

**Emergency Housing Assistance (EHA)
Elderly Rental Assistance (ERA)
State Homeless Assistance (SHAP)
July 1, 2023**



**State Homeless Funds
Program Operations
Manual**

Contacts

Oregon Housing and Community Services
Homeless Services Section
(503) 986-2000

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1. Program Summary

The general purposes of these programs are to provide an individualized approach to homeless households that includes an assessment of individual needs, identification of appropriate solutions that may include services, coordination with other programs and resources and cost-effective use of support across agencies coupled with appropriate monitoring and evaluation of homeless households' individual progress. This guidance may be appropriate for EHA, SHAP and ERA as identified below and may be used for other program funds from state, federal or other sources in which the use of funds aligns with the purpose and intent of these programs.

The **Emergency Housing Assistance (EHA)** provides state funds to supplement effective existing local programs and/or establish new programs designed to prevent and reduce homelessness. **EHA** program funding comes from state funds and the Document Recording Fee (DRF). EHA funds, including DRF, and are allocated annually to subgrantees. DRF funding and DRF funding for Veterans requires separate tracking and reporting of participants and expenditures.

The **State Homeless Assistance Program (SHAP)** provides operational support for emergency shelters and related participant supportive services for homeless individuals, families, and households. **SHAP** program funding comes from state funds allocated annually to subgrantees.

The **Elderly Rental Assistance (ERA)** provides state funds to defray the cost of rental housing for very-low-income households that are homeless or unstably housed and at risk of homelessness, where at least one household member is 58 years or older. **ERA** program funding comes from state funds allocated annually to subgrantees.

2. General Program Requirements

(A) System Wide Performance Requirements

The Oregon Legislative Fiscal office adopted a set of criteria that agencies must meet when developing key performance measures. In alignment with the federal and state strategic plans to end homelessness, OHCS has established the following key performance measure:

Percentage of homeless households who exited into permanent housing and retained that housing for six months or longer (statewide target 80%).

This key performance measure uses HMIS as the primary data source.

(B) Training

Subgrantee and subrecipient staff that provide direct services and supervise staff who provide direct services and manage homeless grants must receive relevant training. Required training must occur for staff minimally, within one year from the beginning date of employment and current staff must receive training minimally once every four years from the date of the previous training taken. Subgrantee and subrecipients must track who attended each training, the date of the training and the synopsis of the training. Records

for training must be made available to OHCS, upon request. Training is an eligible expense of program delivery and must minimally include:

- (1) Trauma Informed Services;
- (2) Mental Health First Aid;
- (3) Harm Reduction;
- (4) Supporting Victims of Domestic Violence;
- (5) Fair Housing; and
- (6) For those using OHCS funds for Street Outreach, training must include Outreach Safety Strategies.

(D) *Equity and Racial Justice*

OHCS is committed to advancing equity and racial justice in alignment with the Statewide Housing Plan and informed by national promising practices and lived experience of communities of color. OHCS is committed to an intentional, data-driven approach to reduce disparities in housing and social service provisions. Subgrantees are expected to further equity and racial justice practices by partnering with Culturally Responsive Organizations (CROs) which includes funding CROs in a meaningful way.

Subgrantees must have a stand-alone policy that addresses how they will deliver OHCS-funded programs in a culturally specific way, which will include the minimum of:

- (1) Identification of how the subgrantee addresses any barriers identified by the CRO;
- (2) Identification of how the subgrantee provides funding to CROs that aligns with OHCS program activities;
- (3) Identification of how subgrantee assists CROs bridge access to other funders and support systems;
- (4) Identification of regularly scheduled partnership meetings with CROs, no less than twice per fiscal year; and
- (5) Partnership agreement/MOU or other written document of partnership (partners, inclusive of all subrecipients, vendors, contractors, who receive OHCS funding, and must include adhering to program requirements).

A Culturally Responsive Organization means an entity that, as determined by OHCS that:

- (1) Comprehensively addresses power relationships throughout the organization by methods that include addressing conflicts and dynamics of inclusion and exclusion;
- (2) Has relationships with and is responsive to communities that the organization serves, including communities of color;
- (3) Hires, promotes, trains and supports staff who are culturally and linguistically diverse in ways that reflect the communities that the organization serves, including communities of color;
- (4) Provides culturally responsive service; and
- (5) With respect to paragraphs (1) to (4) above, has adopted governance structures, policies, and cultural norms to hold its leadership and staff accountable and to continue improvements.

Culturally responsive service means services that:

- (1) Are adapted to maximize the respect of and relevance to the beliefs, practices, culture and linguistic needs of the diverse client populations and communities being served, including clients and communities of color;
- (2) Have the capacity to respond to the issues of diverse communities; and
- (3) Ensures competent language access and incorporates diverse cultural approaches, strengths, perspectives, experiences, frames of reference, values, norms and performance styles of clients and communities to make services and programs more welcoming, accessible, appropriate, and effective for all eligible and intended recipients.

Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

More information can be found at <https://www.centerforsocialinclusion.org/our-work/our-four-strategies/>, <http://center4si.com/sparc/>, and <https://www.usich.gov/news/racial-equity-an-essential-component-of-our-nations-homelessness-response/>

(E) Duplication of Benefits

Per the subgrantee's grant agreement/contract Standard Terms and Condition, OHCS funds shall not be issued if it duplicates a benefit already paid through other sources. If a duplicate payment is made, subgrantee has thirty (30) days in which to return the duplicative payment. Subgrantees and subrecipients must check to ensure that benefits issued do not duplicate other benefits for the same payment/service using HMIS and any other data system for which the subgrantee or subrecipient have access. Subgrantees must have a stand-alone policy that identifies:

- 1) How they will ensure benefits are not duplicated; and
- 2) What system(s) they use to check for duplicated benefits.

Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

(F) Privacy Notification

Subgrantees and subrecipients must have a written document that meets the requirements of this section if provided to applicant/participant in written form, or they must have a stand-alone policy that describes how the subgrantee or subrecipient are providing this Privacy Notification verbally to applicants/participants.

A Privacy Notification must be provided to applicants/participants either verbally or in writing that identifies the following:

“Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services and other state agencies with an information sharing agreement with OHCS and are administering programs that serve the same or similar clients or populations, as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and will be disclosed to Oregon Housing and Community Services without written authorization.”

Applicants/Participants may also be asked to sign a Release of Information by the subgrantee or subrecipient that includes the Privacy Notification. If required to sign a Release of Information, in addition to the information above, such form must include a statement that:

“Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible applicants/participants. Applicant/Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify applicant/participant demographic data for the purposes of reporting”.

Subgrantees and their subrecipients must document in the applicant/participant file that a privacy notification was provided to the applicant/participant either verbally or in writing. For all other purposes of collecting personally identifiable information, subgrantees and their subrecipients must follow state and federal laws for the collection, use and sharing of applicant/participant information.

Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

(G) *Client Service or Housing Stability Plan*

Case management is one of the primary services offered to individuals and families who face multiple challenges, including severe mental illness, addiction, and homelessness. Effective case management includes **assessment, planning, implementation, coordination and evaluation**. Best practices in case management skills are available on the [OHCS Homeless Services Section dashboard](#).

For those clients receiving case management and/or more than one-time only services the development of a client service or housing stability plan (action plan) is required. Additionally, in cases in which, based on the assistance or services provided, where it is a

requirement of the program, a client service or housing stability plan (action plan) can also be required. Plans are required to be client driven, using input and goal setting by the client.

If client is receiving hotel/motel voucher as part of an emergency shelter strategy and are receiving more than 14 days of hotel/motel voucher assistance within a fiscal year, they must have a client service or housing stability plan.

Warming/cooling centers are excluded from this requirement. If hotel/motel vouchers are used in lieu of a warming/cooling center, where there are no warming/cooling centers or they exceed capacity, then a client service/housing stability plan is also not required.

Existing and active client service/housing stability plans with other providers can be used and amended for purposes of OHCS-funded programs.

(H) Confidentiality

Confidential records include all applications, records, files, and communications relating to applicants and participants of, OHCS funded services regardless of hard-copy or electronic format.

Subgrantees must have a stand-alone policy for the confidentiality of applicant/participant records. Such policy must include:

- 1) Identification of how all applicant/participant records are secured and confidentially maintained;
- 2) A statement that all applicant/participant records must be maintained within state guidelines for the proper retention and destruction of records;
- 3) A requirement that all subgrantee officers, employees and agents are aware of and comply with the subgrantees' confidentiality policy and must include an acknowledgement of such policy, in writing;
- 4) A provision for the electronic collection of applicant/participant information which states that:
 - Computer terminals must be located in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for applicant/participant records;
 - Computer monitors must be cleared (or a screen saver activated) immediately after accessing a(n) applicant/participant record;
 - Computer terminals must be on a "locked" mode or turned off if the terminal is unattended; and
 - Access to personally identifiable HMIS data shall be given to only authorized personnel as necessary for performing the work required for OHCS-funded programs; and
- 5) A statement that all records shall be open for review to federal and state authorized representatives, and auditors and/or examiners during their regular audits and monitoring functions of OHCS funded programs.

Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Domestic Violence Shelter Confidentiality Provision:

The address and location of shelters operating solely as domestic violence shelter facilities funded, partially or in whole, by OHCS must be protected from public disclosure except as authorized by the director of the organization responsible for operations of the shelter in compliance with federal, state, or local rules and regulations. OHCS retains the right to obtain shelter addresses and locations funded, partially or in whole by OHCS; however, such information is protected from public disclosure except as authorized by federal, state, or local rules and regulations.

(I) Grievances and Appeals

Subgrantees are required to have an established, written stand-alone policy for addressing applicant/participant grievances/appeal requests. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Applicants/Participants must have the right and opportunity to grieve/appeal any decision that terminates, denies, limits, reduces or modifies benefits for any reason. Applicants/Participants must be notified of their right for a grievance or appeal of such decision and subgrantee policy must clarify how and when applicants/participants are notified of their right to grieve/appeal decisions. Such grievance/appeal policy can be posted in a public place; however, applicants/participants **must** receive a written notification for any decision that terminates, denies, limits, reduces or modifies any benefit. Applicants/Participants must still receive a denial notice in writing even if the reason for denial is a subgrantee's/subrecipient's lack of funding. At a minimum, the policy must include the following components:

- (1) Informs the participant/applicant that they can contest any subgrantee's or subrecipient's decision that terminates, denies, limits reduces or modifies any benefits and identifies the steps to follow to contest the decision;
- (2) Informs the participant/applicant of the reason for termination, denial, limitation, reduction or modification of benefit;
- (3) Allows any aggrieved person a minimum of thirty (30) days to request an administrative review/appeal of such decision;
- (4) Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- (5) Identifies what reasonable accommodations are available for applicant/participants who have language, mobility or disability barriers that would prevent them from participating in the review/appeal process and how to request such accommodations; and
- (6) Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten (10) days of the final determination.

Any person or persons designated by subgrantee and subrecipient can complete the administrative review/appeal, other than the person who made or approved the decision under review/appeal or a subordinate of this person.

OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements for such a policy.

(J) Nondiscrimination

Subgrantees are required to comply with all state and federal statutes relating to nondiscrimination. Subgrantee must have a stand-alone policy that complies with the following:

- 1) A statement that subgrantees will comply with all state, federal or local statutes, rules and guidelines for all protected classes and will not take any of the following actions based on race, color, national origin, age, religion, gender, familial status, or disability (federal) or victims of domestic violence, marital status, sexual orientation, gender identity or source of income (state):
 - (a) Refuse to accept an application for housing assistance or services;
 - (b) Deny an application for housing assistance or services;
 - (c) Set different terms, conditions or privileges for housing assistance or services;
 - (d) Provide different or specific housing, facilities or services;
 - (e) Falsely deny that housing is available for inspection or rental or that services are available; or
 - (f) Deny anyone access to a facility or service; and
- 2) Identifies how applicants or participants can request reasonable accommodation to access assistance or services, how that process is communicated to applicants and participants and how those requests are processed.

Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

The Fair Housing Act prohibits discrimination based on protected classes in the housing activities of advertising, screening, and unit rentals. Using a **target population** in screening is allowed; however, refusal to accept applications or provide information on services or available housing to any protected class, even if these groups do not fit into the targeting strategy, is prohibited.

Screening criteria cannot be discriminatory and must be consistently applied. A **priority population** means persons that are determined to have the greatest need and will receive services first; however, priority cannot be used as means of denying any person assistance and refusal to accept applications or provide information on services, or available housing, to any protected class, even if these groups do not fit into the priority

population, is prohibited. For example, a provider might decide to give priority to applicants/participants who graduate from a tenant readiness education program that is inclusive of all protected classes. If two requests come in at the same time and both meet the screening criteria, the applicant/participant who also has the tenant readiness education experience could receive priority over the applicant who does not; however, providers must always accept the first request meeting their criteria or prioritization policy.

OHCS reserves the right to require a prioritization of participants when such prioritization is intended from a specific funding source. Subgrantees and their subrecipients must adhere to such prioritization required by OHCS.

For more information, see the [Guide to Fair Housing for Homeless and Domestic Violence Shelter Providers](#) produced by the Fair Housing Council of Oregon, or contact them directly at www.fhco.org.

(K) *Limited English Proficiency*

The Federal government has issued a series of policy documents, guides and regulations describing how subgrantees and subrecipients address the needs of persons who have limited English proficiency (LEP). The abbreviated definition of persons with limited English proficiency are those who: have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Subgrantee must have a LEP stand-alone policy that describes the following:

- (1) The actions subgrantee took to identify LEP populations in their service area and cites any source(s) used for evaluation;
- (2) Defines actions subgrantee will take to provide language assistance and address language barriers;
- (3) States how and how often staff will receive training about assisting LEP persons; and
- (4) Identifies that, minimally, LEP populations are evaluated biennially and that updates to the LEP Policy incorporates any needed changes to address new or emerging LEP populations.

Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Subgrantees and subrecipients can create a written Language Access Plan (LAP) to provide a framework to document how the agency's programs will be accessible to all populations in their service area. Subgrantees and subrecipient who serve few persons needing LEP assistance can choose not to establish a LAP; however, the absence of a written LAP does not release subgrantee's and subrecipient's obligation to ensure LEP persons have access to programs or activities.

Links to more information about Limited English Proficiency requirements are provided in the appendices “Applicable Rules and Regulations”.

(L) Conflict of Interest

In the performance of work under EHA, (DRF/DRF VET), ERA and SHAP, subgrantees and subrecipients will create no potential or actual conflict of interest, as defined by ORS Chapter 244, for a director, officer, agent, or employee of subgrantee or subrecipient. A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the subgrantee or subrecipient’s officers, agents or employees or the finances of their officer’s, agent’s, or employees’ relative. If a conflict of interest exists, the subgrantee or subrecipient’s officer, agent or employee must always give written notice of the conflict, and in some situations the officer, agent or employee is restricted in their ability to participate in the matter that presents the conflict of interest. No subgrantee or subrecipient officer, agency or employee may carry out the initial evaluation required to obtain services for any person in which an actual or perceived conflict of interest does or would exist, unless in rare circumstances it is in the interest of the participant for the expediency of housing placement services or to create a seamless service delivery while keeping the participant engaged in services and such situation is documented in the participant file.

Subgrantee must have a conflict of interest policy that outlines the process for disclosing, in writing, any potential or actual conflict of interest. This includes procedures for staff when employees, board members, friends or family members apply for program services. Subgrantees and subrecipients must comply with conflict of interest standards for both individuals and organizations as identified in 24 CFR 576.404(a), 24 CFR 85.36, and 24 CFR 84.42. Subgrantee and subrecipient must keep records to show compliance with program conflict of interest requirements.

(1) Organizational

The provision of any type or amount of assistance must not be conditioned on an individual’s or household’s acceptance or occupancy of emergency shelter or housing owned by subgrantee, subrecipient or an affiliated organization. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by OHCS. If a subgrantee or subrecipient wishes to apply for a waiver, they must contact the OHCS homeless program analyst or manager for guidance in submission of a waiver request, which must be approved by OHCS.

A subgrantee and subrecipient can conduct a participant’s intake assessment to determine program eligibility if the participant resides in housing where the subgrantee or subrecipient has ownership interest for the expediency of housing placement services and to create seamless service delivery while keeping the participant engaged in services. A waiver of the conflict of interest policy for this purpose is not required.

Subgrantees and subrecipients cannot steer potential renters to units owned or operated by the subgrantee or subrecipient, if the renters will be using a rent subsidy paid with any OHCS funds. Rent-subsidized tenants are free to execute a rental contract with another landlord within the subgrantee or subrecipient’s jurisdiction or they can

choose to rent a unit owned or operated by the subgrantee or subrecipient. A waiver request is not required for this situation; however, subgrantees and subrecipients must comply with this provision of the conflict of interest policy.

(2) Individual

For the procurement of goods and services, subgrantee and subrecipient must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations).

Persons for whom the conflict of interest requirements apply include any person who is an employee, agent, consultant, officer or elected or appointed official of the subgrantee or subrecipient agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the programs, or who is in a position to participate in decision-making processes or gain inside information with regard to activities assisted under the programs, can obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has a family or business tie, during his or her tenure or during the one-year period following his or her tenure.

Subgrantee must have a Conflict of Interest stand-alone policy that complies with the following:

- 1) States that subgrantees officers, agents or employees will create no perceived, potential or actual conflict of interest;
- 2) Identifies how officers, agents and employees are notified of policy;
- 3) Outlines the process for disclosing, in writing, any potential or actual conflict of interest;
- 4) Identifies the process the subgrantee will follow when notice of a perceived, potential or actual conflict of interest is received and must include procedures for staff when employees, board members, friends or family members apply for program services; and
- 5) Identifies how records are kept of perceived, potential or actual conflicts of interest.

Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

(M) Monitoring

OHCS will conduct a program monitoring of subgrantees once every two fiscal years or more frequently at OHCS' discretion. OHCS program monitoring may include desk audit, site visit and/or site visit with subrecipients (or subrecipient organization's subrecipient). Fiscal monitoring will be conducted once every two fiscal years unless circumstances and/or risk assessment require less or more frequent monitoring at OHCS' discretion. Subgrantees will be notified thirty (30) days in advance of the monitoring visit and informed of what

documents and records will be reviewed and any required staff or Board interviews. OHCS will provide subgrantees with a written monitoring report inclusive of any findings, concerns, or comments. Subgrantees are required to submit timely corrective action to findings and failure to do so can result in the withholding of funds or a requirement to return EHA (DRF/DRF VET) ERA and SHAP funds to OHCS or other remedies as described in the subgrantee's grant agreement/contract.

Subgrantees must notify and receive approval from OHCS when adding subrecipients and/or renewing subrecipients. Notification and approval normally occur during the subgrantee's grant agreement/contract funding application process. However, if changes are made outside of the funding application, subgrantees must submit an Implementation Report Amendment Request form for approval of subrecipient additions, deletions, or modifications within 30 days of such change.

