

### HOUSING AUTHORITY OF LINCON COUNTY 2022 Annual Plan

# Streamlined Annual PHA Plan (Small PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 03/31/2024

**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** The Form HUD-50075-SM is to be completed annually by **Small PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, HCV-Only PHA, or Qualified PHA do not need to submit this form.

#### Definitions.

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

Α.	PHA Information.					
<b>1.1</b>	PHA Name: HOUSING AUTHORITY OF LINCOLN COUNTY PHA Type: Small PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/01/2022 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 99 Number of Housing Choice Vouchers (HCVs) 546  Total Combined 645 PHA Plan Submission Type: Annual Submission Revised Annual Submission  Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.  HALC's plan is available at the main office located at 1039 NW Nye Street, Newport, OR 97365. Additional information concerning the agency's annual plan or policies may be obtained by submitting a written request or email to the attention of the Executive Director, kkowtko@halc.info. Housing Authority of Lincoln County, P O Box 1470, Newport, OR 97365 or by visiting the HALC website: www.halc.info					
	PHA Consortia: (Check	k box if submitti	ng a Joint PHA Plan and complete	table below)  Program(s) not in the	No. of Units i	n Each Program
	Participating PHAs	PHA Code	Program(s) in the Consortia	Consortia	PH	HCV
	Lead PHA:					

В.	Plan Elements Submitted with 5-Year PHA Plans. Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).					
B.1	Revision of Existing PHA Plan Elements.  (a) Have the following PHA Plan elements been revised by the PHA since its last Five-Year PHA Plan submission?  Y N Statement of Housing Needs and Strategy for Addressing Housing Needs.  Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.  Financial Resources.  Rent Determination.  Homeownership Programs.  Safety and Crime Prevention.  Pet Policy.  Substantial Deviation.  Significant Amendment/Modification  (b) If the PHA answered yes for any element, describe the revisions for each element(s):  (c) The PHA must submit its Deconcentration Policy for Field Office Review.					
B.2	Y N  Hope VI or Choice N  Mixed Finance Mode  Conversion of Public  Conversion of Public  Project Based Vouch  Units with Approved  Other Capital Grant F	reighborhoods. rnization or De sposition. Housing to Ter Housing to Pro ers. Vacancies for I Programs (i.e., C	nant Based Assistance. ject-Based Rental Assistance or Pro-	oject-Based Vouchers under RA Grants or Emergency Safety and activities. For new demolition has applied or will apply for der ition approval process. If using I	D.  I Security Grants; activities, describmolition and/or d Project-Based Vo	be any public isposition uchers (PBVs),
B.3	Progress Report.  Provide a description of the F	PHA's progress	in meeting its Mission and Goals d	escribed in the PHA 5-Year Plan	1.	

B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N
	(b) If yes, please describe:
	Plan Elements Submitted All Other Years (Years 1-4). Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.
B.2	New Activities
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N ☐ ☑ Hope VI or Choice Neighborhoods.
	<ul> <li>✓ ☐ Mixed Finance Modernization or Development.</li> <li>☐ ☑ Demolition and/or Disposition.</li> </ul>
	☐ ☑ Conversion of Public Housing to Tenant-Based Assistance. ☐ ☑ Conversion of Public Housing to Project-Based Assistance under RAD. ☐ ☐ Project Based Versions
	<ul> <li>☑ Project Based Vouchers.</li> <li>☑ Units with Approved Vacancies for Modernization.</li> <li>☑ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</li> </ul>
	(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process.
	HALC will have completed the Section 18 Demo/Dispo process of 20 units in 2021. Current year will be spent exploring options for new projects to use some of the net proceeds from this disposition to increase the number of one and two-bedroom units for very-low income applicants.
	HALC has begun the process of developing a LIHTC project to provide preference housing for victims of the 2020 Wildfires in northern Lincoln County. Lincoln County was awarded a direct allocation of "Disaster Credits" needing to be utilized no later than June 2022.
	Project Based Vouchers – exploring the possibility of using the PBV's in the Disaster Credit LIHTC project as well as another project in northern Lincoln County that was recently funded under the State's NOFA-LIFT Rental Housing program.
	(c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan.
	Using PBV's will enable development of one and two-bedroom units, which is needed, while making the development more financially feasible. Exact number of PBV's has not been determined at this time;
	however, would most likely not be more than 20 total.
	(d) The PHA must submit its Deconcentration Policy for Field Office Review. See attachment B.2.
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
	Form HUD 50075.2, Five-Year Action Plan for 2021-2025 was approved by HUD on 8/2/2021, in the EPIC system. Attachment B.4.

