tenants and the meeting space will be available to community groups and non-profit organizations.

## **Choice Neighborhood Implementation Grant – Southside**

Construction has begun on the first phase of the Southside Terrace redevelopment. The two public housing buildings on the site have been demolished and foundations are being constructed. This phase will consist of a 92 unit multi-family building.

Design work for SST Phase 2 has been finalized. Phase 2 is a 4% LIHTC development that will consist of 115 units in a mix of townhouses and a multi-family building. Closing is anticipated to occur in February 2025. Current plans are available upon request.

Design work for 3030 Upland Parkway is progressing. This will be a 74 unit development consisting of a 71 unit multifamily building and a three unit townhome development. Closing will occur in 2025.

Y Street Townhomes will be a partnership between Brinshore, Canopy South and OHA. The development will consist of 14 townhome units. Closing is anticipated for first quarter of 2025.

Design work for Arbor Flats has continued after a delay due to a revision in the flood map and failed LIHTC application. OHA expects to have an update on timing of this project in the coming months.

LRK & Associates has been selected as the architect for Phase 3 and design work has started. A 4% LIHTC application was submitted in December 2024.

OHA, the City of Omaha and Brinshore are in the process of choosing architects for the final phases of Southside’s redevelopment and anticipate having made awards to firms in the next 30 days.

## **Scattered Site Housing**

OHA staff is continuing to work toward repositioning all scattered site single family houses through PBV, RAD PBV, or Section 18 Disposition.

Applications for conversion and disposition have been submitted to HUD. After HUD approves the application to convert units out of the public housing program and into the Section 8 program, the houses will be sold to OHA's controlled affiliate, River City Housing.

Currently, the applications for disposition are pending with HUD and may be delayed due to the administration change. HUD approved an application to sell 3 houses to Project Houseworks. OHA staff will be working on getting those houses prepared for sale and relocating the residents.

## **Tower Repositioning Planning**

Planning for renovation and preservation for OHA's public housing towers through a variety of HUD redevelopment tools has started with OHA's RAD consultant, AH Forward, and development partner, Brinshore. OHA staff intends to present the board with a master development agreement with Brinshore for the tower work in the coming months.

A resolution for RAD conversion of Pine Tower was approved and a 4% LIHTC application is pending with NIFA.

## 6.8. Procurement/Contracting/Capital Budgets

# Memorandum



To: The OHA Board of Commissioners  
 From: Jennifer Dexter, Procurement Manager  
 Date: February 27, 2025  
 Re: Procurement Report for February 2025

## Current Procurement Activity

Project	Type	Budget	Action Stage	Anticipated Board Month
Employee Healthcare and Benefits Insurance Broker and Consultant	RFP	TBD	Published	April
Insurance Broker for Multiple Lines	RFP	TBD	Published	April
OHA IT Managed Service Provider	RFP	\$225,000	Awaiting Board Approval	February
Title, Escrow & Related Services	RFP	TBD	Awaiting Board Approval	February
Retirement Plan Consultant	Renewal	0.30%	Awaiting Board Approval	February
Resident Relocation	Renewal	\$100,000	Awaiting Board Approval	February
Commercial Real Estate Broker	Renewal	2% Commission	Awaiting Board Approval	February
Lawncare	Renewal	\$375,000	Awaiting Board Approval	February
Painting	Renewal	\$350,000	Awaiting Board Approval	February
Affordable Housing Development Legal Services	Renewal	N/A	Awaiting Board Approval	February

## Contracts Executed – Approved by Previous Board Action

Vendor	Project	Contract Amount	MBE/WBE Section 3
CliftonLarsenAllen, LLP (CLA)	Independent Professional Audit	\$115,000	None
Down's Electrical	Electrical Code Updates	\$50,000	None

## Procurements Executed – over \$30,000

Vendor	Project	Project Amount	MBE/WBE Section 3

## Projects over \$50,000 Commencing Utilizing Previously Approved Contracted Services

Vendor	Project	Contract Utilized	Project Amount	MBE/WBE Section 3

## Capital Improvements Monthly Report – February 2025

### Summary

With major capital grant obligation deadlines behind us, the Caps Team is re-directing its attention to major projects, including the Jackson Tower plumbing stack replacements, and the Park South window replacements. The scope, complexity, and duration of these projects is challenging and will require substantial investment of staff time.