(N) *Subrecipient Monitoring*

For the purposes of this operations manual the term "subrecipient" shall mean any subgrantee's subcontractors, contractors, vendor, subrecipients and any subcontractors, contractors, vendors or subrecipients of a subcontractor, contractor, vendor or subrecipient. Subrecipients must follow program intent, rules, and guidelines for the expenditure of funds.

All subrecipients must comply with all applicable program rules and regulations as noted in this manual, the subgrantee's grant agreement/contract and Program Element: Scope of Work. Records of subrecipient monitoring performed by the subgrantee or subrecipient will be reviewed during OHCS monitoring. Subrecipient monitoring reports must be retained by the subgrantee and available for review by OHCS or other authorized entity, in compliance with program rules.

At least once during each biennium, Subgrantee must monitor the activities and expenditures of its subrecipients to ensure:

- (1) compliance with subgrantee's grant agreement/contract and program rules and requirements; and
- (2) achievement of performance goals.

Subgrantee's monitoring of its subrecipients must include:

- (1) an evaluation of each subrecipient's risk of non-compliance with rules , regulations, and terms and conditions of any applicable subaward for purposes of determining the appropriate level and type of subrecipient monitoring;
- (2) a review of financial and performance reports;
- (3) a review of subrecipient policies and procedures, forms, documentation, client records including eligibility, notifications and documentation;
- (4) a review of participant records to ensure compliance with security, maintenance, retention and destruction of records; and

- (5) follow-up on all deficiencies pertaining to any OHCS funding in accordance with all program rules and regulations.

Subgrantees must have a stand-alone policy that identifies the following:

- (1) Frequency of subrecipient monitoring, which must be minimally once during a biennium or the term of the subgrantee’s grant agreement/contract;
- (2) The number of relevant samplings of fiscal transactions per program;
- (3) The number of relevant samplings of participant files and that such review includes eligibility, notification and documentation;
- (4) The number of relevant samplings of HMIS entries to ensure appropriate entry and tracking of participant information and service transactions;
- (5) A review of participant records to ensure compliance with security, maintenance, retention, and destruction of records; and
- (6) A review of subrecipient’s policies and procedures, forms, documents and notifications to ensure compliance with all program, state and federal rules, regulations and requirements.

OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

3. Applicant Eligibility

Applicant Eligibility	Emergency Housing Assistance (EHA/EHA DRF/EHA VET DRF)	State Homeless Assistance Program (SHAP)	Elderly Rental Assistance (ERA)
Homeless Status	<ul style="list-style-type: none"> • literally homeless • imminent risk • other federal statutes • fleeing DV • unstably housed 	<ul style="list-style-type: none"> • literally homeless • other federal statutes • fleeing DV 	<ul style="list-style-type: none"> • literally homeless • imminent risk • fleeing DV • unstably housed
Income Requirement	80% or below area median income	no income requirements	50% or below area median income
Age	N/A	N/A	One member of household is 58 years or older

(A) Household Composition

“Household” means an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit. For **ERA**, one member of the household must include a member that is 58 years of age or older.

(B) *Legislatively Targeted Populations for EHA*

Legislatively targeted populations for **EHA** include veterans, seniors over 65 years of age, persons with disabilities, farmworkers, and Native Americans. EHA DRF VET funds must be exclusively expended on households that include a veteran.

(C) *Housing Status*

Homeless households are eligible to receive **EHA** (DRF/DRF VET), **ERA** and **SHAP** funded services; and unstably housed households can receive **EHA** (DRF/DRF VET) and **ERA** services. Eligible applicants for program services must meet one of the following categorical definitions of homeless or unstably housed and at risk of homelessness:

Category 1: Literally Homeless—Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Living in a primary nighttime residence that is a public or private place not designed for human habitation (including, but not exclusive to, a car, park, abandoned building, bus or train station, airport or camping ground); **OR**
- Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelter, and hotels or motels paid for by charitable organizations or by federal, state or local government programs); **OR**
- Exiting an institution where he or she has resided for 90 days or less **AND** who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness—Individual or family who will imminently lose their primary nighttime residence provided that:

- The primary nighttime residence will be lost within 21 days of the date of application for homeless assistance; **AND**
- No subsequent residence has been identified; **AND**
- The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes—Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, (literally homeless, imminent risk of homelessness or fleeing/attempting to flee domestic violence) but who:

- Are defined as homeless under other listed federal statutes; **AND**
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the program assistance application; **AND**
- Have experienced persistent instability as measured by two moves or more during the preceding 60 days; **AND**
- Can be expected to continue in such status for an extended period of time due to special needs or barriers.

1. Other Federal Statutes include:

- Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.),
- Head Start Act (42 U.S.C. 9831 et seq.),
- Subtitle N of the Violence against Women Act of 1994 (42 U.S.C. 14043e et seq.) (VAWA),
- Section 330 of the Public Health Service Act (42 U.S.C. 254b),
- Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.),
- Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), and
- Subtitle B of title VII of the McKinney-Vento Act (42 U.S.C. 11431 et seq.)

Category 4: Fleeing/Attempting to Flee Domestic Violence—Individual or family who:

- Is fleeing, or is attempting to flee, domestic violence; **AND**
- Has no other safe residence; **AND**
- Lacks the resources or support networks to obtain other permanent housing.

Category 5: Unstably Housed—Individual or family who:

- Is rent-burdened, defined as paying more than 30% of their gross income in rent (documented income/rent amount); **OR**
- Is currently paying more than the Fair Market Rent, defined by HOME FMRs (<https://www.oregon.gov/ohcs/compliance-monitoring/Pages/rent-income-limits.aspx>) (documented rent amount); **OR**
- Is at risk of losing their housing, and does not otherwise qualify as homeless or imminent risk under the above listed (1-4) categories, provided that:
 - They have been notified to vacate current residence or otherwise demonstrate high risk of losing current housing (rationale for high risk of losing current housing must be documented and kept in the client file); **AND**
 - Lack the resources or support networks to obtain other permanent housing (must be evidenced by documentation in the client file).

(D) Income

There is no income eligibility requirement for **SHAP** funded assistance.

EHA-provided services require applicants to be low-income; i.e., gross household income at or below 80% of area median income.

ERA-provided services require applicants to be very-low-income; i.e., gross household income at or below 50% of area median income.

Income includes the current gross income of all adult household members. Income earned by household members who are minors or full-time students **and** are not considered heads of household is excluded.

While household assets must be identified to determine that a program applicant lacks the resources to obtain or retain permanent housing, if using the unstably housed housing

status, they are generally not counted as income, unless an income is derived from such assets dividends on investments, stocks, bitcoins, etc., which must be counted as part of the household's available income.

Subgrantee's process for determining income eligibility and the documentation required must be consistent with OHCS program requirements.

Subgrantees' policies and procedures must identify what method they will use to calculate income eligibility and income eligibility must be calculated consistently between applicants of the same program. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Documentation methods may include:

- Previous 12 months of income;
- Year-to-date income divided the number of months included in the year-to-date income; or
- Previous 30 days (or the previous 60 days or other specified period of days) of income.

Convert periodic wages to annual income by multiplying:

1. *Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);*
2. *Weekly wages by 52;*
3. *Bi-weekly wages (paid every other week) by 26;*
4. *Semi-monthly wages (paid twice each month) by 24; and*
5. *Monthly wages by 12.*

To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work.

A "Snapshot" of current income can be used as an exception to subgrantee's policies and procedures, when warranted and documented in the client file. **"Snapshot" Method** means the process of determining the estimated annual income that uses a "snapshot" of the household income at the time of application. It does not rely on a specific period in the past to determine the annual income amount. The method must only be used when a household's income has recently changed drastically and is not expected to change from the time of the snapshot (such as in a recent job loss) or when income tends to be very volatile. The snapshot method cannot be used to avoid accounting for income.

- (1) Standardization: Subgrantees/subrecipients have the discretion to calculate income standards in a manner best suited for the organization, based on their own policies. Example policies include using a year-to-date amount divided by the number of months in the year-to-date amount; using the last 30 days of paystubs or the last 60 days of paystubs. The main requirement is that the way income is calculated is consistent

between clients. Exceptions to the standard way of calculating income must be identified in policy (such as circumstances in which a snapshot method is used).

- (2) Consistency: Subgrantee/subrecipient must be consistent in how income calculation standards are applied, even if that means it excludes someone from being able to be assisted. Subgrantee/subrecipient cannot use the most current paystub for one person, the last 30 days for another, and a year-to-date for someone else, especially if the fluctuating use shows that it is being done to under-calculate income. Income calculation standards must be documented in policy and such policy will be subject to OHCS monitoring.
- (3) Client quit a job: If an applicant quits their job within the past 30 days and meets other eligibility, assistance may still be provided; however, the income can be calculated on the “snapshot” method. The snapshot method is an exception to a standardization of income calculation and must be identified in the subgrantee/subrecipient policy as well as documented in the client file as to why the exception was granted.
- (4) Overtime and Bonuses cannot be excluded from income calculations. Income cannot be excluded just because it would put the applicant/participant over the income limit. Year-to-date income methodology is an effective way to determine income when income is varied and includes overtime or bonuses.
- (5) Income from a live-in aide is not considered part of the income determination; however, a live-in aide must meet the following criteria:
 - a. Live-in aide means a person who resides with one or more elderly household member, or near-elderly household member, or member of the household with disabilities, and who:
 - i. Is determined to be essential to the care and well-being of the household member;
 - ii. Is not obligated for the support of the household member;
 - iii. Would not be living in the unit except to provide the necessary supportive services; and
 - iv. Provides documentation of payment for the live-in aide services provided to the household.
- (6) Child tax credits, Earned Income Tax Credits, Stimulus Payment and Tax Refunds are not considered income.
- (7) Self-employment: When calculating self-employment, use the previous year’s tax information, if available. Use the gross income and subtract out the deductions claimed on Schedule C to get a net income. Schedule C is the Profit and Loss form used for a Business, which deducts expenses, such as their vehicle, supplies, offices expenses, travel, utilities, etc. The net income is then divided by 12 and the result is used for the household’s monthly income.

More information on income can be found on the OHCS website in the Income Inclusions and Exclusions form.

(E) Veteran Status

Eligible applicants for **EHA DRF** veterans funding (EHA DRF VET) must meet one of the following conditions as documented with original discharge papers or DD214 Identification or other acceptable Veteran’s Affairs documentation:

- (1) Served on active duty with the Armed Forces of the United States for an identifiable period of time as further defined in ORS 408.225 and was discharged or released from active duty under honorable conditions; **OR**
- (2) Received a combat or campaign ribbon or an expeditionary medal for service in the Armed Forces of the United States and was discharged or released from active duty under honorable conditions; **OR**
- (3) Is receiving a non-service-connected pension from the United States Department of Veterans Affairs; **OR**
- (4) Includes a person who served in the military, naval, or air service that has been discharged or released from that service and has been determined by the United States Department of Veteran's Affairs to be eligible to receive any benefit from that Department.

Documentation of veteran status may include evidence of receiving any benefit from the Veteran’s Affairs Department, such as a signed statement on the letterhead of a Supportive Services for Veteran Families (SSVF) provider. Veterans have up to 12 months from the date of application in which to provide documentation of eligible veteran status. If desired, a template extension form is available to subgrantees/subrecipients on the OHCS dashboard. If documentation is not received within 12 months of the date of application, EHA VET DRF funds cannot be used for assistance/services and subgrantee must rebook the costs with another allowable funding source, such as EHA GF.

(F) Citizenship

There is no applicant/participant citizenship requirement to be eligible for EHA (DRF/DRF VET)-, ERA- and SHAP-funded assistance.

(G) Oregon Residency

Services must be provided to those residing and intending to reside within the state of Oregon; however, there is no length of time prior to receiving services or financial assistance in which a participant had to have been a resident in the state of Oregon.

If a household’s documented housing status is Category 4, Fleeing Domestic Violence, EHA (and EHA DRF/EHA DRF VET) and SHAP can be used for eligible categorical costs associated with moving out of Oregon to a safe location, providing that there is documentation in the client’s service/housing plan, indicating that the client’s destination has been confirmed as an available safe, housing option and that no funds are used for rent, hotel/motel, utilities or other services in a state other than Oregon. Such allowable costs are restricted to moving costs.

OHCS does not require strict adherence to an organization’s service boundaries within Oregon; however, some clients may start intake and assessment with one organization and then find housing or move to another organization’s jurisdiction. OHCS recommends that

organizations coordinate with one another and work together to meet the needs of the client, or one organization can provide a soft hand-off to another organization for continued support. Roles and responsibilities should be clearly identified between the organizations to effectively support the client.

(H) *Eligibility Documentation*

[also see Records Section of this Manual]

- (1) Documentation of all participant/applicant eligibility information must be available in participant/applicant files or if kept electronically, available upon request in the format requested. Documentation of all efforts to obtain higher preference of verification (Third party and Intake Worker/Case Manager Observation) when lower forms of preference are used, must be in writing and kept in the participant/applicant file. Third party documentation is a requirement for payment of mortgage assistance.

(2) Remote Application and Documentation

The standard preference is for applicants/participants to apply for assistance in person or to have in-person contact with the subgrantee or subrecipient throughout the application and service delivery process. A remote application and documentation process can be used when necessitated; however, the identity of the applicant/participant must be verified. Client file must reflect what method of identity verification was used.

Applicants/participants who apply for assistance and provide eligibility or other documentation remotely can do so via electronic and other communication; e.g., phone, email, text, electronic messaging, mail and other electronic or remote means. Eligibility and other documentation must be kept in each applicant/participant file to meet eligibility and monitoring requirements.

Subgrantees must have a stand-alone policy for the use of a remote application and eligibility documentation process. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Such policy must be applied equitably across services that use or are supported by OHCS funding and where allowed by the funding source. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

The subgrantee's Remote Application and Documentation policy must address the following elements:

- a) In what circumstances a remote application and documentation process will be used;
- b) How the verification of the identity of the applicant is ascertained;
- c) How the verification and documentation of qualification for assistance in relation to program eligibility criteria are ascertained;

- d) When remote verification and documentation is appropriate for ongoing demonstration of eligibility; and
- e) How notifications are provided to applicant/participant, inclusive of privacy notification and grievance/appeal notification.

(3) **Order of Preference**

OHCS requires program staff to comply with the following general documentation standards listed in order of preference:

- **Third-Party documentation**, source documents by an outside source, is the preferable form of documentation. Third-party documentation includes a written statement or document from an employer, landlord, public benefit worker, agency service provider, etc. Written verification sent directly to program staff or via the applicant/participant is preferred.
- **Intake/Case Manager Worker Observation**, documented by subgrantee/subrecipient staff includes oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the program intake worker/case manager. When the intake worker/case manager is unable to obtain a written or oral statement from a shelter, institution or facility staff, the intake worker/case manager must document, in writing, their efforts to obtain eligibility documentation and must place their documentation in the applicant/participant's file.
- **Applicant/Participant Self-Certification**, an applicant/participant signed document certifying eligibility, requires a written and signed document by the individual or head of household seeking assistance attesting to the eligibility facts for which they are certifying. A third-party can be designated by an applicant/participant to sign documents on their behalf when they are unable to do so. It is the responsibility of the subgrantee and subrecipient to provide access to language interpretation services and assistive devices necessary for applicants/participants to understand the documents they are certifying. Self-certification documentation is only used when documented staff efforts verify that third-party or intake worker/case manager observation documentation is not available. However, lack of third-party documentation must not prevent an individual or household from being immediately admitted to emergency shelter, receiving street outreach services, or immediately accessing domestic violence/victim service shelter and assistance.

(4) **Simplified Documentation Option**

When a subgrantee or subrecipient moves an active client from the Housing Stabilization Program (HSP) to EHA (DRF/DRF VET), SHAP or Elderly Rental Assistance (ERA) programs or between state funds (EHA (DRF/DRF VET), SHAP, ERA), they can choose to use a simplified documentation process for the client's homeless status and income; whereby the subgrantee or subrecipient case manager verifies that the client

meets the homeless status and income of the funding source at the time of entry and that the participant is eligible for the funding source to which they are moving, without requiring additional documentation. Eligibility requirements specific to a funding source (such as Veteran status and household composition) will still remain requirements that must be documented when using a simplified documentation option for housing status and income. Documentation from the original source of funding must be readily accessible for monitoring purposes. To use the Simplified Documentation Option, there can be no lapse in service from one program to the other.

Subgrantee and subrecipient can use the sample form provided on the OHCS website to document the client file using this simplified documentation option.

Emergency Solution Grant (ESG) funds still require separate documentation and are not subject to a simplified documentation option.

4. Allowable Program Components and Expenditures

Emergency Housing Assistance (EHA/EHA DRF/EHA VET DRF)	State Homeless Assistance Program (SHAP)	Elderly Rental Assistance (ERA)
<ul style="list-style-type: none"> • Street Outreach • Emergency & Transitional Shelter • Transitional Housing • HP/RRH • Supportive In-Home Services • Acquisition/Rehab • Community Capacity Building • Data System Expenses • Engagement Incentives 	<ul style="list-style-type: none"> • Street Outreach • Emergency & Transitional Shelter • Acquisition/Rehab • Data System Expenses • Engagement Incentives 	<ul style="list-style-type: none"> • Transitional Housing • HP/RRH • Supportive In-Home Services • Data System Expenses • Rental Subsidy

Documentation of allowable program components and expenditures must identify how an expense or service helped a participant maintain or attain permanent housing. OHCS-funded assistance provided must be the least amount needed to stabilize clients in their permanent housing or facilitate their transition into permanent housing. Where state guidance is silent or absent, OHCS-funded programs comply with OMB Uniform Administrative Requirements, Cost Principles and Audit Requirements at [2 CFR 200](#). Allowable component expenditures do not include costs associated with residential treatment facilities, residential homes, nursing, memory care or assisted living facilities, permanent supportive housing, hospital, jails and other similar institutions.

EHA (inclusive of EHA Document Recording Fee (DRF) and EHA DRF VET), ERA and SHAP can be used in **one or more** of the following program components, where the program allows:

- (A) [Street Outreach](#)

- (B) [Emergency & Transitional Shelter](#)
- (C) [Transitional Housing](#)
- (D) [Homelessness Prevention & Rapid Re-Housing](#)
- (E) [Supportive In-Home Services](#)
- (F) [ERA Rental Subsidy](#)
- (G) [Shelter or Transitional Housing Facilities Acquisition, Rehab/Conversion](#)
 - a. [Distinguishing Between Maintenance and Rehab/Conversion](#)
- (I) [Community Capacity Building](#)
- (J) [Data System Expenses](#)
- (K) [Gift Cards](#)
- (L) [Engagement Incentives](#)

(A) Street Outreach

EHA (DRF/DRF VET) and **SHAP** funding can pay for street outreach services. Street Outreach is service delivery that targets unsheltered homeless individuals and households. Street outreach includes reaching out to people who **do not otherwise seek assistance**. Street outreach involves going outside of the agency to connect with individuals and households where they build rapport and meaningfully engage with unhoused individuals and families. Street outreach includes connecting with individuals and households experiencing homelessness who may be disconnected or alienated from supports and services and is focused on moving people into permanent housing without preconditions for receiving assistance.