С	Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.
C.1	Resident Advisory Board (RAB) Comments.  (a) Did the RAB(s) have comments to the PHA Plan? We do not have a RAB  Y N
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	Certification by State or Local Officials.  Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. Attachment C.2
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Attachment C.3(a)  Form HUD-50077-CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.  Attachment C.3(b)
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.  (a) Did the public challenge any elements of the Plan?  Y N  □ ☑  If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing.  Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item
	Fair Housing Goal:

	g fair housing strategies		<del></del>	
Fair Ho	ousing Goal:			
			a 1	
<u>Describe</u>	e fair housing strategies	s and actions to achie	eve the goal	
Fair Ho	ousing Goal:			
	e fair housing strategie.	s and actions to achie	eve the goal	
200000	Jun 110 usung su unegre.		<u> </u>	

#### Instructions for Preparation of Form HUD-50075-SM Annual Plan for Small PHAs

- PHA Information. All PHAs must complete this section. (24 CFR §903.4)
  - A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

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

- Plan Elements. PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)

**B.1 Revision of Existing PHA Plan Elements.** PHAs must: Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)). The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii)) ☐ Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR \$903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b) Describe the unit assignment policies for public housing. 24 CFR §903.7(b) Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program and state the planned use for the resources. (24 CFR §903.7(c) Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d) ☐ Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b). ☐ Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5)) Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

	В.2	<b>New Activities.</b> If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."
		HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate
		process. See guidance on HUD's website at: <a href="https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6">https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6</a> . (Notice PIH 2011-47)
		Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <a href="https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4">https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4</a>
		Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm</a> . (24 CFR §903.7(h))
		Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:
		http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))
		Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.
		□ <b>Project-Based Vouchers.</b> Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).
		Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).
		Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
	В.3	<b>Progress Report.</b> For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
	B.4	Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."
	B.5	Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))
В.	Ann	ual Plan Elements Submitted All Other Years (Years 1-4). PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)
	<b>B.</b> 1	<b>New Activities.</b> If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."
		☐ <b>Hope VI or Choice Neighborhoods.</b> 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:
		https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2010-30)
		☐ <b>Mixed Finance Modernization or Development. 1</b> ) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and <b>2</b> ) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:
		http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)
		Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected unit along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and

Page 7 of 9

	guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm">http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm</a> . (24 CFR §903.7(h))
	Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:
	http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))
	Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.
	☐ <b>Project-Based Vouchers.</b> Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.
	Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).
	☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
B.2	Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

#### C. Other Document and/or Certification Requirements.

- C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.2 Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077 CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).
- C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

#### D. Affirmatively Furthering Fair Housing (AFFH).

**D.1** Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that

require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

## Certifications of Compliance with PHA Plan and Related Regulations (Small PHAs)

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

Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024

### PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_\_ 5-Year and/or \_2022 Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning \_01-01-2022 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

- 1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
- 2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) as applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR § 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.

\_\_\_\_3. Resident membership on PHA governing board The PHA provides assurance as part of this certification that:

\_\_2. Membership of Resident Advisory Board

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
- (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
- (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
- 5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
- 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101

- et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
- 8. For a PHA Plan that includes a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site:
  - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(c)(1).
- 9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- 17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.

- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

<b>Housing Authority of Lincoln County</b>		OR005	
PHA Name		PHA Number/HA Code	_
5-Year PHA Plan for Fiscal Years 20 20_		Annual PHA Plan for Fiscal Year 2022	
I hereby certify that all the information stated herein, as is true and accurate. <b>Warning:</b> HUD will prosecute fal civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C.	se claim	s and statements. Conviction may result in crimir	
Name of Executive Director:		Name of Board Chairman:	
Kathy Kowtko		Niesa Chastain	
Signature	Date	Signature	Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

#### HOUSING AUTHORITY OF LINCOLN COUNTY

2022 Annual Plan

#### **Attachment**

#### **DECONCENTRATION POLICY**

It is the Housing Authority of Lincoln County's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, we will skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

The Housing Authority of Lincoln County will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our developments and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement.

