APPENDIX to Oregon's Proposed 2016-2020 Consolidated Plan Amendment

Appendix

ATTACHMENTS

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ATTACHMENT A
List of Outreach and Consultation Partners

Agency/Group/Organization Name	Agency/Group/Organization Type	Section of Plan Addressed by Consultation
Next Door Inc.	Services-Housing Services-Children	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Columbia Gorge Health Council	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Get Them Wings, Inc.	Services-Housing Services-Homeless Services-Education Services-Employment	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
City of Hood River	Other government-Local Civic Leaders	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
MCCAC	Services-Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Mid-Columbia Housing Authority	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
DHS District 9 - Self Sufficiency	Services-Children Services-Elderly Persons Services-Persons w/Disabilities Services-Health Child Welfare Agency	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis

Opportunity Connections	Services-Housing Services-Persons w/Disabilities Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Providence Hood River	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Lifeways Ontario	Services-Victims of Domestic Violence Services-Health Health Agency	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
TFP Therapeutic Services	Services-Health Publicly Funded Institution/System of Care	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Oregon Food Bank SE	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Love Inc.	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Community in Action	Housing Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
OHDC	Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Malheur County Housing Authority	Housing Services-Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Commonworks Consulting LLC	Services-Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Origins Faith Community	Neighborhood Organization	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Project Dove	Services-Victims of Domestic Violence	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Oregon Child Development Coalition	Services-Housing Services-Children Services-Health Services-Education Child Welfare Agency	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Saint Alphonsus	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Worksource Oregon	Services-Employment	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
ACCESS	Housing Services-Housing Services-Homeless Other government-State	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Community Works	Services-Housing Services-Children Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Housing Authority of Jackson County	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Senior and Disabled Services of RVCOG	Services-Housing Services-Persons w/Disabilities Services-Homeless Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Rogue Retreat	Housing Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
All Care CCO	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Helping Hands Seaside	Housing Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Community Alliance of Tenants	Services-Housing Services-Fair Housing Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook County	Other government-County Civic Leaders	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Champion Park	Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Chaplains	Services-Victims	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
DHS SSP	Services-Health Other government-State Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

TBCC	Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
CARE Tillamook	Community Development Financial Institution Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
NWSDS	Services-Elderly Persons Services-Persons w/Disabilities	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Regional Medical Group	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Head Start	Services-Children Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Family Counseling Center	Services-Children Services-Elderly Persons Services-Persons w/Disabilities Services-Victims of Domestic Violence Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Goodwill Industries	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Stewart House	Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Oregon Health Authority Salem	Services-Children Services-Elderly Persons Services-Persons w/Disabilities Services-Persons w/HIV/AIDS	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

	Services-Health	
Tillamook County Women's Resouce Cener	Services-Housing Services-Victims of Domestic Violence Services-Homeless Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Serenity Club	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
NW Regional ESD	Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Sheriday Square	Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Pioneer	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Nehalem Grade School	Services-Children Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Juvenile Department	Services-Children	Homeless Needs-Chronically homeless Housing Needs Assessment Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Oregon Food Bank	Services-Health Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

OSU Extension	Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Oregon Employment Department	Services-Employment Other government-State	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
City of Tillamook	Civic Leaders	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Garibaldi Grade School	Services-Children Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook Christian Center	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
DHS Child Welfare	Services-Children Services-Homeless Services-Housing Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
NOHA	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Veterans Services	Services-Elderly Persons Services-Persons w/Disabilities Other government-County	Housing Needs Assessment Homeless Needs-Families w/Children Homeless Needs-Chronically homeless Market Analysis Anti-Poverty Strategy
CASA of Oregon	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Spokes Unlimited	Services-Persons w/Disabilities	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Klamath City Public Health	Services-Health Other government-Local	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Klamath Falls Worksource Center	Services-Employment	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
DHS Coos Bay	Services-Housing Services-Children Services-Persons w/Disabilities Services-Homeless Services-Health Services-Employment	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Coos Bay School District	Services-Children Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
North Bend City and Coos Curry Housing Authorities	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Oregon Coast Community Action	Services-Housing Services-Homeless Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Bay Area First Step	Services-Housing Services-Homeless Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Oregon Health Authority Coos Bay	Services-Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

City of Coos Bay	Services-Housing Other government-Local Planning Organization	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
NeighborImpact	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
City of Redmond	Other government-Local	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Bend LaPine Schools	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Mosaic Medical	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Legal Aid Services of Oregon - Central Orego Regional Office	Other government-County Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Housing Works	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Family Resource Center	Services-Children Services-Housing Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
The Shepherd's House	Services-Housing Services-Victims of Domestic Violence Services-Homeless Services-Education Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Central Oregon Veterans Outreach	Services-Housing Services-Homeless Services-Health Services-Victims	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Boys and Girls Club of Central Oregon	Services-Children Services-Homeless Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Helping Hands Pendleton	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
First United Methodist Church	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Umatilla County Health Department	Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
DHS Pendleton	Services-Housing Services-Children Services-Homeless Services-Health	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
First Christian Church	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
CAPECO	Housing Services-Housing Services-Children Services-Elderly Persons Services-Persons w/Disabilities Services-Homeless Services-Health Services-Education Services-Employment	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Blue Mountain Action Council	Services-Housing Services-Health Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Pendleton Police Department	Other government-Local	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Lifeways Pendleton	Health Agency Services-Health Services-Victims	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Grace and Mercy Lutheran Church	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Pioneer Relief Nursery	Services-Children Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Eastern Oregon Alcoholism Foundation	Health Agency	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Yamhill County Helping Hands	Services-Housing Services-Homeless Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Compass Center	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Henderson House	Services-Housing Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Victims	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Yamhill Community Action Partnership	Services-Housing Services-Homeless Services-Health Services-Education Services-Employment	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Housing Authority of Yamhill County	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Cascades West Council of Governments	Services-Elderly Persons Services-Persons w/Disabilities	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
YC Gospel Rescue Mission	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
NeighborWorks Umpqua Coos Bay	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Kairos	Services-Housing Services-Elderly Persons Services-Victims of Domestic Violence Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
United Way of Southwestern Oregon	Services-Housing Services-Elderly Persons Services-Homeless Services-Health Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Coquille Indian Housing Authority	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
North Bend Housing Authority	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

ORCCA	Services-Housing Services-Homeless Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Klamath and Lake Community Action Services	Services-Housing Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Anti-Poverty Strategy Market Analysis
Southern Oregon Jobs with Justice	Services-Children Services-Health Services-Education Services-Employment	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
CASA for Children of Klamath Falls	Services-Children Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Rural Organizing Project	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
NeighborImpact Redmond	Services-Housing Services-Health Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
New Priorities Family Services	Services-Children Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
DPL - Redmond Library	Services-Education Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Embassy of Heaven	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Windermere Real Estate Redmond	Services-Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Sisters Habitat for Humanity	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
McMinnville Police Department	Other government-Local	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Yamhill County Veteran Services	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
McMinnville Library	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Yamhill County Gospel Rescure Mission	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Market Analysis Homeless Needs-Families w/Children Anti-Poverty Strategy
McMinnville Fire Department	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
McMinnville Parks and Rec	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
McMinnville School Distric	Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Oregon Food Bank Tillamook	Services-Health Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook County Sheriff	Other government-Local	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Tillamook County Pioneer Museum	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Southern Oregon Rehibilitation Center and Clinics	Services-Housing Services-Persons w/Disabilities Services-Homeless Services-Health Services-Victims	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
City of Medford	Services-Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Easter Seals Medford	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Southern Oregon Head Start	Services-Children Services-Health Services-Education	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Ashland Housing and Human Services Commission	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Veteran Affairs	Other government-State	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Consumer Credit Counseling Service of Southern Oregon	Other	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Health and Human Services - Jackson County	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Rogue Valley Association of Realtors	Services-Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Compass House	Services-Elderly Persons Services-Persons w/Disabilities	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
City of Ontario	Other government-Local Civic Leaders	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Aging and People with Disablities Wasco County	Services-Elderly Persons Services-Persons w/Disabilities	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
Columbia Cascade Housing Corporation	Housing	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy
CAPS Mid Columbia Community Action Council	Services-Housing Services-Homeless	Housing Needs Assessment Homeless Needs-Chronically homeless Homeless Needs-Families w/Children Market Analysis Anti-Poverty Strategy

Economic Development Forum

- Invitation
- List of invitees and attendees
- Summary of statewide forums

July – August 2014

Oregon Business Development Department

OREGON'S ECONOMIC FRAMEWORK FORUMS:
REGIONAL PRIORITIES, STATE OPPORTUNITIES

Oregon is recovering from the Great Recession but economic success is uneven and the state's diverse regions each face unique challenges.

To drive future job and income growth, we need a **demand-driven, bottom-up strategy** that builds on the priorities, assets and opportunities identified by individual regions throughout Oregon–and we must ensure that the state's tools, policies and programs are aligned with regional needs. We need your perspective to make this happen.

In July and August, Business Oregon and the Oregon Business Plan in partnership with the Regional Solutions Centers, Oregon Business Association, and Associated Oregon Industries will hold regional economic forums around the state with businesses, elected leaders and service providers.

These economic framework forums build on needs already identified by regions and will be an opportunity to:

- Identify specific ways to accelerate progress on economic priorities in different parts of Oregon
- Explore current programs and policies, asking: What's working? What's missing?
- Examine how to enhance our state-regional and public-private partnerships

The result of these sessions will have immediate use. They will help inform Business Oregon's economic development strategy and priorities, and help shape the policy discussion of the Oregon Business Plan.

You are invited to attend the forum of your choice. All forums will be held from 1-4 pm.

We look forward to your participation.

Region	Date
South Central Oregon: Klamath Falls	July 16
Southern Oregon: Medford	July 17
Greater Eastern Oregon: Ontario	July 24
Central Oregon: Redmond/Bend	July 29
Mid-Willamette Valley: Salem	July 31
North Coast: Astoria	Aug 5
Portland Metro (AM and PM sessions)	Aug 6
Northeast Oregon: Pendleton	Aug 13
North Central Oregon: The Dalles	Aug 14
So. Willamette Valley: Eugene	Aug 18
South-Central Coast: Coos Bay	Aug 19

Please RSVP here:

www.oregon4biz.com/Forums

at your earliest convenience to join the conversation. Your input is critical in helping to set the state's economic strategy. To the left is the schedule of locations and dates. Your registration confirmation will contain location details and other information.

LIST OF ATTENDEES - 2014 OBDD Economic Development Forum

Email Address	First	Last	Org	Location	BizO Invite	Attended
aausland@AuslandGroup.com	Aaron	Ausland	Ausland Group; SOREDI	Medford	x	x
adam@ashland.or.us	Adam	Hanks	City of Ashland	Medford	x	x
adupuislund@gmail.com	Anders		Cryptalk			x
aenzler@columbiabank.com	Anthoney	Enzler	Columbia Bank	Astoria	x	x
aflores@beavertonoregon.gov	Alma	Flores	City of Beaverton	PDX	x	x
agorayeb@ci.sisters.or.us	Andrew	Gorayeb	City of Sisters	Bend	x	x
ahill@bluecc.edu	Art	Hill	Blue Mountain Community College			x
Ainoura.Oussenbec@state.or.us	Ainoura	Oussenbec	Oregon Employment Department, Econ	Medford	x	x
akeiffer@rdiinc.org	Ami	Keiffer	RDI			x
AKooning@financialguide.com	Annamarie	Kooning	MassMutual of Oregon			x
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wayne_kinney@wyden.senate.gov	Wayne	Kinney	Sen. Ron Wyden	Kfalls	x	x
wes.hare@cityofalbany.net	Wes	Hare	City of Albany	Eugene	x	x
whn@nwtechventures.com	Bill	Newman	NW Technology Ventures	I&E	x	x
wilda37@comcast.net	Wilda	Parks	Clackamas County Economic Development Commission			x
William.A.Summers@oregon.gov	Will	Summers	Oregon Employment Department	Eugene	x	x
William.R.Ellis@ci.eugene.or.us	Bill	Ellis	City of Eugene	Misc1	x	x
Willie.fisher@pcc.edu	Willie	Fisher	PCC CLIMB Center			x
willie.riggs@oregonstate.edu	Willie	Riggs	Oregon State University	Kfalls	x	x
wklooster@pacificcrestfcu.com	Wonda	Klooster	Pacific Crest FCU	Kfalls	x	x
wkotila@gmail.com	Wendy	Kotila	OEN			x
word4wordbooks@gmail.com	Susan	Conn	City of St. Helens City	Astoria	x	x
wpostlewait@craft3.org	Walt	Postlewait	Craft3	Astoria	x	x
yrhodes@tfff.org	Yvette	Rhodes	The Ford Family Foundation			x
ZULUDAR@aol.com	Peggy	Lynch	League of Women Voters of Oregon			x

REGIONAL ECONOMIC DEVELOPMENT FORUMS

Statewide Executive Summary

Input from economic development organizations, local government, business groups, employers, and education leaders on ways to support and strengthen regional economies.

September 2014

A project of
Business Oregon, The Oregon Business Plan, and Regional Solutions Centers

Report prepared by
The Center for Public Service, Portland State University

REGIONAL ECONOMIC DEVELOPMENT FORUMS SUMMARY OF PARTICIPANT INPUT

Methodology

In July and August 2014, Business Oregon, the Oregon Business Plan and Regional Solutions hosted a set of twelve regional economic development forums across the state. Locations included:

- Klamath Falls, July 16
- Medford, July 17
- Ontario, July 24
- Bend, July 29
- Monmouth, July 31
- Astoria, August 5
- Portland Innovation & Entrepreneurship, August 6
- Portland Tri-County, August 6
- Pendleton, August 13
- The Dalles, August 14
- Eugene, August 18
- Coos bay, August 19

The forums were attended by people representing economic development organizations, local government, businesses and business groups, and education and workforce. The purpose of the forums was to listen to economic partners and businesses to understand the challenges and opportunities in each region in order to:

- Help shape Business Oregon's new economic strategy in support of regional opportunities and priorities,
- Inform the policy agenda of the Oregon Business Plan, and
- Strengthen the state and regional economic partnerships.

The format used to gather input included large group discussion on the region's desired five-year economic outcomes, and small group discussions on specific regional priorities. These small group topics included targeted industries such as natural resources or manufacturing, entrepreneurship and innovation, small business development, infrastructure, marketing, and talent and workforce development. In each group, participants identified challenges and opportunities and suggested programs and policies to address them.

This document reflects a synthesis of their participant input by the various economic topics discussed at the forums. It represents the perceptions and ideas of those that attended the forums, and may or may not be accurate in terms of how current programs or services operate. While individual forum write-ups contain a more comprehensive set of ideas, the issues listed in this summary document are those that were suggested in multiple forums.

Suggestions At A Glance

	Suggested Programs	Suggested Policies
Business Development	- Strengthen retention and expansion programs, focusing on growing markets/revenues - Expanded marketing and more visibility for Oregon industries - Greater access to capital to younger companies and emerging industries - Sustained support of natural resource collaboratives and value-added agriculture - Enhanced and forward-looking economic data and assessment	- Systematic approach to regulatory streamlining, including more regional flexibility in land use issues - Adjustments to business incentives to account for size of community and changing industry mix - Support of SBDCs - More field staff in rural areas
Innovation & Entrepreneurship	- Statewide innovation strategy with benchmarked metrics - Sustained funding for programs building entrepreneurial capacity - State support and coordination of capital resources - Competitive SBIR program - Base budget funding for signature Research Centers - Risk capital for industry innovation projects, especially natural resources	- Meaningful support & recognition from state leadership - Dedicated funding source for strategic innovation investments - Reauthorization of the University Venture Development Fund - Increase in the R&D tax credit to $2 MM - Capital gains reduction for the sale of & reinvestment into Oregon companies. - Policies that allow industries to more effective connect to and benefit from university facilities
Infrastructure	- Water policy and planning - Greater ability to package financing - Financing system development charges - Support capacity building in rural areas - Enhance economic impact information - Address workforce housing issues - Provide catalyst funding for regional priorities	- Local flexibility in regulatory application - Funding for SB 246 7 253 - Use of gain share in more programs - Dedicated infrastructure funding source - Funding and policies that keep on top of broadband capacity - Reevaluate the standing policy for land use
Talent	- Better integrate regional workforce and economic plans - Market Oregon's talent base - Fund industry sector-based workforce strategies - Help businesses to share talent retention practices - Coordinate youth work experience programs	- Full funding and strategic coordination of Career Technical Education (CTE) - Revising state workforce and education funding to reflect outcomes - Adequate work-based and on-the=job training programs - Revise BOLI policies that limit youth exposure/experience in certain industries - Explore a training wage for youth
Access to Capital	- Earlier access to capital - Systematic support of seed funding - Establish an innovation fund for natural resources	- Reduce capital gains for the sale of an Oregon company where gain is reinvested back into Oregon

	- Comprehensive information on capital resources	- Examine feasibility of an angel/investor tax credit for accredited investors - Implement policies related to alternative investment tools (e.g. crowdfunding)

Overall Themes

Participants strongly agreed with a "grow your own" economic framework; and with most aspects of the new OBDD economic framework, especially:

- A focus on supporting regions and their economic priorities,
- More focus on retention, growth and expansion efforts of existing businesses,
- Enhanced coordination of infrastructure support and financing, and
- Greater exposure and coordination of innovation & entrepreneurial resources.

In addition to providing specific programs and services, attendees want to see Business Oregon take a more active and visible role as an advocate for the economy; someone at the table defending the economic benefits of projects and the unintended consequences of policies and regulations.

Across regions, there was overwhelming support for Regional Solutions and the role they played in convening state partners and addressing targeted regional priorities. Participants also suggested a more proactive role for Regional Solutions, looking across regions at issues to address shared challenges in a more systematic fashion.

In listening to how areas described solutions, attendees were not just seeking additional resources from the state to fill key shortages, they were also seeking a more effective partnership where the state provided strategic guidance and data, and help with funding catalyst projects like the UAV infrastructure in the Pendleton region. As one participant noted, *"we need partners to help us get ahead of the curve, so we don't not spend all our resources on playing catch up."*

While many general themes were similar across all regions of the state (talent gaps, a lack of infrastructure, etc.), rural communities faced greater challenges in addressing them. Few staff resources to plan or monitor projects, large geographic distances, small populations that cannot keep up with infrastructure costs were a few examples. Rural communities, for the most part, were well organized and had a clear vision of what they wanted, and appeared to be working collaboratively on these shared goals. They asked OBDD, Regional Solutions and the Oregon Business Plan to understand and include the varying degrees of scale and issues to overcome isolation in state programs and policies.

Businesses and economic partners alike are seeking information about current state programs that is easier to access and navigate. This was mentioned for capital and mentoring resources, infrastructure programs, talent and workforce programs, and regulatory issues.

The following forum input summarizes more specific input under various aspects of OBDD economic framework

Business Development

Forum participants strongly supported the focus on business expansion and retention – the "grow our own strategy". Companies and economic partners made a distinction between scaling and expanding a business. They described scaling as growing revenues and expanding markets, with access to capital, trade assistance, and talent as key issues. Scaling issues were faced by newer companies on an initial growth path and by companies post-physical expansion. The other aspect was physical "expansion" generally more tied to facilities and land concerns along with related regulatory barriers. The forum participants suggested various means to address both types of growth.

There was also a reoccurring perception from forum participants, especially the private sector, that Oregon is not a business friendly state. Many noted that Oregon's marketing of business and industry is anemic which reinforces the perception that economic development is not a state priority. Participants noted a lack of visibility in how economic development was promoted by the Governor's office and state agencies.

Access to a predictable supply of resources, balanced management plans and practical regulatory policies were at the forefront of conversation among natural resource industries including forest and wood products, value-added agriculture, fishing and mining. Barriers created by policies centered around two themes: 1) the lack of local/regional flexibility acknowledging that there is no "one size fits all" solutions to resource policies, and 2) the perceived lack of comprehensive economic analysis or cost-benefit evaluation to articulate the unintended consequences that some policies had on the economy. Regional forum summaries provide specific examples of these issues and suggested remedies.

Another reoccurring theme throughout the state, and one highly emphasized in rural communities, is that Business Oregon should provide assistance beyond "just traded sectors" supporting the value chain associated with growing the traded sector industry that often included "asset-based" sectors like recreational services that support the outdoor gear firms. Value-added agriculture was also viewed by participants as a growing industry with impact across the state that warranted more attention.

Multiple groups suggested more flexible business incentives for regions including a Jobs Incentive Program where forgivable loans awards are made to companies with legitimate job creation. Some recognized these programs may exist, yet perceived them as difficult to access (not transparent where to find them).

Forum participants noted that Business Oregon and Regional Solutions Centers could be more proactive, working on policy and infrastructure issues that helped multiple businesses or industry clusters with similar needs. This was especially true around natural resource policies such as water and funding for forest collaborative efforts. It was suggested that a more systematic approach be taken in identifying common business development and regulatory issues and working with regional economic organizations to identify crosscutting issues that are on the horizon.

In summary, what participants wanted out of business programs was a) an evaluation of what's working, b) streamlining of the programs that matter most, and c) more transparency in how to find and use them.