OHCS encourages the use of multi-disciplinary approaches and partnerships with culturally responsive, healthcare-focused, or other specialty outreach services. Leveraging various fund sources to pay for health services, such as through Medicaid, should be explored whenever possible. It is expected that any health professionals providing specialty outreach services have proper credentialing and licensure through relevant governing bodies (e.g., OHA, MHACBO).

1) Requirements for the delivery of Street Outreach:

- a) Employs engagement strategies focused on building rapport as identified in this Section.
 - Includes basic assessment of needs that engages with the individual or household to get an understanding of factors related to immediate health and basic needs, vulnerabilities, and risks, and any other related factors. This does not necessarily need to be a formalized assessment tool and completing an assessment tool (such as coordinated entry assessment) is not a precondition for receiving street outreach services.
- b) Safety in service delivery – the subgrantee must have a written policy (such policy must be made available to OHCS upon request, subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to

require modification of any policy that in its determination does not meet basic principles or requirements of such a policy) regarding staff safety in service delivery, which may include the following:

- Never go out alone. Teams of two should be considered the absolute minimum.
 - Establish a system in which threats to safety to teammates are identified unbeknownst to others while conducting street outreach.
 - The office or clinic (e.g., team members not in the field) should always know the location of outreach teams. Keep to a set schedule and use Smartphones that have GPS functionality built-in.
 - Wear matching clothing, ideally in bright colors, so the street outreach team is easily identified as the street outreach workers.
 - Linkages with crisis response teams and behavioral health support are essential, especially if outreach teams lack a behavioral health provider.
 - Use trauma-informed de-escalation training for outreach staff.
 - Use harm reduction principles: safety and comfort are two different things, as are perceived threats to safety and actual threats. Witnessing drug use is not necessarily a threat to safety, for example.
 - Create time and space for street outreach teams to debrief and process any threatening events. Trauma-informed supervision of outreach personnel is essential.
- c) Works toward connecting participants with local coordinated entry (CE) systems and as a means of connecting participants to available permanent supportive housing opportunities, if participant has this need. If participant agrees, this will include completing a CE assessment or referring them for a CE assessment/enrollment. Coordinated Entry is not a requirement of EHA (EHA DRF/EHA VET) or SHAP)
- d) Services are person centered, trauma informed, culturally responsive and meet requirements of non-discrimination guidelines.
- e) Staff receive appropriate training, that at least covers minimum training requirements, as identified in the Training Section of this manual.
- f) Use of street outreach funds to provide safety/comfort resources (such as food, tarps, sleeping bags, clothing, blankets, tents, toiletries, propane tanks, etc.) is allowable, however, the goal must be the connection to permanent housing and subgrantee/subrecipient must utilize donations and other available resources for obtaining these consumable supplies prior to using state funds and such efforts to obtain these consumable supplies outside of using state funds must be documented.
- g) Data entry - all street outreach events and services must be entered into HMIS

2) Allowable Costs for Street Outreach include:

- a) Assessment, enrollment, data entry – conducting an initial assessment of applicant basic needs and eligibility, conducting a CE entry assessment and data entry into HMIS;
- b) Safety & Comfort Resources such as food, tarps, sleeping bags, clothing, blankets, tents, toiletries, propane tanks are allowed; however, this must not be the sole

strategy for street outreach services and such items must be limited and provided as a means of building rapport with homeless individuals to connect them to shelter, permanent housing options and additional health and human services;

- c) Providing crisis counseling;
- d) Assessing emergent health, behavioral and mental health needs and connecting and/or referring participants to these services;
- e) Collaboration with health, behavioral and mental health service providers to connect with street outreach households in the field;
- f) Connect street outreach households to appropriate shelter services where basic needs can be met, such as access to shower, laundry, food services and other shelter resources and services;
- g) Organizational costs for developing Homeless Connect events;
- h) Marketing and outreach costs inclusive of written materials, translation and interpretation services;
- i) Cell phone costs for outreach workers; and
- j) Travel expenses incurred by outreach workers or in conjunction with outreach workers, social workers, medical professionals, or other service agency employees during the provision of allowable street outreach services

3) Unallowable Costs for Street Outreach include:

- a) Cash or cash-equivalent funds provided to applicants/participants

(B) *Emergency and Transitional Shelter*

(1) SHELTER FACILITY OPERATIONS

EHA (and DRF/DRF VET) and SHAP funding can pay for emergency and transitional shelter facility operations. Emergency/Transitional Shelter Operations are those costs associated with maintaining and operating emergency or transitional shelter facilities whose primary purpose is to provide temporary or transitional shelter to the general homeless or specific populations of the homeless. Use of **EHA DRF VET** funds for emergency and transitional shelter, must include a requirement that recipients of such shelter meet the definition of “veteran” as outlined in this manual.

EHA and SHAP Shelter Operations can be used to support the operations performed by partners of subgrantees when such partners are operating a warming/cooling center during periods of inclement weather. To provide Shelter Operation funds to a partner organizations, such partner organizations must be identified as a subrecipient of the subgrantee and must follow general EHA and SHAP guidance and specific requirements related to the delivery of Shelter Operations as identified in Section (B)(1)(a) and (b) below.

a) Requirements for the delivery of Shelter Operations:

- 1) Subgrantees must have an animal policy in place to ensure the safety and welfare of all residents and animals, if animals are accepted at the shelter facility, and such policy must be available to OHCS upon request. Shelters must not

- implement specific dog breed restrictions. Pets may include service animals and companion animals as defined in ORS 609.500(4). Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy. An animal safety policy must include:
- i. What type of pet is acceptable (dog breed restrictions are prohibited);
 - ii. How many pets are acceptable (per person or per shelter limitation);
 - iii. Whether muzzles or leashes are required, when and where;
 - iv. Requirements on waste clean-up;
 - v. What happens when guidelines are not met;
 - vi. If there are any animal facilities (such as kennels) available, what are the rules to use them; and
 - vii. If there are any requirements for cleanliness of animal or proof of current vaccinations/shots and what are those requirements (or process by which clients could obtain services for these issues?).
 - viii. What is the process for addressing pet aggression behavior or other pet concerns raised by staff or shelter users/residents?
- 2) Hotel/Motel vouchers can be used as an emergency shelter strategy when there is a lack of available emergency shelters in the subgrantee's/subrecipient's service area. Use of hotel/motel vouchers for this purpose must be specifically identified in the subgrantee's annual report and funds used for this purpose must be identified in the hotel/motel category of the subgrantee's budget.
 - 3) Emergency shelter participants and persons receiving hotel/motel vouchers as an emergency shelter strategy must have the same access to essential services delivered by the subgrantee and subrecipient and/or provision of information and referral to other service providers. Essential services include: case management; child care; education services, employment assistance and job training; outpatient health services; life skills training; mental health services; substance abuse treatment services; transportation; services for special populations and mainstream income and health benefits where appropriate.
 - 4) When hotel/motel voucher is used as an emergency shelter strategy, damages to a hotel/motel unit that occurred while the participant was in residence of that unit can be an allowable cost of shelter operation when expenses are **reasonable and specifically itemized** by the hotel/motel voucher facility and would not be allowable if such expenses were not reasonable and specifically itemized. Such documentation must be kept in the participant's file.
 - 5) Hotel/motel costs, when used as an emergency shelter strategy, includes wi-fi costs as part of the room fee, if charged separately; however, no other incidental costs are covered, such as movie rentals, room service, long-distance phone calls, etc.
 - 6) Food costs, when used to prepare congregate meals is allowed.

- 7) Childcare services for residents in shelters: Childcare can be provided when needed to allow residents in shelters to attend meetings, appointments or do job search activities. Childcare service providers should be licensed. Shelters can become licensed, see OAR 413-215 for more information. Shelters can also enter into agreements with licensed childcare facilities for drop-in childcare services. Subgrantees must develop policies that identify how they will provide childcare services that mitigate liability and details when and how clients may access childcare services while they are residents of shelter. Such policy must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.
- 8) All Emergency Shelter events and services must be entered into HMIS.
- 9) Bed Inventory must remain current in HMIS.

b) Allowable Costs for Shelter Operation:

- 1) Lease or rent payments for shelter facility;
- 2) Utilities (includes water, sewer, garbage, gas, electricity, internet, phone) for shelter facility;
- 3) Security equipment or service to operate shelter facility;
- 4) Janitorial supplies and service to operate shelter facility;
- 5) Facility management (staff costs for a facilities manager to manage day-to-day operations necessary to ensure a physical environment also supports a shelter's needs and core function);
- 6) Minor maintenance/repairs to facility (see Definitions, Appendix A and Acquisition/Rehabilitation Sections of this manual for more information);
- 7) Furnishings and appliances for shelter facility (televisions are allowable when placed and used in common spaces);
- 8) Signage that is for the purpose of providing information to users of the shelter. When signage is for the purpose of advertising or public relations, it is allowable as an administrative costs, but only when following OMB 200.421 guidance for such costs.
- 9) Food for congregate shelter facility settings;
- 10) Childcare services for residents; and
- 11) Costs to board and care for shelter residents' animals, such as boarding costs, kennels, leashes, pet food, pet toys, pet licenses, behavioral services for pets, basic veterinary services not available or inaccessible within the community (such as vaccinations, flea treatment, spay/neuter operations and costs must be limited and reasonable).

(2) SHELTER FINANCIAL ASSISTANCE

EHA (and DRF/DRF VET) and SHAP funding can be used for Financial Assistance. Financial assistance are those costs paid on behalf of the participant and that meet the financial needs of the participant to facilitate transitioning out of shelter into more stable housing.

a) **Requirements for the delivery of Shelter Financial Assistance**

- 1) **Client Non-Categorical Services** are the rare provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household obtain or maintain permanent housing or meet a unique **essential** household need, as documented in the client service or housing plan. Consumer debt payments are not allowed as a client non-categorical service. Client Non-Categorical Service payment cannot be made for expenses already allowed in a program category and cannot be used as a means of giving funds directly to a client when a landlord or utility is uncooperative or as a means of covering an unallowable expense. Client Non-Categorical Services is not a cash or cash-equivalent payment to a client and such use is unallowable, except where expressly identified in this manual. Prior approval by the case manager's supervisor is required before goods or payments are delivered.
- 2) **Food** costs associated when facilitating a client out of shelter and into permanent housing is allowable as a one-time emergency benefit, when other resources are not available for this service and at a maximum amount of the standard for SNAP benefit (<https://www.fns.usda.gov/snap/recipient/eligibility>) for one month, based on household size, inclusive of any grocery delivery fees. Clients receiving this service must be connected to SNAP benefits and if needed, assistance must be given to help a client apply for SNAP benefits. Client file must document steps taken to ascertain that other food resources were not available to meet the emergent need. Gift cards can only be used when a gift card policy has been pre-approved by OHCS and the limitation for food costs are identified in such policy and cannot exceed the limitation stated above. This service cannot be duplicated in the rapid re-housing category.
- 3) **Pet Deposit** means a security deposit required by a landlord to house an individual or family with a pet. This may be referred to as a one-time pet fee at move in or a non-refundable pet deposit. This does not include a pet deposit for clients during an existing rental/lease agreement. Pet deposits are limited to one pet. Pet deposit does not include repayment of any damages caused by a pet. Other sources of non-OHCS funding must be deferred to first and pet deposit assistance is only eligible when other sources of non-OHCS funds cannot be obtained and providing a pet deposit is necessary, and documented in the participant file, to ensure stability in housing.
- 4) **Pet Rent** means a monthly rent charged for a pet and required by the landlord through a rental/lease agreement, which must be included in the client file for purposes of documentation.
- 5) **Rent arrearage** means past due rent owed to a current landlord. Payment of arrears is restricted to 6 months past due rent, per calendar year. Subgrantees

have the discretion to limit payments for rent arrearage with a policy that details such further restrictions and their purpose, and identification of how those restrictions are communicated to the participants (such policy must be made available to OHCS upon request). Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

- 6) **Rental-related expenses** include other expenses incurred such as filing fees, property damage, court fees or lease break fees to a previous landlord (or collection agency) **when being required by a prospective landlord**, with a case manager's supervisor's approval. Fund cannot be used for debt payment. There must be **documented evidence** from the prospective landlord that payment of the arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing and a unit must be lined up and available for the participant's occupancy if such expenses are to be paid.
- 7) **Utility arrearage** assistance is past due utilities and can only be provided when there is documented evidence of a utility bill in the participant's name. If arrears are owed to a previous utility company or to a collection agency, these arrears can be paid, but only when there is **documented evidence** that payment of the arrears is necessary for the participant to obtain or retain utility service. Payment of utility arrears to a previous utility company or to a collection agency must result in the utilities remaining on or the connection/reconnection of utility service. Documentation in the client file must show the steps taken to defer to other utility assistance first. Utility deposit assistance may only be provided when there is documented evidence of the requirement of the deposit, the utility will be in the client's/participant's name and client file shows the steps taken to defer to other utility assistance first.
- 8) If using funds for **storage fees** of personal items, such use of funds must be not more than three months of storage rent and provided as a means of securing a homeless person's belonging while obtaining permanent housing. Costs can include arrears, current or future costs or any combination of those costs for the maximum total assistance of 3 months and costs may not be duplicated with rapid re-housing financial assistance. Such households must be actively in the process of obtaining permanent housing and are awaiting placement in their home.
- 9) **Moving costs** can be provided to secure the rental of a moving van/truck and could include a transportation payment in alignment with transportation guidelines. In cases where need is demonstrated, moving costs can cover the professional expenses of a contracted moving company. Moving costs do not include cash or gift cards, except as provided in the transportation guidelines. In circumstances in which a client meets the definition of fleeing domestic violence and there are safety concerns with remaining in Oregon, moving costs can be used to assist the client to safely move to another state; however, the client file must have written documentation that a safe place is available in the destination state

and such allowability must be in alignment with the client's service/housing plan. This allowability does not extend to paying an out-of-state landlord for rent, security deposit, application fees, etc., and only encompasses moving costs.

- 10) **Transportation:** costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repairs/insurance are allowable. Payments that allow participants to use public transportation are the highest priority and must be considered first for the purpose of attending required appointments, job search or other critical services. Case managers have the discretion to provide repairs/gas/insurance for a client's personal vehicle. Case managers must document why a client's personal vehicle option is preferred over public transportation options and that the expense will lead to the stabilization of housing. Costs associated with a vehicle not owned by the client are not allowed. Client must have a valid driver's license.

OHCS funds cannot be used to build assets, such as the purchase of a vehicle or loan payments and cannot be used for debt payments, such as traffic violations/fines to obtain a license. Private transportation options can include minor vehicle repair, car insurance, and the least costly option for vehicle registration, with written subgrantee policy on use of funds for these services and such policy must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy. For example, repair to a vehicle might be preferable to a bus pass if the community does not have public transportation or if the client works at night when public transportation is not operational.

Transportation does not include insurance to pay for roadside assistance (such as a membership to AAA) or traffic violations or any collection costs associated with these fines. Insurance includes only general liability insurance as required by the State of Oregon; however, comprehensive/collision coverage, can be allowed, but only when there is documented evidence that such coverage is a requirement of a vehicle loan. Insurance is paid before the period of service and vehicle owners have 10 days in which to make payment; therefore, insurance arrears is not a factual cost and is unallowable.

A Private Vehicle Costs policy must include:

- I. Dollar limitation per participant and frequency of such limitation (e.g., once per biennium);
- II. Number of months limitation per participant for insurance costs;
- III. Identification on what factors are used to determine whether such costs are preferable to public transportation; and
- IV. Identification of how justification of expense and documentation of that justification is performed. Client files must include such documentation.

b) Allowable Costs for Shelter Financial Assistance:

- 1) Housing relocation (e.g., rent payments (inclusive of first, last, rent arrears, pet rent, and if accepted by landlord as an incentive, forward rent), manufactured home rental space “lot rent”, application fee, security deposit, pet deposit, utility arrears, utility deposit, storage fees);
- 2) Rental-related expenses;
- 3) Moving costs (van/truck rental);
- 4) Purchase of identification and driver’s license;
- 5) Purchase of birth certificates;
- 6) Clothing as needed for those fleeing domestic violence or for job search or job readiness and which cannot be obtained by other community resources and where client file identifies steps taken to ascertain that other resources are not available to meet this need;
- 7) Food, inclusive of delivery fee;
- 8) Transportation costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repairs/insurance; and
- 9) Client non-categorical services.

c) Unallowable Costs for Shelter Financial Assistance:

- 1) Cash;
- 2) Cash-equivalent funds provided to applicants/participants, except through an OHCS-approved gift-card policy; and
- 3) Participant debt payment

(3) SHELTER PROGRAM DELIVERY

EHA (and DRF/DRF VET) and SHAP funding can be used for Shelter Program Delivery. Shelter Program Delivery are those costs associated with providing services to facilitate shelter resident’s transition out of shelter into more stable housing.

a) Requirements for the delivery of Shelter Program Delivery services

- 1) Food costs associated with disseminating technical information necessary and reasonable for successful performance of shelter participant education opportunities, such as tenant readiness education, financial/budgeting education and other client educational services is allowable as identified in OMB 200.432 and Oregon Accounting Manual 10.40.10.
- 2) Case management is one of the primary services offered to individuals and families who face multiple challenges, including severe mental illness, addiction, and homelessness. Effective case management includes **assessment, planning, implementation, coordination and evaluation**. Best practices in case management skills are available on the OHCS Homeless Services Section dashboard.

b) Allowable Costs for Shelter Program Delivery

- 1) Intake, data entry into HMIS;

- 2) Case management including pre-eligibility determination for housing and other needed services;
- 3) Housing navigation assistance;
- 4) Crisis intervention/counseling;
- 5) Education and training in such areas as personal finance and budgeting, job search and access to job training, life skills, and literacy;
- 6) Assistance in completing/submitting applications for other state/federal benefits (SSI/SSDI, TANF, SNAP, Unemployment, etc.);
- 7) Referrals and/or “warm hand-offs” to counseling, addiction and mental health services;
- 8) Mediation between client and landlord;
- 9) Tenant readiness education; and
- 10) Maintenance costs associated to assist a unit pass an HQS inspection, this does not include major repair/rehabilitation costs (see the Acquisition/Rehabilitation Sections of this manual).

(C) *Transitional Housing*

EHA (and DRF/DRF VET) and ERA funding can be used for Transitional Housing. Transitional Housing facilitates a homeless household’s transition to permanent housing and is offered to participants for a reasonable amount of time (usually less than 24 months). Transitional Housing is designed to provide interim support to successfully move a participant to, and help them maintain, permanent housing. Transitional Housing will require program participants to sign either a lease or an occupancy agreement and requires participants to pay some portion of the rent. Transitional Housing is not the same as Transitional Shelter, which requires no lease/occupancy agreement.