Procurement activity is light at this time; the scheduling of major procurements in 2025 will depend on financial and personnel resources, the progression of current projects, and development factors such as timing of RAD at various public housing properties. Potential major procurements in 2025 include multi-site fire panel replacement, waterproofing at Crown Tower, tower lobby renovations, and multifamily exterior work.

Other Capital Improvements team priorities this year include the completion of a new five-year environmental review in cooperation with the City of Omaha, a comprehensive Physical Needs Assessment and Energy Audit, and the continued closeout of expended grants.

### Capital Funds Project Status update as of 02/18/2025

Project	Comments
<i><u>IN PROGRESS</u></i>	
Cherry Tree entry door replacement	Estimated completion March 2025
SCNE/SCNW lead hazard repairs	Estimated completion March 2025
Site drainage A&E	Estimated completion March 2025
Code/safety updates (GFCI, detectors)	Estimated completion March 2025
Key management system	Estimated completion Spring 2025
Park South, Jackson boiler rebuilds	Pending supply chain issues, estimated completion Summer 2025
Lead risk assessments	All public housing, will continue through mid-2025
Park South Tower window replacements	Estimated completion Fall 2025
Kay Jay Tower shower replacements	Estimated completion Fall 2025
Jackson Tower plumbing stack replacements	Estimated completion early 2026
<i><u>IN DEVELOPMENT</u></i>	
Physical needs assessment / Energy Audit	Researching procurement - must be done every five years
Fire alarm panel replacements	Re-initiating solicitation due to inadequate bid responses
Multifamily exterior repairs	Developing solicitation scope based on completed A&E
Tower lobby renovations	Developing solicitation scope based on completed A&E

Capital Funds Grant Status Update as of 02/18/2025

*ACTIVE GRANTS*

<b>Grant Year</b>	<b>Grant Type</b>	<b>Award Amount</b>	<b>Award Date</b>	<b>Obligation Date</b>	<b>End Date</b>	<b>\$ Expended</b>	<b>% Expended</b>	<b>\$ Obligated</b>	<b>% Obligated</b>	<b>Status</b>
2019	Lead Based Paint	\$660,000	8/30/2019	8/30/2023	8/30/2025	\$630,220	95.49%	\$665,097	100.77%	Obligation complete, expending
2022	Formula	\$7,114,398	5/12/2022	5/11/2024	5/11/2026	\$7,039,774	98.95%	\$7,089,036	99.64%	Obligation complete, expending
2022	JT At Risk	\$2,145,000	2/8/2023	1/29/2025	1/29/2027	\$36,577	1.71%	\$2,152,220	100.34%	Obligation complete, expending
2023	Formula	\$7,173,205	2/17/2023	2/16/2025	2/16/2027	\$4,353,137	60.69%	\$7,158,526	99.80%	Obligation complete, expending
2024	Formula	\$7,433,097	5/6/2024	5/6/2026	5/6/2028	\$2,713,184	36.50%	\$3,079,611	41.43%	Obligation in progress

*INACTIVE GRANTS (NO CHANGE)*

<b>Grant Year</b>	<b>Grant Type</b>	<b>Award Amount</b>	<b>Award Date</b>	<b>Obligation Date</b>	<b>End Date</b>	<b>\$ Expended</b>	<b>% Expended</b>	<b>\$ Obligated</b>	<b>% Obligated</b>	<b>Status</b>
2019	Formula	\$5,612,511	4/16/2019	4/15/2023	4/15/2025	\$5,612,511	100.00%	\$5,612,511	100.00%	Closing process in progress
2020	Formula	\$6,017,802	3/26/2020	3/25/2024	3/25/2026	\$6,017,802	100.00%	\$6,017,802	100.00%	Fully expended, ready to close
2020	Safety & Security	\$227,273	4/2/2021	4/1/2022	4/1/2023	\$227,273	100.00%	\$227,273	100.00%	Fully expended, ready to close
2021	Formula	\$5,831,495	2/23/2021	2/22/2023	2/22/2025	\$5,831,495	100.00%	\$5,831,495	100.00%	Fully expended, ready to close
2021	Safety & Security	\$247,000	9/1/2021	9/9/2022	9/9/2023	\$146,530	59.32%	\$146,530	59.32%	Fully expended, ready to close