Business Development Suggestions

Suggested Programs	Suggested Policies
Strengthen BRE and include growth programs: Enhance resources for scaling and growing revenues and jobs; more field staff in rural areas and a focus on asset-based markets as well as traded sectors. **Expanded marketing**: More robust marketing that calls out regional industry assets. Greater coordination between regional and statewide marketing of industry sectors. **Earlier access to capital**: Modifications to capital financing programs to help businesses in earlier stages or with less collateral. **Enhanced data:** More comprehensive and robust data about regional economies and industries that help identify growth opportunities. **Support natural resource collaboratives**: Continue to support and advocate funding for forest collaboratives and other natural resource partnerships. **Enhanced broadband capacity** to support increased use of technologies across all industries, and to support the trend of decentralized/small branch locations and workers that telecommute. **Jobs incentive program:** more visibility and use of tools such as forgivable loans for companies that create jobs with a claw back provision for not meeting goals.	More **systematic approach to identifying and addressing regulatory barriers**, including the examination of how to incorporate more regional flexibility and local control. **Enhanced economic assessments** (cost/benefit analysis) **of regulations** on par with the depth of environmental assessment. **Adjustments of business incentives** to account for relative scale of the community in which a business is located, exploring the need for more than just a single distinction between rural and urban criteria. **Enhanced support for SBDCs** and staff capacity in rural regions. Funding for more **OBDD field staff in remote areas**, especially those that cover large geographic territories.

Innovation & Entrepreneurship

Issues related to innovation and entrepreneurship (I & E) were discussed as both a specific effort and within the context of a broader economic development strategy.

Overall, there was a sense by forum participants that state agencies and partners view innovation and entrepreneurship as a set of programs, rather than a culture and strategy for business development. In Medford, Bend, Eugene, and Salem there was a strong sense that OBDD and the Governor's office did not recognize the strategic importance of innovation and entrepreneurship as a vital part of an economic strategy. There was a sense in these forums that without recognition from state leadership, entrepreneurship would continue to be implemented as a side tactic rather than a strategic imperative.

Groups noted that entrepreneurs and startups come in all shapes and sizes, and that a thriving entrepreneurial culture is one that promotes calculated risks, and encourages new ideas and connections. In fact, most conversations talked about I & E as industry agnostic and not just about tech transfer or high tech industries.

Groups noted that innovation and entrepreneurship are best viewed as investments, not costs to the state. Much like other types of infrastructure, they can have longer and different payback than economic programs focused on existing and mature industries. Therefore, participants pushed for understanding the timeframe and metrics associated with I & E. As with business development conversations, there was frequent mention of measuring economic impact as more than just jobs. Several forum groups asked why the state had stopped producing the innovation index that tracked earlier indicators of economic growth.

Participants felt strongly that there should be more support for capacity building, especially around programs to help mentor new companies and attract the talent needed to scale companies to their potential. There was also a distinction between high impact companies (supported by groups like OEN and angel networks) and lifestyle or local services companies (supported primarily by SBDCs). Each group recognized the importance of the other group and had the desire to see the state support and fund entrepreneurship as a system.

Innovation & Entrepreneurship

Suggested Programs	Suggested Policies
Develop a **statewide, forward-looking innovation strategy** that identifies assets and potential opportunities, connects the various technical assistance and capital resources, and is guided by **a set of metrics that benchmark Oregon's progress** with other states. More **sustained and comprehensive funding of entrepreneurial mentoring and network programs**, especially those focused on businesses in growth stages; use promising practices of other states. **State support of start-up capital:** Provide state support to funds with solid track records (building on examples like the Oregon Angel Fund and Portland Seed Fund). **Coordination of capital** (proof of concept, seed, angel funding, and VC programs) between Oregon Innovation Council, Oregon Growth Board, and OBDD financing programs. More ability to support **industry innovation especially in natural resources** (e.g. risk-capital). **More attention to the talent issue**: going beyond STEM to include a strategy to attract, retain and grow entrepreneurial talent, and that includes how job incentives are structured. **SBIR Phase 0 and Phase I/II matching funds** that cover direct expenses not included in federal funds. **Debt financing** that can be used by businesses with some track record, yet with limited collateral. Other state models were mentioned as successful ways to approach this. Base budget funding of **Signature Research Centers**,	Meaningful support form Governor's office, OBDD, OBP that innovation and entrepreneurship (not just startups) is **a priority of the state's economic strategy.** **Dedicated funding source** (as in other states) for I&E efforts that are producing desired outcomes. **Reauthorization of the University Venture Development Fund** (with some modifications). **Capital gains cut/deferment** for companies that sell and reinvest in Oregon. **R&D tax credit** reauthorized to $2 million with an expansion of what is covered within the credit to include investment in employee training and additional lab and equipment. **Modify state policies that limit private sector use of university facilities and labs**.

Infrastructure

The conversations around infrastructure were robust and plentiful. With an understanding that infrastructure funding is a national issue, the majority of conversations centered on how to package and coordinate efforts to stretch dollars and reduce timelines. These conversations identified several themes that included:

- Local flexibility in regulatory application,
- More mechanisms to package funding sources, and revenue stream that provide a more sustained source of infrastructure funding, and
- Enhanced coordination in planning, implementation and monitoring of projects within a region and from region to region.

In rural areas, and especially in very small communities, the ability to maintain or expand basic infrastructure (water and sewer) was a significant challenge. There was much discussion about the lack of resources in small communities to complete facility plans. Groups suggested exploring more creative ways of managing the infrastructure in communities severely constrained by lack of staff and expertise, including collaborative or multi-district approaches for planning, monitoring, and maintenance.

Water policy was a repeated issue, with a strong desire by participants for clear policies on the allocation, storage and use of water for agriculture, industrial and commercial applications. More incentives for water conversations were suggested along with investment in efficient irrigation systems.

Broadband was viewed as key to traded sector businesses, technology applications in natural resources industries, hospitality sectors, education and health care. There was strong support for funding and policies that promoted greater access to and redundancy of broadband.

Multi-modal transportation was another theme; connecting rail, roads and ports in a more cohesive fashion. There was strong and consistent support for increased funding for Connect Oregon and for finding a dedicated funding stream to support deferred maintenance and expansion projects identified as regional priorities. Port capacity was not only an issue along the coast and Columbia River, but to all parts of the state where industries depended on moving product in and out of the state. In more than half of the regional forums, the costs and ease of access to Columbia River ports was viewed as a barrier to the state's growth (with many companies noting they now go to Seattle because of the unresolved labor issues at the Port of Portland container terminal).

Industrial lands and land availability for business development focused on statewide and federal land use and environmental regulations that did not easily apply to regional situations. Forums discussed the perceived disconnect between programs to assemble industrial lands and infrastructure that served the sites. In every forum, the need for regional land use flexibility arose, and for help in identifying and articulating the costs and unnecessary time associated with a one size fits all solution.

The issue of housing for workforce was an issue raised in many rural forums. The issues included a lack of affordable housing for entry-wage workers, the lack of executive housing, and the apparent lack of flexibility in land-use planning that would help to address the supply of land for housing.

Infrastructure Programs

Suggested Programs	Suggested Policies
Address water: Engage in state and regional efforts to develop water plans for agriculture, industrial and commercial uses. Advocate for flexibility in water policies that adjust for regional supply, storage and allocation needs. **Greater ability to package financing**: Enhance ways of packaging financing for projects and coordinating state and federal resources. **Financing of upfront costs,** especially system development charges. **More support for capacity building in rural areas:** Greater access to and/or funding for shared or contracted staff to develop and monitor land use and infrastructure plans in rural areas; proactive assistance by IFA in rolling up and prioritizing regional infrastructure needs. **Enhance information on economic impact:** Work with OBDD and Regional Solutions to provide more comprehensive information on a project's economic impact; be the economic voice at the table. **Workforce housing:** A strategy to identify and address housing shortages. **Catalyst funding:** The ability to provide targeted funding for regional projects that have significant economic opportunity such as the runway expansion in Klamath Falls or UAV infrastructure in Pendleton region.	**Local flexibility in regulatory application**: A theme in land use, wetlands, water, and other related infrastructure issues. Advocate for funding of **SB 246 & 253.** Support greater funding for **Connect Oregon.** **Examine ways to incorporate the use of gain share** in enterprise zone and similar programs. Explore **dedicated funding sources** for infrastructure projects. Reevaluate the **standing policy** in the legal challenge of land use. Enhanced funding and policies that strengthen **broadband capacity** and redundancy in rural areas.

Talent

The conversation around talent included the attraction and retention of key management and technical talent, the importance of career technical education, the ability to better connect education to careers and regional industries, and the need to support youth work experience programs. While there is a distinction between talent and workforce development, the overwhelming need for workers pushed most conversations toward workforce and education issues.

Not surprising, employers in every forum noted a lack of qualified workers that had soft skills, basic technical skills, and a strong work ethic. Most often soft skills included communication skills, customer service attitude, appropriate dress, and being on time. This gap was most pronounced in companies that had a significant number of entry-level wage jobs.

Throughout the state there was overwhelming support for greater investment in and a more strategy approach to career technical education (CTE). It was viewed in every region as an essential way to implement applied learning and problem solving required for almost any job and especially critical to the education and training for industries such as manufacturing, energy, natural resources, health care and technology. Accompanying the conversation about CTE was an exposure to local careers and industries much earlier in the education cycle (principally in middle school).

Universally there was support for increasing internships and apprenticeships. This was almost immediately followed by a conversation on re-evaluating Bureau of Labor and Industries (BOLI) restrictions that limited youth exposure to jobs in trades, manufacturing, value-added agriculture and related career opportunities.

There was acknowledgement in every forum that industry is pulled in too many directions with each educational institution and workforce board having their own advisory committees. Therefore, groups strongly supported a more coordinated way in which to engage businesses and gather industry related data and information. This included the establishment of Strategic Talent Industry Council and more coordinated sector strategies that connected education and training programs to industries.

Many forums also suggested education and training programs be funded based on outcomes: graduations instead of enrollment, placements instead of completion rates, etc. Private sector participants noted a greater willingness to participate in and help fund programs that were measured on outcomes.

In the innovation and entrepreneurship forum, participants discussed the attraction and retention of management talent in more detail. Attendees wanted to see OBDD and others market Oregon's talent base in different industries and research areas.

Talent

Suggested Programs	Suggested Policies
Enhance the integration of regional workforce and economic development plans including greater coordination of business input (coordinated visits to business, co-hosted input forums etc.) Better use of **Oregon unique talent as an economic attractor**. Work with industry associations and OED, ETIC, SRC and others to identify talent assets and include them in marketing efforts. Support the LWIB and OED **staffing and funding of regional sector strategies** that connect education and training to the needs/demand of regional industries. Utilize regional economic development organizations or business groups to **encourage businesses to share talent retention practices**; aggregate success stories across the state and share among regions. **Coordinate youth work experience programs** within a region, encouraging local workforce boards to work with regional business groups to support internships and other related efforts.	**Greater funding for Career Technical Education and related distance learning infrastructure** Actively review and support revisions to education and training **funding to reflect outcome-oriented results**. **Revise BOLI policies** that limit youth under 18 from gaining exposure and work experience in environments that operate machinery. Ensure **adequate funding for on-the-job training with policies that are more flexible** to meet the needs of various industries. Evaluate the feasibility of a **training wage** for youth 16-18 to encourage employers to hire more youth for seasonal and temporary positions.

Access to Capital

While access to capital was not discussed as a stand-alone issue, there were discussions on capital in multiple groups and forums. Capital issues fell into three buckets: growth and operating capital, seed and start-up capital, and product development/innovation capital (not tied to university R&D or signature research centers).

Overall, people lacked an understanding of what capital resources were available and how they were linked to business assistance throughout the state. They felt that federal and state resources were not well coordinated and there was very little information on new or alternative funding options such as crowd-funding and convertible debt.

Smaller and younger manufacturers and other traded sector industries had moderate difficulty in obtaining operating capital and growth capital. Some were not aware of OBDD capital programs and others had a perception that OBDD programs would not fund businesses without a lengthy track record.

Groups that addressed entrepreneurial development and local services noted a significant gap in startup and early stage growth funds for all types of industries. Revolving loan funds in all but a few regions were viewed as very risk adverse, and others noted the lack of micro-financing funds to accompanying advisory services, which limited the ability for small businesses to put into action advice by business organizations like SBDCs.

In about half of the region forums, groups noted a lack of innovation or prototyping funds to help industries develop and test new products and materials. This was especially true in natural resource industries were new value-added products could be accelerated with small amounts of innovation funding.

On a policy front, there was strong support for some type of beneficial tax treatment (typically a capital gain reduction) for the sale of an Oregon business that is reinvested into another Oregon venture. There was also interest and apparent support for alternative funding source (e.g. crowd funding) and policies that would allow limited investment into companies by non-accredited investors, and for helping regions understand how to implement and manage these new tools.

Assess to Capital

Suggested Programs	Suggested Policies
Earlier access to capital: State-supported grant and loan programs that are more geared toward companies with two to five years of history and/or in low collateral type industries. **Systemic support of seed funding**: evaluation and support of regional seed funds that could be some combination of debt and/or equity depending on regional needs. **Establish an innovation fund for natural resources**: that can help develop stronger value-added markets in natural resources; can be used by industry and university/industry partnerships. Could be established as a grant, forgivable loan or a combination. **Comprehensive information** on capital resources and information and work sessions on newer and alternative forms of capital formation.	**Capital gains** cut/deferment for companies that sell and reinvest in Oregon Examine the feasibility of an **angel investment tax credit** similar to those in other states (WI and MN mentioned as models) to encourage local investment in early stage companies. Ensure Oregon has the appropriate policies to implement **alternative capital mechanisms such as crowd-funding.**

International Trade

Very little direct discussion occurred in regards to international trade. Most of the conversation related to:

- More robust marketing efforts of regional industries to target international markets, including more marketing of natural resource industries.
- Better data to help regions and industries understand where international opportunities are likely to occur.
- Addressing freight mobility issues, especially with ports, to enhance their capacity to move product into and out of the state. Issues surrounding the capacity of the Port of Portland were of serious concern with industries throughout the Gorge, Eastern Oregon, and the Willamette Valley.

Partner Roundtables

- Invitation
- List of attendees
- Summary of roundtables

March – April 2015

Oregon Business Development Department

SCHAADT Fumi * BIZ

From: CDBGNews <cdbgnews-bounces@listsmart.osl.state.or.us> on behalf of PUTINTSEV Alina D * BIZ <Alina.D.Putintsev@oregon.gov>
Sent: Thursday, March 5, 2015 10:23 AM
To: CDBGNews@listsmart.osl.state.or.us
Subject: [CDBGNews] Partner Roundtable Invitation
Attachments: ATT00001.txt

business oregon
IFA Infrastructure Finance Authority

Please Join the Oregon Business Development Department – Infrastructure Finance Authority (OBDD-IFA) for a Series of Partner Roundtable Meetings to Discuss Key Oregon Community Development Needs

Community Development Block Grant
FY 2016 – 2020 Consolidated Plan

Every five years, Oregon produces a Consolidated Plan for HUD that details the State's needs and priorities, as well as strategies to meet those needs and priorities. Before writing this plan, we want to hear from our stakeholders and the public.

As the administrator of Community Development Block Grant Program (CDBG), OBDD-IFA is inviting you to tell us what community development needs that your city/county have by participating in a series of regional meetings (as scheduled below). Please take a few moments to share your opinions on the future of the CDBG program and how it may impact your community. Your responses are critically important to how our agency will prioritize the state investments over the next five years.

You can also comment by simply responding by e-mail to:
loren.j.shultz@oregon.gov

Partner Roundtables (public welcome) Schedule		
March 12th 11:30 to 1:00	Drain City Hall	129 West "C" Avenue, Drain
March 19th 11:30 to 1:00	Huntington VFW Hall	227 Main, Huntington
April 2nd 11:30 to 1:00	Clatskanie City Hall	95 S. Nahalem, Clatskanie
April 8th 11:30 to 1:00	Donald City Hall	10710 Main, Donald
April 9th 11:30 to 1:00	La Pine City Hall	52674 Oregon Hwy 31, La Pine

April 16th 11:30 to 1:00	Mosier Creek Terrace	501 E. 2nd, Mosier

Simultaneously Oregon Housing and Community Services (OHCS) along with Oregon Health Authority (OHA) are conducting outreach efforts for programs administered under both agencies. For more information about this please contact:

- Housing Opportunities for Persons with Aids (HOPWA) :
  - Annick Benson-Scott, HIV Community Services Manager, OHA, 800 NE Multnomah, Portland, Oregon 97232 or by e-mail at annick.benson@state.or.us.
- Home Investment Partnership (HOME) and Emergency Shelter Grant Program (ESG) :
  - Shoshanah Oppenheim, Federal Planning and Policy Manager, OHCS, 725 Summer Street NE, Suite B, Salem, Oregon 97301 or by e-mail at shoshanah.oppenheim@oregon.gov

Alina Putintsev
Operations Coordinator
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Please take a few moments to complete the survey at the link below (no later than March 31, 2015) and share your opinions on the future of the CDBG program and how it may impact your community. Your responses are critically important to how our agency will prioritize the state investments over the next five years.

Link:

This survey will take approximately 10 minutes. We appreciate your time and assistance in helping us plan for the next five years.

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April 16th 11:30 to 1:00	Mosier Creek Terrace	501 E. 2nd, Mosier

OREGONIAN MEDIA GROUP

Order Confirmation for Order # 0003684055

Customer Information

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Placed By: Alina Putintsev

Total Amount	690.40
Amount Paid	0.00
Amount Due	690.40

Payment Method - Invoice

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Materials
Blind Box -
Order Invoice Text - Comm Dev Block Grant FY 2016-2020

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0003684055-01
Oregonian:Full Run

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Placement - C-NoticeAds - Classified

Color -
Position - C008 - PublicNotice

PO - Comm Dev Block Grant FY 2016-2020

Run Dates - 03/11/2015

Order Confirmation for Order # 0003684055

0003684055-02 AdSize - 1x90 li Color - PO - Comm Dev Block Grant FY 2016-2020

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Run Dates - 03/11/2015

WYSIWYG Content

Please Join the Oregon Business Development Department - Infrastructure Finance Authority (OBDD-IFA) for a Series of Partner Roundtable Meetings to Discuss Key Oregon Community Development Needs

Community Development Block Grant
FY 2016 - 2020 Consolidated Plan

Every five years, Oregon produces a Consolidated Plan for HUD that details the State's needs and priorities, as well as strategies to meet those needs and priorities. Before writing this plan, we want to hear from our stakeholders and the public.

As the administrator of Community Development Block Grant Program (CDBG), OBDD-IFA is inviting you to tell us what community development needs that your city/county have by participating in a series of regional meetings (as scheduled below). Please take a few moments to share your opinions on the future of the CDBG program and how it may impact your community. Your responses are critically important to how our agency will prioritize the state investments over the next five years.

You can also comment by simply responding by e-mail to:
loren.j.shultz@oregon.gov

Partner Roundtables (public welcome) Schedule

March 12th 11:30 to 1:00 Drain Civic Center 205 West "A" Avenue, Drain
March 19th 11:30 to 1:00 Huntington VFW Hall 205 1st Street E, Huntington
April 2nd 11:30 to 1:00 Clatskanie City Hall 95 S. Nahalem St., Clatskanie
April 8th 11:30 to 1:00 Donald City Hall 10710 Main Street, Donald
April 9th 11:30 to 1:00 La Pine City Hall 16345 Sixth Street, La Pine
April 16th 11:30 to 1:00 Mosier Creek Terrace 501 E. 2nd, Mosier

Simultaneously Oregon Housing and Community Services (OHCS) along with Oregon Health Authority (OHA) are conducting outreach efforts for programs administered under both agencies. For more information about this please contact:
oHousing Opportunities for Persons with Aids (HOPWA) :
"Annick Benson-Scott, HIV Community Services Manager, OHA, 800 NE Multnomah, Portland, Oregon 97232 or by e-mail at annick.benson@state.or.us.
oHome Investment Partnership (HOME) and Emergency Shelter Grant Program (ESG) :
" Shoshanah Oppenheim, Federal Planning and Policy Manager, OHCS, 725 Summer Street NE, Suite B, Salem, Oregon 97301 or by e-mail at shoshanah.oppenheim@oregon.gov

Order Confirmation for Order # 0003684055

Date of Outreach	Location	Atttendees	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
March 12, 2015	City of Drain	Barbara Roberts	Lakeside Senior Center	Service - Elderly Persons	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs; Econmic Development Needs
		Carl Patenode	City of Drain	Other Government - Local City	
		Sean Negherbon	City of Myrtle Creek	Other Government - Local City	
		Vicky Luther	City of Sutherlin	Other Government - Local City	
		Eileen Ophus	CCD Business Development	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Tracy Loomis	CCD Business Development	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
March 19, 2015	City of Huntington				
		Shellie Nash	City of Huntington	Other Government - Local City	
		Tracy McCue	City of Huntington		
		Lynn Findley	City of Vale	Other Government - Local City	
		Judy Moore	The Greater Eastern Oregon Development Corporation	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
April 2, 2015	City of Clatskanie	Susan Conn	City of St. Helens	Other Government - Local City	
		John Walsh	City of St. Helens		
		Josette Mitchell	City of Vernonia	Other Government - Local City	
		Beverly Danner	Community Action Team Inc.	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Susan Wagner	Community Action Team Inc.		
April 8, 2015	City of Donald	Larry Layton	City of Amity	Other Government - Local City	
		Renata Wakeley	Mid-Valley Council of Government	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Darcy Reynolds	Yamhil County Affordable Housing Corporation	Services - Housing; regional organization	
		Kimberly Lyell	Polk Community Development Corporation	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Diana Cvitanovich			
		Heidi Bell	City of Donald	Other Government - Local City	
		Angela Lazarean	Department of Land Conservation and Development	Other Government - State	
April 9, 2015	City of La Pine	Ken Mulenex	City of La Pine	Other Government - Local City	
		Scott Perkins			
		Tony DeBone	Deschutes County	Other Government - County	
		Janet Burton	Economic Development of Central Oregon	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Vic Russel	Vic Russel Construction	Private business	
April 16, 2015	City of Mosier				
		Bil Elfering	Umatilla County	Other Government - County	
		Nicholas Ducote	JUB engineers	Private Business	
		Jaclyn McCurdy	City of Rufus	Other Government - Local City	

2016 – 2020 Consolidated Plan

Partner Roundtables Notes and Responses to Comments

In early 2015 Business Oregon/Infrastructure Finance Authority (IFA) undertook outreach across Oregon as part of the needs assessment process required by 24 CFR 91.110. Partner roundtables were held in six locations throughout Oregon. IFA contacted every city and county in the non-entitlement areas of the state. Following, by location, are summary notes of each meeting. IFA responses to partner input are located at the end of this document. Please note that explanations and discussions of current practice as described in the Method of Distribution, as a general rule, are not included in the responses.