(1) TRANSITIONAL HOUSING OPERATIONS

EHA (and DRF/DRF VET) and ERA funding can be used for Transitional Housing Operations. Transitional Housing Operations are those costs associated with maintaining and operating Transitional Housing facilities whose primary purpose is to provide housing to the general homeless or specific populations of the homeless while they perform activities that increase their ability to obtain permanent housing.

a) Requirements for the delivery of Transitional Housing Operations:

- 1) Transitional Housing tenancy should be limited to less than 24 months. If more than 24 months of tenancy is needed, the client file must document the reason and a clear plan of action to move the client to permanent housing which includes time-bound activities.
- 2) All Transitional Housing events and services must be entered into HMIS.

b) Allowable Costs for Transitional Housing Operations

- 1) Lease or rent payments for transitional housing facility;

- 2) Utilities (includes water, sewer, garbage, gas, electricity, internet, phone) for transitional housing facility;
- 3) Security equipment or service to operate transitional housing facility;
- 4) Janitorial supplies and service to operate transitional housing facility;
- 5) Facility management (staff costs for a facilities manager to manage day-to-day operations necessary to ensure a physical environment supports a transitional housing's needs and core function);
- 6) Minor maintenance/repairs to facility (see the Definitions Appendix A, and Acquisition/Rehabilitation Sections of this manual); and
- 7) Furnishings and appliances for transitional housing facility, if included as part of the unit and not retained by client upon move-out.

(2) TRANSITIONAL HOUSING FINANCIAL ASSISTANCE

EHA (and DRF/DRF VET) and ERA funding can be used for Financial Assistance. Financial Assistance are those costs paid on behalf of the participant and that meet the financial needs of the participant to facilitate transition out of transitional housing and into permanent housing.

a) Requirements for the delivery of Transitional Housing Financial Assistance

- 1) Paying a **tenant's share** of transitional housing placement is not allowed. A purpose of the transitional housing service model is working with participants on building ownership and responsibility in paying housing costs which means having the income necessary to do so. Programs often have graduated rent share levels or do income proportional requirements, etc., so outright paying the tenant's portion of rent is counterproductive to service delivery. Subgrantees and subrecipients can employ different degrees and approaches for flexibility so if there's a month where a participant is unable to pay rent, the transitional housing provider can reassess the current participant's income/rent ration. Subgrantees must have a policy in place on income/rent formula reassessments and such policy must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy

A Transitional Housing Formula Reassessment policy must include:

- I. Frequency of income/rent ratio formula reassessments or what event(s) trigger a reassessment;
 - II. Any limitation on frequency of reassessments;
 - III. Methodology of formula for reassessment; and
 - IV. A statement that formula reassessments are used consistently between participants.
- 2) **Client Non-Categorical Services** are the rare provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet a unique **essential**

household need, as documented in the client service or housing plan. Consumer debt payments are not allowed as a client non-categorical service. Client Non-Categorical Service payment cannot be made for expenses already allowed in a program category and cannot be used as a means of covering an unallowable expense. Client Non-Categorical Service is not a cash or cash-equivalent payment to a client and such use is unallowable, except where expressly identified in this manual. Prior approval by the case manager's supervisor is required before goods or payments are delivered.

- 3) **Food** costs when facilitating a client out of transitional housing and into permanent housing as a one-time emergency benefit, when other resources are not available for this service and at a maximum amount of the standard for SNAP benefit (<https://www.fns.usda.gov/snap/recipient/eligibility>) for one month, based on household size, inclusive of any grocery delivery fees. Clients receiving this service must be connected to SNAP benefits and if needed, assistance must be given to help a client apply for SNAP benefits. Client file must document steps taken to ascertain that other food resources were not available to meet the emergent need. Gift cards can only be used when a gift card policy has been pre-approved by OHCS and the limitation for food costs are identified in such policy and cannot exceed the limitation stated above.
- 4) **Pet Deposit** means a security deposit required by a landlord to house an individual or family with a pet. This may be referred to as a one-time pet fee at move in or a non-refundable pet deposit. This does not include a pet deposit for clients during an existing rental/lease agreement. Pet deposits are limited to one pet. Pet deposit does not include repayment of any damages caused by a pet. Other sources of non-OHCS funding must be deferred to first and pet deposit assistance is only eligible when other sources of non-OHCS funds cannot be obtained and providing a pet deposit is necessary, and documented in the participant file, to ensure stability in housing.
- 5) **Pet Rent** means a monthly rent charged on a pet and required by the landlord through a rental/lease agreement, which must be included in the client file for purposes of documentation.
- 6) **Rent arrearage** means past due rent owed to a current landlord. Payment of arrears is restricted to 6 months past due rent, per calendar year. Subgrantees have the discretion to limit payments for rent arrearage with a policy that details such further restrictions and their purpose, and identification of how those restrictions are communicated to the participants (such policy must be made available to OHCS upon request) Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.
- 7) **Rental-related expenses** include other expenses incurred such as filing fees, property damage, court fees or lease break fees to a previous landlord (or collection agency) **when being required by a prospective landlord**, with a case

manager's supervisor's approval. There must be **documented evidence** from the prospective landlord that payment of the arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing and a unit must be lined up and available for the participant's occupancy if such expenses are to be paid.

- 8) **Utility arrearage** assistance is past due utilities and can only be provided when there is documented evidence of a utility bill in the participant's name. If arrears are owed to a previous utility company or to a collection agency, these arrears can be paid, but only when there is documented evidence that payment of the arrears is necessary for the participant to obtain or retain utility service. Payment of utility arrears to a previous utility company or to a collection agency must result in the utilities remaining on or the connection/reconnection of utility service. Documentation in the client file must show the steps taken to defer to other utility assistance first. Utility deposit assistance may only be provided when there is documented evidence of the requirement of the deposit, the utility will be in the client's/participant's name and shows the steps taken to defer to other utility assistance first.
- 9) **Transportation:** costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repairs/insurance are allowable. Payments that allow participants to use public transportation are the highest priority and must be considered first for the purpose of attending required appointments, job search or other critical services. Case managers have the discretion to provide repairs/gas/insurance for a client's personal vehicle. Case managers must document why a client's personal vehicle option is preferred over public transportation options and that the expense will lead to the stabilization of housing. Costs associated with a vehicle not owned by the client are not allowed. Client must have a valid driver's license.

OHCS funds cannot be used to build assets, such as the purchase of a vehicle or loan payments and cannot be used for debt payments, such as traffic violations/fines to obtain a license. Private transportation options can include minor vehicle repair, car insurance, and the least costly option for vehicle registration, with written subgrantee policy on use of funds for these services and such policy must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy. For example, repair to a vehicle might be preferable to a bus pass if the community does not have public transportation or if the client works at night when public transportation is not operational.

Transportation does not include insurance to pay for roadside assistance (such as a membership to AAA) or traffic violations or any collection costs associated with these fines. Insurance includes only general liability insurance as required by the State of Oregon; however, comprehensive/collision coverage, can be allowed, but

only when there is documented evidence that such coverage is a requirement of a vehicle loan. Insurance is paid before the period of service and vehicle owners have 10 days in which to make payment; therefore, insurance arrears is not a factual cost and is unallowable.

A Private Vehicle Costs policy must include:

- I. Dollar limitation per participant and frequency of such limitation (e.g., once per biennium);
- II. Number of months limitation per participant for insurance costs;
- III. Identification on what factors are used to determine whether such costs are preferable to public transportation; and
- IV. Identification of how justification of expense and documentation of that justification is performed. Participant files must include such documentation.

b) Allowable Costs for Transitional Housing Financial Assistance:

- 1) Housing relocation (upfront housing costs related to relocation such as rent arrears, first/last month's rent, application fee, security deposit, pet deposit, pet rent, utility arrears, utility deposit);
- 2) Rental-related expenses;
- 3) Purchase of identification and driver's license;
- 4) Purchase of birth certificates;
- 5) Clothing as needed for those fleeing domestic violence or for job search or job readiness and which cannot be obtained by other community resources and where client file identifies steps taken to ascertain that other resources are not available to meet this need;
- 6) Food, inclusive of delivery fee;
- 7) Transportation costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repair/insurance; and
- 8) Client non-categorical services.

c) Unallowable Costs for Transitional Housing Financial Assistance:

- 1) Cash
- 2) Cash-equivalent funds provided to applicants/participants, except through an OHCS-approved gift-card policy; and
- 3) Participant debt payment.

(3) TRANSITIONAL HOUSING PROGRAM DELIVERY

EHA (DRF/DRF VET) and **ERA** funding can pay used for Transitional Housing Program Delivery. Transitional Housing Program Delivery are those costs associated with providing services that facilitate a participant's transition out of transitional housing and into permanent housing.

a) Requirements for the delivery of Transitional Housing Program Delivery services

- 1) Food costs associated with disseminating technical information necessary and reasonable for successful performance of transitional housing participant education opportunities, such as tenant readiness education, financial/budgeting education and other client educational services is allowable as identified in OMB 200.432 and Oregon Accounting Manual 10.40.10.
- 2) Case management is one of the primary services offered to individuals and families who face multiple challenges, including severe mental illness, addiction, and homelessness. Effective case management includes **assessment, planning, implementation, coordination and evaluation**. Best practices in case management skills are available on the OHCS Homeless Services Section dashboard.

b) Allowable Costs for Transitional Housing Program Delivery

- 1) Intake, data entry into HMIS;
- 2) Case management including pre-eligibility determination for housing and other needed services;
- 3) Housing navigation assistance;
- 4) Crisis intervention/counseling;
- 5) Education and training in such areas as personal finance and budgeting, job search and access to job training, life skills, and literacy;
- 6) Assistance in completing/submitted applications for other state/federal benefits (SSI/SSDI, TANF, SNAP, Unemployment, etc.);
- 7) Referrals and/or “warm hand-offs” to counseling, addiction and mental health services;
- 8) Mediation between client and landlord;
- 9) Tenant readiness education; and
- 10) Maintenance costs associated to assist a unit pass an HQS inspection, this does not include major repair/rehabilitation costs (see the Acquisition/Rehabilitation Sections of this manual).

(D) *Homelessness Prevention and Rapid Re-Housing*

EHA (and DRF/DRF VET) and ERA can be used to support Homelessness Prevention and Rapid Re-Housing activities.

Homelessness Prevention are those services performed to prevent homelessness and assist a participant in remaining in their current housing. Homelessness Prevention is used when a household’s housing status is at imminent risk of homelessness (category 2) or unstably housed (category 5).

Rapid Re-Housing are those services performed to enable households to obtain permanent housing when they are currently homeless. Rapid Re-Housing is used when a household’s housing status is literally homeless (category 1), homeless under other federal statutes

(category 3) or when a household is fleeing or attempting to flee a domestic violence situation (category 4).

1) HP/RRH FINANCIAL ASSISTANCE

HP/RRH FA are those costs paid on behalf of a participant to meet the financial need of the participant.

a) Requirements of HP/RRH Financial Assistance

- 1) “Roommate” situations are areas of high fraud probability and due diligence is needed to ensure that such situations are adequately documented. Self-certifications or dependence on a client’s statement are not valid methods of meeting documentation requirements for roommate situations. Clear documentation of a roommate arrangement includes both a lease agreement with wet signatures demonstrating the tenant/landlord relationship between the two parties **AND** documented financial records showing a pattern of financial transactions (bank statements, money order receipts, Paypal/Venmo statements, etc.) are needed. Hand-written receipts are not allowed for this purpose due to the high risk of fraud.
- 2) **Utility assistance** programs must be deferred to first, utility assistance is only eligible when other utility assistance cannot be obtained and payment of utility assistance is in the context of, and documented in, an action plan or goal designed to increase housing stability, along with documentation of the steps taken to defer to other utility assistance first. There must be documented evidence of a utility bill in the participant’s name.
- 3) **Utility arrearage** assistance is past due utilities and can only be provided when there is documented evidence of a utility bill in the participant’s name. If arrears are owed to a previous utility company or to a collection agency, these arrears can be paid, but only when there is documented evidence that payment of the arrears is necessary for the participant to obtain or retain utility service. Payment of utility arrears to a previous utility company or to a collection agency must result in the utilities remaining on or the connection/reconnection of utility service. Documentation in the client file must show the steps taken to defer to other utility assistance first. Utility deposit assistance may only be provided when there is documented evidence of the requirement of the deposit, the utility will be in the client’s/participant’s name and shows the steps taken to defer to other utility assistance first.
- 4) **Phone services** must be in the participant’s name and must only be provided for one line of service (either landline or cellular line) per household and only when such billing statement clearly identifies the costs of a single line of service, or such cost can be ascertained from the phone service provider. Arrearages are allowed in alignment with the limitation of a single line of service. Purchases of phones are unallowable and clients can be connected to the Affordable Connectivity Program (<https://www.affordableconnectivity.gov>) or through Oregon LifeLine (<https://www.oregon.gov/puc/pages/oregon-lifeline.aspx>) to meet the need.

- 5) **Internet-related fees and taxes, equipment** (modem/router) rental fees are allowed and must be capped at no more than \$300 per biennium and must be in the participant's name. Subgrantees and subrecipients must attempt to obtain a participant's documentation or perform outreach to the internet provider to acquire monthly internet service costs; however, if either of these options are unduly burdensome, the subgrantee must have a policy that applies a reasonable process to determine the amount of the bill that is applicable to the internet costs; however, total internet assistance cannot exceed \$300 per funding biennium. Such policy must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Internet providers retain a "price list" which can be requested to determine the separate costs for each type of service which will provide subgrantees/subrecipients a reasonable process to determine the amount to be paid.

In addition, the Affordable Connectivity Program (ACP) is a Federal Communications Commission (FCC) program that helps low-income households pay for internet service and connected devices. If eligible, a household can receive up to \$30/month discount on internet service; up to a \$75/month discount if the household is on qualifying tribal lands; and a one-time discount of up to \$100 for a laptop, tablet, or desktop computer (with a co-payment of more than \$10, but less than \$50. More information can be found at: <https://acpbenefit.org/>

- 6) **Pet Deposit** means a security deposit required by a landlord in order to house an individual or family with a pet. This may be referred to as a one-time pet fee at move in or a non-refundable pet deposit. This does not include a pet deposit for clients during an existing rental/lease agreement and is not allowable under homelessness prevention. Pet deposits are limited to one pet. Pet deposit does not include repayment of any damages caused by a pet. Other sources of non-OHCS funding must be deferred to first and pet deposit assistance is only eligible when other sources of non-OHCS funds cannot be obtained and providing a pet deposit is necessary, and documented in the participant file, to ensure stability in housing.
- 7) **Pet Rent** means a monthly rent charged on a pet and required by the landlord through a rental/lease agreement, which must be included in the client file for purposes of documentation.
- 8) **Rent arrearage** means past due rent owed to a current landlord. Rent arrears is only allowable for Homeless Prevention. Payment of rent arrears is restricted to 6 months past due rent, per calendar year. Subgrantees have the discretion to limit payments for rent arrearage with a policy that details such further restrictions and their purpose, and identifies how those restrictions are communicated to the participants (such policy must be made available to OHCS upon request) Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by

OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

- 9) **Rental-related expenses** include other expenses incurred such as filing fees, property damage, court fees, lease break fees or unpaid rent to a previous landlord (or collection agency) **when being required by a prospective landlord**, with a case manager's supervisor's approval; however, total expenses cannot exceed 6 months of the rent amount charged at the previous unit. There must be **documented evidence** from the prospective landlord that payment of the arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing and a unit must be lined up and available for the participant's occupancy if such expenses are to be paid.
- 10) **Rent/Lease-to-Own.** When a homelessness prevention tenant is under a rent/lease-to-own contract, a contractual monthly payment (or arrears per this manual's guidance) is allowable to keep a tenant from being homeless; however, program funds may not be used to enter into a rent/lease-to-own contract.
- 11) Rapid Re-Housing funds can be used for **storage fees** – these costs are not allowable under Homelessness Prevention. If using funds for storage fees of personal items, such use of funds must be not more than three months of storage rent and provided as a means of securing a homeless person's belonging while obtaining permanent housing for the purpose of rapid re-housing only. Costs can include arrears, current or future costs or any combination of those costs for the maximum total assistance of 3 months and costs may not be duplicated with shelter financial assistance. Such households must be actively in the process of obtaining permanent housing and are awaiting placement in their home. Such cost is not allowable through homelessness prevention.
- 12) **Moving costs** provided to secure the rental of a moving van/truck and could include a transportation payment in alignment with transportation guidelines. Moving costs do not include cash or gift cards, except as provided in the transportation guidelines. In circumstances in which a client meets the definition of fleeing domestic violence and there are safety concerns with remaining in Oregon, moving costs can be used to assist the client to safely move to another state; however, the client file must have written documentation that a safe place is available in the destination state and such allowability must be in alignment with the client's service/housing plan. This allowability does not extend to paying an out-of-state landlord for rent, security deposit, application fees, etc., and only encompasses moving costs.
- 13) In **Homeless Prevention, Food** costs as a one-time (per fiscal year) emergency benefit, when other resources are not available for this service and at a maximum amount of the standard for SNAP benefit (<https://www.fns.usda.gov/snap/recipient/eligibility>) for one month, based on household size, inclusive of any grocery delivery fees. Clients receiving this service must be connected to SNAP benefits and if needed, assistance must be given to help a client apply for SNAP benefits. Client file must document steps taken to ascertain that other food resources were not available to meet the emergent need. Gift cards can only be used when a gift card policy has been pre-approved by OHCS and the

limitation for food costs are identified in such policy and cannot exceed the limitation stated above.

- 14) In **Rapid Re-Housing, Food** costs when facilitating a client out of homelessness and into permanent housing as a one-time emergency benefit, when other resources are not available for this service and at a maximum amount of the standard for SNAP benefit (<https://www.fns.usda.gov/snap/recipient/eligibility>) for one month, based on household size, inclusive of any grocery delivery fees. Clients receiving this service must be connected to SNAP benefits and if needed, assistance must be given to help a client apply for SNAP benefits. Client file must document steps taken to ascertain that other food resources were not available to meet the emergent need. Gift cards can only be used when a gift card policy has been pre-approved by OHCS and the limitation for food costs are identified in such policy and cannot exceed the limitation stated above. This benefit cannot be duplicated in the shelter financial assistance category.
- 15) **Transportation:** costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repairs/insurance are allowable. Payments that allow participants to use public transportation are the highest priority and must be considered first for the purpose of attending required appointments, job search or other critical services. Case managers have the discretion to provide repairs/gas/insurance for a client's personal vehicle. Case managers must document why a client's personal vehicle option is preferred over public transportation options and that the expense will lead to the stabilization of housing. Costs associated with a vehicle not owned by the client are not allowed. Client must have a valid driver's license.

OHCS funds cannot be used to build assets, such as the purchase of a vehicle or loan payments and cannot be used for debt payments, such as traffic violations/fines to obtain a license. Private transportation options can include minor vehicle repair, car insurance, and the least costly option for vehicle registration, with written subgrantee policy on use of funds for these services and such policy must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy. For example, repair to a vehicle might be preferable to a bus pass if the community does not have public transportation or if the client works at night when public transportation is not operational.