HALC is non-asset management and maintains all of our 99 units in one amp, there is not much geographic distance and differences among properties. Therefore all of the public housing units operate from one waiting list. When a unit becomes available it is offered to the next applicant on the waiting list. If the applicant is currently employed in the central part of the county, they often will not accept a unit that is located outside of their comfort distance for travel. Lincoln County does not have a reliable and comprehensive transit system.

The attached analysis worksheet reflects the average, unadjusted income of the families residing at each property. Of the six sites, two are currently below and two are above the established range, based on the agency-wide average income.

Project 5001 is located eight miles from central Newport, with limited public transportation options. Applicants who are on fixed incomes or not currently employed are more likely to accept these units, resulting in a lower average. The averages on the small properties can be easily changed by just one household's income.

#### Attachment B.4

#### Housing Authority of Lincoln County Annual Plan 2022

#### **Statement of Capital Improvements**

The rolling five-year plan for FY 2021 – 2025 was submitted through the EPIC system and was approved by HUD on 8/2/2021. The Annual Statements/Budgets for 2019, 2020, and 2021 Capital Fund Grants were also included in the 2021 Annual Plan, with revisions submitted through EPIC.

The Environmental Review process on 2018-2022 5YR Plan was completed., August 2019. The only "new" work activity, administrative office remodel at 1039 NW Nye St, was added and is currently undergoing the review process.

HALC is in compliance with all obligation and expenditure deadlines.

Listed below are the open Capital Fund Grants from prior year awards. Progress on these work items was delayed in 2021 due to COVID-19 restrictions as well as availability of contractors.

#### 2019 Capital Fund Grant:

•	Balance of Window	Replacement at	Fircrest Develop	ment, Toledo – \$	90,000
---	-------------------	----------------	------------------	-------------------	--------

•	Exterior Doors/I	Locks at Fircrest.	. Toledo	\$ 102,133

• Ocean Spray II – 142 NW High St, Newport- Sidewalk, concrete

eway repair	\$ 25	5,000
V	veway repair	veway repair \$ 25

• Trash Enclosures at Fircrest, Toledo \$ 30,000

#### 2020 Capital Fund Grant Proposed Projects:

•	Exterior Painting @ Fircrest	\$ 40,000
•	Roof Replacement at Coast/High	\$ 75,000
•	Window Replacement at Ocean Spray	\$120,000
•	Replacement of Roof Vents @ Ocean Spray	\$ 12,000

#### 2021 Capital Fund Grant Proposed Projects:

•	Exterior Doors/Locks at Sites B, C, and D.	\$ 40,000
•	Lobby Expansion on Admin Building	\$158,259

#### **2022** Capital Fund and Future Proposed Projects:

- Repairs to brick building façade at Site B 142 NW High St, Newport
- Exterior lightning upgrades at Sites B, C, D
- Sealing and striping of parking lots at Sites A, B, C, and D and repairing slopes and access to sidewalks, and mailbox areas
- Exterior painting at Sites B, C, D with siding repairs as needed
- Replacement of gutter and downspouts at Sites B, C, D and Gladys St
- Repair/replace sealants around windows at Sites B, C, D
- Replace remaining windows at Site D
- Replacement of back doors @ Ocean Spray units
- Dumpster enclosures at Sties A, B, C, D

#### Housing Authority of Lincoln County Annual Plan 2022

#### Attachment C.3(a)

Summary of Proposed HCV Administrative Plan and ACOP Changes Effective Upon Board Approval

	HCV Administrative Plan	Chapter or	
Subject Area	Explanation of Proposed or New Language	Section Changed	
Taking of Applications	Included language: Applications will be accepted in person at the office, by mail, FAX, or electronically.		
Local Preferences	Clarifies current language:	5.2	
	C. Maximum of Five (5) preference vouchers per year will be issued to applicants who are participants in the Samaritan House Shelter of Hope Program.		
Local Preferences	Clarifies current language:	5.2	
	D. Maximum of Twelve (12) preference vouchers per year will be issued to applicants who are participants in the Health and Human Services Department's Supportive Housing Project.		
Local Preferences	Clarifies current language:	5.2	
	B. Residents in the Housing Authority 's Public Housing program who are required to move and who cannot be placed in another public housing unit. Eligible families displaced from Housing Authority-owned units due to acquisition or sale of property, demolition or rehabilitation work.		
	HALC public housing households who are under-housed, over-housed or in need of reasonable accommodation that Public Housing cannot accommodate through relocation.		
Preference	Clarifies current language:		
	HALC adopted a preference for single persons who are elderly or disabled over other single persons. Since there are continuously single applicants who qualify as elderly or disabled, HALC has closed the wait list for those single persons who do not meet the definition of elderly or disabled.		
Selection from Wait List	Applications will be assigned points for meeting the local preferences. Those is category A & B will receive 100 pts; C & D 75pts; and applicants in category E 10 pts. Applicants will be selected in date and time order, by preference category when there are vouchers available to issue.	5.3	