CLATSKANIE CDBG PARTNER ROUNDTABLE April 2 2015

Present:	St Helens:	Susan Conn, councilor
		John Walsh, city manager
	Vernonia:	Josette Mitchell, mayor
	CAT:	Beverly Danner
		Susan Wagner
	IFA	Becky Baxter
		Loren Shultz

Shultz began the roundtable at 11:32 with general comments and then opened the floor for comments. Following is a summary of comments, by attendee.

John Walsh

- There is a decided lack of community facilities, ie public meeting rooms, park shelters, picnic facilities etc in St. Helens
- There should be more emphasis on public facilities
- CDBG used to be all about social type services, social welfare programs. How did the priority get to be infrastructure? Especially since there is lots of funding available from other sources.
- How is funding distributed?
- Is CDBG included in one-stop funding discussions?
- How valuable is leverage in the rating and ranking process?
- Can CDBG dollars be de-federalized?
- A good use for CDBG would be support of community health programs ie walking paths, exercise facilities, anti-smoking campaigns etc
- What will be done if there are not enough projects to use the public works funding?
- Does housing ever weigh in during the process?
- Would an application for community space score well?

Josette Mitchell

- Why are water and sewer projects a priority when there are other dollars to meet that need?
- Should be more money for housing and public facilities
- Last year Vernonia was told not to apply to CDBG for a senior center. Now the old senior center has been torn down to comply with FEMA requirements.
- Can't the allocation be more flexible between categories such as public works and public facilities?

Susan Wagner and Beverly Danner

- There is a northwest Oregon organization for Tillamook, Clatsop, and Columbia counties that could take advantage of more rehab dollars. The group acts cooperatively in pursuit and use of funds.
- Last year there were four applications for housing rehab and only one got funded. That leaves a tremendous need gap
- Has increasing the limit for public facilities to $2 million had a detrimental effect to funding other projects?
- HOME funding is currently limited to multi-family projects. A set-aside for single family projects and/or geographic projects (such as manufactured dwelling unit parks) should be examined.
- Why can't there be a fixed (not flexible) set aside of housing rehab funds?
- Great encouragement to "shake the HUD tree" in pursuit of additional dollars

There was additional discussion regarding

- Oregon's Method of Distribution
- how applications were rated and ranked
- how Entitlement operations differed from State programs
- current and historic funding levels, including targeting.

DONALD April 8, 2015

CDBG PARTNER INPUT ROUNDTABLES

Present:	Larry Layton	Amity
	Renata Wakeley	MWVCOG
	Darcy Reynolds	YCAHC
	Kimberly Lyell	Polk CDC
	Diana Cvitanovich	Polk CDC
	Heidi Bell	Donald
	Angela Lazarean	DLCD

IFA Staff: Becky Baxter, Michelle Bilberry, Loren Shultz

llayton@ci.amity.or.us; renatac@mwvcog.org; Darcy@hcyc.org; klydell@polkcdc.org; dcvitanovich@polkcdc.org; manager@donaldoregon.gov; angela.lazarean@state.or.us

Following is a summary of questions and suggestions regarding Oregon's Community Development Block Grant. All questions and comments will be summarized and addressed as part of the 2016-2020 Consolidated Plan.

Shultz opened the meeting with a background of the Consolidated Plan process and the role of Business Oregon/IFA.

[POST MEETING NOTE: There was considerable discussion regarding use of CDBG Technical Assistance funds which were mistakenly identified as $2,000,000 annually. The correct amount is 1% of the allocation, or $115,000. Funds have been provided to Fair Housing Council of Oregon to conduct fair housing training throughout the state, a firm to assist OBDD-IFA, OHCS and OHA in conducting the analysis of impediment to fair housing as part of our preparation of the Annual Action Plan, funding, in partnership with Idaho Department of Commerce, to the Northwest Community Development Institute providing community and economic development practitioners and volunteers with formal training with the ultimate goal to become a Professional Community and Economic Developer (PCED) . As mentioned at the meeting, this year 1% funds are being used for the Analysis of Impediments. Following is the breakdown for 2015 that has been submitted to HUD.

Allocation	$11.5m
State Admin 2%	
(this is the required match we have to come up with)	$230,000
State Admin $100,000 – no match funds	$100,000
Technical assistance fund 1%	$115,000

Allocation Available for Projects $11,055,000

Renata Wakeley

- Asked about the method used to publicize the meetings
- Asked for a summary of technical assistance funds are spent (see above)
- Led a discussion on how the housing rehab collaborative worked in her area.
- Asked if perhaps limits for public works projects were too high.
- Asked why Oregon's variety of eligible activities seems to get smaller as time passes. Some of the cities in which she works have asked "Why should the State decide how we want to spend the money?"
- Suggested IFA and DLCD should explore ways to work together.
- Supported the new rules that allowed housing rehab grants.

Diana Cvitanovich

- Asked about the history of CDBG allocations and how it may affect projects
- Asked if lower maximums might help the money go further.
- Supported the new rules that allowed housing rehab grants
- Asked if CDBG funds could be more leveraged.
- Asked why Oregon's CDBG expenditure rate was so low, 46th in nation.
- Said that IFA's checklists were very good, but perhaps a grant expenditure timeline could be included

Angela Lazarean

- Asked about the funding cycle for CDBG, annual? Biennial?
- Discussed RST processes and funding

Heidi Bell

- Discussed the potential for funding something like a senior center in Donald, and with the lack of funds and competition for them, whether an application was worth the effort.
- Asked about use of CDBG funding for sidewalks for low income households.

Larry Layton

- Suggested $3 million maximum might be lowered
- Asked if breaking a construction project into design, and then construction, might help address the issue of spend down rate of CDBG funds.

Darcy Reynolds

- Supported the use of CDBG housing rehab funds for use in manufactured housing. She said there are 118 households on their waiting list now.
- Discussed ?????
- Supported the use of CDBG housing rehab funds for use in the traditional revolving loan fund program, stated that these funds continue to allow communities to come up with innovative solutions to their communities housing and development needs.

Kimberly Lyell

- Supported the eligibility of manufactured housing for rehab.

Drain March 12 2015

Present:	Barbara Roberts	lakesideseniorcenter@gmail.com
	Carl Patenode	city.admin@cityofdrain.org
	Sean Negherbon	snegherbon@ci.myrtle-creek.or.us
	Eileen Ophus	e.ophus@ccdbusiness.com
	Vicki Luther	v.luther@ci.sutherlin.or.us
	Tracy Loomis	t.loomis@ccdbusiness.com
	Staff Becky Bryant, Fumi Schaadt, Loren Shultz	

- Major topic of discussion:
  - 2014 LMISD and how that is putting a lot of rural communities in Oregon in a difficult position to have to do an Income survey.
    - Input specifically came from the city of Drain who is currently undergoing the income survey process which is costly, time consuming and too complex.
    - CCD indicated that the same sentiment was heard from a lot more communities
    - City of Myrtle Creek identified that their poverty level is not well represented in the LMISD especially when it is compared to the county wide data
  - Capacity issue:
    - City of Drain expressed that CDBG program is very complex and small communities with little capacity have a tough time pursuing CDBG or managing a CDBG funded project successfully without being assisted with an experienced grant administrator.
    - CCD followed up the comment with a question about training or other technical assistance
    - OBDD-IFA responded its intent to work more on the training and technical assistance closely with the Regional Coordinators, statewide and at various points of projects as requested.
  - Environmental Assessment:
    - CCD brought this topic into the discussion as they noticed that the EA process is getting more complex than before, as shown in the thickness of the document
    - OBDD-IFA concurred that the process is indeed a lot more involved and also noted, unfortunately CCD has been working with 2 of the most complex EA in the area, Canyonville and Glendale. OBDD-IFA assured those in attendance it is committed to assist the recipient with more tools and technical assistance so that at the end they are able to complete the EA successfully.

- Roundtable:
  - Lakeside:
    - the city is pursuing CDBG funding to build a senior center that meets ADA compliance requirements and is able to serve their active members (125 members), with the additional component of a possible food bank.
    - In the long term they are interested to have a facility that will be used as a community emergency shelter equipped with the food storage facility.
  - Myrtle Creek:
    - The city has recently completed the Water Treatment System improvements along with the sewer system. For now there is no major need for the city other than for the downtown improvements (renovation of a couple buildings downtown)
    - CCD and other attendees recommended the city contact main street program and CCD as possible resources to fund the building renovations or downtown improvement work
  - Sutherlin:
    - The city just recently completed the water treatment system improvements project and is currently working on the sewer treatment system improvements
    - Their current need is to address street improvements and downtown revitalization.
  - Drain:
    - The city is concentrating their focus for the sewer system improvement project. Currently the design is being worked on and funded by CDBG
    - The city is in the midst of doing income survey. They are working directly with PSU.
    - The city is hoping to get the income survey completed by July so that they can move forward with the "One Stop" process to secure the remaining funding needed to complete the construction portion of the project.
    - They are seeking all the assistance that they can get to fund the project

Huntington Oregon, Catfish Capitol of the World March 19, 2015

Summary of CDBG Roundtable meeting

Present: Shellie Nash and Tracy McCue, Huntington
Lynn Findley, Vale
Judy Moore, GEODC
Lisa Dawson, Northeast Oregon EDD
Chad Carter and Andrew Gehrke, Holladay Engineering
Loren Shultz, IFA

Shultz opened the meeting with comments about the process and purpose of the meeting - the five year Consolidated Plan. Shultz stated that although the ConPlan covers four HUD programs, HOME, ESG, HOPWA, and CDBG, and comments could be made on any, the focus was on CDBG.

Lynn Findley explained that Vale was in need of water treatment improvements and had planned on applying for CDBG. Vale had been classified as having in excess of 51% low and moderate income citizens, a HUD threshold requirement. Last summer however, HUD reclassified Vale and the community was no longer eligible. Vale was in the process of conducting a special income survey.

There was extensive discussion regarding HUD's LMI methodology and the consensus of the group was the process was not reliable and was unfair. Although IFA funded half of the $10,000 survey cost, the cost was prohibitive for a small community, and also presented serious timing difficulties for having the results for the next round of CDBG applications.

Nash discussed the project currently underway in Huntington, and the difficulty in administering the grant, even with professional assistance from GEODC.

The group discussed the application process, timing in terms of fiscal vs. program years. Shultz discussed his view of the difference between eligible projects and fundable projects. He explained that part of the round table process was to help gather input from cities and counties to set priorities for CDBG funding, as required by HUD. Shultz said that Oregon had placed non-compliant water and sewer systems as a higher priority than community facilities such as senior centers, food banks, fire houses, etc., and awards depended on the mix of applications and amount of target funding.

Moore suggested Oregon consider have firm set-asides for different categories of funding to assure that public facilities, for example, have an amount certain that will be awarded, separate from water and sewer projects.

There was discussion among the group regarding whether or not eventually, all the water and sewer systems would be in compliance and CDBG could be used for other eligible projects.

Moore asked about needed repair for a swimming pool which was associated with a youth center. Shultz handed out copies of the 2015 Method of Distribution and the group discussed HUD requirements for public facilities meeting the LMI requirement.

Moore indicated she had a list of projects of which GEODC was aware, and would e-mail it to Shultz so it could be part of the record of the meeting.

Moore asked if IFA would be publishing a new grant management handbook in association with the new ConPlan. Shultz got distracted and never replied to the question.

Dawson reinforced the need to continue funding the micro-enterprise program. She also suggested that IFA consider using CDBG for public building energy retrofits and ADA compliance matters.

Shultz reminded the group that comments were welcome at any time, and there would be a formal comment period and public hearing this fall.

CITY OF LA PINE **April 9, 2015**

PRESENT: Vic Russell, Tony DeBone, Janet Burton, Ken Mulenex, Scott Perkins
Staff: Becky Baxter, Loren Shultz

kmulenex@ci.la-pine.or.us; sperkins@ci.la-pine.or.us; tonyd@deschutes.org; jburton@edcoinfo.com; Vickir@VicRussellConstruction.com

Shultz opened the meeting with an overview of HUD's consolidated plan process and the four covered programs.

The following items were discussed.

- Differences between entitlements and balance of state
- Regional coordinator for LaPine (Loren will follow up when certain)
- Possible assistance for a half completed subdivision of 300 lots within the City of LaPine. Existing homes have private wells and septic. There are growing concerns about quality of groundwater. Compliance issues vs. use of CDBG for future growth was discussed.
- Need for a mental health clinic, possible location St. Charles.
- Need for improvements to the rodeo grounds, a major economic engine for the area
- Types of community facilities eligible
- Issues of "eligible vs. fundable" and the rating and ranking system
- Need for support of an economic development tool in the form of an incubator/classroom/public market area.
- Need for affordable housing, especially in support of workers in local tourism industry.
- We need funds for community capacity training
- It would be nice to have a list of previous grants, especially for non-public works projects
- Are there funds available for application preparation?
- Can a list of potential projects be submitted, as an FYI?

Mosier April 16, 2015

Present: Bill, Elfering, Commissioner Umatilla County
Nicholas Ducote, JUB Engineers
Jaclyn McCurdy, City Manager, Rufus
Staff: Fumi Schaadt, Loren Shultz

Bill.elfering@umatillacounty.net; nducote@gmail.com; rufuscityhall@gmail.com

Shultz opened the meeting with a summary of purpose and brief explanation of the consolidated plan process and the four HUD funded programs.

Ducote
- asked for more detail on the rating system.
- asked if recording of all the roundtables will be available on line to provide an overall view of needs in the state.

McCurdy
- asked about CDBG funding for streets, saying there was a great need in small cities
- asked about use of CDBG for downtown revitalization
- asked about safety related (ie routes to schools) sidewalk construction
- asked about CDBG for water master plans, saying Rufus' water had very high iron content and well production has dropped about 50%

Elfering

- Commissioner Elfering indicated his interest in learning about the funding programs mainly for the understanding of all the available financing avenues for economic development projects in the county.
- OBDD-IFA explained different funding tools that we administer in the agency to assist economic development kind of projects. Went on to describe SPWF program and how that is relating to the job creation/retention of any possible business benefiting from the project. The discussion went to the Patient lending as Commissioner Elfering mentioned that there are some industrial lands that the county is interested in enhancing. We provided contact information for both the RC and BDO for Umatilla for commissioner Elfering to start discussions with.

- Commissioner Elfering brought up a need for Milton-Freewater to expand its water system service to people outside of the area and if that is a suitable project for CDBG., Currently the issue is that the new potential user is reluctant to do so due to their unwillingness to pay for the SDC
- OBDD-IFA explained that CDBG cannot be used to pay for the SDC, and this is something that we need more information on. The city is recommended to discuss the project with our Regional Coordinator. In our records, Milton-Freewater is currently receiving CDBG funds and they are currently in the middle of the Environmental Assessment process.
- OBDD-IFA introduced the One-Stop forum and how our agency, through the RC, can assist project development by having other potential funding agencies at the table to brainstorm about the project.

2016-2020 Oregon Consolidated Plan CDBG Partner Roundtables	
Comment/Question	**Response**
There should be more emphasis on public facilities.	HUD, through the Consolidated Plan process, requires the State of Oregon to assess community needs, available resources, and then prioritize the needs and plan to address them. The great majority of cities and counties have consistently given highest priority to public works projects. Public facilities will remain an objective and IFA will re-evaluate the relative priority each year through the Annual Action Plan process.
CDBG should be used for things like community health programs, walking paths, exercise facilities, anti-smoking campaigns etc.	Federal law and regulation permits myriad uses for CDBG. HUD recognizes that there is never enough funding for all needs, and thus requires State and other grantees to prioritize uses as described above.
Why are water and wastewater projects a priority when there are other funds to meet those needs?	IFA works closely with Oregon DEQ, Oregon Health Authority, USDA Rural Development and other funders of public works projects. These agencies have a complex formula considering community relative wealth and impact of improvements to user rates. Typically, no single grant or loan source is adequate to keep user rates affordable.
There should be more money for public facilities and housing.	IFA reviews the allocation of funds among priorities each year through the Annual Action Plan process.
Can the target allocations between categories such as public facilities and public works be more flexible?	Funding decisions, including variances of target allocations, are made by a panel of IFA management in concert with representatives from the Oregon Association of Counties and the League of Oregon Cities. Flexibility is decided each funding round based on circumstances unique to that competition.
Why can't there be a fixed (not flexible) set aside of housing rehab funds?	Rigid allocations would hamper Oregon's ability to equitably distribute CDBG funding between adopted priorities. It may also compromise discretion by decision makers when comparing, say, funding a contaminated water system versus funding

	an ill-prepared rehab program submitted by an applicant with a poor performance record.
There is a tremendous gap between housing rehab demand and funding.	The gap between rehab need and resources is recognized by IFA. As previously stated, priorities have to be set, and public health via water and wastewater treatment remains primary.
HOME funding is currently limited to multi-family projects. A set-aside for single family projects and/or geographic projects (such as manufactured dwelling unit parks) should be examined.	Oregon Housing and Community Services will respond to this comment.
Maximum grant amounts for public works may be too high.	Grant maximums for all set asides are reviewed annually. Unfortunately, the basic "entry" costs for water and waste water systems to some extent affects all applicants regardless of size. Public works maximums are set with consideration to small, underprivileged communities which may not have the optimum number of users to afford the loans typically required in addition to grants.
Why are there fewer and fewer CDBG eligible activities as time passes?	Two primary factors affect the number of eligible CDBG activities in Oregon. First is the priorities set with input from cities and counties. Second is the dramatic decrease, over 50%, in CDBG funding since 2003.
Why can't the applicants decide what they want to apply for from the menu of HUD approved activities?	Oregon is required to establish priorities for use of CDBG funds, and to set funding and performance targets for those activities. The decisions are based on balance of state needs, and not those of a single community.
IFA and DLCD should work more closely.	IFA agrees and continues to participate in regular inter-agency meetings relating to policy, as well as projects.
Support given for the ability to provide rehab grants rather than loans.	Thank you. IFA plans to continue.
Suggestion to lower grant maximums to allow for more projects.	Grant maximums are reviewed annually in relation to available funding from other agencies and cost trends of projects.
Are there ways to increase CDBG leverage?	IFA and other public funders in Oregon use a complex formula to assure user rates are both affordable and equitable. Grant and

	loan amounts are calculated so users pay a fair amount, neither excessively burdened nor gifted by the grant process.
IFA checklists are very good, but could a sample time line be added?	IFA will consider this addition for the 2016 Method of Distribution.
Sidewalks for LMI households?	Sidewalks are not currently a priority for public works but can be considered as part of housing rehab.
Could public works projects be broken into design and construction phases to help address spend-down rates ?	IFA will consider this suggestion as part of developing the 2016 Method of Distribution.
Support of rehab for manufactured housing	Thank you. IFA plans to continue.
Issue of changing LMI data from HUD, eligibility for special surveys, time and cost also.	IFA recognizes the turmoil resulting from HUD's system for determining community low and moderate income data. IFA has been, and will continue to work with the Portland HUD office staff to address these very serious concerns.
CDBG cannot effectively be administered without professional help.	IFA recognizes this concern and will continue discussion of possible solutions.
Consider facility or use eligibility for community emergency shelter	IFA will consider this suggestion as part of developing the 2016 Method of Distribution.
Consider street construction as priority	Streets are not currently a public works priority but will be discussed as part of developing the 2016 Method of Distribution.
Consider downtown revitalization as priority	Downtown revitalization, once a CDBG eligible activity, has legislatively been transferred to Oregon Parks and Recreation.
Question if there ever will be a time when all CDBG eligible communities are fully compliant with water and sewer.	IFA will investigate the relationship between CDBG eligible communities with potential compliance issues in relation to estimated economic life of systems and the regulatory environment.
Would swimming pool repair be eligible?	Currently swimming pool repair is not a priority for the State of Oregon
Will there be a new grant management handbook in association with the new ConPlan?	IFA anticipates a new Grant Management Handbook to be available early 2016. Regular updates are also provided when changes in law and regulation dictate.
Support for continued funding of micro-enterprise	IFA plans to continue support for micro-enterprise funding.
Consider set aside for ADA compliance retrofits	Through the input process for the Consolidated Plan, IFA will discuss ADA

	compliance when establishing priorities for CDBG funding.
Consider set aside for energy efficiency measures	Through the input process for the Consolidated Plan, IFA will discuss energy efficiency retrofits when establishing priorities for CDBG funding.
Consideration of public works for a subdivision with all private wells and septic.	Several factors need consideration in determining eligibility/fundability of public works for an existing subdivision. At first glance it appears to be a unique situation and thus not a priority for the State as a whole.
Public facilities should include an incubator type use.	Through the input process for the Consolidated Plan, IFA will discuss incubator type facilities when establishing priorities for CDBG funding.
Affordable housing as support for employees of tourism industry.	Off-site infrastructure for housing projects is an eligible use of CDBG. Currently it is not aState of Oregon priority.
Fund community capacity training.	Community capacity training is an ongoing topic of discussion at IFA.
Funding for assistance in app preparation	Federal regulations prohibit committing or expending CDBG funds prior to contract execution.
Put audio of roundtables on line	IFA will consider making audio of roundtables available on its website.
Consider safety related projects i.e. sidewalks to schools	Through the input process for the Consolidated Plan, IFA will discuss safety related sidewalks when establishing priorities for CDBG funding.