Transportation does not include insurance to pay for roadside assistance (such as a membership to AAA) or traffic violations or any collection costs associated with these fines. Insurance includes only general liability insurance as required by the State of Oregon; however, comprehensive/collision coverage, can be allowed, but only when there is documented evidence that such coverage is a requirement of a vehicle loan. Insurance is paid before the period of service and vehicle owners have 10 days in which to make payment; therefore, insurance arrears is not a factual cost and is unallowable.

A Private Vehicle Costs policy must include:

- I. Dollar limitation per participant and frequency of such limitation (e.g., once per biennium);
- II. Number of months limitation per participant for insurance costs;
- III. Identification on what factors are used to determine whether such costs are preferable to public transportation; and
- IV. Identification of how justification of expense and documentation of that justification is performed. Participant files must include such documentation.

16) **Client Non-Categorical Services** are the rare provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet a unique **essential** household need, as documented in the client service or housing plan. Consumer debt payments are not allowed as a client non-categorical service. Client Non-Categorical Service payment cannot be made for expenses already allowed in a program category and cannot be used as a means of covering an unallowable expense. Client Non-Categorical Services is not a cash or cash-equivalent payment to a client and such use is unallowable, except where expressly identified in this manual. Prior approval by the case manager’s supervisor is required before goods or payments are delivered.

17) There are no **duration or amount of assistance** limitations imposed on subgrantees/subrecipients, with the exception of any specific limitations for particular types of services or expenses as identified in this manual. Subgrantees have the discretion to set a maximum number of months that a participant can receive assistance and a maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for all households and, if subgrantee make any such limitation, they must have a policy describing these limitations and how such limitations are determined and monitored, incorporated into the subgrantee’s policies and procedures and communicated in advance to eligible participants. Such policy must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

b) Allowable Costs for HP/RRH Financial Assistance:

Where allowable, expenses for HP/RRH Financial Assistance:

Expense	HP Allowable	RRH Allowable
Housing costs such as mortgage/manufactured home payments and arrearages (arrears limited to 6 months) <u>[ERA is excluded from this allowability]</u>	X	

Housing costs such as rent payments and security deposit (inclusive of first, last, pet rent, and if accepted by landlord as an incentive, forward rent), and late fees	X	X
Rent arrears	X	
Rental-related expenses	X	X
Rent/Lease-to-Own payments	X	
Manufactured home rental space “lot rent” or RV space lot if used for primary housing	X	X
Utility payments and arrearages (utilities include water, sewer, garbage, gas, electricity, phone, internet)	X	X
Moving costs (van/truck rental)		X
Storage costs		X
Utilities deposits		X
Pet deposit, limited to one pet per household		X
Application fees		X
One-time Food benefit	X	X
Transportation costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repair/insurance	X	X
Client non-categorical services	X	X

c) Unallowable Costs for HP/RRH Financial Assistance:

- 1) Cash;
- 2) Cash-equivalent funds provided to applicants/participants except through an OHCS-approved gift card policy;
- 3) Hotel/motel expenses (emergency shelter costs are covered under the Emergency Shelter component);
- 4) Participant debt payment,
- 5) Home repairs and/or maintenance; and
- 6) For **ERA**, mortgage payments are unallowable.

2) HP/RRH PROGRAM DELIVERY

HR/RRH PD are those costs associated with providing services to help facilitate either maintaining a participant’s current housing or assisting a participant to obtain

permanent housing. Program Delivery are costs determined necessary to enable a household to obtain/retain their housing and achieve housing stability as identified and documented in their client service/housing stability plan.

a) Requirements for the delivery of HP/RRH Program Delivery services

- 1) Food costs associated with disseminating technical information necessary and reasonable for successful performance of HP/RRH participant education opportunities, such as tenant readiness education, financial/budgeting education and other client educational services is allowable as identified in OMB 200.432 and Oregon Accounting Manual 10.40.10.
- 2) Case management is one of the primary services offered to individuals and families who face multiple challenges, including severe mental illness, addiction, and homelessness. Effective case management includes **assessment, planning, implementation, coordination and evaluation**. Best practices in case management skills are available on the OHCS Homeless Services Section dashboard.
- 3) All events and services must be entered into HMIS

b) Allowable Costs for HP/RRH Program Delivery

- 1) Intake, data entry into HMIS;
- 2) Case management including pre-eligibility determination for housing and other needed services;
- 3) Housing navigation assistance;
- 4) Crisis intervention/counseling;
- 5) Education and training in such areas as personal finance and budgeting, job search and access to job training, life skills, and literacy;
- 6) Assistance in completing/submitting applications for other state/federal benefits (SSI/SSDI, TANF, SNAP, Unemployment, etc.);
- 7) Referrals and/or “warm hand-offs” to counseling, addiction and mental health services;
- 8) Mediation between client and landlord;
- 9) Tenant readiness education; and
- 10) Maintenance costs associated to assist a unit pass an HQS inspection, this does not include major repair/rehabilitation costs (see the Acquisition/Rehabilitation Sections of this manual).

(E) *Supportive In-Home Services*

EHA (and DRF/DRF VET) and ERA funding can be used for Supportive In-Home Services. Assistance is designed to provide supportive in-home service for clients who experience a short-term medical or disability need. Use of funds are allowable to meet the emergency and to support the client’s recovery and facilitate the immediate needs to ensure their health and physical safety in situations when such services are not available or accessible in their community. Clients may reside in rental housing or own their own home.

1) Supportive In-Home Services requirements:

- a) Supportive In-Home Services must be for clients who meet the housing status of imminent risk of homelessness (category 2) or unstably housed (category 5);
- b) Clients receiving Supportive In-Home Services must be receiving case management services through another funding category or program of OHCS funds or a non-OHCS funding source;
- c) Clients receiving Supportive In-Home Services must receive, as part of case management, minimally at time of application, a welfare/safety check to provide a needs assessment to appropriately identify needs in health care management and safety services. Additional welfare/safety checks should continue as needed;
- d) Supportive In-Home Services must meet the needs of an emergency situation and efforts must be made to determine that other in-home service options are not available or accessible in the service area and such efforts must be documented in the client's file; and
- e) Supportive In-Home Services cannot be used to make general unit repairs or to rehabilitate a unit.

2) Allowable costs for Supportive In-Home Services:

- a) Housing maintenance to address mobility or safety barriers, such as temporary ramps, grab bars or rails with an approved reasonable accommodation request by the property manager or owner, or such maintenance can be permanent if there is documented evidence in the client's file that the client owns their home (no other home repair and/or maintenance is an allowable cost);
- b) Short-term (less than six months) licensed personal care assistance for a medical condition or to recover from surgery when other such care is not available;
- c) Performance of needs assessment and linkages to appropriate health care management and safety services;
- d) Assisting the client with linkages to family support and/or community social support networks; and
- e) Costs to cover emergency situations that threaten the health and safety of the household, such as an emergency payment for a life-saving prescription medication, rental of a hospital bed or other temporary durable medical equipment, dietary management by a registered nurse, temporary transportation to and from medical appointments, chore-service for household cleaning during period of short-term disability or injury recovery. Justification of such costs must be maintained in the client's file and such cost must not be covered as a cash payment; however, due to the emergency nature of the situation such cost can be covered under a subgrantee's OHCS-pre-approved gift card policy, if such policy exists at the time of need.

(F) *ERA Rental Subsidy Assistance*

ERA can be used to provide ERA clients a monthly rental subsidy to meet this population's ongoing rental assistance needs.

1) ERA-Based Rental Subsidy Assistance Requirements:

- a) Subgrantee must have a stand-alone ERA Rental Subsidy policy, available for review by OHCS upon request and OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy. Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Documentation will be reviewed during monitoring and costs will be disallowed without sufficient documentation of the ERA-Based Rental Subsidy Assistance requirements.

An ERA Rental Subsidy policy must identify:

- i. How tenants will be selected to participate in the subsidy program;
 - ii. How often tenants will be assessed for continued assistance and what factors are considered in the assessment;
 - iii. The conditions under which a subsidy agreement is terminated;
 - iv. The notification process, and or remedies, of such termination;
 - v. Frequency of welfare checks or case management checks;
 - vi. What additional factors, if any, will be used in a formula that determines how much rental subsidy a client will receive. All tenants must be assessed using the same formula; and
 - vii. Limitation on the length of ERA Rental Subsidy, if any.
- b) Clients must not pay more than 30% of their gross income in rent when using ERA Rental Subsidy, although, depending on factors identified in the subgrantee's policy, a client may pay less than 30% of their gross income in rent.
 - c) Clients receiving ERA Rental Subsidy Assistance must meet the housing status of imminent risk of homelessness (category 2) or unstably housed (category 5) and must meet ERA income and household composition requirements.
 - d) Routine welfare checks or case management checks must occur for tenants receiving ERA rental subsidy.
 - e) As part of case management (and an allowable cost under ERA HP), a client service/housing plan must be developed and monitored for specified goals for to assist clients in achieving long-term stabilization.
 - f) There are no FMR or utility allowances.
 - g) Units must receive and pass a Habitability Standards inspection (a Habitability Standards Inspection form can be found on the OHCS website, specifically for ERA).
 - h) Landlord/tenant must have an executed lease/rental agreement.
 - i) Subgrantee/subrecipient must execute an Agreement for purposes of an ERA rental subsidy agreement. A sample template is available for this purpose on the OHCS website.
 - j) ERA HP can be used for costs associated with helping a unit pass a Habitability Standards inspection as part of minor repairs (this does not include rehabilitation, see the Acquisition/Rehabilitation section of this manual for more information).
 - k) Subsidy payments are allowable on a month-to-month rental agreement or a fixed term rental/lease agreement.
 - l) If a tenant moves to another unit, subgrantees/subrecipients are not required to enter into a new rental subsidy agreement with the tenant for the new location;

however, they are not prohibited from doing so. ERA rental subsidy assistance cannot be paid for the same tenant in two separate dwelling units for the same period.

- m) ERA Rental Subsidy cannot be used to replace other subsidy that the client already receives, nor can ERA Rental Subsidy be used to provide additional subsidy to a client that is already receiving other subsidy (such as Housing Choice Voucher Program).
- n) ERA Rental Subsidy cannot be used in an Assisted Living Facility or cover the costs of discharge planning programs in mainstream institutions.

2) Termination of ERA Rental Subsidy Assistance

Landlord and/or Tenant must notify subgrantee in writing when terminating the tenancy and such termination must be done in compliance with state and local laws. Such termination would end the ERA Rental Subsidy Assistance and subgrantee/subrecipient must send notification of termination of the ERA Rental Subsidy Assistance to the Landlord and Tenant.

Subgrantee/subrecipient can terminate a subsidy agreement if:

- a) Landlord/Tenant terminates the tenancy or tenant no longer occupies the unit;
- b) Tenant has committed any fraud or misrepresentation in connection with any OHCS-funded program;
- c) Subgrantee has determined tenant was non-compliant with ERA program requirements;
- d) Landlord does not make needed health and safety repairs in a timely manner;
- e) Unit is uninhabitable;
- f) Landlord has committed any fraud or misrepresentation in connection with any OHCS-funded program;
- g) Lack of available ERA funding or if required to terminate the agreement by OHCS; or
- h) Other circumstances have occurred which are contrary to ERA program requirements.

Subgrantee/subrecipient shall notify landlord and tenant in writing of its decision to terminate tenant's rent subsidy and that the subgrantee's/subrecipient's share of the rent, pursuant to the Rental Assistance Agreement, shall terminate 30 days after subgrantee/subrecipient gives such notice to landlord and tenant.

Subgrantee/subrecipient can continue or can decide not to continue ERA rental subsidy assistance in another unit for the tenant if the termination of subsidy is not due to the tenant noncompliance of program requirements. A new rental subsidy agreement must be executed at the new unit in compliance with ERA program requirements and in accordance with the subgrantee's ERA rental subsidy policy.

(G) *Distinguishing Between Maintenance and Renovation (Rehab/Conversion)*

EHA (EHA DRF/EHA VET DRF) and **SHAP** can be used for “Repairs to facility” as identified in the category of Shelter Operations. This is meant to define minor or routine repairs.

Distinguishing between maintenance activities and more extensive repair and rehabilitation activities requires careful consideration. This information provided will assist in determining whether an activity is maintenance and therefore exempt from further environmental review, or, if it is rehabilitation and therefore requires further environmental review.

In general, maintenance activities slow or halt deterioration of a building and do not materially add to its value or adapt it to new uses. Sometimes, maintenance of a building feature or system requires periodic replacement of individual component parts that are subject to normal wear and tear. While maintenance is often budgeted as an operating expense, and repairs and rehabilitation are treated as capital expenses, it is the nature of the activity itself, not its budget category that determines whether it qualifies as maintenance. Simultaneous maintenance work in multiple units or buildings is still considered maintenance.

For environmental review purposes, deferred maintenance that has resulted in a need for extensive repairs and rehabilitation does not qualify as maintenance. If items that would otherwise be considered maintenance are done as part of an extensive remodeling or renovation of a building that amounts to rehabilitation, the entire job is considered rehabilitation. Depending on the extent of damage, activities performed after a disaster event will typically not be considered maintenance.

(1) Shelter Operations: Maintenance

In general, maintenance activities include: cleaning; minor or routine repairs of furnishing, equipment, and fixtures not permanently affixed to the building; protective or preventative measures to keep a building, its systems, and its grounds in working order; periodic replacement of a limited number of component parts of a building feature or system that are subject to normal wear and tear; and replacement of a damaged or malfunctioning component part of a building feature or system. Replacement of all or most parts or an entire system is not maintenance. Maintenance activities:

- Do not materially add to the value of the building/property;
- Do not appreciably prolong the useful life of the building/property; and
- Do not adapt the building/property to new uses.

See the Table in the Appendix of the program’s operational manual for specific examples of maintenance activities.

The minimum period of use for maintenance activities is the same as for other shelter operations and essential services activities—that is, the recipient/subrecipient must provide services or shelter to homeless individuals and families at least for the period during which OHCS funds are provided (for example, the contract period specified in a subgrantee contract/agreement). Again, maintenance activities are not subject to environmental review.

(2) Renovation and Conversion

In general, an activity that does materially add to the value of the building, appreciably prolong its useful life, or adapt it to new uses would be considered renovation or conversion.

See the Table in the Appendix of the program’s operational manual for specific examples of maintenance activities.

When the activity is renovation, rehabilitation or conversion, the scope of the environmental review may be limited if the work is minor and does not involve ground disturbance. Consult Regional Environmental Officers, Field Environmental Officers, and Program Environmental Clearance Officers for information and examples of Environmental Review Record documentation for limited reviews. The scope of an environmental review relates to the nature and extent of the rehabilitation activities. Some activities, especially those limited to interior spaces, may not have the potential to affect the natural environment, and therefore not require analysis under some of the related laws and authorities like those addressing Wild and Scenic Rivers, Endangered Species, Farmland Protection, or Protection of Wetlands. A reviewer can quickly document such instances in the Environmental Review Record, and focus effort and further analysis on those environmental areas that may be impacted by a project. In residential rehabilitation, those typically include Floodplain Management, Historic Preservation, Noise Abatement, Toxic Chemicals and Radioactive Materials. Historic Preservation review (Section 106) may be expedited through Programmatic Agreements and other program alternatives.

It is also possible to group multiple years of expected activities into one environmental review. For instance, rehabilitation activities could be outlined in a 5-year environmental review for a property and be reviewed once, without requiring individual reviews each time a single activity occurs during the time period.

Depending on the cost of the renovation and value of the building, it might be considered minor rehabilitation or major rehabilitation (see below).

Renovation costs can include architect’s fees, engineering costs, permits, and other costs of a renovation or conversion project when they are reasonable and appropriate, and directly related to the renovation or conversion project.

Renovation includes four separate activities. The chart below shows each activity, the definition, the minimum period of use requirement, and the level of environmental review for each. Note that for renovation and conversion activities, the minimum period of use starts on the date the building is first occupied by homeless individuals or families after the renovation or, if the building is occupied during the renovation, the period of use starts on the date the renovation is completed.

Type of Renovation Activities	Definition	Minimum Period of Use	Level of Environmental Review Required
Minor Rehabilitation	The cost of the rehabilitation of an existing emergency shelter is 75% or less of the value of the building before rehabilitation*	3 Years	Environmental Assessment (can require an Environmental Impact Statement (EIS))
Major Rehabilitation	The cost of the rehabilitation of an existing emergency shelter exceeds 75% of the value of the building before rehabilitation*	10 Years	Environmental Assessment (can require an Environmental Impact Statement (EIS))
Minor Conversion	The cost of the conversion of a building to an emergency shelter is 75% or less of the value of the building after conversion*	3 Years	Environmental Assessment (can require an Environmental Impact Statement (EIS))
Major Conversion	The cost of the conversion of a building to an emergency shelter exceeds 75% of the value of the building after conversion*	10 Years	Environmental Assessment (can require an Environmental Impact Statement (EIS))

* The value of the building is the reasonable monetary value assigned to the building, e.g., by an independent real estate appraiser or other OHCS approved process and applies to the building(s) that either will operate as an emergency/transitional shelter or transitional housing or that with rehabilitation, renovation or conversion activities will operate for the purpose of emergency/transitional shelter or transitional housing on the site of the property.

(H) Shelter or Transitional Housing Facilities Acquisition, Rehab/Conversion

[Refer to your Subgrantee Contract/Agreement for Procurement requirements]

EHA (EHA DRF/EHA DRF VET) can be used for the categories of acquisition and rehab/conversion (encompasses rehabilitation, renovation, and conversion), of emergency shelter and transitional housing for households who are homeless. Projects using **EHA DRF**

VET funds must ensure that funds exclusively serve the veteran population. Where the program requires, client eligibility applies.

SHAP can be used for the categories of acquisition and rehab/conversion (encompasses rehabilitation, renovation, and conversion), of emergency shelter.

For OHCS-funded programs, acquisition of land must also include a building structure to be used. Acquisition of bare land is not an eligible use of funds.

(1) Free-Standing Temporary Shelter

Free-Standing Temporary Shelter (FSTS), also known as tiny homes and “Pallet™” shelters, are a type of alternative shelters that do not include a foundation and are allowed under the definition of Shelter Acquisition as an equipment purchase. This includes “new construction” of shelter. Prior OHCS approval of the purchase of FSTS is not the same as the OHCS Acquisition/Rehab/Renovation process. The process to receive approval for the purpose of Free-Standing Temporary Shelters is to complete a FSTS Pre-Approval Form, located on the [HSS Dashboard](#). The FSTS Pre-Approval Form includes completing information on your purchase process, site location, amenities on site which is inclusive of utilities, waste management, food service, and public safety strategy, as well as your shelter operation plan. Funds used for the purchase of FSTS must be allocated to the acquisition category of your OHCS grant; however, ongoing operation of FSTS already placed in service may be allocated to the shelter operations category of your OHCS grant, if an allowable expense.