## 6.9. Human Resources

# Memorandum



To: The Board of Commissioners

From: Latina Jackson, Director of Human Resources

Date: February 13, 2025

Re: Staffing Report Summary January 17, 2025 – February 13, 2025

## Total Open Positions 13

Position(s)	Number of Positions Open	Department	Status
Housing Specialist	4	Property Management	Interviewing and checking references
Assistant Property Manager	1	Property Management	Interviewing
Housing Inspector	1	Inspections	Interviewing
Maintenance Manager	1	Property Management	Interviewing
Public Safety Dispatcher – PT	1	Public Safety	Interviewing
Assistant Director of Facilities Operations	1	Property Management	Reviewing Applications
Project Based Voucher Program Manager	1	Housing Choice Voucher	Interviewing
Project Based Voucher Program Coordinator	1	Housing Choice Voucher	Interviewing
Housing Compliance Specialist	1	Compliance	Interviewing
Certification Specialist	1	Housing Choice Voucher	Making offer

## Total New Hires 3

Title	Number of Positions Filled	Department/Location
Administrative Clerk – PHI	1	Public Housing Intake
Public Safety Officer – PT	1	Public Safety
Maintenance Manager	1	Property Management

## Total Transfers 0

Name	Old Title	New Title	Department	Date

## Total Promotions 1

Name	Old Title	New Title	Department	Date
Cole Garey	Housing Compliance Specialist	Quality Control Specialist	Compliance	02/03/25

Type of Termination	Number of Employees
Involuntary	2
Voluntary	2

Current Monthly Turnover Rate
2.39%

Annual Turnover Rate (02/2024 – 01/2025)
40.12%

## 6.10. Family and Community Services

*Family and Community Services Department*

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**Synergy of Services = Self-Sufficiency**

Outreach

Academic Achievement

Transportation

Elderly and Disabled Services

Resident Education and Employment

Family Self-Sufficiency

Homeownership

Grants



*Families Towards Self-Sufficiency*

***Family and Community Services Department***

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***Family Services and Community Outreach (FSCO) Program***

Goal: The primary goal of the Family Services and Community Outreach Program is to assess, upon lease-up, the needs of public housing residents and strategically connect them to community resources and internal OHA programs that stabilize their housing situations; provide access to education and employment opportunities and offer youth tutoring and mentoring as well as quality services that allow older people to age-in-place. Additionally, the FSCO Program assists the overall agency with the collection of non-payment of rent through referral resources; enhanced public safety through resident mediation; formal and informal HCV and Public Housing hearings; incentive transfer; and the development of the Community Service/Section 3 Resident program, Resident Associations, and the Central Advisory Committee.

Snapshot of Services/Referrals	The Impact (Households served)
Home Visits	150
Study Centers (Youth & Adult)/Computer Lab (SST and TSF)	300+
Outreach Efforts	300+
Educational Opportunities (ABE/GED/ESL/Translation services) Adult	25
Employment Referrals (Job Readiness/Employment Leads/Job Placement)	100+
Youth/Adult (Cultural/Recreational/Educational)	100+
Transportation to all activities	200+
Intra-Agency Service Coordination & Support	35
Number of New Enrollment (Case management)	9
Number of New Community Partnerships	5
Number of Cultural/Recreational Activities (Soccer training)	10
Referral to FSS/HOP	8
Food/Nutrition Program (TSF food program)	500+
Service Coordination with Property Management	35

**Residents’ Opportunity for Self-Sufficiency (ROSS) Program:**

The Resident Opportunity for Self-Sufficiency (ROSS) Program is designed to help adults and youth living in public housing set and achieve goals related to economic self-sufficiency. The program is broken down into a set of purposes related to the following:

- Education
- Employment and Job Training
- Health/Wellness

The program is self-directed and self-paced. The ROSS coordinator will collaborate with participants to access these resources. This program will best serve those who are initiative-taking and genuinely interested in improving their current situation.