OTHER

Letters of interest were received from the Vernonia Food Bank and the Vernonia Senior Center, stating the need for new facilities and the intent to apply for CDBG.

Greater Eastern Oregon Dev. Corp. sent a list of potential projects from among their members.

Non-entitlement Cities and Counties Survey

- Invitation
- List of Participants
- Summary of survey

March 2015

Oregon Business Development Department

SCHAADT Fumi * BIZ

From: PUTINTSEV Alina D * BIZ
Sent: Wednesday, March 4, 2015 2:29 PM
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Cc: SCHAADT Fumi * BIZ; BAXTER Becky * BIZ; SHULTZ Loren J * BIZ

Subject: CDBG Need Survey

business oregon IFA Infrastructure Finance Authority

Please Join the Oregon Business Development Department – Infrastructure Finance Authority (OBDD-IFA) for a survey and a Series of Partner Roundtable Meetings to Discuss Key Oregon Community Development Needs

FY 2016 – 2020 Consolidated Plan

Community Development Block Grant

Every five years, Oregon produces a Consolidated Plan for HUD that details the State's needs and priorities, as well as strategies to meet those needs and priorities. Before writing this plan, we want to hear from our stakeholders and the public.

As the administrator of Community Development Block Grant Program (CDBG), OBDD-IFA is inviting you to tell us what community development needs that your city/county have by completing the survey and/or participating in a series of regional meeting (as scheduled below).

Please take a few moments to complete the survey at the link below *(no later than March 31, 2015)* and share your opinions on the future of the CDBG program and how it may impact your community. Your responses are critically important to how our agency will prioritize the state investments over the next five years.

https://www.surveymonkey.com/r/KJLPFZF

This survey will take approximately 10 minutes. We appreciate your time and assistance in helping us plan for the next five years.

Partner Roundtables (public welcome) Schedule

March 12th 11:30 to 1:00	Drain City Hall	129 West "C" Avenue, Drain
March 19th 11:30 to 1:00	Huntington VFW Hall	227 Main, Huntington
April 2nd 11:30 to 1:00	Clatskanie City Hall	95 S. Nahalem, Clatskanie
April 8th 11:30 to 1:00	Donald City Hall	10710 Main, Donald
April 9th 11:30 to 1:00	La Pine City Hall	52674 Oregon Hwy 31, La Pine
April 16th 11:30 to 1:00	Mosier Creek Terrace	501 E. 2nd, Mosier

Alina Putintsev
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	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
56	Baker City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
49	Boardman	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
58	Brookings	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
107	Canby	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
8	Cannon beach	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
25	City of Adams	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
87	City of Amity	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
68	City of Antelope	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
6	City of Beaverton	Other	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
91	City of Coquille	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
26	City of Cornelius	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
66	City of Cottage Grove	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
61	City of Culver	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
64	City of Falls City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
95	City of Florence	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
39	CITY OF GATES	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
2	City of Gervais	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
17	City of Glendale	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
92	City of Glendale	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
13	City of Helix	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
76	City of Hermiston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
97	City of Hermiston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
47	City of Huntington	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
48	City of Lafayette	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
73	City of Lakeside	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
40	City of Long Creek	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
50	City of Lowell	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
18	City of Madras	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
41	City of Malin	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
93	City of MIll City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
21	City of Mt. Vernon	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
102	City of Myrtle Point	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
23	City of Newport	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
88	City of North Powder	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
55	City of Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
84	City of Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
14	City of Powers	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
11	City of Prineville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
90	City of Prineville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
75	City of Reedsport	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
78	City of Rogue River	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
69	City of Seneca	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
42	City of Sisters	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
3	City of Sodaville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
22	City of St. Helens	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
100	City of Stanfield	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
53	City of Sublimity	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
71	City of Sutherlin	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
32	City of Tillamook	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
98	City of Union	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
85	City of Vale	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
57	City of Vernonia	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
105	City of Waterloo	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
5	city of Weston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
29	City of Wheeler	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
15	Clatsop Country	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
54	Coos County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
101	Cottage Grove	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
52	Creswell	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
74	Curry County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
96	Dallas	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
9	Dundee	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
83	ELGIN	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
44	Estacada	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
33	Falls City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
72	Fossil	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
103	gaston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
31	gladstone,or	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
70	GRASS VALLEY, SHERM	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
38	Haines, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
19	Harney County, Burns/Hine	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
67	Heppner	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
77	Independence	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
62	Joseph, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
34	Josephine County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
94	Junction City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
12	Keizer	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
43	Klamath County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
51	Lake County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
86	Lincoln Community Land T	Other	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
60	McMinnville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
80	Mitchell	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
37	Molalla, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
28	Monmouth	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
81	Myrtle Creek	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
106	Nehalem	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
1	Oakland	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
89	Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
7	Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
79	Oakridge, Or.	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
59	Philomath	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
82	Polk County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
10	Port Orford	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
30	Port Orford	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
104	Prairie City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
35	Sheridan (city)	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
20	Spray	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
46	St. Helens	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
27	Sumpter	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
63	Tillamook County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
108	Tillamook County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
45	Town of Canyon City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
65	Wasco	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
36	Winston, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
4	Wood Village	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
24	Woodburn	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
16	Woodburn Oregon	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
99	Yoncalla	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

Summary of Survey

Oregon Business Development Department

COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020 Consolidated Plan

What is the name of your Community (county, city, town)?

Answer Options	Response Count
	108
answered question	108
skipped question	1

Number	Response Date	Response Text	Categories
1	Mar 30, 2015 8:30 PM	Oakland	City
2	Mar 30, 2015 7:49 PM	City of Gervais	City
3	Mar 30, 2015 7:37 PM	City of Sodaville	City
4	Mar 30, 2015 4:08 PM	Wood Village	City
5	Mar 28, 2015 12:39 PM	city of Weston	City
6	Mar 27, 2015 3:34 AM	City of Beaverton	Other
7	Mar 26, 2015 5:26 PM	Oakridge	City
8	Mar 26, 2015 5:11 PM	Cannon beach	City
9	Mar 26, 2015 3:51 PM	Dundee	City
10	Mar 26, 2015 3:25 PM	Port Orford	City
11	Mar 26, 2015 2:13 PM	City of Prineville	City
12	Mar 26, 2015 9:18 AM	Keizer	City
13	Mar 25, 2015 11:03 PM	City of Helix	City
14	Mar 25, 2015 9:57 PM	City of Powers	City
15	Mar 25, 2015 7:12 PM	Clatsop Country	County
16	Mar 25, 2015 6:41 PM	Woodburn Oregon	City
17	Mar 25, 2015 6:09 PM	City of Glendale	City
18	Mar 25, 2015 5:59 PM	City of Madras	City
19	Mar 25, 2015 5:46 PM	Harney County, Burns/Hines, Oregon	County
20	Mar 25, 2015 5:27 PM	Spray	City
21	Mar 25, 2015 4:43 PM	City of Mt. Vernon	City
22	Mar 25, 2015 4:41 PM	City of St. Helens	City
23	Mar 25, 2015 4:31 PM	City of Newport	City
24	Mar 25, 2015 4:19 PM	Woodburn	City
25	Mar 25, 2015 4:01 PM	City of Adams	City
26	Mar 25, 2015 3:42 PM	City of Cornelius	City
27	Mar 25, 2015 3:27 PM	Sumpter	City
28	Mar 25, 2015 3:12 AM	Monmouth	City
29	Mar 24, 2015 11:14 PM	City of Wheeler	City
30	Mar 24, 2015 11:06 PM	Port Orford	City
31	Mar 24, 2015 10:39 PM	gladstone,or	City
32	Mar 24, 2015 10:20 PM	City of Tillamook	City
33	Mar 24, 2015 10:10 PM	Falls City	City
34	Mar 24, 2015 10:09 PM	Josephine County	County
35	Mar 24, 2015 9:41 PM	Sheridan (city)	City
36	Mar 24, 2015 9:31 PM	Winston, OR	City
37	Mar 24, 2015 9:26 PM	Molalla, OR	City
38	Mar 24, 2015 9:17 PM	Haines, OR	City
39	Mar 24, 2015 9:15 PM	CITY OF GATES	City
40	Mar 24, 2015 9:10 PM	City of Long Creek	City
41	Mar 24, 2015 9:05 PM	City of Malin	City
42	Mar 24, 2015 9:03 PM	City of Sisters	City
43	Mar 24, 2015 9:03 PM	Klamath County	County

44	Mar 24, 2015 9:02 PM	Estacada	City
45	Mar 24, 2015 8:58 PM	Town of Canyon City	City
46	Mar 24, 2015 8:58 PM	St. Helens	City
47	Mar 24, 2015 8:57 PM	City of Huntington	City
48	Mar 24, 2015 8:56 PM	City of Lafayette	City
49	Mar 24, 2015 8:54 PM	Boardman	City
50	Mar 24, 2015 8:49 PM	City of Lowell	City
51	Mar 24, 2015 8:48 PM	Lake County	County
52	Mar 24, 2015 8:38 PM	Creswell	City
53	Mar 24, 2015 8:35 PM	City of Sublimity	City
54	Mar 24, 2015 8:34 PM	Coos County	County
55	Mar 24, 2015 8:34 PM	City of Oakridge	City
56	Mar 24, 2015 8:33 PM	Baker City	City
57	Mar 24, 2015 8:26 PM	City of Vernonia	City
58	Mar 24, 2015 8:26 PM	Brookings	City
59	Mar 24, 2015 8:26 PM	Philomath	City
60	Mar 24, 2015 8:20 PM	McMinnville	City
61	Mar 24, 2015 8:20 PM	City of Culver	City
62	Mar 19, 2015 4:13 PM	Joseph, OR	City
63	Mar 18, 2015 8:48 PM	Tillamook County	County
64	Mar 18, 2015 2:16 PM	City of Falls City	City
65	Mar 17, 2015 3:28 PM	Wasco	City
66	Mar 16, 2015 11:09 PM	City of Cottage Grove	City
67	Mar 16, 2015 3:53 PM	Heppner	City
68	Mar 14, 2015 5:04 PM	City of Antelope	City
69	Mar 12, 2015 3:40 PM	City of Seneca	City
70	Mar 11, 2015 11:16 PM	GRASS VALLEY, SHERMAN COUNTY	County
71	Mar 11, 2015 4:57 PM	City of Sutherlin	City
72	Mar 10, 2015 7:02 PM	Fossil	City
73	Mar 10, 2015 4:48 PM	City of Lakeside	City
74	Mar 10, 2015 3:50 PM	Curry County	County
75	Mar 9, 2015 6:20 PM	City of Reedsport	City
76	Mar 9, 2015 4:34 PM	City of Hermiston	City
77	Mar 9, 2015 3:18 PM	Independence	City
78	Mar 9, 2015 2:09 PM	City of Rogue River	City
79	Mar 7, 2015 2:45 AM	Oakridge, Or.	City
80	Mar 7, 2015 12:56 AM	Mitchell	City
81	Mar 7, 2015 12:21 AM	Myrtle Creek	City
82	Mar 6, 2015 10:53 PM	Polk County	County
83	Mar 6, 2015 10:14 PM	ELGIN	City
84	Mar 6, 2015 10:13 PM	City of Oakridge	City
85	Mar 6, 2015 8:22 PM	City of Vale	City
86	Mar 6, 2015 6:31 PM	Lincoln Community Land Trust	Other
87	Mar 6, 2015 6:10 PM	City of Amity	City
88	Mar 6, 2015 6:08 PM	City of North Powder	City
89	Mar 6, 2015 5:42 PM	Oakridge	City
90	Mar 6, 2015 5:35 PM	City of Prineville	City
91	Mar 6, 2015 4:51 PM	City of Coquille	City
92	Mar 6, 2015 3:59 PM	City of Glendale	City
93	Mar 6, 2015 3:55 PM	City of MIll City	City
94	Mar 6, 2015 3:13 PM	Junction City	City
95	Mar 6, 2015 7:48 AM	City of Florence	City
96	Mar 6, 2015 5:56 AM	Dallas	City
97	Mar 6, 2015 12:13 AM	City of Hermiston	City
98	Mar 5, 2015 11:21 PM	City of Union	City

99	Mar 5, 2015 10:24 PM	Yoncalla	City
100	Mar 5, 2015 9:59 PM	City of Stanfield	City
101	Mar 5, 2015 9:56 PM	Cottage Grove	City
102	Mar 5, 2015 9:47 PM	City of Myrtle Point	City
103	Mar 5, 2015 9:38 PM	gaston	City
104	Mar 5, 2015 9:37 PM	Prairie City	City
105	Mar 5, 2015 9:31 PM	City of Waterloo	City
106	Mar 5, 2015 9:27 PM	Nehalem	City
107	Mar 5, 2015 9:25 PM	Canby	City
108	Mar 5, 2015 9:16 PM	Tillamook County	County

COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020 Consolidated Plan

What is your position in your Community?

Answer Options	Response Count
	107
answered question	107
skipped question	2

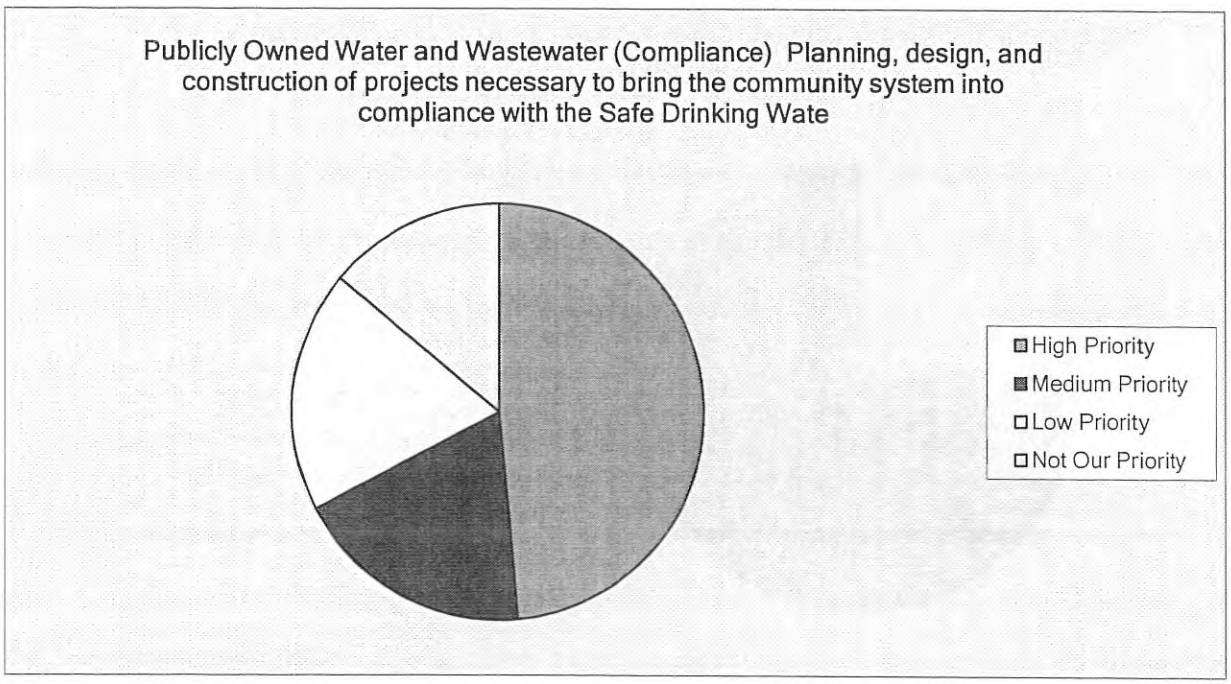
Number	Response Date	Response Text	Categories
1	Mar 30, 2015 8:30 PM	Mayor	
2	Mar 30, 2015 7:49 PM	City Manager	
3	Mar 30, 2015 7:37 PM	City Administrator	
4	Mar 30, 2015 4:08 PM	City Administrator	
5	Mar 28, 2015 12:39 PM	grant coordinator	
6	Mar 27, 2015 3:34 AM	Economic development manager	
7	Mar 26, 2015 5:26 PM	City Councilor	
8	Mar 26, 2015 3:51 PM	Mayor	
9	Mar 26, 2015 3:25 PM	City Administrator	
10	Mar 26, 2015 2:13 PM	Planning Director	
11	Mar 26, 2015 9:18 AM	Mayor	
12	Mar 25, 2015 11:03 PM	City Recorder	
13	Mar 25, 2015 9:57 PM	City Recorder	
14	Mar 25, 2015 7:12 PM	County Commissioner, District 5	
15	Mar 25, 2015 6:41 PM	Economic and Development Services Director	
16	Mar 25, 2015 6:09 PM	City Recorder	
17	Mar 25, 2015 5:59 PM	Public Works Director	
18	Mar 25, 2015 5:46 PM	Business Owner, County Commissioner	
19	Mar 25, 2015 5:27 PM	City Recorder	
20	Mar 25, 2015 4:43 PM	City Recorder	
21	Mar 25, 2015 4:41 PM	City Administrator	
22	Mar 25, 2015 4:31 PM	City Manager	
23	Mar 25, 2015 4:19 PM	City Recorder	
24	Mar 25, 2015 4:01 PM	City Recorder	
25	Mar 25, 2015 3:42 PM	City Manager	
26	Mar 25, 2015 3:27 PM	City Recorder	
27	Mar 25, 2015 3:12 AM	Mayor	
28	Mar 24, 2015 11:14 PM	City Manager	
29	Mar 24, 2015 11:06 PM	Mayor	
30	Mar 24, 2015 10:39 PM	mayor	
31	Mar 24, 2015 10:20 PM	City Recorder/Treasurer	
32	Mar 24, 2015 10:10 PM	Interim City Manager	
33	Mar 24, 2015 10:09 PM	County Commissioner	
34	Mar 24, 2015 9:41 PM	city manager	
35	Mar 24, 2015 9:31 PM	Mayor	
36	Mar 24, 2015 9:26 PM	City Manager	
37	Mar 24, 2015 9:17 PM	City Recorder	
38	Mar 24, 2015 9:15 PM	CITY ADMIN/RECORDER	
39	Mar 24, 2015 9:10 PM	City Recorder	
40	Mar 24, 2015 9:05 PM	City Recorder/Clerk/Treasurer	
41	Mar 24, 2015 9:03 PM	Community Development Director	
42	Mar 24, 2015 9:03 PM	Commissioner	
43	Mar 24, 2015 9:02 PM	City Recorder/Finance Director	
44	Mar 24, 2015 8:58 PM	City Recorder	
45	Mar 24, 2015 8:58 PM	City Recorder	
46	Mar 24, 2015 8:57 PM	City Recorder	
47	Mar 24, 2015 8:56 PM	City Administrator	
48	Mar 24, 2015 8:54 PM	City Manager	

49	Mar 24, 2015 8:49 PM	City Administrator
50	Mar 24, 2015 8:48 PM	Rural Development Specialist (Economic/Community Development
51	Mar 24, 2015 8:38 PM	City Administrator
52	Mar 24, 2015 8:35 PM	Finance Director/City Recorder
53	Mar 24, 2015 8:34 PM	County Commissioner
54	Mar 24, 2015 8:34 PM	Finance Director
55	Mar 24, 2015 8:33 PM	City Manager
56	Mar 24, 2015 8:26 PM	Mayor/ Assistant to City Administrator
57	Mar 24, 2015 8:26 PM	City Manager
58	Mar 24, 2015 8:26 PM	City Manager
59	Mar 24, 2015 8:20 PM	City Manager
60	Mar 24, 2015 8:20 PM	City Recorder/Manager
61	Mar 19, 2015 4:13 PM	City Recorder/Administrator
62	Mar 18, 2015 8:48 PM	County Commissioner
63	Mar 18, 2015 2:16 PM	Mayor
64	Mar 17, 2015 3:28 PM	Administrator
65	Mar 16, 2015 11:09 PM	Community Development Director
66	Mar 16, 2015 3:53 PM	Mayor
67	Mar 14, 2015 5:04 PM	City Recorder, Deputy Watermaster, Assistant Fire Chief
68	Mar 12, 2015 3:40 PM	City Recorder/Manager
69	Mar 11, 2015 11:16 PM	FIRE CHIEF
70	Mar 11, 2015 4:57 PM	Community Development
71	Mar 10, 2015 7:02 PM	Mayor
72	Mar 10, 2015 4:48 PM	City Recorder/Manager
73	Mar 10, 2015 3:50 PM	Commissioner
74	Mar 9, 2015 6:20 PM	City Manager
75	Mar 9, 2015 4:34 PM	City Manager
76	Mar 9, 2015 3:18 PM	Economic Development Director
77	Mar 9, 2015 2:09 PM	City Administrator
78	Mar 7, 2015 2:45 AM	City Counciler
79	Mar 7, 2015 12:56 AM	City Clerk
80	Mar 7, 2015 12:21 AM	City Administrator
81	Mar 6, 2015 10:53 PM	County Administrator
82	Mar 6, 2015 10:14 PM	MAYOR
83	Mar 6, 2015 10:13 PM	City Councilor
84	Mar 6, 2015 8:22 PM	City Manager
85	Mar 6, 2015 6:31 PM	Operational Manager of the LCLT
86	Mar 6, 2015 6:10 PM	City Administrator
87	Mar 6, 2015 6:08 PM	City Recorder
88	Mar 6, 2015 5:42 PM	Mayor
89	Mar 6, 2015 5:35 PM	Planning Director
90	Mar 6, 2015 4:51 PM	City Manager
91	Mar 6, 2015 3:59 PM	City Recorder
92	Mar 6, 2015 3:55 PM	City Recorder
93	Mar 6, 2015 3:13 PM	Mayot
94	Mar 6, 2015 7:48 AM	City Manager
95	Mar 6, 2015 5:56 AM	Mayor
96	Mar 6, 2015 12:13 AM	Assistant City Manager
97	Mar 5, 2015 11:21 PM	City Manager
98	Mar 5, 2015 10:24 PM	Administrator
99	Mar 5, 2015 9:59 PM	City Manager
100	Mar 5, 2015 9:56 PM	City Planner
101	Mar 5, 2015 9:47 PM	City Manager
102	Mar 5, 2015 9:38 PM	mayor
103	Mar 5, 2015 9:37 PM	City Recorder
104	Mar 5, 2015 9:31 PM	City Recorder
105	Mar 5, 2015 9:27 PM	City Manager
106	Mar 5, 2015 9:25 PM	Mayor
107	Mar 5, 2015 9:16 PM	County Commissioner

COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Publicly Owned Water and Wastewater (Compliance) Planning, design, and construction of projects necessary to bring the community system into compliance with the Safe

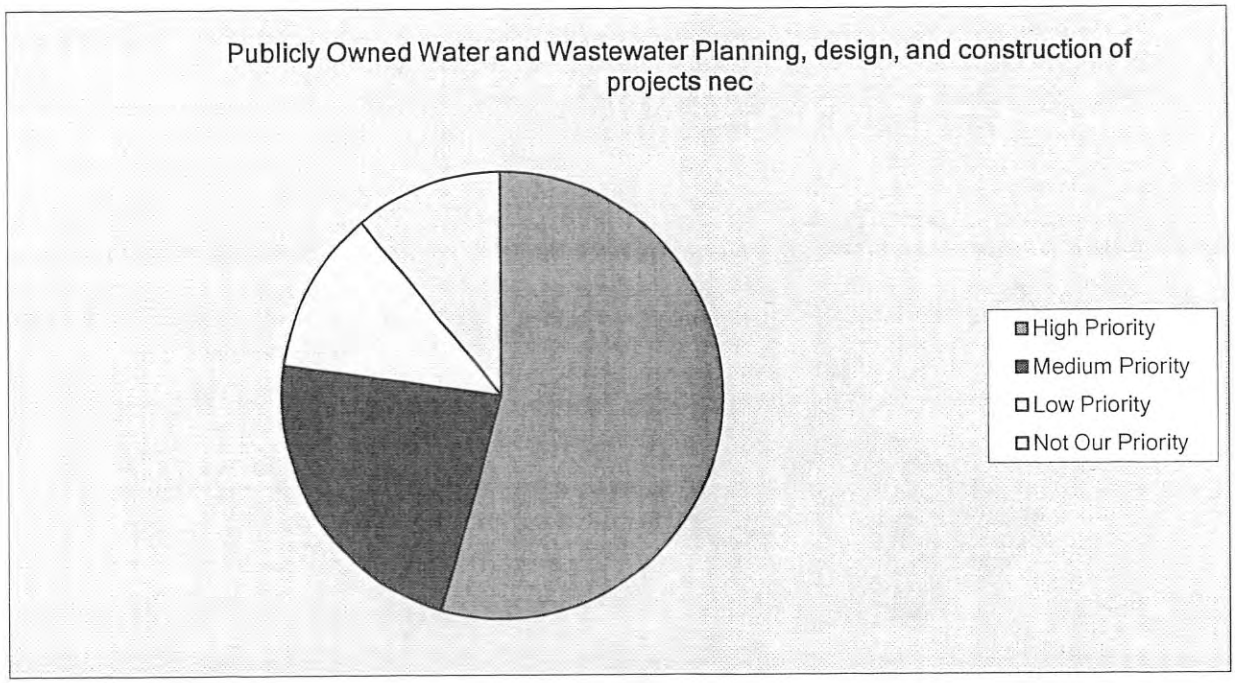
Answer Options	Response Percent	Response Count
High Priority	48.5%	49
Medium Priority	18.8%	19
Low Priority	18.8%	19
Not Our Priority	13.9%	14
	answered question	101
	skipped question	8



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Publicly Owned Water and Wastewater Planning, design, and construction of projects necessary for the provision of safe, healthy, reliable drinking water and proper sanitary

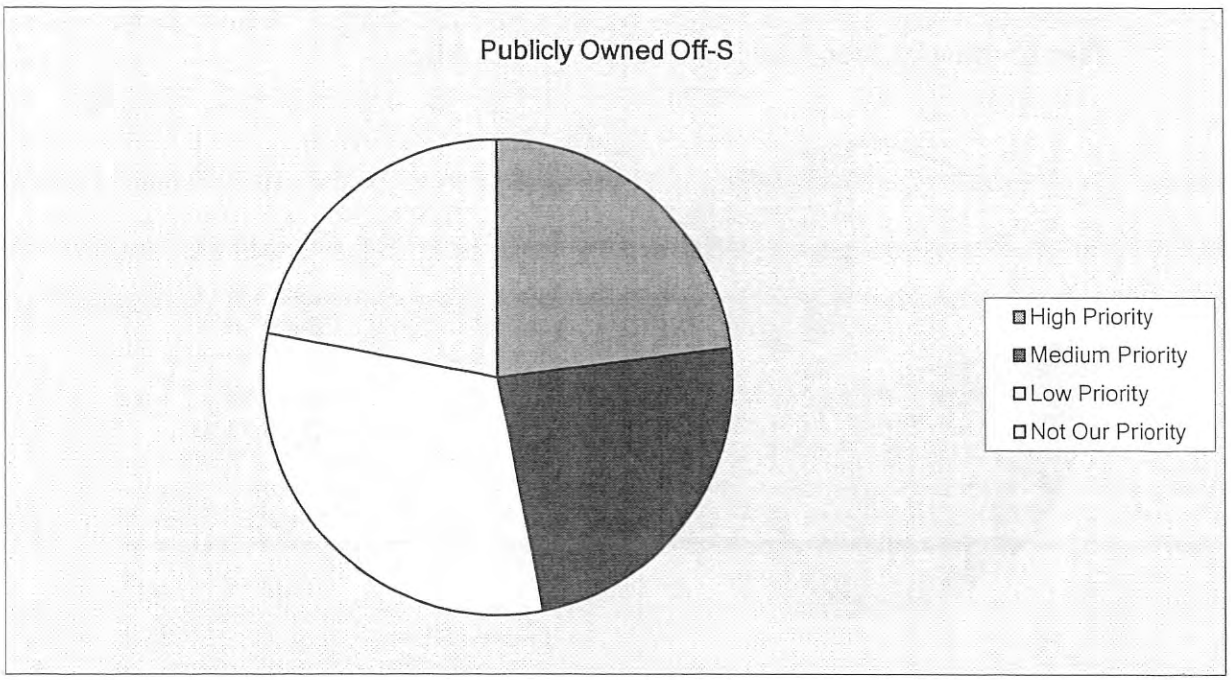
Answer Options	Response Percent	Response Count
High Priority	54.5%	55
Medium Priority	22.8%	23
Low Priority	11.9%	12
Not Our Priority	10.9%	11
	answered question	101
	skipped question	8



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Publicly Owned Off-Site Infrastructure for New Affordable Housing Publicly owned infrastructure projects necessary for the construction of affordable, permanent, new, multi-

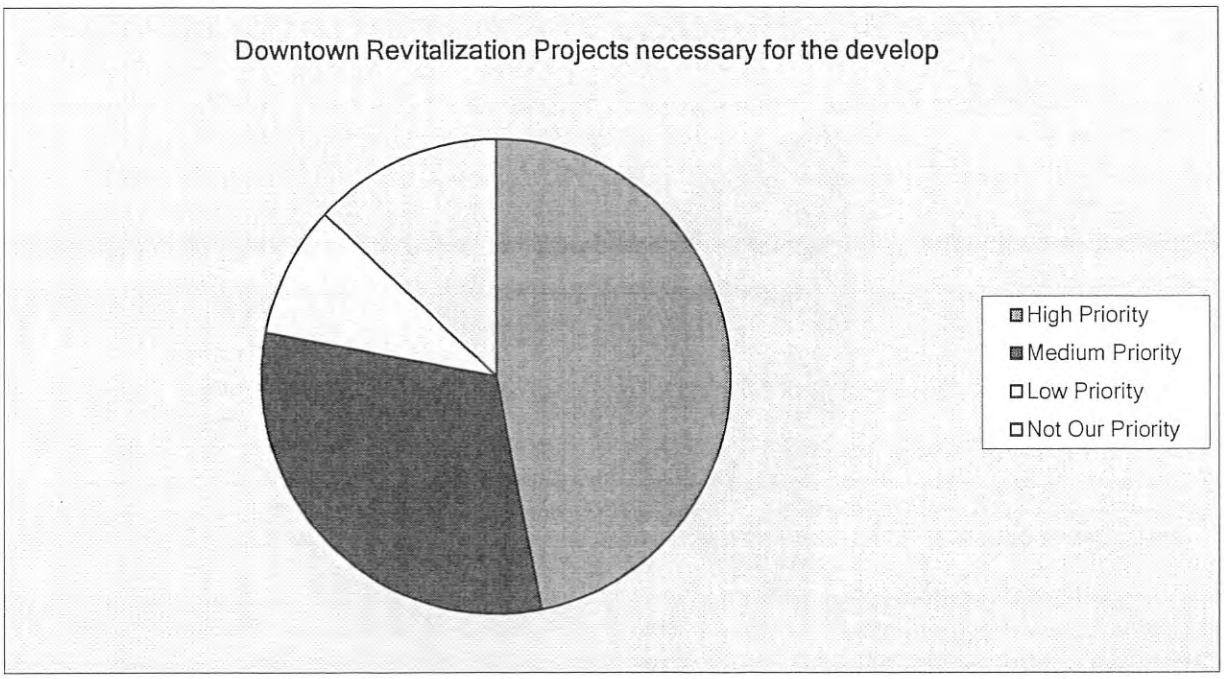
Answer Options	Response Percent	Response Count
High Priority	23.0%	23
Medium Priority	24.0%	24
Low Priority	31.0%	31
Not Our Priority	22.0%	22
	answered question	100
	skipped question	9



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Downtown Revitalization Projects necessary for the development of downtowns located within incorporated city limits to enhance the downtown area through beautification and

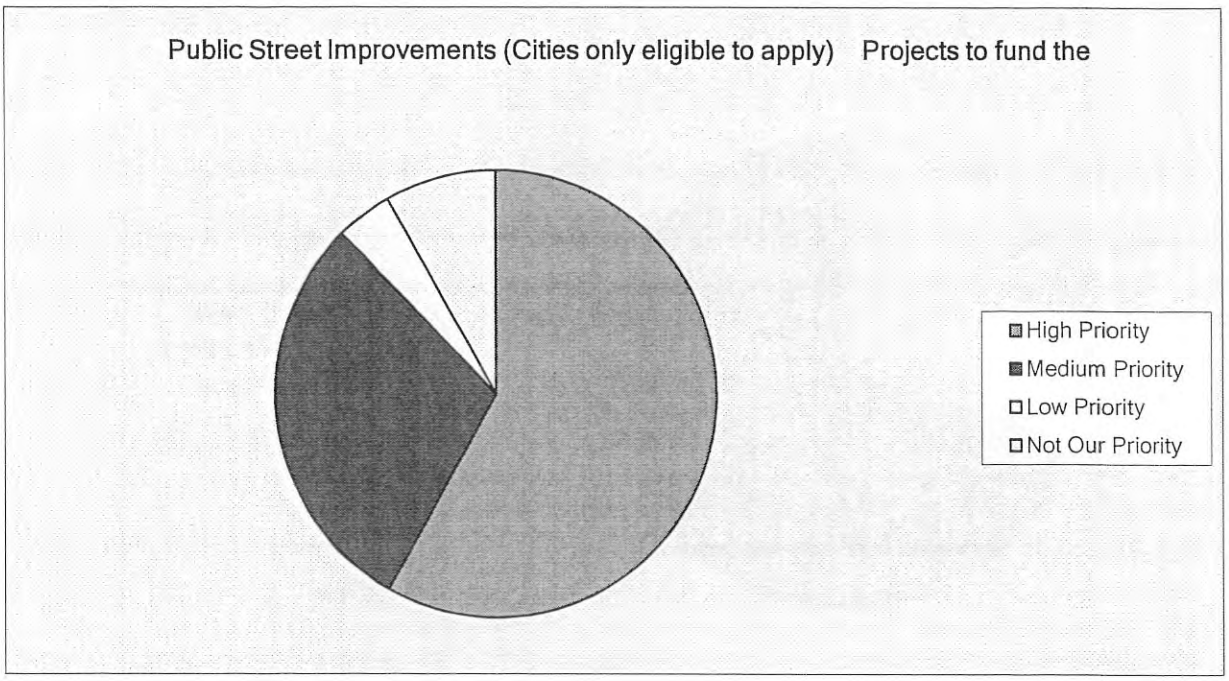
Answer Options	Response Percent	Response Count
High Priority	47.0%	47
Medium Priority	31.0%	31
Low Priority	9.0%	9
Not Our Priority	13.0%	13
	answered question	100
	skipped question	9



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Public Street Improvements (Cities only eligible to apply) Projects to fund the design and construction of the following improvements: paving, curbs, gutters, sidewalks, storm

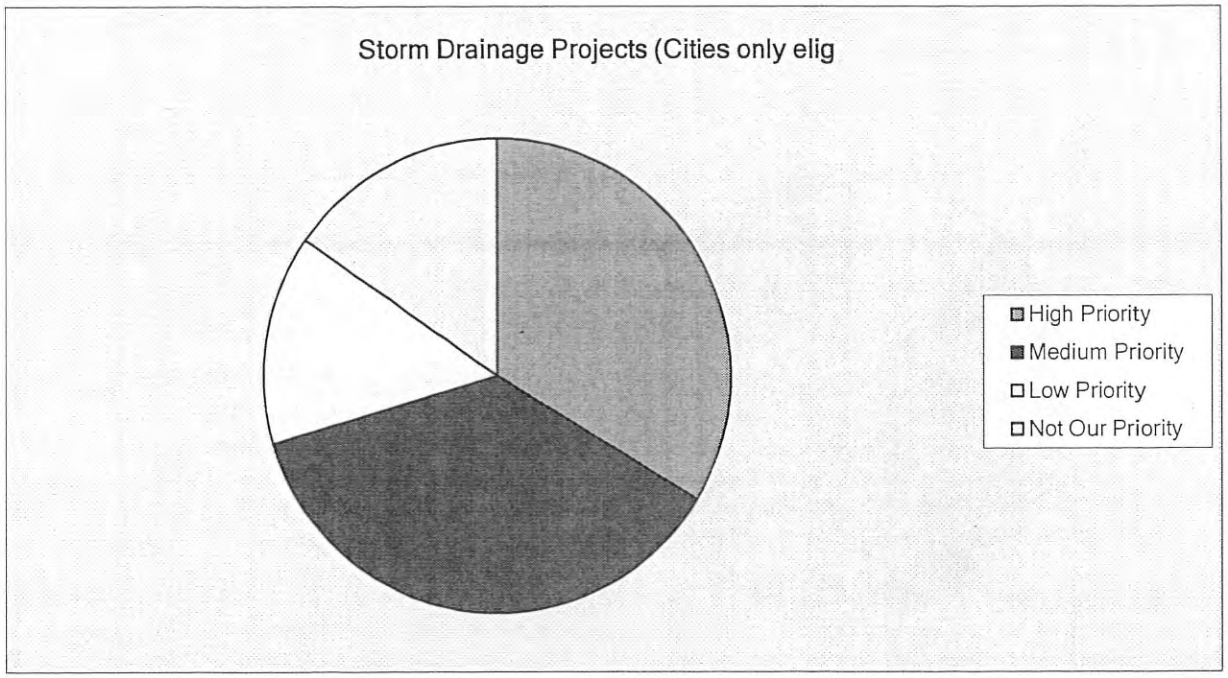
Answer Options	Response Percent	Response Count
High Priority	58.2%	57
Medium Priority	29.6%	29
Low Priority	4.1%	4
Not Our Priority	8.2%	8
	answered question	98
	skipped question	11



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Storm Drainage Projects (Cities only eligible to apply) Projects to fund the design and construction of new or the repair/replacement of existing storm drainage systems within

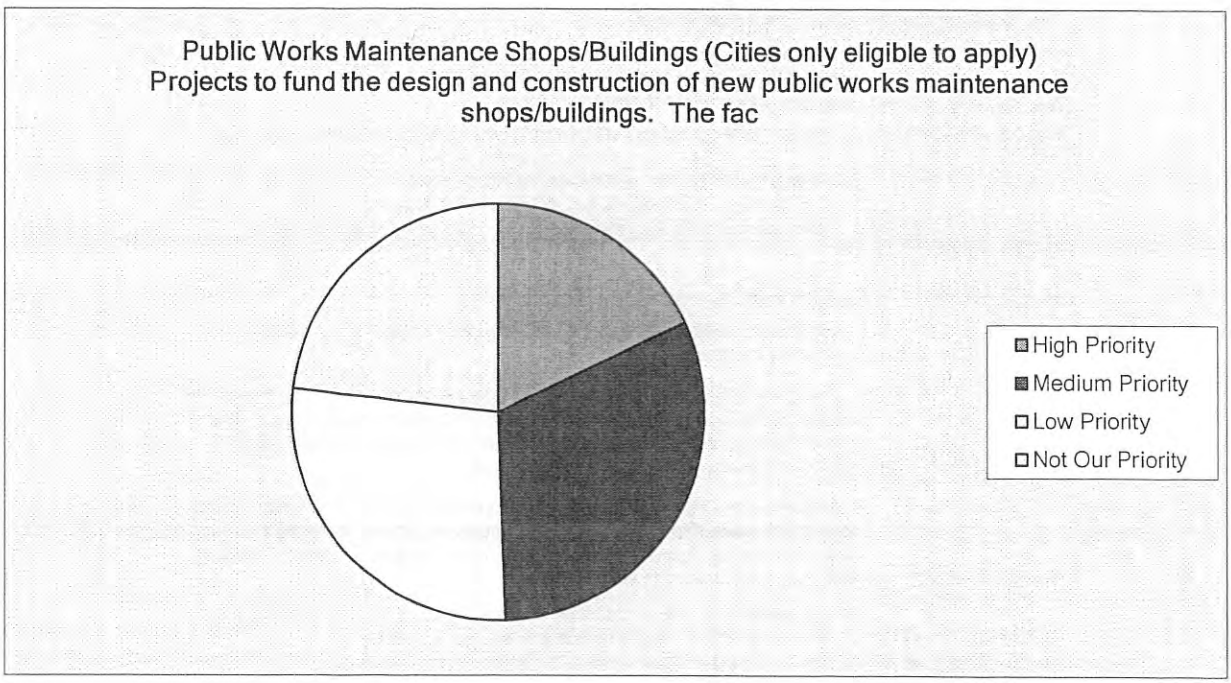
Answer Options	Response Percent	Response Count
High Priority	33.7%	33
Medium Priority	36.7%	36
Low Priority	14.3%	14
Not Our Priority	15.3%	15
	answered question	98
	skipped question	11



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Public Works Maintenance Shops/Buildings (Cities only eligible to apply) Projects to fund the design and construction of new public works maintenance shops/buildings. The

Answer Options	Response Percent	Response Count
High Priority	17.9%	17
Medium Priority	31.6%	30
Low Priority	27.4%	26
Not Our Priority	23.2%	22
	answered question	95
	skipped question	14



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020 Consolidated Plan

Other Public Works Improvements? (please describe)