Using OHCS funds for bringing utilities to a site for the purpose of operating FSTS will require following OHCS guidance for the rehabilitation of property and the FSTS Pre-Approval Form does not provide approval of that work. Follow all the OHCS guidance for acquisition/rehabilitation/renovation/conversion identified below.

For information and instruction and a How To Guide on Building a Shelter Community, visit www.palletshelter.com.

(2) Acquisition, Rehabilitation, Renovation or Conversion Instructions

Reporting on all acquisition, rehabilitation, renovation, and conversion projects must be provided to OHCS in the form and form required and must be submitted by the due date identified by OHCS. A subgrantee who failure to provide required report is non-compliant with program rules and guidelines. Please read the requirements carefully to ensure compliance. Reports must be sent to hss.acq.rehab@hcs.oregon.gov.

Acquisition is acquiring property through purchase, donation, trade, or any other method. For Housing Stabilization Division (HSD)-funded programs, acquisition

of land must also include a building structure to be used for the purpose of emergency/transitional shelter or transitional housing. Acquisition of bare land is not an eligible use of funds. For the purpose of HSD programs, the existing building structure in an acquisition project means a building that either will operate as an emergency/transitional shelter or transitional housing or that with rehabilitation, renovation or conversion activities will operate for the purpose of emergency/transitional shelter or transitional housing.

Conversion is the process of changing or causing to change from one form to another or changing the function of a piece of property from one use to another.

Renovation or Rehabilitation is action taken to return a property to a useful state by means of repair, modification, or alteration.

a) **Restrictive Use Period**

The Restrictive Use Period for the OHCS-funded acquisition, rehabilitation, conversion and/or renovation is dependent on use of funds and is 10 years for all acquisition. The Restrictive Use Period runs from December 31 of the year the first building in the Project is placed in service (PIS) or until December 31, [Year of PIS + # of years appropriate for use], whichever is later. The project owner must agree to annually certify compliance with this requirement and submit that certification to OHCS at hss.acq.rehab@hcs.oregon.gov.

Rehabilitation and Renovation Minimum Period of Use		
Type of Renovation Activities	Definition	Minimum Period of Use
Minor Rehabilitation	The cost of the rehabilitation of an existing emergency shelter is 75% or less of the value of the building before rehabilitation*	3 Years
Major Rehabilitation	The cost of the rehabilitation of an existing emergency shelter exceeds 75% of the value of the building before rehabilitation*	10 Years
Minor Conversion	The cost of the conversion of a building to an emergency shelter is 75% or less of the value of the building after conversion*	3 Years
Major Conversion	The cost of the conversion of a building to an emergency shelter exceeds 75% of the value of the building after conversion*	10 Years

* The value of the building is the reasonable monetary value assigned to the building(s), e.g., by an independent real estate appraiser or other OHCS approved process and applies to the building(s) that either will operate as an emergency/transitional shelter or transitional housing or that with rehabilitation, renovation or conversion activities will operate for the purpose of emergency/transitional shelter or transitional housing on the site of the property.

b) **Contracted Oversight**

Architectural: All rehab, conversion or renovation concepts must be reviewed and approved by an architect of subgrantee's choosing. For any rehab, conversion, or renovation activity costing more than \$30,000, or if any internal or external doors, windows or walls will be added, removed, or moved, the subgrantee must hire an architect of record to develop the construction documents.

General Contractor: For any construction costing more than \$50,000 or involving three or more trade specialties, the subgrantee must hire a general contractor.

c) **Period of Fund Availability**

All project costs to be paid with OHCS funds must be incurred on or before the last day of the biennium in which the allocation was made.

d) **Use of HMIS**

Except for Domestic Violence victims, subgrantee will be required to enter data into an approved HMIS system for all persons assisted in an OHCS-funded shelter or transitional housing unit. Domestic Violence providers must collect client data in a database comparable but separate from the subgrantee's HMIS database and must report client-blind data to the subgrantee. Subgrantee must participate in OHCS's required data reporting process, complying with all information requests, and reporting deadlines.

e) **Procurement Requirements**

Subgrantees must follow procurement requirements as outlined in the subgrantee contract/agreement.

f) **OHCS Anti-Displacement and Relocation Assistance Policy**

OHCS-funded acquisition should not cause the involuntary displacement of tenants. OHCS encourages subgrantees to pursue projects that will not permanently displace tenants. If applicable, Subgrantee will provide OHCS, submitted at hss.acq.rehab@hcs.oregon.gov, with a description of the relocation plan and whether existing residents will have an opportunity to return to the facility, as well as any permanent relocation. Subgrantee's description shall include the kind of advance notice that will be given to affected tenants; and what funding the subgrantee will provide to assist persons being relocated. Subgrantee must comply with any laws addressing tenant protections and evictions. OHCS provides a template for an Anti-Displacement and Relocation Assistance Policy on the HSS Dashboard. Additionally, more information on this subject can be found

at the HUD website at:
<https://www.hudexchange.info/programs/relocation/overview/#overview-of-the-ura>.

g) OHCS Fiscal Monitoring

OHCS fiscal monitoring requirements for acquisition and/or rehab/construction projects are the same as fiscal monitoring of other costs incurred. Subgrantee must maintain a project file available for review during the monitor’s visit or at the monitor’s direct request.

h) Quarterly Progress Report

A standardized Quarterly Progress Report form must be submitted first, by the 10th day of the month following the month the project began and then quarterly thereafter, due by the 10th day the month following the quarter being reported. Reporting must begin for the month following the date of the first expense of OHCS funds is incurred and must continue quarterly until the project can be reported “in use” (shelter) or “occupied” (transitional housing). During all quarters when the subgrantee will be requesting funds from OHCS, the Quarterly Progress Report must include detail of the project work completed during that quarter and the percentage of completion achieved to date until the project is complete and placed into service. The Quarterly Progress Report form is available on the OHCS HSS Dashboard at:

<https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>. Submit report to OHCS at: hss.acq.rehab@hcs.oregon.gov.

i) First Year Report

At the end of the first calendar year the project was placed in service, subgrantee will be asked to provide OHCS with a year-end narrative report describing the project and how it is being used in the community. The First Year Report form is available on the OHCS HSS Dashboard at: <https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>. Submit report to OHCS at: hss.acq.rehab@hcs.oregon.gov. This report must be sent in the month of January prior to the due date and must not be sent earlier.

j) Annual Certificate of Continuing Program Compliance

A Certificate of Continuing Program Compliance will be required from the subgrantee for the previous year. Subgrantee will use the Certificate to confirm the operation of the project complies with the restrictive use requirements. The Certificate form is available on the OHCS HSS Dashboard at: <https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>. Submit Certificate to OHCS at: hss.acq.rehab@hcs.oregon.gov. This report must be sent in the month of January prior to the due date and must not be sent earlier.

k) **Environmental Review**

Subgrantee must complete the appropriate Environmental Assessment or Environmental Impact Statement. Such environmental review must be performed by the responsible entity. The responsible entity must be the unit of general local government within which the project is located that exercises land use responsibility. Such review must be submitted to OHCS by the 10th day of the month following the month the project began, or minimally before any land disturbance: hss.acq.rehab@hcs.oregon.gov.

l) **Certificate of Occupancy**

Subgrantee must submit a Certificate of Occupancy signed by their local jurisdiction upon completion of the project. The Certificate of Occupancy must be submitted to OHCS at: hss.acq.rehab@hcs.oregon.gov.

m) **Subgrantee's Responsibilities for Subrecipients**

OHCS will only fund the acquisition of property if that property will be owned by the subgrantee. OHCS will fund rehabilitation in a property owned by a subgrantee or a subrecipient of the subgrantee. OHCS will always allocate OHCS funds to the subgrantee, not the subrecipient. All requirements of the grant agreements, program guidelines apply and the subgrantee will be held responsible to ensure all requirements are met by the subrecipient and its vendors, including monitoring of subrecipients by the subgrantee to ensure compliance with program rules, regulations, and requirements.

n) **Repurposing the Property**

Subgrantee cannot repurpose the use of the property before the end of the required restrictive use period. OHCS is exploring this pathway and will provide further guidance if developed.

o) **Transferring Property Ownership**

Within the Restrictive Use Period, the project owner may not transfer, sell, assign, bequeath, or dispose of any interest in the project to any person, entity, or other assignee, without obtaining the **prior written consent of OHCS**. The proposed use of any monies gained from the transaction must be pre-approved by OHCS.

The Transfer of Property, in which OHCS funds were used for the property's acquisition, conversion, rehabilitation or renovation (acquisition/rehabilitation), can occur within the period of required restrictive use; however, the restrictive use must remain in effect for the length required by OHCS guidelines. Such transfer of property must receive prior approval by OHCS. Such transfer of property will not be approved prior to the project being placed into service and OHCS's receipt of the Certificate of Occupancy, the timely receipt of Quarterly Reports on the project's progress as identified in the Acquisition/Rehab guidance, a First Year Report, any required Environmental Review and at a minimum, the

first Annual Certificate of Continuing Compliance. All documents regarding the transfer of property must be submitted to OHCS at: hss.acq.rehab@hcs.oregon.gov.

To be approved for the Transfer of Property in which OHCS funds were used, the Subgrantee must enter into a Memorandum of Understanding (MOU) with the partner organization that will be the recipient of the transfer of property with the following requirements:

- MOU must be effective for the duration of the required restrictive use period;
- MOU must include the Subgrantee's continued timely submission to OHCS of the Annual Certificate of Continuing Compliance for the length of the required restrictive use period;
- MOU must include the partner organization's compliance with Subgrantee's Nondiscrimination, Confidentiality, Grievance and Appeals and Limited English Proficiency Policies, as approved by OHCS. This requirement can be met by a reference in the MOU to the guidance for compliance of these policies as identified in the program's Operation Manual;
- MOU must include the Subgrantee's continued monitoring as required by the OHCS' program guidelines for the OHCS funds used for the acquisition/rehabilitation of the property for the length of the required restrictive use period, which must include access to the property and the property records as required by OHCS program guidelines for the same duration;
- MOU must include access to the property and property records by OHCS and OHCS' authorized representatives for the purposes of monitoring as required by OHCS program guidelines;
- MOU must include the requirement for records retention for a period of 6 years following the end of the required restrictive use period; and
- MOU must be submitted to OHCS prior to execution and upon execution, OHCS must receive the executed copy of the MOU, as approved. Submit to OHCS at hss.acq.rehab@hcs.oregon.gov.

The above guidance provides the flexibility for subgrantee's to transfer property; however, maintains the integrity of the program dollars that are spent for the purposes of the project. While this will require continued follow-up on the Subgrantee's behalf, it provides for the transfer of property to meet the Subgrantee's and their partner organization's needs while still retaining emergency shelter or transitional housing for the needs of the community.

(3) Checklist of Steps to Follow

File review is the basis for OHCS monitoring. Subgrantee must keep a complete file of all project requirements for 6 years following the final year of the restrictive use period. Subgrantee must follow all requirements of Sections G and H of this

manual for the acquisition, conversion, rehabilitation, or renovation of property and must follow the reporting requirements identified below:

- 1) Read through all these materials to ensure you understand the requirements that apply to your project and your responsibilities.
- 2) Submit all required reports, reviews and certificates to OHCS at: hss.acq.rehab@hcs.oregon.gov, in form and format required by OHCS.
- 3) Before drawing your first request for funds, ensure that OHCS has received your first completed Quarterly Progress Report, due the 10th day following the first month the project began; AND by the 10th day of the quarter following each quarter thereafter until the project is placed into service, submit to OHCS a completed Quarterly Progress Report.
- 4) If required, ensure that the performance of an Environmental Review is complete and submitted to OHCS.
- 5) By January 5th following the end of the first calendar year that the project is placed in service, submit to OHCS a completed First Year Report. This report must be sent in the month of January prior to the due date and must not be sent earlier.
- 6) Upon completion of the project and prior to placing the project in service, submit to OHCS a completed Certificate of Occupancy.
- 7) By January 20th of each year after the project is placed into service and for the duration of the applicable restrictive use period, submit to OHCS a completed Annual Certificate of Continuing Program Compliance. This report must be sent in the month of January prior to the due date and must not be sent earlier.

(I) Community Capacity Building

EHA (and EHA DRF) funding can be used to support projects and activities that increase a subgrantee's service area's capacity to provide emergency housing and homeless services. Community capacity building is not the same as increasing a subgrantee/subrecipient's capacity to deliver OHCS funds, which are service provider investments (agency capacity building).

The specific focus of Community Capacity Building (CCB) is to enhance local homelessness provider capacity to design and implement strategies to build, rebuild and sustain community capacity – especially in deprived communities and in towns, cities and regions suffering from economic decline, worklessness and benefits dependency. Supporting organizations with mentoring, finance, strategy building, and system analysis are a vital part of CCB. Records of CCB activities must be kept in accordance with OHCS Records Requirements, inclusive of meeting records, outcomes, and evaluation records, along with any fiscal records associated with the project.

1) Community Capacity Building:

- a) Increases the range of funders¹ and potential contributors at community planning and implementation tables;
- b) Encourages all levels of government to participate; and
- c) Assists organizations to develop networks to undertake joint activities and coordinate their services to achieve common goals and provide better service to homeless participants.

2) Objectives of Community Capacity Building are:

- a) To enhance, or more effectively utilize, skills and abilities and resources of homeless service providers;
- b) Strengthen understandings and relationships amongst homeless service providers; and
- c) Address issues of values, attitudes, motivations, and conditions to support homeless activities in a sustainable manner.

CCB is not a space to simply share program information and available services with other providers which can be accomplished through marketing and outreach efforts. CCB projects are activities that a subgrantee would not be able to undertake with regular OHCS-funded programs and specifically designed to increase the community's ability to provide homeless services. Costs associated with advertising and public relations designed solely to promote the subgrantee/subrecipient organization and their activities are not allowable under CCB.

OHCS-Funded CCB projects must be defined and receive prior approval in the subgrantee's Implementation Report before costs can be incurred. Such IR will require the following elements:

- i. Provide specific outcomes or deliverables that are SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound [project must have a beginning and end date]);
- ii. Identify specific partnerships needed to carry out the project (CCB projects must have partnerships to be considered CCB otherwise it is a service provider investment – such as through an MOU, charter, agreement or other document that identifies the partnership) and such documentation must be submitted with the IR;
- iii. Increase the service area's capacity with the purpose of expanding the community's ability to meet the needs of its homeless population;
- iv. Provide a method to evaluate the effectiveness of the project;
- v. Have a specific budget that is identified and described in detail and must include leveraged resources (such as costs needed for materials, transportation, staff, procurement/service agreements, hardware/software purchases², and any leveraged resources) and such documentation must be submitted with the IR; and
- vi. Identify what staff will be involved in the project (such as number of FTE, length of time FTE are needed, position types and staff names – this information will be needed to effectively monitor the CCB project).

¹ See example for Funders Table

² See example for system mapping or systems analysis

3) Example of allowable activities include:

- (a) **Regional Homelessness Plan:** Sets out policy directions for addressing homelessness in the region and serve as a template for other sub-regional plans, including efforts by municipalities, neighborhoods and private foundations committed to a structured approach to addressing homelessness.
- (b) **Engagement Strategies:** Adopting a membership structure to regional homelessness councils to be more inclusive, strategic and effective, providing for an open membership, a new decision-making body and opportunities for members to participate through Advisory Groups and other forums. Membership, which includes all levels of government, community foundations and agencies that provide a range of services to address homelessness in the region.
- (c) **Community Homeless Tables (CHTs):** Develop CHTs to help develop local strategies and promote communication and collaboration. CHTs have created the local councils on community homelessness to help develop local strategies to address homelessness
- (d) **Funders Table:** Creating a Funders Table that includes all levels of government and private and philanthropic foundations that fund local homelessness initiatives and support the vision to end homelessness. The purpose of this Table is to create a collaborative forum for regional funders to play a leadership role in: (a) Promoting a common vision for funding priorities to end homelessness; (b) Maximize resources and efficiencies for programs and services to end homelessness; and (c) Advocate for policies and systems changes that promote cross-sector coordination and permanent solutions to homelessness.
- (e) **Systems Analysis:** Collection and analysis of a comprehensive set of data elements that describe a community's homeless population, the system's ability to move people to permanent housing quickly, and the system's cost-efficiency. Qualitatively analyze a system by surveying community leaders, providers including executive directors and front-line staff, and people experiencing homelessness and involves reviewing planning and operation documents, and evaluation reports. Through training and consultation, guidance provided to the community in creating action plans to achieve identified priorities and, following a training and/or technical assistance, support implementation efforts.
- (f) **Homeless Response System Assessment and Recommendations:** Work with CoCs to provide analysis and recommendations to the CoC Collaborative Applicant, CoC Governance Board and community stakeholders on implementation of best practices in crisis response systems, including reviewing core system components such as CoC Governance, Coordinated Entry, Outreach, Homelessness Prevention, Diversion, Emergency Shelter, Rapid Re-Housing, Permanent Supportive Housing and others, analyze data including System Performance Measures and key housing outcomes by program type, and develop recommendations on strategies, including the role of CoC governance and its critical role in coordinating this system, to address identified challenges to ensure homelessness is rare, brief, and one time.
- (g) **Rapid Re-Housing Learning Collaborative:** Develop a RRH Learning Collaborative as an opportunity for homeless services organizations to make changes in the way they operate, while being supported by their peers and rapid re-housing experts. The goal

of the Rapid Re-Housing Learning Collaborative is to increase the number of households being rapidly rehoused and shorten the amount of time households remain homeless. Learning Collaboratives last a year or more, involve three to five in-person meetings, and in-depth technical assistance for participating organizations.

- (h) **Emergency Shelter Learning Collaborative:** Develop an ES Learning Collaborative as an opportunity for homeless services organizations to make changes in the way they operate, while being supported by their peers and emergency shelter/homeless crisis response experts. The goal of the Learning Collaborative is to support the implementation of a Housing First approach to shelter services, increase the number of households being permanently housed, and shorten the amount of time households remain homeless. Learning Collaboratives last a year or more, involve three to five in-person meetings, and in-depth technical assistance for participating organizations.
- (i) **Diversion and Problem-Solving Strategies Training:** Strategies training that involves system leaders, providers, coordinated entry staff, HMIS staff, and key community stakeholders to improve the understanding of an effective system, and the role of effective diversion practice. The training focuses on the effective implementation of problem-solving as an intervention across the homeless response system. The training begins with an overview of the effective homeless response system, then focuses on the core components of an effective problem-solving approach and defines problem-solving, diversion, and rapid exit and how these interventions are distinguished from prevention. Last, the training focuses on various diversion and problem-solving strategies, including data collection and analysis; integration with coordinated entry; and effective practices.
- (j) **System Mapping:** Development of a system map of existing housing and services throughout the region with specificity on updating the information regularly – this can include a software system for which a form of crowd sourcing could be utilized.

