



Oregon Rehousing Initiative

Program Guidance

CONTACT:
Oregon Housing and Community Services
Homeless Services Section
(503) 986-2000
EO2302.questions@HCS.oregon.gov

Updated: May 2024



Table of Contents

- Program Overview4**
 - 1. Program Summary 4
 - 2. Program Intent 5
 - 3. Guiding Principles 5
- Participant Eligibility6**
 - 4. Eligibility Criteria 6
 - (A) Housing Status: 7
 - (B) Household Composition..... 8
 - (C) Income Limits 8
 - (D) Citizenship 9
 - (E) Oregon Inhabitancy..... 9
 - (F) Exiting Institutional Facilities..... 9
 - 5. Eligibility Documentation 9
- General Program Requirements.....9**
 - 6. Prioritizing Equity and Racial Justice in Programming 9
 - 7. Lived Experience 10
 - 8. Coordinated Entry 11
 - 9. Length of Assistance..... 11
 - 10. Amount of Assistance 11
 - 11. Habitability Requirements 12
 - (A) Transitional Living Programs for Youth & Young Adults 12
 - (B) Oxford Housing Models and Alcohol & Drug Free Community Housing 12
 - (C) RV Housing Options..... 12
 - 12. Supportive Services 13
 - 13. Landlord Partnerships 13
 - (A) Housing Choice Landlord Guarantee Program 13
 - (B) Landlord Incentives 14
 - (C) Regional Landlord Engagement Liaisons 14
 - 14. Relocation (Portability) 15
 - (A) Rehousing Outside of Provider’s Region 15
 - (B) Costs Associated with Reunification 15
 - 15. Repeat Housing Placements..... 15
 - 16. Required Policies 16
 - (A) Privacy Policy..... 16
 - (B) Confidentiality 17
 - (C) Grievances and Appeals Procedure 18
 - (D) Nondiscrimination..... 18
 - (E) Limited English Proficiency 19



(F) Conflict of Interest.....	20
17. Records Access	21
18. Records Retention	21
Allowable Program Components and Expenditures	22
19. Quick Reference Table:.....	22
20. Street Outreach.....	22
21. Rapid Rehousing.....	23
22. Unit Access	23
23. Data Collection	24
24. Administration.....	24
Data, Submission, and Reporting Requirements	25
25. Data Entry.....	25
26. Data Timeliness	25
27. Comparable Database.....	26
28. Program Reporting Requirements	26
29. Performance Measures	27
Financial Management.....	27
30. Supplanting of Funds/Programs.....	27
31. Advanced Requests for Funds	27
32. Use of OPUS	28
33. Request for Funding Documentation	28
34. Budget Change Requests	28
35. Funds Spend Down	29
Definitions	29



Program Overview

1. Program Summary

On January 10, 2023, Governor Kotek issued three Executive Orders to address homelessness and housing instability and their root cause: housing affordability. Executive Order (EO) 23-02 declared a state of emergency in Continuum of Care (CoC) regions, which had increased unsheltered homelessness by 50% or greater since 2017.

On January 9, 2024, Governor Kotek signed EO 24-02 to maintain the added capacity to the state's shelter system, rehouse people experiencing homelessness, and prevent homelessness. The rehousing goals established in this program will align with those of EO 24-02 for the ten regions named in the executive order: Central Oregon, Clackamas County, Clatsop County, Jackson County, Lane County, Linn County, Malheur County, Marion-Polk Counties, Multnomah County, and Washington County.

OHCS was allocated \$39 million in a Special Purposes Appropriation (SPA) via SB 5701. This funding is designated for a statewide rehousing program—the Oregon Rehousing Initiative—to help rehouse more community members experiencing homelessness. In addition to allocating to the ten MAC groups designated under EO 24-02 as well as the BoS, the legislation designated a minimum of 25% to be allocated to Culturally Responsive Organizations (CROs). This program is intended to house more community members experiencing homelessness, above and beyond the work initiated by EO 23-02 and House Bill (HB) 5019. Rehousing efforts will be for new households, not the sustaining of those previously rehoused.

Funds disbursed through ORI will support placement into permanent housing throughout the remainder of the 23-25 biennium, with rehousing placements taking place by June 30, 2025. However, grantees will have until the end of the 25-27 biennium, June 30, 2027, to fully expend allocated funds through means such as rental assistance (up to 24 months per household), supportive services, and other programmatic costs connected to rehousing of those placements that have already been made. (The program will not support the rehousing placement of new households after 6/30/2025.)

ORI is designed similarly to the HB 5019 rehousing program, with one major change being broader eligibility criteria to include households that meet definitions of homelessness outside of unsheltered homelessness. The program allows up to 24 months of rental assistance to each household placed in housing prior to 6/30/2025 but relies upon a progressive engagement approach to tailor the intervention for each household's unique needs.

Through a Community Regional Planning process, grantees determined the number of households their region will rehouse through the Oregon Rehousing Initiative. Grantees have a collective goal of rehousing over 1,100 households by 6/30/2025.



2. Program Intent

A Rehousing Program is intended to rapidly move households along the continuum from homelessness to permanent, stable, and safe housing. These are some of the critical characteristics of a rehousing program and its primary populations of focus:

- Rapid rehousing programs have been demonstrated to be effective in getting people experiencing homelessness into permanent housing and keeping them there. By connecting people with a home, they are in a better position to address other challenges that may have led to their homelessness, such as obtaining employment or addressing substance abuse issues. Programs should prioritize a housing-first program with low barriers to entry and tailored services that allow a household to access a range of supports, from housing placement services to employment support services, behavioral health, and childcare services, amongst others.
- There are three core components to rapid rehousing: housing identification, rent and move-in assistance, and case management and services. While a program must make all three available, it is not required that a single entity provide all three services or that a household utilize them all.
- Rehousing programs have been used to provide shelter diversion services for families and individuals facing a temporary economic crisis but are also useful for those who need moderate levels of services for just a few months up to 24 months.
- Rehousing programs can be deployed successfully for unsheltered populations through street outreach services or as part of a housing-focused shelter system where the intervention has been shown to reduce shelter lengths of stay significantly.
- This program utilizes a Progressive Engagement Approach to rapid rehousing. Progressive engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with individually tailored financial and support resources. Through progressive engagement, assistance may be provided to any household entering the homelessness system at a level needed by that household. In many cases, a household may need a small amount of assistance to stabilize, while others may need more resources and tailored assistance.