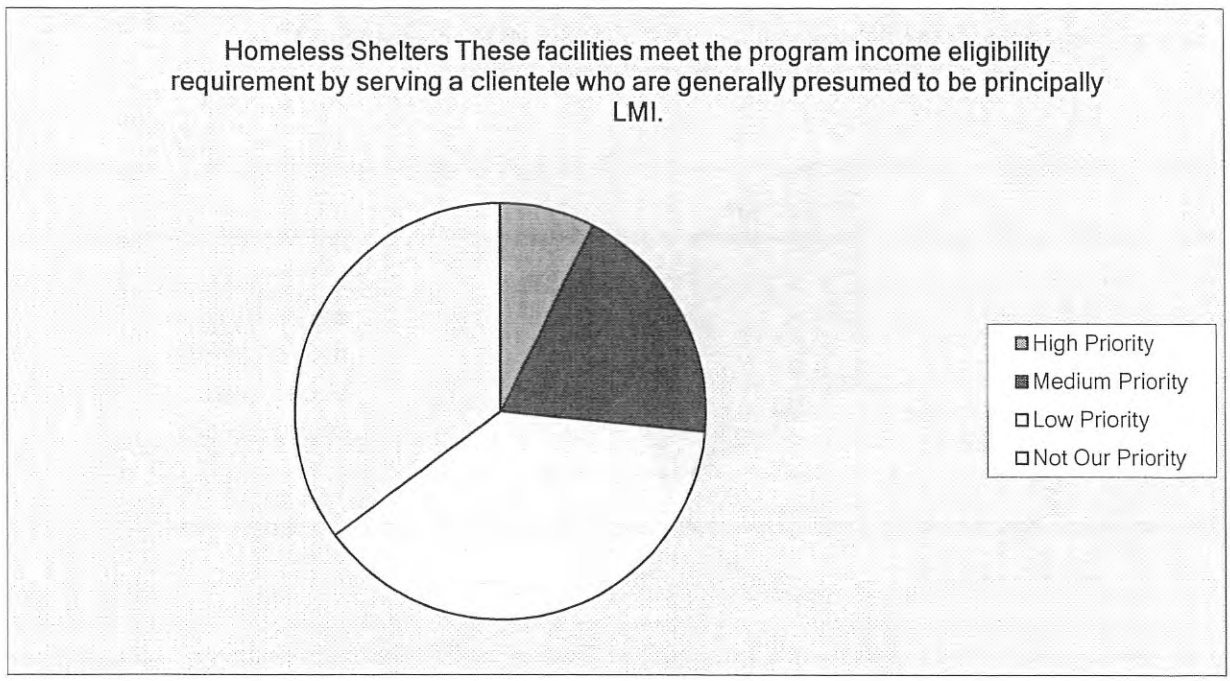
Answer Options	Response Count
	19
answered question	19
skipped question	90

Number	Response Date	Response Text	Categories
1	Mar 30, 2015 7:51 PM	New City Hall/Community Center with a bathroom. Current City Hall is only allowed 18 people at one time and has no bathroom facilities.	
2	Mar 30, 2015 4:10 PM	All noted above	
3	Mar 28, 2015 12:51 PM	Three bridges in town are at critical need replacement level.	
4	Mar 26, 2015 3:53 PM	Undergrounding utilities	
5	Mar 26, 2015 2:24 PM	water system improvements	
6	Mar 25, 2015 4:33 PM	The City of Newport has many water, sewer and storm sewer infrastructure needs. Base on Community low and mod income levels, the City appears ineligible for most of these types of programs.	
7	Mar 25, 2015 3:16 AM	New headquarters building / shop / yard facility for Monmouth Power and Light.	
8	Mar 24, 2015 11:23 PM	Water distribution system, Wastewater collection system, and streets are our highest priority. Relocating city hall, police and fire departments along with critical infrastructure out of the Tsunami innondation zone are also important,	
9	Mar 24, 2015 9:38 PM	CITY PARKS	
10	Mar 24, 2015 9:37 PM	Expansion of effluent spreading infrastructure	
11	Mar 24, 2015 9:13 PM	Improvement in areas that could be expanded for walking and recreation for community members.	
12	Mar 24, 2015 8:55 PM	A project would be to upgrade all city water meters and relocate many that are not located on the properties that they meter. For instance, some houses are on one side of the street and the meter is on the other side, making the line from the meter to the house go under public right-of-way.	
13	Mar 18, 2015 2:21 PM	Equipment. The City's road grader is a 1963 model that is wore out, public works vehicle is in need of replacement, street sweeper would help meet DEQ mandated sweeps, lawn mowers are aged. Without the proper tools it is hard for P/W to work efficently and safely.	
14	Mar 17, 2015 3:37 PM	Road preservation. We are currently unable to keep up with maintenance let alone construction of roads due to significant cuts in funding.	
15	Mar 14, 2015 5:06 PM	Repairs to the exterior (primarily) of the 2 story community center.	
16	Mar 9, 2015 6:20 PM	existing levee systems.	
17	Mar 6, 2015 5:50 PM	Inflow and infiltration, new water tank, funds for street improvements	
18	Mar 6, 2015 5:37 PM	Downtown core sidewalk improvements.	
19	Mar 6, 2015 4:53 PM	Neighborhood revitalization, parks and homeowner home improvements.	

COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Homeless Shelters These facilities meet the program income eligibility requirement by serving a clientele who are generally presumed to be principally LMI.

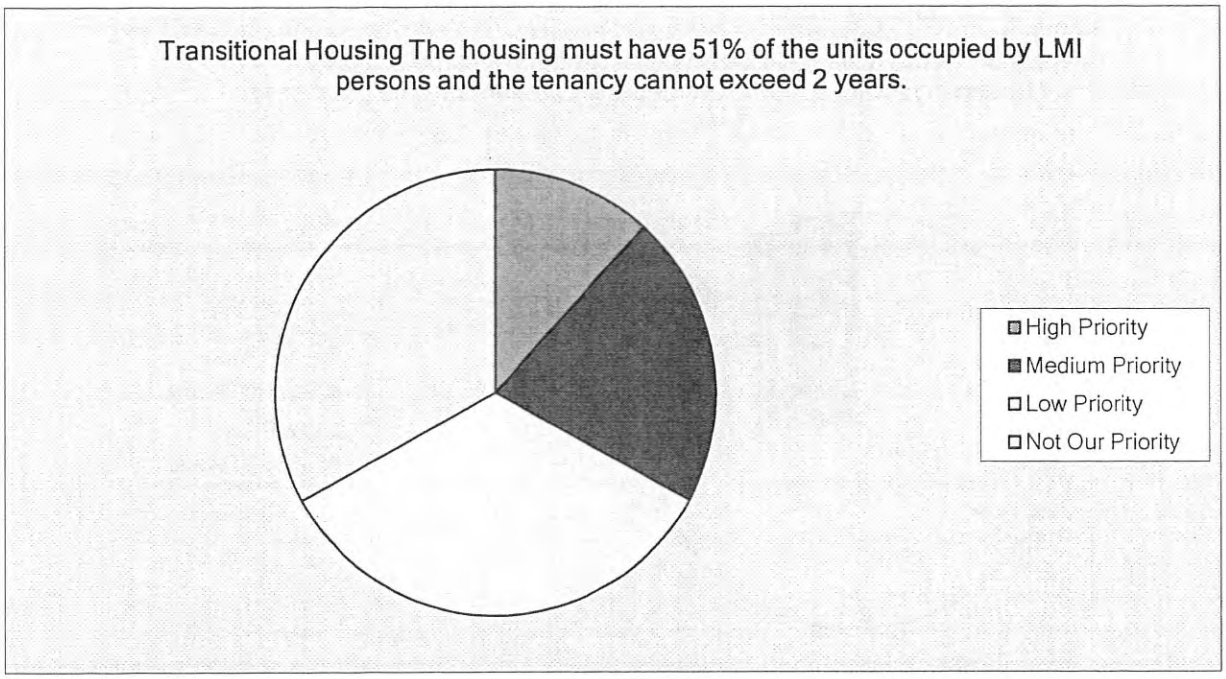
Answer Options	Response Percent	Response Count
High Priority	7.4%	7
Medium Priority	19.1%	18
Low Priority	38.3%	36
Not Our Priority	35.1%	33
	answered question	94
	skipped question	15



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Transitional Housing The housing must have 51% of the units occupied by LMI persons and the tenancy cannot exceed 2 years.

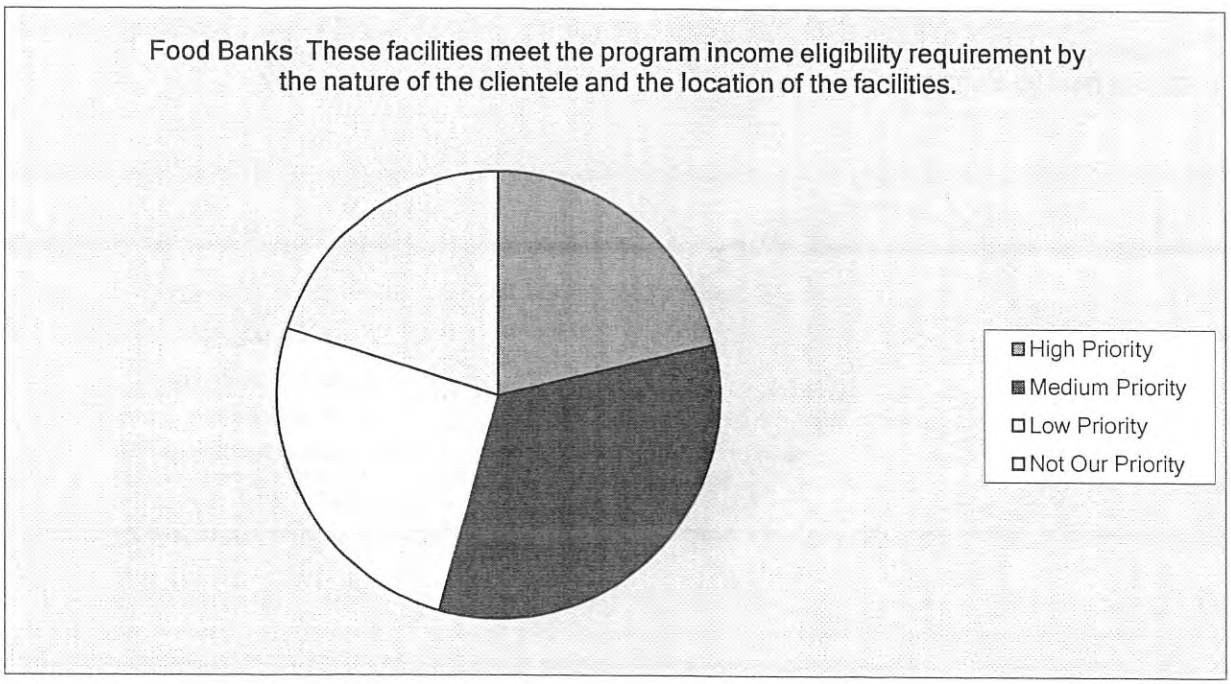
Answer Options	Response Percent	Response Count
High Priority	11.7%	11
Medium Priority	21.3%	20
Low Priority	34.0%	32
Not Our Priority	33.0%	31
	answered question	94
	skipped question	15



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Food Banks These facilities meet the program income eligibility requirement by the nature of the clientele and the location of the facilities.

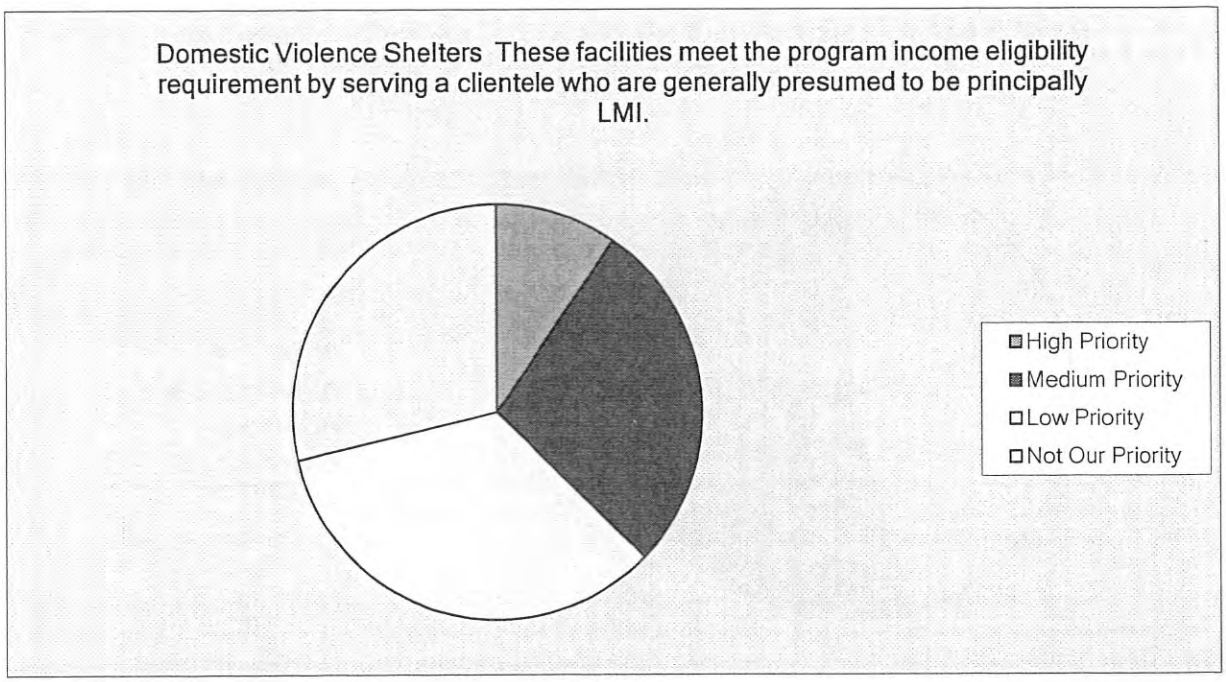
Answer Options	Response Percent	Response Count
High Priority	21.3%	20
Medium Priority	33.0%	31
Low Priority	25.5%	24
Not Our Priority	20.2%	19
answered question		94
skipped question		15



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Domestic Violence Shelters These facilities meet the program income eligibility requirement by serving a clientele who are generally presumed to be principally LMI.

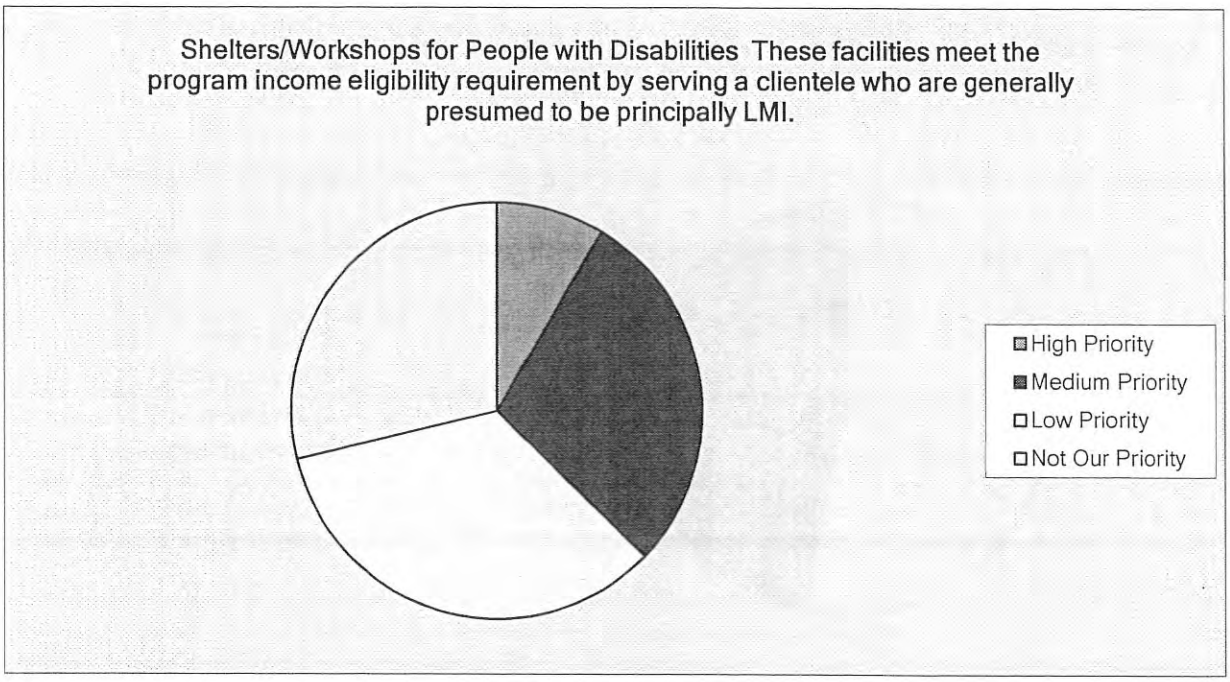
Answer Options	Response Percent	Response Count
High Priority	9.6%	9
Medium Priority	27.7%	26
Low Priority	34.0%	32
Not Our Priority	28.7%	27
	answered question	94
	skipped question	15



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Shelters/Workshops for People with Disabilities These facilities meet the program income eligibility requirement by serving a clientele who are generally presumed to be

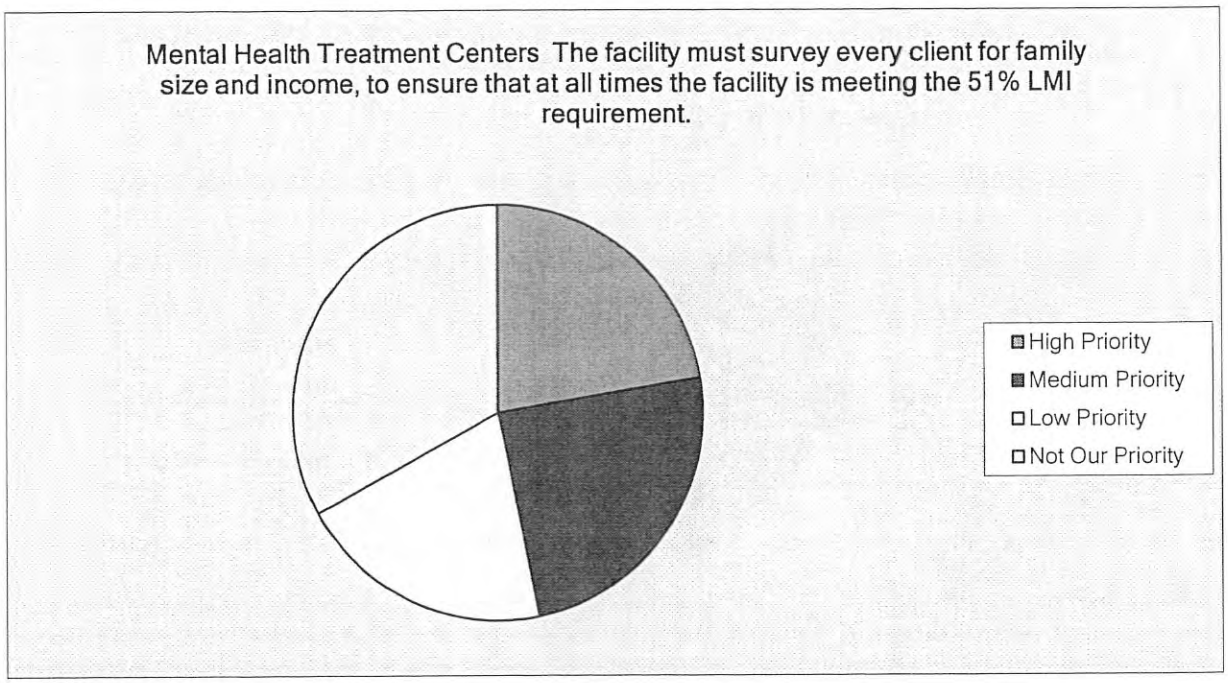
Answer Options	Response Percent	Response Count
High Priority	8.5%	8
Medium Priority	28.7%	27
Low Priority	34.0%	32
Not Our Priority	28.7%	27
	answered question	94
	skipped question	15



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Mental Health Treatment Centers The facility must survey every client for family size and income, to ensure that at all times the facility is meeting the 51% LMI requirement.

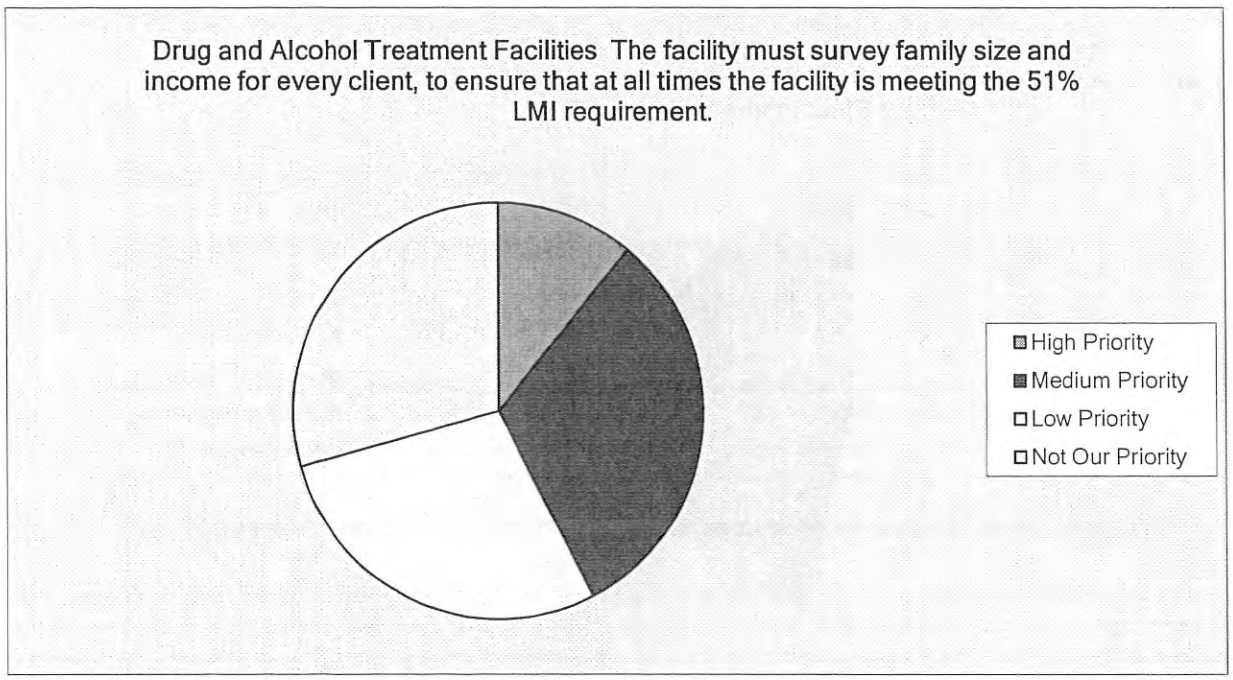
Answer Options	Response Percent	Response Count
High Priority	22.3%	21
Medium Priority	24.5%	23
Low Priority	20.2%	19
Not Our Priority	33.0%	31
	answered question	94
	skipped question	15



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Drug and Alcohol Treatment Facilities The facility must survey family size and income for every client, to ensure that at all times the facility is meeting the 51% LMI requirement.