(J) Data System Expenses

EHA (DRF/DRF VET), ERA and SHAP funding can be used to support data system related costs necessary to collect and report shelter bed nights, participant services, participant demographic data, performance outcomes and other reporting requirements. Eligible data system expenses include:

- (1) HMIS user licenses;
- (2) Equipment upgrade for the purpose of HMIS needs;
- (3) Network systems upgrade (it is recommended that systems be networked) for the purpose of HMIS needs; and
- (4) HMIS training and technical assistance support for partner organizations to maximize effective use of HMIS system for data entry, reporting and program management. Such as:
 - a) staffing to conduct trainings related to HMIS;
 - b) develop and manage program specific workflows and on-boarding training related to HMIS;
 - c) develop and manage data quality plans related to HMIS; and

- d) provide end user support, ad hoc reporting support and troubleshooting relate to HMIS.

(K) Gift Cards

Gift cards given to eligible clients for the purpose of purchasing items must be in support of the client’s written housing goals and is allowable with EHA (DRF/DRF VET), ERA and SHAP funds, provided that adequate documentation exists to support the purpose and the expense and there is an OHCS-approved Gift Card Policy with established policies and procedure in place to address the process.

Use of gift cards must be rare, for very specific housing-related goals and only when other options are not available. There are multiple alternatives to using gift cards which are highly recommended:

- Partner³ with bus or transportation services that bill for their eligible clients.
- Partner with stores for a voucher system. A voucher is a document which is worth a maximum dollar value, and which may be used only for specific items at a specific vendor. Vouchers are very similar to purchase orders. In advance, the organization establishes agreements with a vendor under which the vendor agrees to accept a “voucher” at the point of sale and then invoices the organization for the actual purchase. The voucher is created in multiple parts with one copy being sent to the vendor, one copy given to the individual making the purchase and at least one copy retained by the organization. The voucher must be uniquely numbered and must clearly detail the allowed item(s) and the maximum cost the purchaser is allowed to spend on the item(s). The vendor invoices for the actual amount of the purchase up to the maximum established cost listed on the voucher.
- Partner with clothing stores that will bill for clothing selected by eligible clients and the clothing can be picked up once the bill is paid (for example, Salem-Keizer Schools currently has this arrangement with Kohl’s).
- Online purchases. Subgrantees can use a credit card to purchase the item through an online vendor and have the item shipped. Some online vendors (such as Walmart.com) also offer a same day pick up option for items currently available in local stores. Same day pick up allows an organization to make the purchase online and specify the name of an individual(s) authorized to pick the item up at their local store.
- Employee purchase. An employee goes to a store and purchases the needed items with either a company credit card or receives reimbursement by submitting detailed receipts for allowable costs.

1) Gift Card Requirements:

- a) Subgrantees must document in their Gift Card Policy the justification as to why they must use gifts cards rather than providing assistance through conventional means, such as partnerships with service providers, checks for goods/services to providers, or voucher options.

³ CCB potential for increasing partnerships

- b) Gift cards cannot be used for events as a means of attracting applicants, but must be specific to clients receiving financial assistance and in support of a client's written housing goals.
- c) Gift cards cannot be used as a standard way of delivering program services allowable under other components of OHCS funds, such as rent assistance, deposits, hotel/motel costs, etc.
- d) Documentation will be reviewed during monitoring and costs will be disallowed without sufficient documentation.
- e) The cost must be allocable, within program guidelines and must adhere to internal controls (OMB 200.403, 200.303) and must clearly meet the intent of ORS 458.650(1), showing a connection to housing stabilization.
- f) Gift cards for the purchase of food must follow OHCS guidance for limitation.
- g) Subgrantee procurement policies must be followed when purchasing gift cards.
- h) Gift cards must be purchased and issued to clients within the same grant period. For any gift cards that are not issued within the same grant period in which they were purchased, subgrantees must submit a negative request for funds for the grant period in which the gift cards were purchased totaling the amount of the unissued gift cards and other non-OHCS funds must be used for the cost of the gift cards.
- i) Subgrantee must have prior approval of a stand-alone gift card policy by OHCS **before incurring costs for gift cards**. The gift card policy must be prior-approved each biennium with the subgrantee's Implementation Report. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.
- j) Subrecipients of a subgrantee **must** follow the provision of the subgrantee's approved gift card policy and all OHCS requirements for the use of gift cards; however, subrecipients can create their own procedures for how they will implement the subgrantee's OHCS-approved policy (such as the position title of an approver, etc.).
- k) Costs will be disallowed without a prior OHCS-approved Gift Card Policy.
- l) Subgrantee must identify the dollar limitation for gift cards per client and the frequency limitation for a client's receipt of gift cards and such limitations must be reasonable as determined by OHCS.
- m) Subgrantee must maintain complete record of gift card purchases and issuance and gift cards must be kept in a secure location.
- n) Client must receive documentation that identifies the purpose and intent of the gift card and must acknowledge, by written, legible, wet signature, the same, and such documentation must be kept in the client's file.
- o) Issuance of a gift card must be in the context of an action plan or goal designed to increase housing stability and such plan/goal clearly documents, in writing, how the purpose of the gift card is helping the client obtain or maintain housing stability.

2) Gift Card Policy must include the following:

- a) Justification as to why the subgrantee must use gifts cards rather than providing assistance through conventional means, such as partnerships with service providers,

- checks for goods/services to providers, or voucher options (i.e., why are other options of providing assistance not available?);
- b) If gift cards will be used for food purchases, policy must clearly identify the limitations as stated in this manual;
 - c) Identifies internal controls on how gift cards are purchased and issued to clients within the same grant period;
 - d) Identifies internal controls on how gift cards are securely maintained, who has access to gift cards, and how the issuance of gift cards is tracked;
 - e) Identifies, per client, dollar limitation for gift cards and frequency limitation for how often a client can receive a gift card. Additionally, policy must identify internal controls on how these limitations are tracked to ensure compliance with the limitation;
 - f) Requirement that issuance of gift card is in context to a client's action plan or goal designed to increase housing stability and that such plan is included in the client file; and
 - g) Written, legible, wet signature statement from client that identifies purpose and intent of gift card and acknowledging and agreeing to the receipt of the gift card under the intended purpose.

5. Financial Management

(A) **Administration**

Subgrantees are allowed to use up to fifteen percent (15%) of their total **EHA** (DRF/DRF VET), **ERA** and **SHAP** allocation for administrative costs, including administrative costs for subrecipient organizations with whom the subgrantee contracts. There is an expectation that administrative funds will be shared with subrecipients (partners and culturally responsive organizations) commensurate to the services provided through the program by subrecipients.

Allowable administrative costs benefit the organization as a whole and cannot be attributed specifically to a particular program. All amounts billed to administration must be supported by actual costs.

Allowable costs include, but are not limited to:

- (1) Senior executive management personnel salaries and benefits (unless they are directly involved in program operations), administrative staff travel costs;
- (2) General services such as accounting, budget development, personnel, contracting, marketing, agency audit, agency insurance;
- (3) Board and commission member expenses (excluding meals), limited to \$30 per day in which they are engaged in the performance of official duties. Members can also receive travel reimbursement. Payment of these expenses cannot be made through cash, gift cards, gas cards or other cash equivalent means (ORS 292.495, DAS OSPA Reference Manual);
- (4) Organization-wide membership fees and dues specific to homeless systems and programs;

- (5) General agency facilities costs (including those associated with executive positions), such as rent, depreciation expenses, and operation and maintenance (as part of the organization's direct or indirect cost allocation plan); and
- (6) Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to agency-wide administration.

(B) Advance Requests for Funds

Subgrantee can request and be paid in advance, provided it maintains or demonstrates the willingness to maintain both written procedures that minimize the time elapsing between the transfer of funds and disbursement, and financial management systems that meet the standards for fund control and accountability. See the subgrantee's grant agreement/contract for all identified requirements and allowability.

Advance payments to a subgrantee must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the subgrantee in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the subgrantee for direct program or project costs and the proportionate share of any allowable indirect costs.

An advance can be requested using the field labeled "Projected" in OPUS on the AGR screen.

The need for an advance must be justified by a short comment in the AGR "Comment" field, or your comment can advise to "see attached". The comment and/or the attachment needs to provide enough detail to justify your request and demonstrate the impact to subgrantee's operations and cash flow. Below are some acceptable methods that can be used to justify an advance request:

- (1) Wait list total, or expected demand, plus additional funds to serve participants over a specified period. Analysis must be provided on how any additional funds were calculated, expected number of households and amount per household.
- (2) Amount needed to provide to one or more subrecipients, with an analysis of the calculated amount (projected volume or demand for subrecipient, number of households, etc.), while factoring in timelines for invoicing and processing.
- (3) Funds to meet subgrantee's upcoming payroll.
- (4) Participant intake completed in another system, or applications in process of approval.

OHCS is mindful of subgrantee's operational needs and cash flow as they work to deliver critical programs. If there are additional questions or if a subgrantee would like to talk through the operational and cash flow needs they are experiencing, they can contact Carol Wagner, Carol.Wagner@hcs.oregon.gov or by phone at 971-273-9235.

(C) Use of OPUS

The OPUS System is a web-based centralized data system designed to meet business-processing needs. Subgrantee staff must complete training before being authorized to use the fiscal operations program of OPUS. Training can be provided by the Fiscal Grant

Specialist at OHCS. A Zoom Replay of OPUS Fiscal Training can be found on the HSS Dashboard.

OHCS maintains an OPUS Manual and OPUS Help Desk. View the OPUS User Manual from the landing page, under the Help tab, after logging into OPUS. OPUS Help Desk can be reached at:

Email: opushelp@hcs.oregon.gov

Ph: (503) 986-2099

Toll Free: (800) 453-5511 Option 6

(D) *Request for Funding Documentation*

Subgrantees/subrecipients must retain supporting documentation of all costs charged to the applicable grant and be able to provide evidence that grant funds were spent on allowable costs. When subgrantee submits an Agency Grant Request (AGR)/Request for Funds (RFF) in OPUS, they are required to upload documentation of the costs for which they are requesting payment. Any AGR/RFF submitted without accompanying documentation or with insufficient documentation will be returned to the subgrantee with instructions to provide additional information. Subgrantee are required to **frequently and regularly** submit AGR/RFFs to appropriately expend their funds within their identified spending targets. An AGR/RFF can be denied/voided if documentation is insufficient, if unallowable costs are included or if submitted after the grant period has closed.

(E) *Budget Change Requests and Implementation Report Amendments*

Changes in a subgrantee's scope of work can necessitate the submission of a budget change request. All budget changes require OHCS approval by submitting a Budget Change Request form electronically to: mga.fiscal@hcs.oregon.gov.

At the discretion of OHCS, additional information can be required for a budget change request, in form and format required by OHCS.

Implementation Report Amendments can be required as needed for specific funding categories. All Implementation Report Amendments require OHCS approval by submitting an Implementation Report Amendment Request through the appropriate Smartsheet form.

Subgrantees must identify, and receive OHCS approval, of all subrecipients through the funding application. For any additional subrecipients, changes to subrecipients or deletion of subrecipients, identified outside of the funding application, subgrantees must notify OHCS within 30 days of such amendment for OHCS' approval. by submitting an Implementation Report Amendment Request through the appropriate Smartsheet form.

(F) *Funds Spend Down*

Subgrantees are expected to fully obligate or expend grant funds during each funding cycle in accordance with OHCS policy and Subgrantees must meet spending targets identified in their Implementation Report spenddown plan (Standard or Time-Bound Expenditure Plan (TBEP), if applicable. OHCS will review subgrantee's grant spending in accordance with subgrantee's grant agreement/contract and OHCS policy. Subgrantee must fully expend

funds or have filed a final Agency Grant Status (AGS)/Financial Status Report (FSR) for a previous fiscal period to roll funds, if allowable, and prior to OHCS approving funds in a current fiscal period.

Any spending below the minimum standard spending target or the time-bound expenditure plan is subject to rescission of grant funds. Any amount of funding greater than 10% of a funding source's total allocation or a combined total of \$100,000 that is subject to rescission will trigger Subgrantee Board notification. See Standard Terms and Condition of subgrantee's grant agreement/contract for more information.

Any funds left unexpended by 60 days following the end of the funding period, are subject to recapture/deallocation by OHCS.

(G) *Funds Rollover*

EHA General Fund, ERA and SHAP funds can be rolled mid-biennium; however, they cannot be rolled between biennia and must be drawn from OPUS for allowable expenditures in the spending period within 60 days following the end of the fiscal period when the final AGS/FSR is due, according to subgrantee's grant agreement/contract requirements. The AGS/FSR is the mechanism for which a subgrantee will request an allowable rollover. Subgrantees are required to submit AGS/FSRs within 60 days following the end of each fiscal year.

EHA DRF and EHA VET DRF funds can both be rolled at mid-biennium and at the end of the biennium. The final AGS/FSR must be submitted within 60 days of the end of each fiscal period.

(H) *Internal Controls for Fraud*

As stated in the subgrantee's OHCS agreement/contract, subgrantees are responsible for maintaining an internal controls framework, satisfactory to OHCS, which assures compliance with program requirements. Written policy and procedures must be established and outlined in local documentation (e.g., staff policy/procedure manuals). Subgrantees must establish and maintain clear procedures for management of program applicants and participants who may have committed fraud and for dealing with public complaints regarding potential fraud, including preventing, detecting, investigating and dealing with fraud. Subgrantees must establish and maintain clear procedures for preventing, detecting and dealing with employee fraud. All incidents of fraud must be reported to OHCS. Subgrantees are responsible for repayment of funds which were provided to applicants and participants that do not meet program eligibility.

(I) *Match*

EHA funds can be used to match public and private moneys available from other sources for the production of housing for persons with low or very low income.

(J) *Supplementing Existing Funds/Programs*

EHA (DRF/DRF VET), ERA and SHAP funds can be used to supplement existing funds or to support existing programs or establish new programs in alignment with Oregon Administrative Rules 813.046, 053, 240 and Oregon Revised Statute 458.650. EHA (DRF/DRF

VET), ERA and SHAP can be used in a flexible manner to absorb costs from other programs where there are mutually allowable costs insofar as the subgrantee's cost allocation policy allows for this type of flexibility and the subgrantee outlines the circumstances in which they will charge other program costs to EHA (DRF/DRF VET), ERA and SHAP.

Costs can be born 100% by EHA (DRF/DRF VET), ERA and SHAP in order to supplement the other program **consistent with the intention** of EHA (DRF/DRF VET), ERA and SHAP to serve low-income households who are experiencing housing instability and homelessness and in EHA DRF VET programs must include a veteran member of the household, in ERA, programs must include an elderly member of the household and in SHAP programs, households must be literally homeless. EHA (DRF/DRF VET), ERA and SHAP must not be used to replace costs from another program, meaning they must be used in a manner that supplements and supports those other program operations.

Supplement means EHA (DRF/DRF VET), ERA and SHAP funds are used to increase the available services and funding for a particular program by incurring certain costs that can be allocable to other programs. Supplementing and supporting funds is allowed. Whenever a cost is being supplemented, it must be thoroughly documented that the costs are allowable under the EHA (DRF/DRF VET), ERA and SHAP program.

Replacement means utilizing EHA (DRF/DRF VET), ERA and SHAP funds to completely eliminate or supplant the use of funds from another program. An example of this would be to use EHA (DRF/DRF VET), ERA or SHAP funds to take over all the costs of a previously established grant, thus eliminating the need for the other program. Replacement of funds **is not allowable**. EHA (DRF/DRF VET), ERA and SHAP must always be used in a manner that "builds upon" another grant and does not supplant or take over the work of an entirely different grant.

Grantees must document their rationale for when and how costs will be used to supplement the costs of other programs through a reasonable basis within their cost allocation plan.

(K) Procurement

Purchases of equipment or property are subject to additional provisions and requirements as stated in the subgrantee's grant agreement/contract Standard Terms and Conditions and Special Provisions exhibits.

Fixed assets with a value greater than \$5,000, includes computer equipment, electronic equipment, photography equipment, hand tools and other items and are subject to pre-approval by OHCS. Title to all equipment as defined in 2 CFR Part 200, purchased in whole or part with OHCS funds shall rest with the subgrantee. Disposal of any item having an original cost of more than \$5,000 or those purchases which have a current per-unit, fair market value of \$5,000 or more requires prior OHCS consent before disposal. Property and equipment purchased with OHCS grants shall not be used for collateral or to secure financing. See subgrantee's grant agreement/contract for more information.

Subgrantee can contract for services purchased in whole or in part with program funds. Contractor must be of recognized professional expertise, certification, license, registration,

or stature in the relevant field where required. Contractor shall further be registered to do business in the State of Oregon, as required by Oregon Law.

When OHCS approval is required, subgrantee is expected to obtain multiple bids or pricing, and if required, provide sufficient information on cost allocation principals in accordance with 2 CFR 200. Subgrantee must provide sufficient information, in OHCS' determination, to justify reasonableness and cost allocation of the purchase. If using a sole source contract, subgrantee must have written justification documentation to explain why they were not able to obtain more options. All purchasing must comply with subgrantee's policies and procedures and the subgrantee's grant agreement/contract.

6. Data, Submission and Reporting Requirements

(A) ***Data Entry***

Subgrantees and their subrecipients are required to enter reliable, valid, and accurate **EHA (DRF/DRF VET), ERA and SHAP** related participant and service data into the Homeless Management Information System (HMIS) being operated in their geographic Continuum of Care (CoC). HMIS Data and Technical Standards have been established by the U.S. Department of Housing and Urban Development (HUD). Subgrantees and their subrecipients must adhere to their CoC's HMIS Data Quality Plan.

HUD-defined Victim Service Providers (VSPs) must enter information into a comparable database that meets HUD HMIS standards.

(B) ***Data Timeliness***

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. For all project types, subgrantees and subrecipients must enter data within two business days or sooner, depending on local CoC HMIS policies. It is highly recommended for project types such as Emergency Shelter and Coordinated Entry that even more stringent data timeliness standards are applied.

(C) ***Data Entry Requirements for Emergency and Transitional Shelters***

Emergency or transitional shelters, or hotel/motel vouchers are required to report participants who are sheltered overnight. Overnight date-in and date-out must be entered to be able to determine who and how many people were served by a shelter or shelter type for any given night. This allows reporting on bed nights and daily shelter utilization in addition to the client-level information for those staying in shelters. Using ShelterPoint for new projects is required and shifting to ShelterPoint for existing projects. Facility, congregate-based programs, must be tracked separately and reported separately from any hotel/motel, non-congregate program.

(D) ***Data Entry Requirement for Other Program Components***

All other allowable components require both an HMIS entry/exit and HMIS Service Transaction to be entered into HMIS. Each allowable service must be represented with a Service Transaction. Same-day services will have the same Service Start and End Date. Service Transactions for Homelessness Prevention and Rapid Re-Housing costs, including all

payments, arrearages, deposits, fees, landlord engagement and client non-categorical services, must include a HMIS Fund Source and Amount. An HMIS entry/exit and Service Transaction is required for both services-only and day-access shelter types

(E) *Required Data Elements*

Universal, program specific, and OHCS-required Data Elements must be collected in HMIS and are specific to program and project type. Refer to the [Data Collection Requirement by Program and Project Type](#) document that can be found on the HSS dashboard for applicable data elements specific to EHA (EHA DRF/DRF VET), ERA and SHAP.