3. Guiding Principles

1. **Lead with racial equity.** Racial equity is achieved if one's racial identity is no longer predictive, in a statistical sense, of one's disparate housing, economic, and health outcomes. Instead, outcomes for all racial groups are improved. Racial equity includes addressing root causes of inequities. Oregon Housing and Community Services (OHCS) strives to embed racial equity into the design, implementation, performance measures, and monitoring of our work. Some examples of leading with racial equity include:
 - Eliminating policies, practices, attitudes, and cultural messages that reinforce differential outcomes by race or otherwise fail to address them. Achieving racial equity is a process. This means that Black people, Indigenous people, and people of color—those most impacted—are part of the decision-making about funding, policies, and programs as outlined by [Center for Assessment and Policy Development and Center for Social Inclusion](#).
 - Committing OHCS to advancing racial equity and justice in alignment with the [Oregon Statewide Housing Plan](#). OHCS's racial equity work is informed by national promising practices and lived experience of communities of color. OHCS commits to an intentional,



data-driven approach to reducing disparities in housing and social service provision. Additional guidance and information continue to be developed to further identify how OHCS and grantees can advance equity and racial justice within state and federally funded programs. To achieve racial equity in the community, government (local, regional, and state) must be working in partnership with community and other institutions.

- Through regional planning processes, OHCS is requiring a disparity analysis as a component of the application process for funds, to encourage the utilization of a targeted universalism approach.
 - In recognition that Black people, Indigenous people, and people of color across Oregon continue to be disproportionately impacted by the crisis of homelessness, the Oregon Rehousing Initiative is prioritizing resources for Culturally Responsive Organizations to support those communities most impacted.
2. **Remove barriers and simplify processes.** Structure Program design and operation to be streamlined to offer support where applicable to rehouse a household with minimal barriers to both participants and landlords. Program design should be intentional to reduce barriers to housing.
 3. **Support local flexibility and responsiveness.** Allow for local flexibility where possible to build on the services funded through HB 5019 under EO 23-02.
 4. **Strengthen relationships with landlords.** Strong partnerships with landlords to address each community's unique needs. Landlords are vital in preventing evictions and helping individuals and families find new homes. Some examples of this include:
 - Partnering with landlords to make a real difference in ending homelessness by making units more accessible to those in need and taking advantage of available programs.
 - Increasing awareness of identified [liaisons in each region of the state who can support landlords interested in supporting this work](#) and the state will make this information available to landlord associations.

Participant Eligibility

4. Eligibility Criteria

Participant Eligibility	
Homeless Status	<ul style="list-style-type: none"> • Literally Homeless, including those living in shelter, unsheltered, or exiting an institution. • Fleeing Domestic Violence • Other Federal Statutes, including HUD McKinney-Vento
Income Requirement	No income requirements
Age	N/A

Providers are responsible for ensuring that households admitted to the program meet program eligibility requirements. Providers will conduct an initial evaluation of participants in accordance with local CoC requirements applicable at the time of participant evaluation. For the purposes of participant eligibility, providers must determine which category of housing status each household meets. Eligibility based on



housing status shall be determined based upon the initial engagement with the participant and be determined based upon the head of household only.

Participant eligibility criteria for the Oregon Rehousing Initiative requires a household to meet the following Housing Status Criteria, as defined below, at the time of initial engagement:

- Category 1: Literally Homeless
- Category 3: Homeless Under Other Federal Statutes
- Category 4: Fleeing/Attempting to Flee Domestic Violence
- Category 6: Unsheltered Homelessness

(A) Housing Status:

Category 1: Literally Homeless—Individual or family that 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 limited to, a car, park, abandoned building, bus or train station, airport or camping ground);
- Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelters, and hotels or motels paid for by charitable organizations or by federal, state, or local government programs); or
- Exiting an institution where the individual or family has resided 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 that will lose their primary nighttime residence provided that:

- The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- 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 another category, (literally homeless, imminent risk of homelessness or fleeing/attempting to flee domestic violence) but who:

- Are defined as homeless under other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the Program assistance eligibility determination;
- 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.



- Other Federal Statutes include:
 - Runaway and Homeless Youth Action (34 U.S.C sec. 11201 to 11281);
 - Head Start Act (42 U.S.C. 9831 et seq.);
 - Part N of the Violence against Women Act of 1994 (34 U.S.C. sec. 12511 to 12512) (VAWA);
 - Section 330 of the Public Health Service Act (42 U.S.C. 254b and 254b-1);
 - 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 VII-B of the McKinney-Vento Act (42 U.S.C. 11431 et seq.)

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

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

Category 5: Unstably Housed—Individual or family that:

- Is at risk of losing their housing, and does not otherwise qualify as homeless under Categories 1-4 listed above;
- Has been notified to vacate current residence or otherwise demonstrate high risk of losing current housing; AND
- Lacks the resources or support networks to obtain other permanent housing.

Category 6: Unsheltered Homelessness – Individual or family that is living in a primary nighttime residence that is a public or private place not designed for human habitation (including, but not limited to, a car, park, abandoned building, bus or train station, airport, or camping ground).

(B) Household Composition

Household composition may include but not be limited to the following, regardless of actual perceived sexual orientation, gender identity, or marital status.

- A single person, who may be an elderly person, displaced person, disabled person, near elderly person, or any other single person.
- A group of people residing together. Such group includes but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a family.