***Family and Community Services Department***

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**Purpose:** To provide case management services to residents living within Omaha Housing Authority communities that focus on strengthening the family and promoting self-sufficiency through supportive services and referrals to community partners.

Snapshot of Services/Referrals	The Impact (Households served)
Caseload to Date	173
New Enrollments	2
TANF Recipients	0
Face-to-Face Contact Visit	80
Virtual Contact Visit	15
Phone Visit	15
ROSS Employment Goals	5
Job Placement	0
Employed Full-Time	61
Employed Part-Time	12
Employment Referrals	20
Education Goals	3
Education Goals Met	100 MCC/UNO
Education Referrals	0
College Enrollment	0
Healthcare Coverage	40
Program Coordination Committee (PCC)	25
New PCC Partners	0

***Resident Education and Employment Program (REEP)***

Goal: The primary goal of the Resident Education and Employment Program (REEP) is to provide meaningful opportunities for Public Housing and Section 8 residents to receive job readiness training, soft and life skill development, post-secondary education, GED/ABE/ESL, job search assistance, and resume preparation. By connecting residents with Metro-area employers, REEP seeks employment opportunities that lead to economic self-sufficiency.

Snapshot of Service Coordination	The Impact (Households served)
Job Placement (DED-Internship through TSF)	30
Job Readiness Training/Referral and Job Fair	75
Direct Employment Leads/Flyers	300
Post-Secondary Education (Certificate Programs/2/4-year University)	181

***Family and Community Services Department***

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***Family Self-Sufficiency Program (HCV/PH) (FSS)***

Goal: The primary goal of the Family Self-Sufficiency Program is to empower families to become economically self-sufficient. Through intensive case management services, financial literacy counseling, asset development, life skills workshops, goal planning (ITSP), and strategic service coordination through the Program Coordinating Committee (PCC), residents have the skills necessary to live and lead self-sufficient lives.

Snapshot of Service Coordination	The Impact (Households served)
Intensive One-on-One Case Management (HCV & PH)	HCV-143 PH-26
TANF Recipients (Welfare to Work)	HCV-2 PH-1
Recommendation for Graduation	HCV-5 PH-1
Recommendation for Termination	HCV-2 PH-0
Program graduates	HCV-5 PH-1
New Enrollment	HCV-2 PH-0
Employment/Job Training/Referrals (YTD)	220
Post-Secondary Education (YTD)	52
Employed full-time (YTD)	HCV-125 PH-18
Financial Literacy (Financial Management & Homeownership Counseling) (YTD)	80
Asset Development (Escrows)	<b>HCV-\$504,103.00</b> <b>PH-\$57,547.00</b> <b>Total-\$561,651.00.</b> <b>Forfeiture Total-\$57,892.00</b>
Life Skills	80
Service Coordination (PCC)	35
In-Person Meetings	30

***How do We Impact OHA and the Community?***

**ACHIEVEMENTS:**

- *Two tenants were pre-approved for a home mortgage loan this month.*
- *One tenant purchased a home this month.*
- *Three HCV/PH tenants enrolled in the FSS program this month.*
- *HUD awarded our FSS program \$525,000 for 2025.*
- *Three FSS participants graduated this month with a total escrow amount of \$20,125.*
- *Two FSS participants were recommended for graduation this month.*