Clarifies current language:

6.0

The Housing Authority of Lincoln County will issue a voucher for a bedroom size to determine the level of assistance for the household. The family voucher size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room.

The following requirements apply when determining family voucher size:

- The subsidy standard must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under the HQS
- The subsidy standards must be applied consistently for all families of like size and composition.
- A child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the voucher size.
- A family that consists of a pregnant woman (with no other persons) will be treated as a two-person family.
- Any live-in aide (approved by HALC to reside in the unit to care for a member who is disabled) will be counted in determining the voucher size.

HALC will assign one bedroom for each two persons within the household. The following exceptions apply:

- A child temporarily away from the home because of placement in foster care is considered in voucher size; however, documentation of the return plan within 180 days will be required.
- A live-in aide is entitled to a separate bedroom, but no other consideration for live-in's family will be considered.
- A separate bedroom will be allocated for a single head of household with children.

The following chart will be referenced in determining the appropriate unit bedroom size for a household:

HALC my grant exceptions to normal occupancy standards when a family requests a larger size than the guidelines allow and documents a disability or medical reason why the larger size is necessary.

# of Bedrooms	Minimum # Persons	Maximum # Persons
1	1	3
2	2	5
3	3	7
4	4	9

		ACOP Policy		Chapter or
Subject Area	Explanation of Proposed or New Language		Section Changed	
Taking Applications	Included language: Applications will be accepted in person at the office, by mail, FAX, or electronically.			Sec 7.0
Assignment of Bedroom Sizes	Each unit is intend One bedroom ass with the following	that consists of a pregna will be treated as a nt on the wait list. of the opposite sex (ounder age 6) will not not not different generations bedroom.  In aide (approved by HACCOUNTED INTERIOR OF THE LIBERT OF TH	pancy. In within the household, Int woman (with no other two-person family, for other than spouses, and be required to share a will not be required to ALC to reside in the unit) he unit size, but no other ive-in aide's family will be d when determining unit children to the household the unit based on HALC ember by birth, adoption, be considered when for whom the unit is, and children temporarily I be considered when dopted will be considered  O% or less of the time will ling unit size.	Sec. 10.2
	# of Bedrooms	Minimum # Persons 1	Maximum # Persons 3	
	2	2	5	
	3	3	7	
	Exceptions to the above occupancy standards may be requested and will be reviewed through the Reasonable Accommodation process.			

Offer of a Unit	When HALC discovers that a unit will become available, contact will be made with the top five applicants for the appropriate unit size. A verbal offer can be made to first applicant, requiring two (2) days to accept or reject. If unable to reach by telephone, an electronic message, or written notice by first-class mail will be sent. Offer will be made to next applicant only after those above have withdrawn or rejected the offer. If rejected, a formal written notification will be sent documenting the reject and removal from the wait list.	Sec 10.6
Rejection of Unit	HALC maintains one waiting list for each bedroom size. If the Housing Authority did not skip over other applicants on the waiting list to reach this applicant, did not offer any other deconcentration incentive, and the applicant rejects the unit without good cause, their application will be removed from the wait list and they will be notified in writing that they must reapply.	Sec 10.7
Move-in Inspections	Move-in inspection will be completed by HALC staff, with copy given to new tenants to complete and return to office after having moved into the unit. A copy of inspection with both parties' signatures will be maintained in the tenant file.	Sec 17.1
Housekeeping Inspections	When brought to Housing Specialist's attention that conditions warrant a special inspection due to housekeeping issues, a special inspection will be scheduled. Tenant will be notified and inspection conducted. If the inspection fails, a 30-day notice with 14-day to cure will be issued. If cured within the time period specified in the notice, tenant will be notified, with a reinspection scheduled for 5 months following the cure period. Tenant may be moved to a semi-annual rather than an annual inspection schedule.	Sec 17.5