(C) Income Limits

There is no income eligibility requirement for the Oregon Rehousing Initiative.

However, regional programs *may* determine income limits for eligibility at program admission. Income limits are used to determine eligibility for the program and for income targeting purposes by comparing the annual income of an applicant household to the applicable income limit for the household size.



(D) Citizenship

The Oregon Rehousing Initiative does not require providers to obtain and verify Social Security Number (SSN) documentation and documentation evidencing citizen status before admitting households to the program. Citizenship *may not* be used as a basis of program decisions for grantees and subrecipients.

(E) Oregon Inhabitancy

Services must be provided to those who are inhabiting 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 located in the state of Oregon.

If a household's documented housing status is Category 4, Fleeing Domestic Violence, Oregon Rehousing Initiative funding can be used for eligible categorical costs associated with moving out of Oregon to a safe location, providing that there is documentation in the participant's service/housing plan, indicating that the participant'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.

(F) Exiting Institutional Facilities

There is no maximum time limit for days spent in an institutional care facility (i.e. hospitals, jails, substance abuse or mental health treatment facilities, or other similar facility), that would cause ineligibility for rehousing through the Oregon Rehousing Initiative, so long as the individual or household was experiencing homelessness prior to entering an institutional care facility. This differs from HUD's definition of homelessness, which stipulates that time spent in an institution must not exceed 90 days in order to not constitute a break in homelessness. OHCS acknowledges the importance of recognizing where the point of entry may be for communities and is expanding the definition of eligibility for rapid rehousing as a result.

5. Eligibility Documentation

Documentation of all participant eligibility information must be available in participant 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 file.

File documentation will be the basis of OHCS monitoring to ensure grantee and subrecipient follows program requirements and regulations. OHCS recommends that grantees and subrecipients use a participant file checklist to ensure adequate documentation of case files.

General Program Requirements

6. Prioritizing Equity and Racial Justice in Programming

All grantees are encouraged to prioritize equity and racial justice in their programs.



This means that grantees proactively consider steps to ensure that programs are designed and implemented in a representative fashion in the communities served, with racial justice at the forefront of service delivery.

- Grantees proactively ensure that programs are accessible to all eligible individuals and organizations, regardless of race, color, national origin, religion, sex, familial status, or disability.
- Grantees take proactive steps to reach out to and engage with communities that have been historically underserved or marginalized. This should include direct engagement with people who have lived experience of homelessness to inform program design, strategy and deliver higher quality services.
- Grantees ensure that programs are designed and implemented in a way that considers and values equity and racial justice. This may include, but is not limited to:
 - Providing targeted outreach and support to historically underserved or marginalized communities;
 - Ensuring that application review and selection processes are fair and unbiased; and
 - Utilizing data analysis, community input, equity-based decision making, and continuous quality improvement led by people with lived experience to inform programmatic decisions.
- Providing technical assistance and support to help grantees and subrecipients ensure equity and racial justice within programming.
- Grantees comply with all applicable fair housing laws and the equal protection clause of the 14th amendment to the US constitution. Please consult your legal counsel for advice in program design and determining criteria for participant eligibility.
- Grantees prioritize incorporating the lived experience of homelessness into program design, implementation, and evaluation. See more in section 7, Lived Experience.

7. Lived Experience

Incorporating the lived experience (LE) of homelessness into program design and implementation is a commitment and framework to include everyone, especially people with lived experience, in planning, implementation, and evaluation.

Lived Experience best practices included, but are not limited to:

- Bring the perspective of LE to the forefront by ensuring that no one is left out or misrepresented; ensuring that your organization’s communications, fundraising, research, and programs do not reinforce the misconceptions that homelessness is caused by individual problems or can be solved by charity; using professional influence to help advance the goals identified by first voice people; and dedicating time and resources to advocacy and supporting grassroots social change efforts.
- Include people with LE at all levels of the organization by hiring those with LE in positions at all levels within the organization; inviting those with LE to join the organization’s Board and committees; including LE as a dimension in your organization’s equity and diversity policies; creating liaisons within municipal governments to include city councils and police boards; and working towards sustainability and advancement for peer positions so that those hired on as peer counselors or peer researchers can advance to permanent positions.



- Value the time of those with LE and provide appropriate supports by anticipating the compensation required, and including that cost within your budget, of properly including people with LE; creating a welcoming environment in which it is safe to express emotions; provide training and capacity building to all members of the organization; and ensuring timeframes for LE initiatives do things at a reasonable pace.
- Challenge stigma, confront oppression and promote dignity by providing training that addresses these issues to the whole organization; confronting oppression; educate around the intersectionality of racism, sexism, classism, and ableism and how they work together and reinforce each other; and reviewing organizational policies and practices to ensure they promote equity, dignity, and the rights of people facing homelessness.
- Recognize LE expertise and engage those with LE in decision making by mandating that people with LE are included in decision making roles in the organization and including those with LE in influential roles allowing them to speak when they can, use social media and other platforms and methods as they are available.
- Work together toward equitable representation by including equitable representation in the organization’s strategic planning process; setting concrete objectives and specific timeframes; working with other organizations that have successfully implemented equitable representation and evaluate your progress, seeking input from people with LE in the process.
- Build authentic relationships between people with and without LE by cultivating an environment of caring, acceptance and openness where differences are celebrated, and everyone’s contribution is acknowledged; ensuring that all members of the organization are included in social activities and that those activities are accessible to all; and breaking down rigid roles such as “service provider” and “service user”.

More information can be found at: <https://www.usich.gov/>. Search for “Lived Experience”.

8. Coordinated Entry

OHCS is deferring to the local Continuums of Care (CoC) to determine if Coordinated Entry (CE) will be used for the Oregon Rehousing Initiative in that CoC’s geographic area. While ORI encourages the use of CE, this is not a requirement. If you are unsure of your CoC’s stance on CE for these funds, please reach out to your CoC for further clarification. CoCs that opt to use CE must determine if the local CE process is capable of delivering assistance pursuant to ORI’s goals and requirements and make appropriate adjustments to CE standards, as necessary.