(F) *Comparable Database*

Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contains strong, legally codified confidentiality provisions that limit HUD-defined Victim Service Providers (VSPs) from sharing, disclosing, or revealing victims' personally identifying information (PII), including entering information into shared databases like HMIS. To protect clients, VSPs must enter required client-level data into a comparable database that is comparable to and complies with all HUD HMIS requirements.

Subgrantees/subrecipients defined as HUD VSPs are still subject to reporting requirements to OHCS of the grant for which they receive OHCS funding even if using a comparable database; however, no PII will be shared, only aggregate counts.

(G) *Submissions/Reporting Requirements*

It is critical and subgrantees must meet deadlines for the submission of data, budgets, and reports (including, but not limited to annual, quarterly, implementation, and financial status reports, etc.) as required by OHCS. Subgrantees must submit **complete and accurate** materials requested by OHCS by the deadline provided by OHCS and in the form and format required. Any submission that is incomplete or after the deadline will be considered by OHCS to be late and out of compliance with requirements.

Subgrantees must enter complete, accurate, timely data and must monitor and confirm the quality of their data on a monthly basis.

System Query Data

Subgrantees must directly submit or automate the export of disaggregated HMIS participant, program and service transaction data twenty (20) days following the end of each month or as directed by OHCS. System Query Data may be used in published data visualizations (e.g., Tableau dashboards) and as the HMIS annual report.

Aggregated Quarterly Reports

Subgrantees must directly submit aggregated reports using the report provided in the HMIS reporting tool, SAP Business Objects, or the provided template, twenty (20) days following the end of each quarter.

Bed/Unit Inventory

Subgrantees must update Bed/Unit Inventory for Shelter and Transitional Housing in HMIS within 30 days of any change (additional or loss of beds, changes in bed type, etc.).

Program Delivery Annual Report

A narrative annual report must be submitted, in form and format required by OHCS, by the 60th day following the end of the fiscal year providing detail, including, but not limited to subrecipient budgets, program services, performance, outcomes, successes, and challenges.

Fiscal

The AGR/FSR is due to OHCS by the 60th day following the end of the fiscal year (see Funds Rollover section) and must be submitted within OPUS within this timeline.

At the discretion of OHCS, other reports can be required when deemed necessary by OHCS and subgrantees are subject to such requirement.

Subrecipient reporting to subgrantee must occur timely, so that subgrantees can meet the required deadline for reports to OHCS. It is the subgrantee's responsibility to ensure that subrecipients provide information to the subgrantee as required so that subgrantees can meet the reporting requirements of OHCS inclusive of subrecipient information.

Failure to provide required data or reports may result in a non-monetary finding in the Monitoring Report.

7. Records Requirements

(A) Case Files

Documentation of participant eligibility and services received must be maintained in participant case files (paper or electronically). Documentation for applicants found to be ineligible for assistance or for participants who are no longer eligible to receive assistance is required and must include the participant's request for assistance, why they are ineligible and how it was communicated to the applicant/participant, along with notification of the subgrantee's grievance/appeal process. Ineligible participants do not need to be entered into HMIS unless the use of HMIS is a part of the subgrantee or subrecipient's intake/assessment process.

A participant services or housing plan is required for those participants **receiving more than one time only** services (as identified in this manual) and must be in the case file. Existing assessments and active case plans with other providers can be used and included in the participant file.

Drop-in or mass shelter facilities that provide bed nights and no case management must maintain sign-in attendance documentation that includes shelter resident self-certification of their homeless status. All other shelter provisions, including issuance of hotel/motel vouchers as a part of shelter strategy, require that participant eligibility documentation be maintained in the participant file.

File documentation will be the basis of OHCS monitoring to ensure subgrantee and subrecipient comply with program requirements, rules, and regulations. OHCS recommends that subgrantees and subrecipients use a participant file checklist to ensure adequate documentation of case files. Sample forms are available on the OHCS website.

(B) *Records Access*

Subgrantees, their subrecipient organizations and subrecipient organization's subrecipients are required to permit OHCS, the Oregon Secretary of State's Office, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program records, applicant/participant records and fiscal records for such purposes as research, data collection, evaluations, monitoring, and auditing. At the sole discretion of OHCS, access to records shall include the removal of records as necessitated by OHCS or their duly authorized representative.

(C) *Records Retention*

Subgrantees, subrecipient organizations and subrecipient organization's subrecipients shall retain all program records pertinent to applicant/participant services and expenditures incurred under **EHA** (DRF/DRF VET), **ERA** and **SHAP** in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules. Find the OHCS Special Schedule at the Oregon State Archives:

https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx.

Find the State Agency General Records Retention Schedules at the Oregon State Archives:

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=591>

Records can be stored electronically; however, electronic records must be maintained securely and confidentially and be available in paper format if requested by OHCS for monitoring, audit, or other purposes. HMIS can be used as a method of document collection and maintenance when it represents all required records and is appropriate.

Subgrantees, subrecipient organizations and subrecipient organization's subrecipients shall retain and keep accessible all such **fiscal and program records**, applicant/participant records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of **(6) six years**, or such longer period as required by applicable law, whichever date is later. Destruction of records must occur timely and in compliance with applicable law and retention schedules. Retention begins from the later of the date that final payment is made or from the termination of **EHA** (DRF/DRF VET), **ERA** and **SHAP** funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to, **EHA** (DRF/DRF VET), **ERA** and **SHAP**.

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8. Applicable Rules and Regulations

All the following as can be amended from time to time:

1. ORS 456.515 through 456.725 (OHCS): https://www.oregonlegislature.gov/bills_laws
2. ORS 458.505 through 458.545 (Community Services): https://www.oregonlegislature.gov/bills_laws
3. ORS 458.600 through 458.650 (Oregon Housing Fund): https://www.oregonlegislature.gov/bills_laws
4. ORS 458.375: [Rental housing assistance for very-low-income elderly persons](#)
5. ORS 458.377: [Elderly Rental Assistance Fund](#)
6. OAR 166-300 (Retention Schedule): <https://secure.sos.state.or.us/oard/ruleSearch.action>
7. OAR 813-005 (General): <https://secure.sos.state.or.us/oard/ruleSearch.action>
8. OAR 813-046 (EHA): <https://secure.sos.state.or.us/oard/ruleSearch.action>
9. OAR 813-053 (ERA): <https://secure.sos.state.or.us/oard/ruleSearch.action>
10. OAR 813-240 (SHAP): <https://secure.sos.state.or.us/oard/ruleSearch.action>
11. HMIS Data Standards Manual: <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>
12. Limited English Proficiency federal interagency website can be found at: <http://www.lep.gov/> and guidance and additional materials can be found at: https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0
13. **This manual** as guidelines for EHA, EHA DRF, EHA DRF VET, ERA and SHAP are amended from time to time along with all other references made within this manual. All references made in this manual are understood to be as written, and as amended from time to time.
14. **ORS** cited are amended from time to time and can be found at: https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx
15. **OARs** cited are amended from time to time and can be found at: <https://secure.sos.state.or.us/oard/ruleSearch.action>
16. **CFRs** cited are amended from time to time and can be found at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl>
17. **OMBs** cited are amended from time to time and can be found at: <https://www.whitehouse.gov/omb/information-for-agencies/circulars>

9. Definitions

- A. Acquisition** means action taken to acquire a building for the purpose of emergency shelter or transitional housing. This does not include the acquisition of bare land.
- B. Chronically homeless** means a homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who: (a) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and has been homeless and living as described for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described; (b) an individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility; or (c) A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
- C. Client** means a household who has received an assessment of need, has been entered into an OHCS-funded program (intake), entered in HMIS and who is receiving financial assistance. A client is someone who has developed a client services/housing plan and is not receiving one-time only assistance.
- D. Code of Conduct Agreements** can be required by any type of shelter facility. A Code of Conduct Agreement can require that participants adhere to the shelter facility's rules and expectations of behavior and may or may not be required to be signed by the participant. Code of Conduct Agreements are not the same as Occupancy/Lease/Rental Agreements.
- E. Domestic Violence:** This definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance or friend, unless those persons are family members, intimate partners or household members. (Note: This definitional aligns with TANF rules and regulations)
- F. Emergency Shelter** means a facility whose primary purpose is to provide temporary shelter to homeless households or specific populations of the homeless and which do not require occupants to sign leases or occupancy agreements. Emergency shelters types can include, but are not limited to:
- **Low-Barrier Shelters:** Shelters with limited entry requirements that enable people, who otherwise are not willing or able to access shelter services, to be off the streets. Low barrier shelters must not expect residents to abstain from using alcohol or other drugs, or from carrying on with street activities while living on-site, so long as they do not engage in these activities in common areas of the house and are respectful of other tenants and staff. Low

barrier shelters can allow pets, allow couples to stay together, and can provide secure storage space for personal item. Low-barrier shelters are a state priority and should be implemented whenever feasible.

- **High Barrier Shelters:** Shelters where residents must meet specific entry requirements such as passing a sobriety/drug or alcohol test, criminal background check, allow belongings to be searched, have a specific level of income, participate in program activities, etc.
- **No-Barrier Shelter:** shelters where residents are not required to meet any specific entry requirements.
- **Abstinence-Based or Dry Shelter:** Shelters where residents are not allowed to drink alcohol or use other drugs while in tenancy. Residents are expected to be “clean” before moving in and actively working on their recovery while living there and can be discharged from the program if they refuse treatment for a relapse.
- **Wet Shelters:** Shelters where residents are not expected to abstain from using alcohol and other drugs, and where entering a rehabilitation program is not a requirement. Residents have access to recovery services and get to decide if and when they use these services.
- **Damp Shelters:** Shelters where residents do not need to be “clean” when entering the program but are expected to be actively working on recovery from substance use problems.
- **Day Shelters:** Temporary daytime accommodations and services for individuals and families who meet the definition of literally homeless as described under Participant Eligibility and are sleeping on the streets, lack a fixed, regular and adequate nighttime shelter and/or are living in an emergency shelter.
- **Transitional Shelters:** Emergency shelter projects with a primary purpose to provide temporary or transitional shelter and essential services to all eligible participants in general and/or for specific populations of the homeless. Some transitional shelter programs have a comprehensive service focus and participants can stay for a period of time based on participant need. Transitional shelters are different from transitional housing, as they do not require an occupancy/rental/lease agreement or rent payment obligation. Transitional shelters can require a code of conduct agreement.
- **Mass Shelters:** High volume, high turnover emergency shelters where multiple individuals and/or family households sleep.
- **Hotel/Motel Vouchers** used as emergency shelter strategy in those areas and times when no emergency shelter is available.
- **Vehicular Shelters:** Vehicular shelters provide participants with a place to park their vehicle that is secure and free from ticketing, where they have access to garbage and sanitation services, onsite management that ensures the safety of participants, site cleanliness and adherence to site rules. Participants in vehicular shelters are provided access to participant services.

G. HMIS means Homeless Management Information System. Victim Service Providers must use an HMIS Comparable Database.

- H. Occupancy/Lease/Rental Agreements** are used for temporary or permanent housing, which includes Transitional Housing. Occupancy/Lease/Rental Agreements are not the same as a Code of Conduct Agreement.
- I. Participant** means a household who may or may not be a client, but is receiving OHCS-funded services.
- J. Priority Population** means persons that the subgrantee/subrecipient has determined as having the greatest need and will receive services first (such as veterans and homeless families with children). (For example, for the purposes of HSP, TANF participants are a priority as required by the federal funds.)
- K. Rehabilitation or Rehab** means action taken to return an emergency shelter or transitional housing property to a useful state by means of repair, modification, or alteration. Bringing a property to the point where it is usable, safe, comfortable, hygienic, etc., but not necessarily bringing it back to its previous state or improving the property.
- L. Renovation** means the process carried out to upgrade an existing structure for the use as an emergency shelter or transitional housing and to improve performance by either altering the scope of structure, providing additional facilities or improving existing facilities. Improving the property.
- M. Repair and Maintenance** means actions taken to keep a building at a certain level of integrity, or to restore a structure to such a condition that it can be effectively used for its designated purpose. Actions that make improvements that will raise the building to a higher level of integrity or allow the building to be used for a new activity are not considered repair or maintenance. Bringing a property back to its original condition or taking action to keep a property at its current condition.
- N. Stand-Alone Policy** means a written policy that includes all the requirements for such a policy and is either its own separate document or it is included in a larger document, such as a policy and procedures handbook, that can easily be separated from the larger document for the purpose of approval and review by OHCS.
- O. Subrecipient** means entities that, by contract with the subgrantee agency, provide assistance payments/services and may receive funding directly from the subgrantee agency. Through its agreements with subgrantee agency, subrecipients must comply with all requirements for the program. Subrecipients include a subgrantee's subcontractors, contractors, vendor, subrecipients and any subcontractors, contractors, vendors or subrecipients of a subcontractor, contractor, vendor or subrecipient.
- P. Support Network:** Examples include family, friends and faith-based or other social networks.
- Q. Target Population** means persons a subgrantee/subrecipient wishes to reach out to who are under-represented in their service population, but delivery of funds cannot be limited to only the target population.

- R. Warming/Cooling Centers** are a short-term, drop-in and/or overnight facility that operates when temperatures or a combination of precipitation, wind chill, wind and temperature become dangerously inclement. Their paramount purpose is the prevention of death and injury from exposure to the elements.
- S. Wet Signature** means any signature affixed to a hard copy with a pen or other writing device. An electronic signature does not meet the requirements of a wet signature.

10. Appendix A – Maintenance/Rehab Activities

EXAMPLES OF MAINTENANCE ACTIVITIES vs. REHABILITATION ACTIVITIES FOR ENVIRONMENTAL REVIEW PURPOSES

Feature or System	Maintenance Activities ⁴	Rehabilitation Activities ⁵
Site	<ul style="list-style-type: none"> • lawn care (litter pickup, mowing, raking), trimming trees and shrubs • snow/ice removal • neighborhood cleanup • application of pavement sealants, parking lot restriping, directional signage or marking for handicapped accessibility • repair of cracked or broken sidewalks 	<ul style="list-style-type: none"> • new landscaping throughout an area • construction of new walkways, driveways or parking areas, or replacement thereof
Building Exterior	<ul style="list-style-type: none"> • cleaning and fixing gutters and downspouts • repainting previously painted surfaces (including limited wet scraping and low-pressure washing) • replacing deteriorated section of siding • removal of graffiti 	<ul style="list-style-type: none"> • cleaning masonry or stripping painted surfaces by sandblasting, acid wash, or high pressure washing • applying new exterior siding
Roof	<ul style="list-style-type: none"> • fixing leaks • application of waterproof coating to a flat roof • replacement of deteriorated flashing • in-kind replacement of loose or missing shingles or tiles 	<ul style="list-style-type: none"> • complete replacement of roof with new shingles, tiles, roll roofing, membrane, or new metal roof • installation of solar panels
Windows and Doors	<ul style="list-style-type: none"> • washing windows • caulking, weather stripping, re-glazing windows and doors • fixing broken windowpane(s), storm window(s) or damaged entry door • replacing broken door lock • replacing a vandalized entry door to restore security of a building or unit • replacing a single severely damaged window to match • annual switch out of storm and screen panels 	<ul style="list-style-type: none"> • replacement of windows • replacement of exterior doors • adding storm windows or storm doors
Interior Walls and Ceilings	<ul style="list-style-type: none"> • patching or mending cracked plaster • patching or fixing holes or cracks in drywall • replacing stained ceiling tiles • painting or wallpapering 	<ul style="list-style-type: none"> • installation of new drywall or paneling • installation of new acoustical ceiling • installation of dropped ceilings
Flooring	<ul style="list-style-type: none"> • cleaning floors • stripping wooden floors and resealing • installation or replacement of carpeting or vinyl flooring* 	<ul style="list-style-type: none"> • installation of new wood floor

* These maintenance items may require purchase of flood insurance if they occur in a Special Flood Hazard Area (SFHA), and costs exceed the standard deductible for the specific type of structure or unit under the National Flood Insurance Program (NFIP).

Feature or System	Maintenance Activities ⁴	Rehabilitation Activities ⁵
Circulation	<ul style="list-style-type: none"> • in-kind replacement of broken stair treads or balusters • inspection and servicing of elevators 	<ul style="list-style-type: none"> • rebuilding stair or constructing new stair • installation of new access ramp • elevator replacement
Kitchen	<ul style="list-style-type: none"> • replacement of stoves, refrigerators, and microwaves* • replacing cabinet hardware* 	<ul style="list-style-type: none"> • complete or substantial kitchen remodel
Bathroom/Laundry	<ul style="list-style-type: none"> • unclogging sink or toilet • replacing deteriorated toilet in an occupied housing unit* • replacing broken medicine cabinet* • replacing washing machines and dryers* • installation of grab bars 	<ul style="list-style-type: none"> • complete or substantial bathroom remodel
HVAC	<ul style="list-style-type: none"> • servicing and maintenance of mechanical systems • changing air filters • cleaning air ducts • installing or replacing a window air conditioner • replacing a malfunctioning part of a HVAC system like a thermostat * 	<ul style="list-style-type: none"> • installation of new furnace or heat distribution system • installation of central air conditioning
Electrical/Lighting	<ul style="list-style-type: none"> • changing light bulbs • replacing malfunctioning light fixture, electrical switch or outlet* 	<ul style="list-style-type: none"> • major rewiring of building • installation of new electrical service • replacing or moving electrical panels
Plumbing	<ul style="list-style-type: none"> • fixing plumbing leaks* • repairing damage from frozen pipes* • repairing water or sewer connection within existing utility trench alignment • replacing malfunctioning water heater* 	<ul style="list-style-type: none"> • installation of new plumbing system • new water or sewer connection
Security	<ul style="list-style-type: none"> • repair of security alarm systems • boarding up a vacant building with protective plywood • installation of temporary security fencing • installation of security devices needed for an individual health facility patient 	<ul style="list-style-type: none"> • installation of permanent security bollards • installation of new security alarm system
Life Safety	<ul style="list-style-type: none"> • servicing smoke, fire and CO2 detectors • installation of smoke, fire and CO2 detectors 	<ul style="list-style-type: none"> • making substantial physical changes to a building to comply with fire and life safety codes • installing fire suppression system
Pest Infestation	<ul style="list-style-type: none"> • pest inspection/treatment 	

⁴ Categorically Excluded from NEPA and not subject to the related authorities listed in 24 CFR 50.4 and 58.5, unless Extraordinary Circumstances apply pursuant to 24 CFR 50.19(a) or 58.35(c).

⁵ Generally Categorically Excluded from NEPA and generally require review under related authorities listed in 24 CFR 50.4 and 58.5, but an RE or HUD reviewer may make a determination that an Environmental Assessment or Environmental Impact Statement is required due to individual project circumstances.