Board Report

***Family and Community Services Department***

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- *In December, 56 HCV residents (\$23,315, including interest) and 10 PH FSS residents (\$2,987, including interest) accumulated escrow deposits.*
- *Year to date: 24 HCV FSS participants graduated from the program with a combined escrow amount of \$230,399.08. Additionally, 5 PH FSS participants graduated, with a total escrow of \$32,885.89.*
- *Three PH FSS participants moved to HCV.*
- *Met with staff from the recruitment department at Metro Community College to discuss ways OHA and Metro can collaborate more effectively to support clients and improve communication between OHA, MCC, and students. We brainstormed strategies to identify OHA residents who are students and develop connections between OHA clients and the appropriate MCC staff for recruitment and retention initiatives.*
- *One tenant graduated with a GED from MCC.*
- *Fifteen residents attended the Goodwill Job/Career Fair.*
- *Staff is recruiting for the Earn While You Learn MCC Cohort.*
- *Staff participated in the FSS HUD office hours.*
- *Met with Charles Drew Community Health Center staff to discuss our partnership.*
- *Staff visited Highland Tower to recruit for FSS, distributed flyers, and met with the Resident Advisory Council President, who agreed to distribute the flyers.*
- *Staff attended Pine Tower's Resident Association Meeting, presented on FSS, distributed flyers and applications, answered program-related questions, and established key relationships with residents and staff.*
- *Staff handed out flyers and applications to residents at Keystone.*
- *Staff initiated HCV briefings to recruit FSS participants.*
- *Staff attended the Florence Tower Resident Association Meeting to recruit for FSS, distributing flyers and applications.*
- *Staff attended the two-day HCV Homeownership Webinar, which provided resources and strategies for both new and established programs to assist more HCV-assisted families in achieving homeownership.*
- *Staff met with Omaha Bridges Out of Poverty to discuss potential partnerships and learn about their program.*
- *Staff met with Momentum to build a partnership and establish an MOU.*
- *Staff met with In Common to discuss a potential partnership for utilizing their space for resident meetings.*
- *Staff participated in HUD's Coaching Mindset in Tough Money Training.*
- *OHA partnered with Methodist College Mobile Clinic to provide free flu vaccinations at all the towers.*
- *Established a new partnership with Goodwill to provide various workshops, training sessions, certification programs, and classes throughout OHA towers.*
- *Currently, 25 OHA tenants are still enrolled in either Career Forward or Spring classes at MCC. This partnership strengthens our relationship with MCC, helping pipeline FSS participants and OHA residents into career-centered educational opportunities. The program allows participants to earn college credit toward a degree of their choice while receiving an hourly stipend for classroom time. Additional support includes an MCC-assigned coach, scholarship opportunities, and other benefits.*
- *Staff is developing and maintaining a master list of community resources frequently requested by participants, including food pantries, mental health care, and utility assistance.*

Board Report

***Family and Community Services Department***

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- *Continued collaboration with Creighton University's TRIO Program for Adults. (Seven tenants were referred this month.)*
- *Coordinators are working with HWS to better serve OHA tenants by providing employment opportunities and job training, including interview skills, resume workshops, and career exploration. (Fifteen tenants were referred this month.)*
- *Staff continues to work with Metro Community College to finalize details for our Career Forward cohort, further strengthening our educational pipeline for FSS participants and OHA residents.*
- *Strengthened our partnership with The Simple Foundation (TSF) to secure opportunities for resident youth, including after-school and summer programs as well as paid internships.*
- *REACH Partnership with Creighton University Center for Promoting Health and Health Equalities focuses on four key areas: vaccination, physical activity, breastfeeding, and nutrition. (Five CHWs participated in Douglas County Health Department training.)*
- *Continued collaboration with The Simple Foundation to provide after-school and summer programs. (Eight families were referred this month.)*
- *Novel Care, a home healthcare service, provides professional and paraprofessional healthcare services to tenants in their homes, including companion services, light housekeeping, transportation, and personal care. They have a nurse on staff to assist with medical questions and are Medicare and Medicaid certified. (This month, they visited 45 residents at ET, KJT, and HT.)*
- *Continued partnership with Methodist College Mobile Diabetes Clinic. Nursing students will continue providing free on-site screenings for blood pressure, BMI, pre-diabetes, blood glucose, cholesterol, etc.*
- *Catholic Charities visited Evans and Benson Towers this month to host bingo, assist residents with food pantries, and provide rides to medical appointments. (Fifty-five residents participated in the bingo event.)*
- *Youth involvement remains a top priority for our organization. This month, we actively promoted scholarship opportunities for 91 OHA high school students pursuing higher education.*
- *Family Self-Sufficiency coordinators continue developing strategies to connect participating families with public and private resources, increasing earned income and financial independence.*
- *Ongoing exchange of referrals with the Property Management team to address bedbug and housekeeping issues in the towers. (Fifteen tenants were referred this month.)*
- *Partnered with United Healthcare to provide educational workshops on health disparities throughout OHA towers. (Hosted seminars and resource fairs, serving 60 tenants.)*
- *GOCA/ENCAP provided critical services to 70 OHA tower residents this month.*
- *Archwell Community Health Care hosted Lunch and Learn events at OHA towers this month, with over 40 tenants participating.*
- *Distributed over 600 coats to OHA tenants.*
- *Distributed over 2,500 toys to OHA tenants through Toys for Tots and The Simple Foundation.*
- *The OHA/TSF soccer program reached its highest participation level in history, with over 700 kids engaged in year-round programming. (Thirty-five players participated in College ID camps and campus visits.)*
- *Monthly follow-up assessments continued for 39 high school seniors regarding scholarships, GPAs, and college applications.*
- *Continued support for 201 OHA/TSF college students across multiple universities, ensuring access to the Scott Foundation Scholarship, which committed over \$300,000 annually.*