9. Length of Assistance

The maximum length of rental assistance is 24 months per household. OHCS recommends a progressive engagement approach to tailor the intervention for each household’s unique needs, including the length and amount of rental assistance provided.

10. Amount of Assistance

Rehousing programs will not be required to adhere to Fair Market Rate (FMR) constraints. Specific monthly rent assistance amounts may be determined by local programs, according to available funding.



11. Habitability Requirements

To be considered eligible permanent housing, housing facilities must align with client choice and meet habitability requirements that include minimum safety, sanitation, and privacy standards as outlined in 24 CFR § 576.403, including the following minimum requirements, unless an alternative plan is approved by OHCS:

- Household has a lease or sublease agreement in their own name;
- Access to a private bathroom; and
- Access to kitchen facilities.

Please see subsections 11(A), 11(B), and 11(C) for more information on requirements for Transitional Living Programs, Oxford Housing Models and Alcohol & Drug Free Community Housing, and RV Housing Options. For technical assistance support around meeting habitability requirements and additional questions, please contact the OHCS team by emailing EO2302.questions@HCS.oregon.gov.

(A) Transitional Living Programs for Youth & Young Adults

Oregon Rehousing Initiative funding can be used for transitional living programs for youth and young adults, ages 14 to 24. Transitional living programs facilitates a homeless youth or young adult's transition to permanent housing and is offered to participants for no more than 24 months. If more than 24 months of tenancy is needed, the participant file must document the reason and a clear plan of action to move the participant to permanent housing which includes time-bound activities. Transitional living programs are designed to provide interim support to successfully move a participant to, and help them maintain, permanent housing. Transitional living programs will require program participants to sign either a lease or an occupancy agreement. Transitional living programs are not the same as Transitional Shelter, which requires no lease/occupancy agreement.

(B) Oxford Housing Models and Alcohol & Drug Free Community Housing

Oxford Housing models and Alcohol & Drug Free Community (ADFC) program models are deemed as eligible forms of housing, in situations when individuals have a choice between this type of program and others. Tenants must be provided with an individual lease or occupancy agreement and must have access to a private bathroom and kitchen facilities. Oxford Housing models and ADFC housing must align with Oregon State Law regarding programs of recovery per ORS 90.243.

(C) RV Housing Options

If the household is not seeking traditional permanent housing, and their housing preference is an RV, it can be counted as permanent housing. Permanent housing for an RV should include being in livable good condition, hooked up to sewer, water and electricity, and on at least a month-to-month leased or owned land. Please be sure to check on any local habitable structure codes, and safety and sanitation codes for RVs. The RV would need to comply with any local codes as well.



12. Supportive Services

Funds should be used to help individuals achieve a greater level of housing security through supportive services. Supportive services are those necessary to provide a household with safe and stable housing, and costs under this category must be reasonable and sufficient to stabilize the household. Programs are encouraged to utilize strategies to braid or blend funding streams to increase supportive services opportunities. For unique instances, please reach out to OHCS staff to confirm eligibility, by emailing EO2302.questions@HCS.oregon.gov.

Eligible expenses may include, but are not limited to the following examples:

- Staffing and support for retention and Wraparound Case Management. The concept of “Wraparound” programming is used to describe any program that is flexible, family or person-oriented, and comprehensive. In a “Wrap-around” approach, a team of professionals (e.g., educators, mental health workers, social workers, etc.) and key figures in an individual/household’s life (e.g., family, community members, religious leaders etc.) create, implement, and monitor a plan of support.
- Because “Wraparound” is a strengths-based intervention an individualized wraparound plan is supposed to reflect the needs of the individual or family, rather than availability of services. A wraparound approach is designed for people/families with complex needs. A form of Collaborative Community Case Management.
- Work supports (i.e., training costs; transportation assistance – bus tokens, ride sharing, auto repair; childcare or eldercare costs, clothing to support employment needs, tech to support Wi-Fi access, phone costs). The purpose of the work supports is to allow the household to stabilize by avoiding costs or expenses in other areas that are a barrier to housing stability.
- Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation, and access to health care (e.g., doctors, medication, and mental and behavioral health services).
- Furniture and household goods to support a household with moving to a new home (i.e., bedroom furniture, bedding, pots, pans, kitchen utensils, bath towels, etc.)
- Providers may make available housing search assistance as part of supportive services that may include: Assistance identifying eligible units, including physically accessible units as needed; Outreach to owners of potentially eligible units; Provide transportation assistance and direction to potential units; Assist families and individuals with rental applications, rental agreements, and other paperwork; Advocate directly, as needed, with landlords on behalf of the families and individuals; and Otherwise help expedite the rehousing process for families and individuals.

13. Landlord Partnerships

(A) Housing Choice Landlord Guarantee Program

The [Housing Choice Landlord Guarantee Program](#) (HCLGP) provides financial assistance to landlords to mitigate damages caused by Housing Choice Voucher (also known as Section 8) tenants. The program was expanded to include those tenants who were rehoused under the EO 23-02 and EO 24-02 to address homelessness. This include those rehoused through the Oregon Rehousing Initiative.



A landlord may apply for financial assistance to reimburse them for qualifying damages. Program assistance may include expenses related to property damage, unpaid rent, or other damages satisfactorily described and documented in an application from the landlord to OHCS.

The program can reimburse the landlord up to \$5,000 for:

- Unpaid rent and utilities for which the tenant was responsible;
- Up to 30 days of vacancy loss with respect to repairs for qualifying property damage;
- Late fees or lease-break fees (does not include the costs of eviction);
- Property damage that exceeds normal wear and tear;
- Other costs related to lease violations by a tenant.