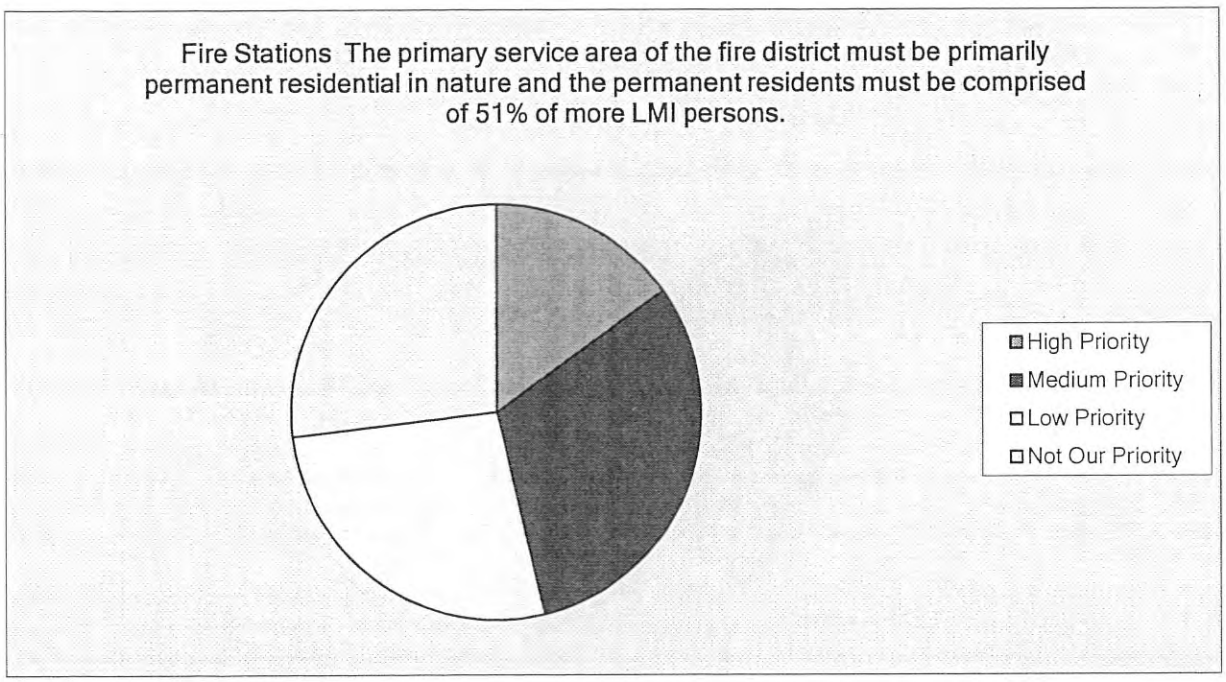
Answer Options	Response Percent	Response Count
High Priority	10.9%	10
Medium Priority	31.5%	29
Low Priority	28.3%	26
Not Our Priority	29.3%	27
	answered question	92
	skipped question	17



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Fire Stations The primary service area of the fire district must be primarily permanent residential in nature and the permanent residents must be comprised of 51% of more LMI

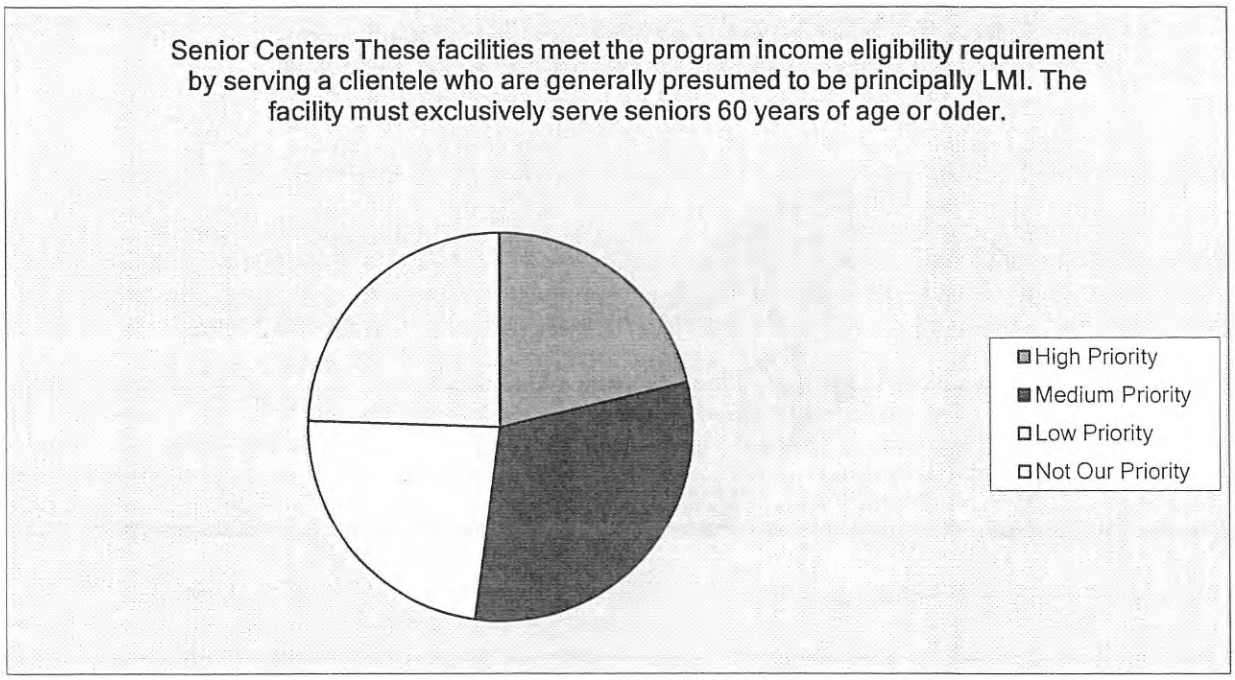
Answer Options	Response Percent	Response Count
High Priority	15.1%	14
Medium Priority	31.2%	29
Low Priority	26.9%	25
Not Our Priority	26.9%	25
	answered question	93
	skipped question	16



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Senior Centers These facilities meet the program income eligibility requirement by serving a clientele who are generally presumed to be principally LMI. The facility must

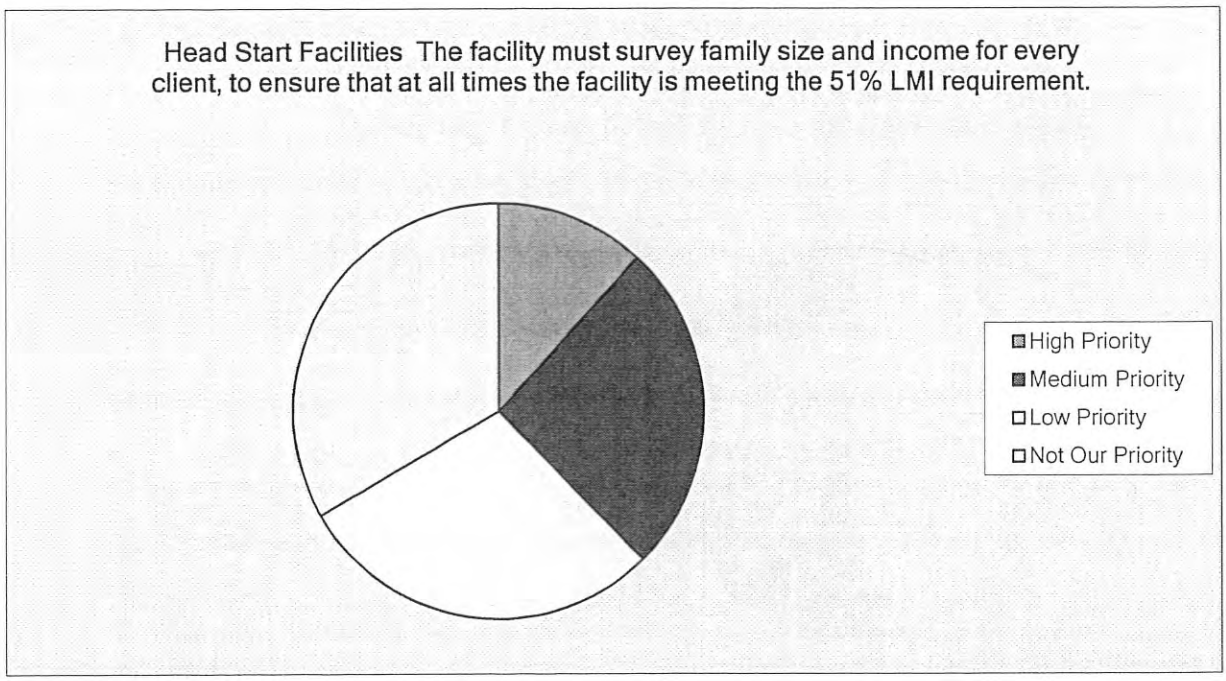
Answer Options	Response Percent	Response Count
High Priority	21.3%	20
Medium Priority	30.9%	29
Low Priority	23.4%	22
Not Our Priority	24.5%	23
	answered question	94
	skipped question	15



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Head Start Facilities The facility must survey family size and income for every client, to ensure that at all times the facility is meeting the 51% LMI requirement.

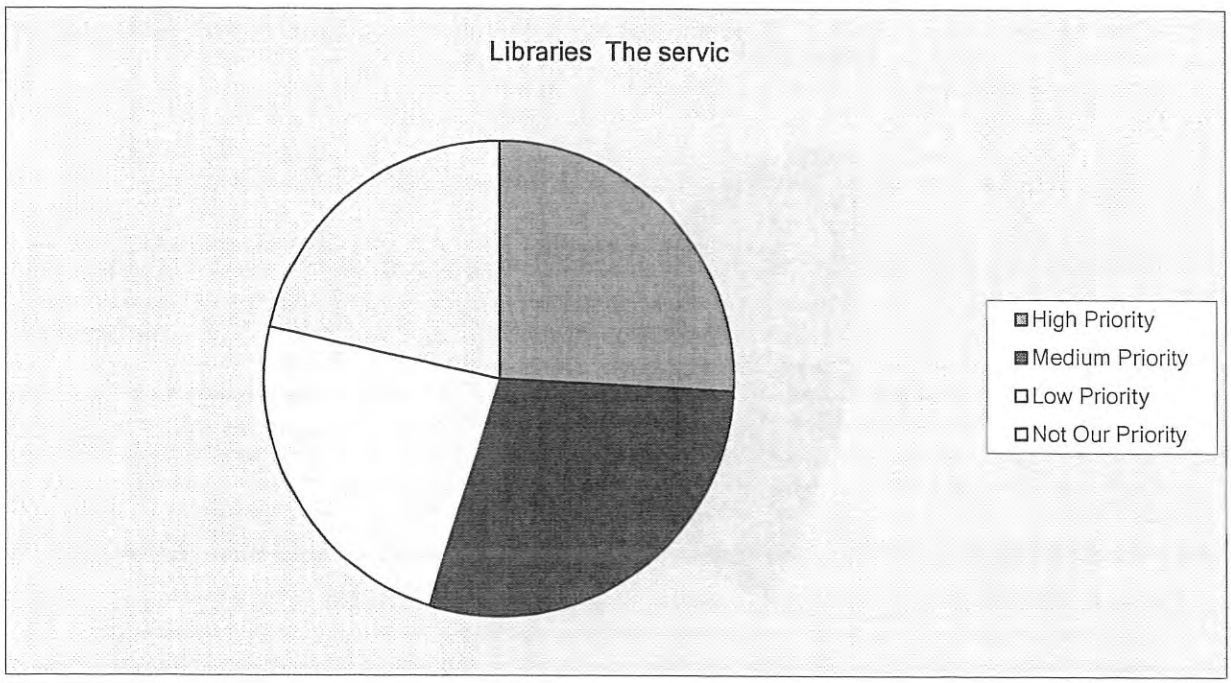
Answer Options	Response Percent	Response Count
High Priority	11.8%	11
Medium Priority	25.8%	24
Low Priority	29.0%	27
Not Our Priority	33.3%	31
	answered question	93
	skipped question	16



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Libraries The service area of the library must be primarily permanent residential in nature and the permanent residents must be comprised of 51% of more LMI persons. The

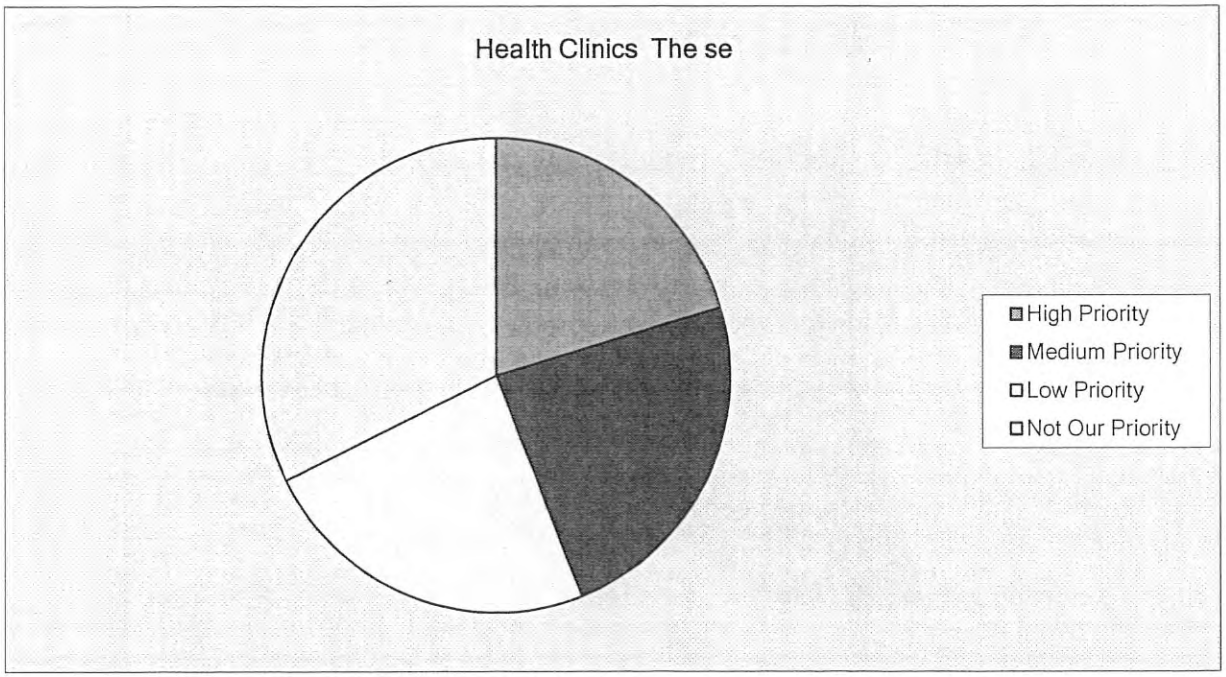
Answer Options	Response Percent	Response Count
High Priority	25.8%	24
Medium Priority	29.0%	27
Low Priority	23.7%	22
Not Our Priority	21.5%	20
	answered question	93
	skipped question	16



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Health Clinics The service area of the clinic must be primarily permanent residential in nature and the permanent residents must be comprised of 51% or more LMI persons. The

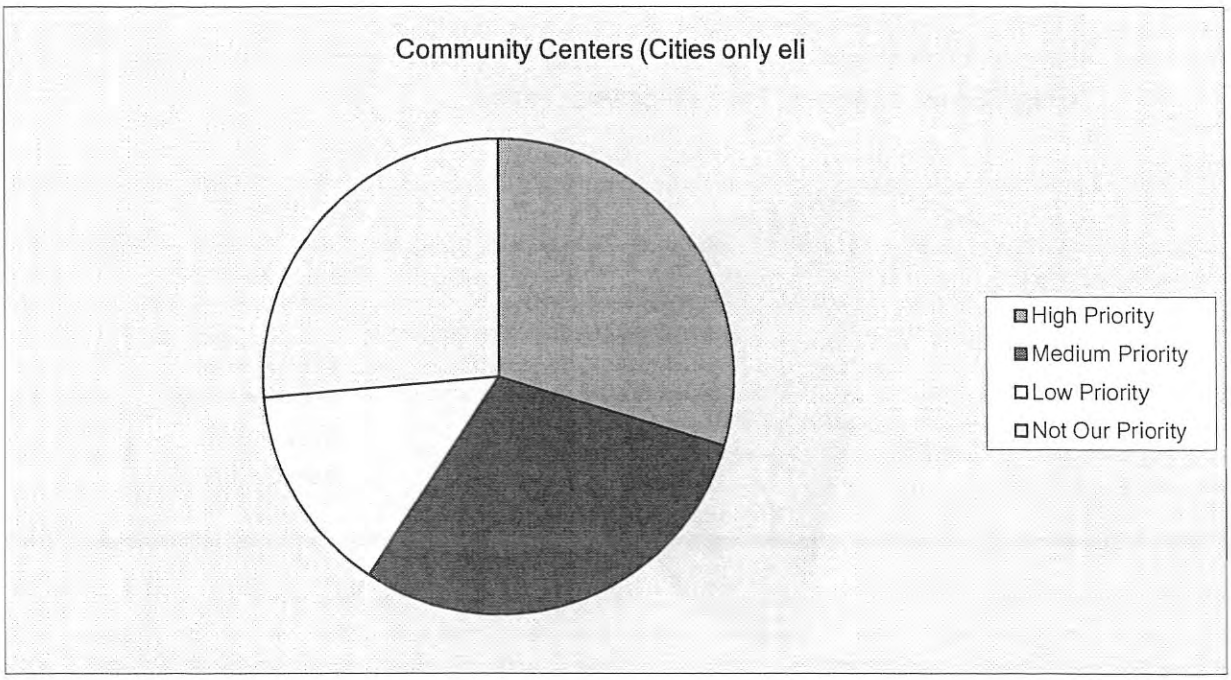
Answer Options	Response Percent	Response Count
High Priority	20.4%	19
Medium Priority	23.7%	22
Low Priority	23.7%	22
Not Our Priority	32.3%	30
	answered question	93
	skipped question	16



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Community Centers (Cities only eligible to apply) The facility must be owned by the city and constructed on land owned by the city. The service area of the Center must be

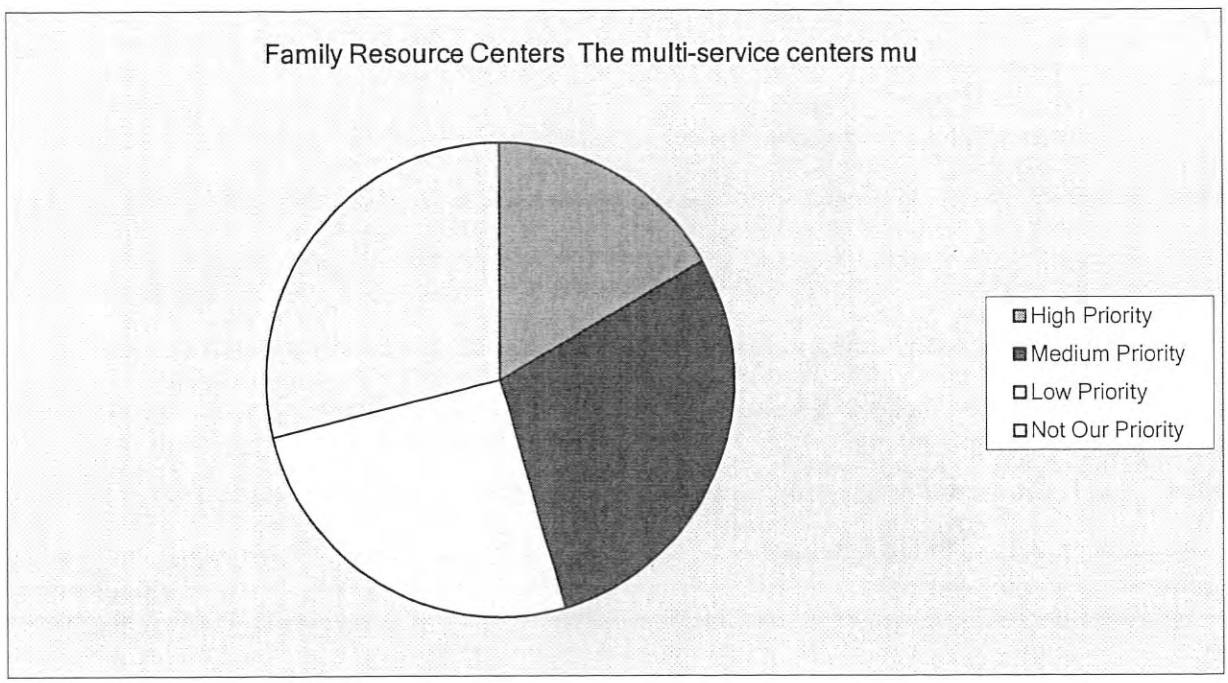
Answer Options	Response Percent	Response Count
High Priority	29.7%	27
Medium Priority	29.7%	27
Low Priority	14.3%	13
Not Our Priority	26.4%	24
	answered question	91
	skipped question	18