Board Report

***Family and Community Services Department***

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- *Collaborated with over 10 organizations to provide Thanksgiving dinners to more than 800 OHA tenants.*
- *Established a new partnership with Integrity First Care Home Health Care, serving over 30 tower tenants this month.*
- *Ongoing flu shot clinics in partnership with Charles Drew Community Clinic.*
- *Strengthened The Simple Foundation partnership for the 2025–26 school year and summer, providing after-school Learning PODs with educational, technological, social, emotional, and mental health support.*
- *OHA staff continues bridging communication barriers with Sudanese, Somali, and Somali Bantu populations regarding CNI, CNP, trash, and public safety. (Ten tenants were served this month.)*
- *Conducted over 100 home visits for Southside residents and scattered sites to assess needs and provide direct support.*
- *Strengthened partnerships with community organizations to expand resources for Southside residents.*
- *Hosted diverse employment opportunities, job counseling, resume workshops, and interview preparation for tenants.*

***Upcoming Events:***

- *Various training sessions, career fairs, outreach programs, and continued recruitment for FSS and ROSS SC programs.*

## 6.11. Legal

# Memorandum



To: OHA Board of Commissioners  
 From: Brian Hansen, General Counsel  
 Date: February 27, 2025  
 Re: Legal Matters

## TORT CLAIMS PENDING PER PSTCA

Hasani Lee et al	Tort	10/06/24	Notice of intent to sue		
Chaunci Calloway	Tort	08/13/24	Notice of intent to sue		

## LITIGATION

Select Contracting v OHA	Contract	08/18/23 11/12/23 12/03/24 07/01/25 08/01/25	P Complaint filed OHA answer filed Mediation ordered All discovery to be completed Projected trial date	Douglas County District Court	PENDING
Cribbs v. OHA	Negligence	12/29/23 04/25/24 11/03/25	P Complaint filed OHA answer filed Projected trial date	Douglas County District Court	PENDING
Bush v OHA	Class action hardship etc.	06/27/24 PENDING	P complaint filed Settlement negotiations pending	US District Ct	PENDING
Bell v OHA	Class action habitability	01/06/25 PENDING 05/01/25	P Complaint filed P amending Complaint Est date OHA Answer is due	Douglas County District Court	PENDING
Silence (Harris) v OHA	Employment discrimination	02/11/25	P Complaint filed Response due 21 days	US District Ct	PENDING
Hasani Lee et al 24-0039		01/02/24 03/15/24	P Complaint filed Dismissed with prejudice	Douglas County District Court	RESOLVED
Hasani Lee et al 24-1768		03/05/24 12/12/24	P Complaint filed Dismissed without prejudice	Douglas County District Court	RESOLVED
Hasani Lee et al 24-2225		03/21/24	P Complaint filed PENDING	Douglas County District Court	PENDING
Hasani Lee et al 24-3481		05/03/24 02/24/25	P Complaint filed P multiple motions incl jury	Douglas County District Court	PENDING
Sherman Wells v OHA		05/15/24 10/15/24	Complaint filed Dismissed	Douglas County District Court	RESOLVED
Calloway v. OHA		6/14/24 08/13/24	P Complaint filed Dismissed with prejudice	Douglas County District Court	RESOLVED
OHA v Lide	Eviction rent & Counter claims	04/24/24 05/24/24 04/03/25	Eviction action filed D answer & counterclaims Pretrial scheduled	Douglas County District Court	