In order to be eligible, rehousing providers must register the tenancy by completing the Rehousing Certification online at:

<https://app.smartsheet.com/b/form/671833935f9c47c8b26444bd53dee9d7>. This certification must be completed within 30 days of when a household is rehoused. Complete the Rehousing Certification with: (1) Provider's contact information, (2) Landlord's contact information, (3) Tenant's name, (4) Property address and (5) Date the household was rehoused (January 10, 2023, or later).

(B) Landlord Incentives

Landlord participation rates affect the overall availability of rental options as well as the location and quality of available options, thus shaping the extent to which households can access the intended benefits of rehousing assistance. Landlord incentives can be a valuable tool. Examples include:

- **Landlord bonuses:** One-time payments to landlords, usually at the point of lease-up or renewal. May also include referral bonuses for landlords who refer others who end up leasing to program participants.
- **Funds to overcome rental barriers:** Funds to cover costs such as bringing units up to HQS/NSPIRE standards, holding fees, security deposits, application fees, rental insurance, and related costs such as credit or background checks.
- **On-call support:** Case manager or other staff to quickly respond to concerns or assist with urgent situations.
- **Mediation services:** Support resolving landlord-tenant or tenant-tenant disagreements.
- **Property improvement services:** Maintenance support or repair work, in the event a unit or surrounding property is damaged during lease term or when a tenant moves out, or landscaping, gardening, and other property improvement work.

(C) Regional Landlord Engagement Liaisons

Through Oregon's Emergency Homelessness Response, regional landlord engagement liaisons will be identified for MAC and LPG regions. These liaisons serve as a primary point of contact for landlords local in their communities who are interested in further engaging with rehousing programs. Regional landlord engagement liaisons may be found at the following link:

<https://orhomelessnessresponse.org/for-landlords/>.



14. Relocation (Portability)

(A) Rehousing Outside of Provider's Region

If a participant household prefers to be rehoused in a different geographic area, the rehousing provider should use all options available to accommodate whenever possible. Unit selection in rehousing should be centered around participant choice. Centering participant choice is an important element in successful housing placement and sustaining that housing. Equally important is that the supportive services that work concurrently with rehousing are available and accessible by the participant. It is possible that a provider may have budgetary, staffing capacity, or other limitations that restrict adequate provision of services and may limit where the household may be rehoused. If a household wants to be relocated to a location where the current provider cannot serve them, the provider must make reasonable effort to connect the household with another provider in the area where they are wanting to relocate.

(B) Costs Associated with Reunification

There may be instances where individuals or households prefer housing placement within communities of support, rather than engaging with more traditional service provision. Participant choice should be centered in these instances and paying for transportation costs (such as bus tickets for rehousing in another county or state) is an available street outreach tool, and an eligible use of Oregon Rehousing Initiative street outreach funds. This is not an eligible cost under ORI funding categories other than street outreach, unless an alternative plan is approved by OHCS.

While an allowable use of ORI street outreach funds, these households would not be counted towards the community's rehousing goal, unless approved by OHCS. Long-term success of reunification can be difficult to track, and supportive services may not be available, as are standard with traditional rehousing efforts. Reunification should be used as tool that is deployed as part of a comprehensive housing problem solving conversation that aligns with participant choice, and not as a stand-alone program offering.

15. Repeat Housing Placements

In the instance where a household that is successfully rehoused were to later become unhoused, that housing placement would still be counted towards the grantee's rehousing goal associated with the program.

If a household were to be rehoused for a second time through the program, that second placement *may* be counted towards the grantee's rehousing goal under certain circumstances. If a household no longer receives a rental subsidy and successfully exits the Rapid Rehousing project, then later falls back into homelessness before becoming housed a second time, the second rehousing will count towards the overall rehousing goal. If a household is still engaged with the Rapid Rehousing program and is at risk of, or loses, housing while being enrolled in the program, it is recommended that attempts are made to locate another acceptable unit for the household to prevent any period of homelessness. If a household loses housing while still being enrolled in the Oregon Rehousing Initiative, the relocation of the household into a new unit would not count as a second rehousing because the household did not fall back into homelessness. A household that is rehoused into a different housing placement and who did



not enter back into homelessness should have one consistent enrollment in HMIS to maintain an accurate housing history. A household that relocated housing placements will not be counted as a second “rehoused” household because they were not homeless at the time of moving into the new housing placement. OHCS recognizes that despite best efforts, rehousing providers cannot prevent or mitigate every situation that could result in a household falling back into homelessness.

If attempts to locate another acceptable unit are unsuccessful, and the household enters a period of homelessness, they should be exited from the Rapid Rehousing program in HMIS with an exit destination that matches their new living situation. If a household becomes eligible for rehousing through ORI again, a new enrollment into a Rapid Rehousing program with a new housing move-in date is required for the household to be counted a second time towards the overall rehousing goal.

16. Required Policies

The following policies are required for grantees and their subrecipients. These include policies pertaining to privacy, confidentiality, grievance and appeal procedures, nondiscrimination, limited English proficiency, and conflicts of interest.

(A) Privacy Policy

Grantees and subrecipients must have a written document that meets the requirements of this section and must have a stand-alone policy that describes how the grantee or subrecipients are providing their Privacy Notification verbally to participants.

A Privacy Notification must be provided to 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 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.”

Participants may also be asked to sign a Release of Information by the grantee or subrecipients 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 participants.

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 participant demographic data for the purposes of reporting.”

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

Grantees 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 requirements of the policy.

(B) Confidentiality

Confidential records include all applications, records, files, and communications relating to participants and regardless of format.

Policies and Procedures pertaining to confidentiality must include:

1. Identification of how all participant records are secured and confidentially maintained;
2. A statement that all participant records must be maintained within state guidelines for the proper retention and destruction of records;
3. A requirement that all grantee officers, employees, and agents are aware of and comply with the grantees’ confidentiality policy and must include an acknowledgement of such policy, in writing;
4. A provision for the electronic collection of participant information which states that:
 - a. Computer terminals must be in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for participant records;
 - b. Computer monitors must be cleared (or a screen saver activated) immediately after accessing a participant record;
 - c. Computer terminals must be on a “locked” mode or turned off if the terminal is unattended;
 - d. 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
 - e. 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.

Grantees 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.



(C) Grievances and Appeals Procedure

Grantees are required to have an established, written stand-alone policy for addressing participant grievances/appeal requests. Grantees 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. Participants must have the right and opportunity to grieve/appeal any decision that terminates, denies, limits, reduces, or modifies benefits for any reason. Participants must be notified of their right for a grievance or appeal of such decision and grantee policy must clarify how and when participants are notified of their right to grieve/appeal decisions. Such grievance/appeal policy can be posted in a public place; however, participants must receive a written notification for any decision that terminates, denies, limits, reduces, or modifies any benefit. Participants must still receive a denial notice in writing even if the reason for denial is a grantee's/subrecipient's lack of funding. At a minimum, the policy must include the following components:

1. Informs the participant that they can contest any grantee'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 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 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 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 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 the grantee 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.

(D) Nondiscrimination

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

1. A statement that grantees 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 participants can request reasonable accommodation to access assistance or services, how that process is communicated to participants and how those requests are processed.

Grantees must ensure 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.

OHCS reserves the right to require prioritization when such prioritization is intended from a specific funding source. Grantees 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.

(E) **Limited English Proficiency**

The Federal government has issued a series of policy documents, guides, and regulations describing how grantees 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.

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

1. The actions grantee took to identify LEP populations in their service area and cites any source(s) used for evaluation;



2. Defines actions grantee 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.

A LEP policy may also include how the grantee or subrecipient will make programs accessible for hearing-impaired users, such as through the use of teletypewriter (TTY). TTY VCO mode is for hearing-impaired users who can send messages through voice, but who would benefit from receiving messages on a TTY text display. TTY HCO mode is for users who can receive voice messages but would benefit from sending text messages.

Grantees 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.

Grantees 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. Grantees and subrecipients who serve few persons needing LEP assistance can choose not to establish a LAP; however, the absence of a written LAP does not release grantee's and subrecipient's obligation to ensure LEP persons have access to programs or activities.

(F) Conflict of Interest

In the performance of work, program grantees 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 grantee or subrecipient. A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the grantee's 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 grantee's 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 grantee 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.

Grantee 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.



Grantees and subrecipients must comply with conflict-of-interest standards for both individuals and organizations. Grantee and subrecipient must keep records to show compliance with program conflict of interest requirements.

17. Records Access

Grantees and their subrecipient organizations 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 participant 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 removing of records from the grantees' and subrecipients' office.

OHCS, including its authorized representatives and authorized third parties, will monitor the activities and records of grantees and subrecipients and vendors as it deems necessary or appropriate for, among other things, to ensure: (1) grantee and its subrecipients and vendors comply with the terms of the Agreement, including but not limited to the Program requirements, and that ORI Grant Funds are used properly for authorized purposes hereunder; and (2) that performance goals are achieved as specified in the Agreement, including without limitation in the community plan, NOAs, and the Program Requirements, and that performance is to the satisfaction of OHCS.

18. Records Retention

Grantees and subrecipients shall retain all program records pertinent to participant services and expenditures incurred under the Oregon Rehousing Initiative 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://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx).

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.

Grantees and subrecipients shall retain and keep accessible all such fiscal and program records, participant records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of (6) six years, such longer period as may be required by applicable law, whichever date is later.



Allowable Program Components and Expenditures

19. Quick Reference Table:

Eligible Expenses	Ineligible Expenses
Street Outreach <ul style="list-style-type: none"> - Housing Navigation and Placement Services - Marketing and Outreach - Sanitation Services Rapid Rehousing <ul style="list-style-type: none"> - Coordinated Entry Planning and Delivery - Housing Navigation and Placement Services - Move-In Financial Assistance - Rehousing and Supportive Housing Services - Rental Assistance (24 months maximum) - Renter's Insurance Unit Access <ul style="list-style-type: none"> - Block Leasing - Landlord Engagement - Landlord Incentives - Renovation/Rehabilitation/Conversion Data Collection <ul style="list-style-type: none"> - HMIS Training and Technical Assistance Administrative Costs	Acquisition Capacity Building Construction

Oregon Rehousing Initiative can be used in one or more of the following program components, where the program allows: Street Outreach, Rapid Rehousing, Unit Access, Data Collection, and Administration.

20. Street Outreach

Oregon Rehousing Initiative 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).

Allowable expenses for street outreach include, but are not limited to:

- Housing navigation and placement services;
- Assessing emergent health, behavioral, and mental health needs and connecting and/or referring participants to these services;
- 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; and
- Marketing and outreach costs inclusive of written materials, translation, and interpretation services;

21. Rapid Rehousing

Oregon Rehousing Initiative funds are primarily intended to support rapid rehousing activities. Rapid rehousing activities are those services performed to enable households to obtain permanent housing when they are currently homeless. Rapid rehousing 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).

Allowable expenses for rapid rehousing include, but are not limited to:

- Housing costs such as rental assistance (up to 24 months per household) and security deposit (inclusive of first, last, pet rent, and if accepted by landlord as an incentive, forward rent), renter's insurance, and late fees;
- Utility payments and arrearages (utilities include water, sewer, garbage, gas, electricity, phone, internet);
- Moving costs (van/truck rental) and transportation costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repair/insurance;
- Housing navigation and case management including pre-eligibility determination for housing and other needed services;
- Education and training in such areas as personal finance and budgeting, job search and access to job training, life skills, and literacy, as well as assistance in completing/submitted applications for other state/federal benefits (SSI/SSDI, TANF, SNAP, Unemployment, etc.); and
- Crisis intervention/counseling or referrals and/or "warm hand-offs" to counseling, addiction, and mental health services.