OHA v Freeman	Eviction rent & Counter claims	08/21/24 08/30/24 09/09/24 04/22/25	Eviction action filed D answer & counterclaims Transferred to district court Pretrial scheduled PENDING SETTLEMENT	Douglas County District Court	PENDING
OHA v Valentine	Eviction 3-day & Jury trial	01/24/25 02/06/25 03/13/25	Eviction action filed D answer & jury trial request Pretrial scheduled PENDING SETTLEMENT	Douglas County District Court	

**DISCRIMINATION CLAIMS—TENANTS & PROGRAM PARTICIPANTS**

Henry Lee v. OHA	Discrimination	02/26/24 07/31/24	Date of charge Answer filed PENDING ADDL INFO	OHRRD	PENDING
Johnson v. OHA	Discrimination	3/27/24 05/06/24	Date of charge OHA response submitted Settlement negotiations PENDING	HUD	PENDING
Kurtenbach v. OHA	Discrimination	5/24/24 6/13/24	Date of charge OHA response submitted	NEOC	PENDING
Coleman v. OHA	Discrimination	12/09/24 01/07/25	Date of charge OHA response submitted	OHRRD	PENDING
Freeman v OHA	Discrimination	07/23/24 12/13/24	Date of charge OHA response submitted SETTLEMENT PENDING	OHRRD	PENDING
Diaz v. OHA	Discrimination	10/17/24 03/04/25	Notice of charge OHA response due	NEOC	PENDING

**DISCRIMINATION CLAIMS—EMPLOYEES**

Harris v OHA #4	Employment discrimination	01/11/24 03/11/24	Date of notice OHA response submitted	NEOC	PENDING
LA Thomas v. OHA	Employment discrimination	03/05/24 05/15/24 02/19/25	OHA received charge OHA response submitted Final review of evidence	NEOC	PENDING
G Thomas v. OHA	Employment discrimination	03/12/24 05/06/24	OHA received charge OHA response submitted NEOC finds no probable cause	NEOC	RESOLVED
Early v. OHA	Employment discrimination	09/13/24 11/18/24	Notice of charge OHA Response filed	NEOC	PENDING
Cobb v. OHA	Employment discrimination	11/12/24 02/19/25	Notice of charge OHA response submitted	NEOC	PENDING

## JANUARY 2025 EVICTION CASES

	Eviction	Cured/Paid	Moved Out	Other/Dismiss	Pending	Denied	Total
Nonpayment	1	8	0	4	11	0	24
Lease	1	1	0	1	1	0	4
Criminal/HSW	0	0	0	0	0	0	0
01/25 Totals	2	9	0	5	12	0	28
12/24 Totals	3	9	1	0	0	0	13
11/24 Totals	5	10	2	0	0	0	17
10/24 Totals	9	9	5	8	0	0	31
09/24 Totals	10	4	1	3	0	0	18
08/24 Totals	5	0	1	0	0	0	6
07/24 Totals	2	4	0	11	6	0	23
06/24 Totals	0	0	0	0	0	0	0
05/24 Totals	11	5	2	15	9	1	43
04/24 Totals	4	1	1	2	0	0	8
03/24 Totals	1	3	1	1	0	0	6
02/24 Totals	0	0	0	0	0	0	0
01/24 Totals	0	0	1	0	0	0	1
2023 Totals	50	45	15	40	15	1	166

7. NEW BUSINESS
8. EXECUTIVE SESSION FOR LEGAL, REAL ESTATE, AND/OR PERSONNEL MATTERS (as necessary)
9. ADJOURNMENT