22. Unit Access

Oregon Rehousing Initiative funding can be used to support unit access. Unit access may include expenses tied to landlord engagement, block leasing initiatives, and other expenses connected to the access of available units in a region, including but not limited to, renovation, rehabilitation, and conversion of preexisting structures. Acquisition and construction are ineligible uses of ORI funds.



Block leasing is a type of lease that gives the lessee the right to control and sublease the property during the lease, while the owner retains the legal title. For example, a housing authority or service provider would be the lessee, allowing them to sublease the property to its tenants. An example of an eligible expense would be those related to a property manager on site as part of the block leasing agreement.

Allowable expenses for unit access include, but are not limited to:

- Landlord engagement and landlord incentives, including participation/landlord mediation services;
- Block leasing initiatives, including providing onsite property management; and
- Renovation/rehabilitation/conversion when it results in the addition of units for permanent housing for the rehousing program.

23. Data Collection

Oregon Rehousing Initiative funding can be used to support data system related costs necessary to collect and report participant services, participant demographic data, performance outcomes, and other reporting requirements.

Allowable expenses for data collection include, but are not limited to:

- HMIS user licenses;
- Equipment or network systems upgrade for the purpose of HMIS needs;
- 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:
 - Staffing to conduct trainings related to HMIS;
 - Develop and manage program specific workflows and on-boarding training related to HMIS;
 - Develop and manage data quality plans related to HMIS; and
 - Provide end user support, ad hoc reporting support, and troubleshooting related to HMIS.

24. Administration

Grantees may use up to 15% of the total Oregon Rehousing Initiative regional allocation for administrative costs, including administrative costs for subrecipient organization with whom the grantee contracts. There is an expectation that administrative funds will be shared with subrecipients commensurate to the services provided through the program by subrecipient.

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 expenses for administration include, but are not limited to:

- Senior executive management personnel salaries and benefits (unless they are directly involved in Program operations), administrative staff travel costs;
- General services such as accounting, budget development, personnel, contracting, marketing, agency audit, and agency insurance;
- Board expenses (excluding meals);



- Planning and implementation of Multi Agency Coordination (MAC) Group or Local Planning Group (LPG) infrastructure;
- Organization-wide membership fees and dues specific to the rehousing program;
- 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
- Equipment rental/purchase, insurance, utilities, and information technology costs that are not specific to the rehousing program but relate to the administration of the grantee as a whole.

Grantees may also utilize ORI funds to address the specific needs of various homeless subpopulations as set forth in their regional plan. Targeting of funds must not violate the Fair Housing Act or other applicable anti-discrimination requirements.

Data, Submission, and Reporting Requirements

25. Data Entry

Except for Domestic Violence victims and other specific circumstances approved by OHCS in advance, grantees will be required to enter data into an approved Homeless Management Information System (HMIS) for all persons assisted through the Oregon Rehousing Initiative. Grantees and their subrecipients are required to enter reliable, valid, and accurate participant and service data into the 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). Grantees and their subrecipients must adhere to their CoC's HMIS Data Quality Plan.

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 participants, VSPs must enter required participant-level data into a comparable database that is comparable to and complies with all HUD HMIS requirements.

Grantees/subrecipients defined as HUD VSPs are still subject to ORI reporting requirements even if using a comparable database; however, no PII will be shared, only aggregate counts.

Grantees must participate in OHCS's required data reporting process, complying with all information requests, and reporting deadlines.

26. Data Timeliness

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. For all project types, grantees and subrecipients must enter data within 72 hours or sooner, depending on local CoC HMIS policies.



27. Comparable Database

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases which provide aggregate information and data consistent with HMIS data collection requirements. Comparable Databases must have the following characteristics:

- The victim service provider controls who can access and see participant information;
- Access to the database is carefully controlled by the victim service provider;
- Meets the standards for security, data quality, and privacy of the HMIS within the CoC;
- The Comparable Database may use more stringent standards than the CoC's HMIS;
- Complies with all HUD-required technical specifications and data fields listed in HMIS;
- Be programmed to collect data with the most up to date HMIS Data Standards;
- Be able to generate all reports required by federal and state partners, for example, the HUD-CoC, APR, HUD-ESG CAPER, and the OHCS Participant Demographic Report; and
- Data fields that can be modified and customized by the victim service provider to benefit participants.

Additionally, individual survivor data must be routinely destroyed as soon as the program no longer needs it to provide participant services or to satisfy grant/legal requirements. Victim service providers may suppress aggregate data on specific participant characteristics if the characteristics would be personally identifying. Finally, the program's contract with the database vendor should include binding agreements to ensure security of and program control over participant data.

28. Program Reporting Requirements

Grantees must meet deadlines for the submission of data, budgets, and reports as required by OHCS. Grantees 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. Grantees may request a reporting deadline extension. An extension must be approved in writing by OHCS, and such approval may be granted or withheld in OHCS' sole discretion. Requests must be emailed to HCS.REPORTING@hcs.oregon.gov prior to the submission deadline.

The following reports and other documents will be submitted to OHCS throughout the duration of Oregon Rehousing Initiative programming:

- Monthly disaggregated data using the SAP Business Objects (the HMIS reporting tool). A monthly System Query Report will be run by OHCS. A file with aggregated data will be generated and provided to grantees to confirm their monthly data as complete and accurate. If needed, grantees will have 5 days to update or correct data in HMIS. OHCS will re-run a final System Query Reports on the 25th of each month.
- Annual System Performance Measure Reports (SPMs) for ORI funded projects (Reporting Group) are due 20 days following the end of each month. These are "canned" reports found in WellSky Community Services (ServicePoint) Report Module: System Performance Measures. Instructions on how to format and share these reports will be provided by OHCS. Reports must be emailed to HCS.REPORTING@HCS.oregon.gov.



- Requests for funds through the OPUS system must be submitted within 60 days of the end of each quarter. A final request for funds must be submitted for all fiscal year expenses not previously reported within 60 days of each fiscal year end.
- Grantees shall provide additional reports and shall cooperatively attend meetings with OHCS, as reasonably requested by OHCS.

29. Performance Measures

Grantees shall and shall cause and require its subrecipients by written agreement to achieve the following performance goals, as well as the performance goals that are outlined in their ORI community regional plans:

1. Increased housing stability as measured by the number of households who were successfully rehoused before the end of the performance period (June 30, 2025) unless otherwise stated.
2. Reduced the length of time participants spend homeless by having the average length of time from participant identification and program enrollment to moving into housing being 45 days or less, or as otherwise approved by OHCS.
3. Increase in housing stability by assisting 80% of all participants, or as otherwise approved by OHCS, who exit the program maintain their permanent housing or relocate to another permanent housing destination.

Financial Management

30. Supplanting of Funds/Programs

Oregon Rehousing Initiative funds may not be used to supplant other funds available for the same purpose.

31. Advanced Requests for Funds

Grantees can request and be paid in advance, provided they maintain 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. Advance payments to a grantee must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the grantee 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 grantee 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 the comment can advise to “see attached”. The comment and/or the attachment needs to provide enough detail to justify the request and demonstrate the impact to the grantee’s operations and cash flow. Below are some acceptable methods that can be used to justify an advance request:



- 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.
- 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.
- Funds to meet grantee's upcoming payroll.
- Participant intake completed in another system, or applications in process of approval.

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

32. Use of OPUS

The OPUS System is a web-based centralized data system designed to meet business processing needs. Grantee 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. 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

33. Request for Funding Documentation

Grantees/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 grantee 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 grantee with instructions to provide additional information. Grantees 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.

34. Budget Change Requests

Changes in a grantee'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. Budget change requests must be approved by OHCS program staff. At the discretion of OHCS, additional information can be required for a budget change request, in form and format required by OHCS.



Budget Change Requests are not required for advanced funds, however approval by OHCS program staff is still required.

35. Funds Spend Down

Grantees are expected to fully obligate or expend grant funds during each funding cycle in accordance with OHCS policy, and grantees must meet spending targets identified in their Time-Bound Expenditure Plan (TBEP). OHCS will review grantee's grant spending in accordance with grantee's grant agreement and OHCS policy. Grantees 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.

In the event that grantee spending is below the minimum standard spending target or the time-bound expenditure plan, OHCS may pursue any or all of the remedies available to it as defined in the grantee agreement. Please review the grant agreement for more information.

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

Definitions

Acquisition: Acquisition means action taken to acquire a building for the purpose of permanent or transitional housing. This does not include the acquisition of bare land.

Block Leasing: Block leasing is a type of lease that gives the lessee the right to control and sublease the property during the lease, while the owner retains the legal title. For example, a housing authority or service provider would be the lessee, allowing them to sublease the property to its tenants. An example of an eligible expense would be those related to a property manager on site as part of the block leasing agreement.

Code of Conduct Agreements: Agreements that may be required by some Oxford Housing Models and Alcohol & Drug Free Community Housing models. A Code of Conduct Agreement can require that participants adhere to the housing 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.

Construction: Has the meaning provided in ORS 456.515. "Construction" includes, but is not limited to, new construction or moderate or substantial rehabilitation of existing structures or facilities.

Conversion: In general, an activity that does materially add to the value of an existing structure, appreciably prolong its useful life, or adapt it to new uses.

Domestic Violence: This definition means those activities including, but not limited to 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.

Grantee: The entity receiving funds and entering into agreement with Oregon Housing and Community Services.

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

Occupancy/Lease/Rental Agreements: Agreements used for temporary or permanent housing, which includes Transitional Housing. Occupancy/Lease/Rental Agreements are not the same as a Code of Conduct Agreement.

Participant: Participant means a household who is receiving OHCS funded services.

Priority Population: Priority population means persons that the grantee/subrecipient has determined as having the greatest need and will receive services first.

Progressive Engagement: Progressive engagement is an approach to helping households end their homelessness as rapidly as possible, despite barriers, with individually tailored financial and support resources. Through progressive engagement, assistance may be provided to any household entering the homelessness system at a level needed by that household. In many cases, a household may need a small amount of assistance to stabilize, while others may need more resources and tailored assistance.

Rapid Rehousing: Rapid rehousing activities are those services performed to enable households to obtain permanent housing when they are currently homeless. Rapid rehousing 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).

Rehabilitation: Rehabilitation or rehab means action taken to return a 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.

Renovation: Renovation means the process carried out to upgrade an existing structure and to improve performance by either altering the scope of structure, providing additional facilities, or improving existing facilities. Improving the property.

Repair and Maintenance: 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.



Stand-Alone Policy: 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.

Street Outreach: 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.

Subrecipient: Subrecipient means entities that, by contract with the grantee agency, provide assistance payments/services and may receive funding directly from the grantee agency. Through its agreements with grantee agency, subrecipients must comply with all requirements for the program. Subrecipients include a grantee's subcontractors, contractors, vendor, subrecipients and any subcontractors, contractors, vendors or subrecipients of a subcontractor, contractor, vendor, or subrecipient.

Support Network: Entities including, but not limited to, family, friends and faith-based or other social networks.

Target Population: Target Population means persons a grantee/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.

Transitional Living Programs: Transitional living programs are programs that facilitate a homeless youth or young adult's transition to permanent housing and is offered to participants for no more than 24 months. Transitional living programs are designed to provide interim support to successfully move a participant to, and help them maintain, permanent housing. Transitional living programs will require program participants to sign either a lease or an occupancy agreement. Transitional living programs are not the same as Transitional Shelter, which requires no lease/occupancy agreement.