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Family Resource Centers The multi-service centers must operate as a community center in that they must be open to the entire population of a defined service area comprised of

Answer Options	Response Percent	Response Count
High Priority	16.7%	15
Medium Priority	28.9%	26
Low Priority	25.6%	23
Not Our Priority	28.9%	26
	answered question	90
	skipped question	19



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020 Consolidated Plan

Other Public / Community Facilities needs? (please describe)

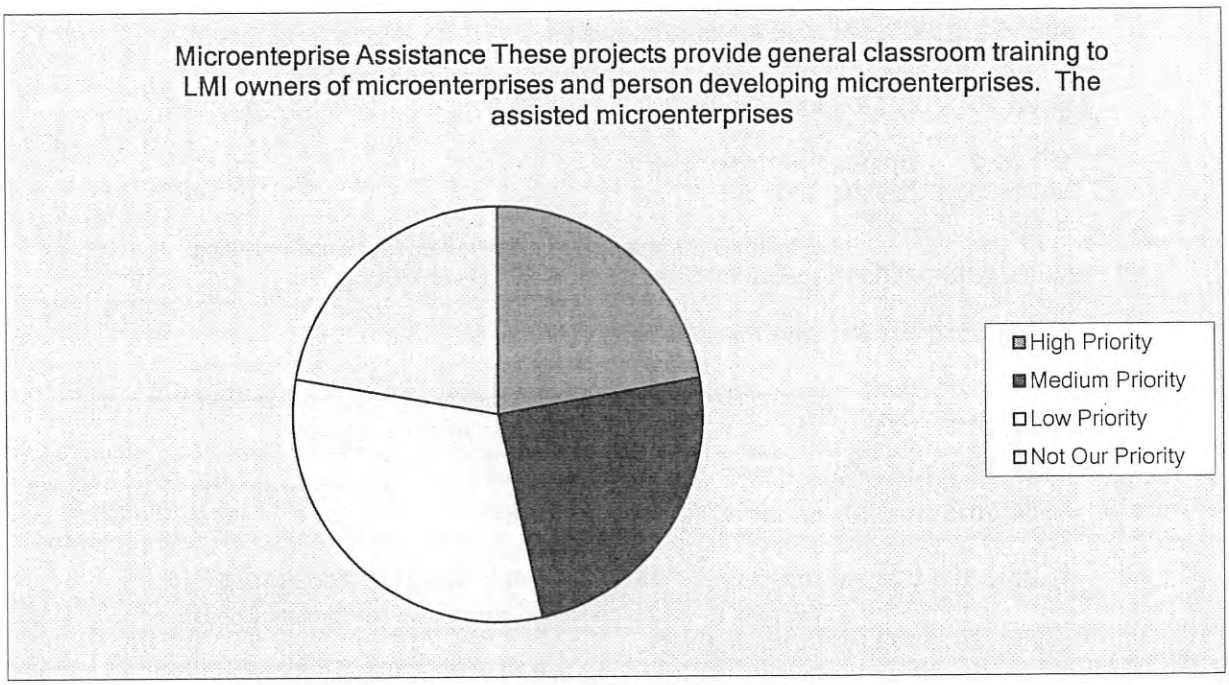
Answer Options	Response Count
	19
answered question	19
skipped question	90

Number	Response Date	Response Text	Categories
1	Mar 30, 2015 7:51 PM	City Hall/Community Center with a bathroom. Current City Hall only 18 people allowed in it at one time and it has no restroom facilities	
2	Mar 30, 2015 4:11 PM	None identified in our plan	
3	Mar 28, 2015 12:57 PM	Safe sidewalks and lighting for pedestrian and bike transportation between facilities.	
4	Mar 26, 2015 5:15 PM	Emergency prep	
5	Mar 26, 2015 2:25 PM	New Jail	
6	Mar 25, 2015 10:00 PM	General Government Administration Buildings and providing adequate ADAA access to all City services.	
7	Mar 25, 2015 4:34 PM	Work Force Housing	
8	Mar 24, 2015 11:28 PM	Our community building is drastically in need of improvement. We also need to complete upgrades to our city hall.	
9	Mar 24, 2015 10:43 PM	new police station/city hall facilitiy	
10	Mar 24, 2015 10:16 PM	Sewer facility for industrial area.	
11	Mar 24, 2015 9:38 PM	REMODELED/NEW CITY HALL. NEED FOR UPGRADES.	
12	Mar 24, 2015 8:39 PM	We want to build a combined community health/mental health treatment facility.	
13	Mar 18, 2015 8:54 PM	housing has been done in the last 20 years. Northwest Oregon Housing Authority will be doing a housing needs assessment that we plan to use to kick start some new affordable housing.	
14	Mar 7, 2015 2:53 AM	We need a community center where kids can play ball or games.	
15	Mar 6, 2015 6:38 PM	It's critical given the market forces in the community that a continuum of housing option be made available for families of all kinds living and working in LIncoln County. Please include homeownership as a option for funding.	
16	Mar 6, 2015 6:14 PM	Need a new City Hall and Library building.	
17	Mar 6, 2015 5:55 PM	agencies and build a new recreation center, existing structure housing these is 80 yrs old.	
18	Mar 6, 2015 5:39 PM	Swimming pool.	
19	Mar 6, 2015 7:53 AM	We are thankful for our beautiful Senior Center facility that was funded in part by a CDBG grant. We'd be very interested in an opportunity to fund our Public Works maintenance and vehicle storage buildings through CDBG funding.	

COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Microenteprise Assistance These projects provide general classroom training to LMI owners of microenterprises and person developing microenterprises. The assisted

Answer Options	Response Percent	Response Count
High Priority	22.2%	20
Medium Priority	24.4%	22
Low Priority	31.1%	28
Not Our Priority	22.2%	20
answered question		90
skipped question		19



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020 Consolidated Plan

Other Public Services needs? (please describe)

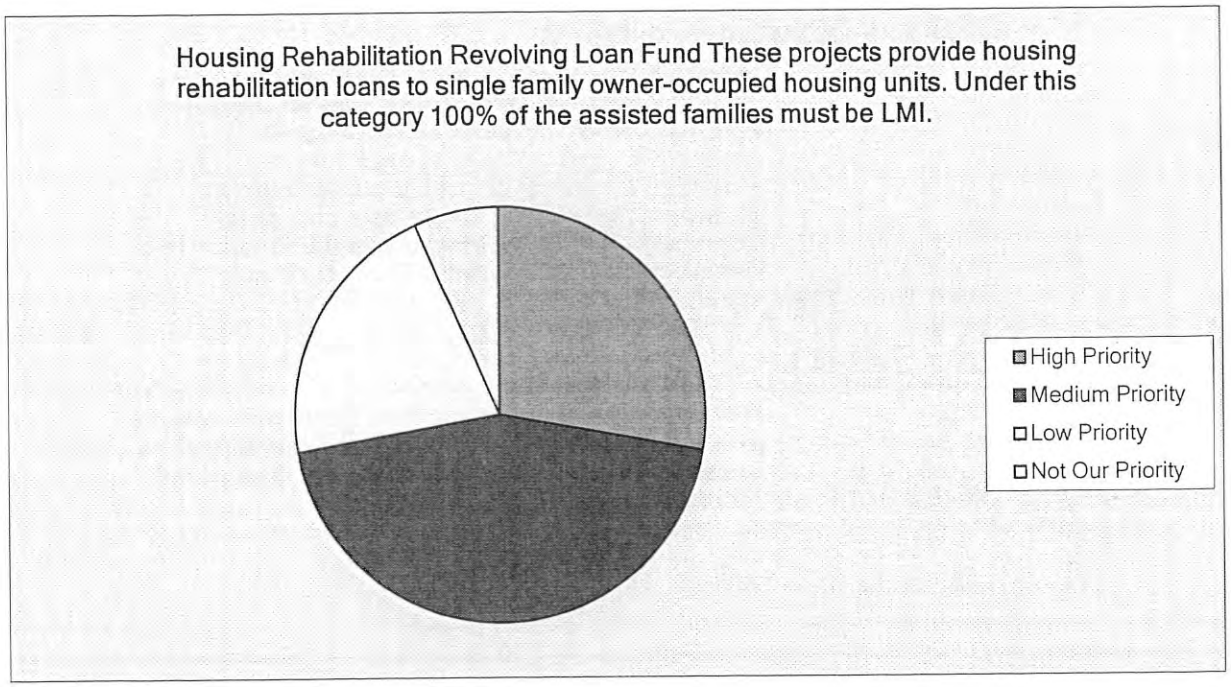
Answer Options	Response Count
	8
answered question	8
skipped question	101

Number	Response Date	Response Text	Categories
1	Mar 30, 2015 4:11 PM	Recreational and public park improvements	
2	Mar 28, 2015 12:57 PM	Transportation to shopping and medical	
3	Mar 26, 2015 2:25 PM	none	
4	Mar 24, 2015 9:38 PM	LAW ENFORCEMENT	
5	Mar 9, 2015 3:27 PM	I'm not sure where this fits in, but telecom is rapidly becoming critical infrastructure. Many rural communities are falling behind urban areas, and the digital divide will only exacerbate this problem. Some kind of program to help serve LMI populations with internet and develop programs to get them using the internet would be really helpful. The digital accessibility programs (not building fiber infrastructure) would probably be the easier piece to fund, and would also have the most immediate impact.	
6	Mar 6, 2015 5:57 PM	Helping people suffering from severe poverty.	
7	Mar 6, 2015 5:39 PM	n/a	
8	Mar 6, 2015 7:54 AM	Ability to partner with School District and Community College to provide work force training and business administration training so that those who grow up in small community will stay to live and operate a successful business.	

COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Housing Rehabilitation Revolving Loan Fund These projects provide housing rehabilitation loans to single family owner-occupied housing units. Under this category

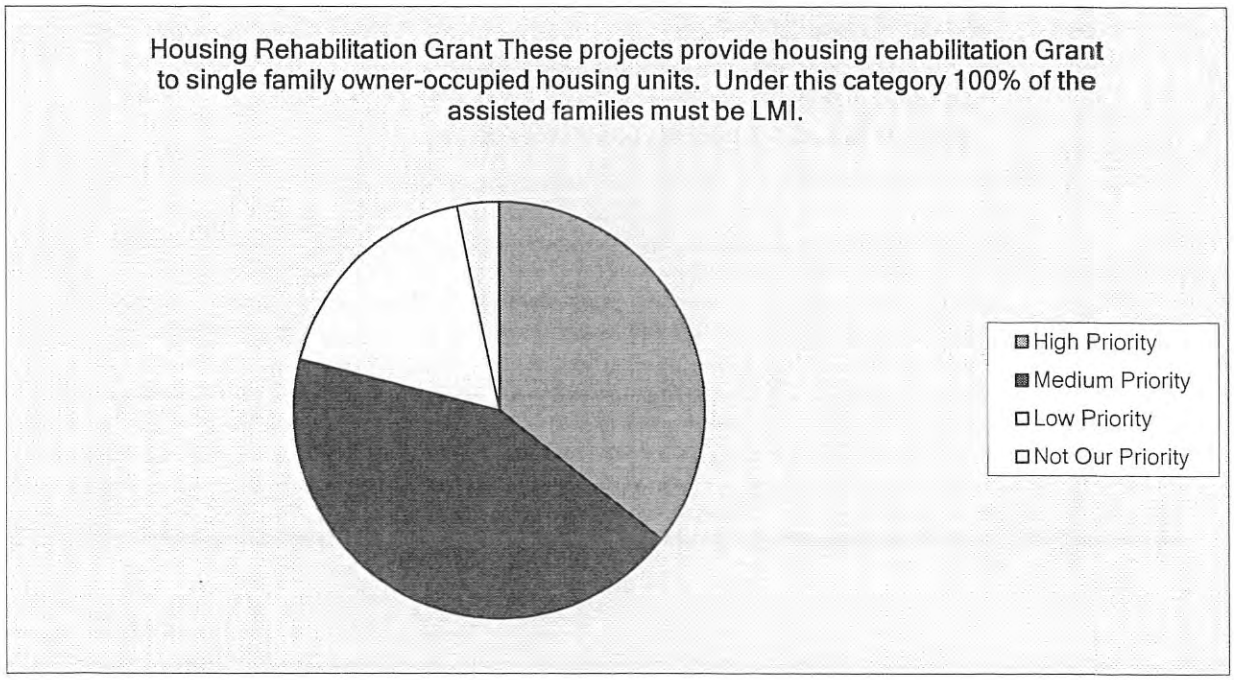
Answer Options	Response Percent	Response Count
High Priority	27.8%	25
Medium Priority	44.4%	40
Low Priority	21.1%	19
Not Our Priority	6.7%	6
	answered question	90
	skipped question	19



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020
Consolidated Plan

Housing Rehabilitation Grant These projects provide housing rehabilitation Grant to single family owner-occupied housing units. Under this category 100% of the assisted

Answer Options	Response Percent	Response Count
High Priority	35.6%	32
Medium Priority	43.3%	39
Low Priority	17.8%	16
Not Our Priority	3.3%	3
	answered question	90
	skipped question	19



COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020 Consolidated Plan

Other Public Services needs? (please describe)

Answer Options	Response Count
	6
answered question	6
skipped question	103

Number	Response Date	Response Text	Categories
1	Mar 30, 2015 4:11 PM	None	
2	Mar 28, 2015 12:57 PM	In town recreation as well as transportation to out of town recreation during summer months	
3	Mar 26, 2015 2:25 PM	none	
4	Mar 24, 2015 11:19 PM	Law enforcement resources.	
5	Mar 6, 2015 5:40 PM	n/a	
6	Mar 6, 2015 4:01 PM	Business Loan/Grant Program	

COMMUNITY DEVELOPMENT BLOCK GRANT FY 2016-2020 Consolidated Plan

Other Community Development needs? (please describe)

Answer Options	Response Count
	14
answered question	14
skipped question	95

Number	Response Date	Response Text	Categories
1	Mar 30, 2015 8:52 PM	Assistance in restoring and maintaining historic buildings in our downtown.	
2	Mar 30, 2015 4:12 PM	Park development and provision of park and open space opportunities in identified neighborhoods	
3	Mar 26, 2015 2:26 PM	Recreation and aquatic center	
4	Mar 25, 2015 5:18 PM	Parks facilities funding. Play equipment, picnic shelters, trails and walking paths, ball fields, community center	
5	Mar 24, 2015 11:20 PM	City Hall upgrades for ADA compliance and long term infrastructure integrity.	
6	Mar 24, 2015 9:07 PM	The city is currently working on the Huntington Memorial Park and Garden. It is starting from the ground up. The city would like to have public restroom facilities available, however, the cost is very expensive for a facility that is already built and have it delivered. We continue to have fund raisers to hopefully someday soon provide this to our community.	
7	Mar 24, 2015 8:52 PM	trash removal around abandoned and substandard housing. Especially in the northern portion of the county.	
8	Mar 18, 2015 8:55 PM	Senior Center for Central County is a priority.	
9	Mar 16, 2015 3:58 PM	Multi-Family dwelling developement	
10	Mar 9, 2015 3:28 PM	See the comment about internet accessibility. It's important that LMI populations engage with the internet, and statistics show that a big chunk are not. We need to work to bridge that gap.	
11	Mar 6, 2015 6:06 PM	We live in a community that did not reach PM2.5 attainment according to the the EPA and it's deadline of 12-31-14. Where the monitoring station is located in also in one the poorest areas of our community. We have a very pressing need to rectify this problem due to unhealthful air quality and it's impact as well on economic development. Some of the solutions are to ban wood burning completely, which would solve the problem but also have a dire financial impact on people that burn wood, most of whom can't afford trash pick up yet alone an electric bill in the winter for heat, ergo the problem, they burn trash and green wood in their stoves which just exacerbates the problem. We have formed a committee of stakeholders to try and rectify the issues without a complete bangs, some solutions; BPA grant to install ductless heat pumps, replace uncertified stoves for tenant occupied residences, seasoned cord wood swap, better education and enforcement.	
12	Mar 6, 2015 5:40 PM	Funding for downtown improvements.	
13	Mar 6, 2015 4:15 PM	Low income family housing. What is available is in horrible condition. People complain for the conditions; bugs, cold, mold, etc. The local school is declining. If better housing was available families would move to Union. City would like to bring in a new facility into town but not sure where to start or who to contact.	
14	Mar 5, 2015 9:33 PM	Updating City Hall	

Summary of Priorities

Code	Type of Project	Priority 1		Priority 2		Priority 3		Priority 4		Priority 5	
		Number of input	% - Priority 1	Number of input	% - Priority 2	Number of input	% - Priority 3	Number of input	% - Priority 4	Number of input	% - Priority 5
PW	Public Works	36	46%	26	33%	13	17%	6	8%	5	6%
CF	Community Facility	10	13%	16	21%	16	21%	19	24%	17	22%
Street/trans	Street/Transportation Improvements	11	14%	13	17%	15	19%	6	8%	6	8%
Housing	Housing need	9	12%	5	6%	4	5%	4	5%	7	9%
HR	Housing Rehabilitation	1	1%		0%	4	5%	9	12%	5	6%
DR	Downtown Revitalization	5	6%	3	4%	3	4%	3	4%		0%
Other CF	Other Community Facility	3	4%	3	4%	6	8%	3	4%	10	13%
OTHER	Other needs			4	5%	3	4%	4	5%	3	4%
Micro-E	Micro Enterprise			2	3%	3	4%	2	3%		0%
Off-site infra	Off site infrastructure			1	1%	1	1%	1	1%		0%
BLANK	Not answered	3	4%	5	6%	10	13%	21	27%	25	32%
	TOTAL	78	100%	78	100%	78	100%	78	100%	78	100%

ATTACHMENT C: COMMUNITY SURVEY QUESTIONS

Community Survey: Tell us about the housing needs in your community!

Exit this survey

1. Have you or someone you know had difficulty finding housing that's affordable in the past 5 (five) years.

- Yes
- No

2. If yes, please describe the reason or reasons that housing that was affordable was hard to find.

3. What are the most urgent priorities for people experiencing homelessness in our community? Check all that apply.

- Increase emergency shelter spaces
- Increase emergency rent assistance
- Increase transitional housing (up to 2 years)
- Increase permanent housing
- Homeless support services (transportation voucher, services, centers)
- Medical and dental services
- Mental health services
- Addiction services
- Food services

Other (please specify)

4. What is the most significant barrier to people finding and maintaining housing in your area?

- Rent costs
- Home purchase fees
- Household credit
- Money for utilities and rent deposits

- Housing discrimination
- Finding vacant units
- Lack of steady household income
- Lack of supportive services to help households maintain housing

Other (please specify)

5. What housing programs and activities are the most needed in our community now? Please select your 1st, 2nd and 3rd choices from the list below.

	1st Choice	2nd Choice	3rd Choice
Additional affordable rental housing			
Down Payment assistance for first time home buyers			
Emergency home repair for low income home owners			
Major home repair programs for low income home owners			
Accessibility improvements for renters with disabilities			
Accessibility improvements for owners with disabilities			
Repairs/Renovation of affordable rental units			
Homebuyer education			
Emergency rental assistance			

	1st Choice	2nd Choice	3rd Choice
Foreclosure prevention assistance			
Housing case management assistance			
Eviction prevention			
Security deposit assistance			
Assistance with utilities and energy bills			

6. Which of the following social services are the most needed by low income persons?

- Medical and dental assistance
- Food assistance
- Housing assistance
- Veteran services
- Mental health services
- Addiction services
- Youth services
- Legal assistance
- Services for families with children
- Services for seniors and elderly
- Services for people with disabilities
- Services for victims of domestic or sexual abuse

Other (please specify)

7. What housing programs and activities are most needed in your community? Please select your 1st, 2nd and 3rd choices from the list below.

	1st Choice	2nd Choice	3rd Choice
Additional affordable rental housing			

	1st Choice	2nd Choice	3rd Choice
Down payment assistance for first time homebuyers			
Emergency home repair programs for low-income owners			
Major home repair for low-income owners			
Accessibility improvements for renters and homeowners with physical disabilities			
Homebuyer education			
Emergency rental assistance			
Medium term rental assistance (3-24 months)			
Long term rental assistance (over 24 months)			
Foreclosure prevention assistance			
Housing case-management assistance			
Eviction prevention			
Energy assistance			
Security deposit assistance			
Debt to landlord assistance			
Other Debt payment assistance			

Other (please specify)

***8. What city do you live in?**

***9. What county do you live? (this question is required to be answered. If you don't know, enter Don't Know).**

10. What is your current living situation?

- I rent
- I live in student housing
- I am temporarily living with family or friends
- I don't have a permanent place to live
- I own my home

Other (please specify)

11. How many people live in your household?

- I live alone
- 2 people
- 3 people
- 4 people
- 5 people
- 6 people
- 7 people
- More than 7 people

12. Which racial, ethnic or cultural group do you consider yourself a member of? Check all that apply.

- African American/Black
- American Indian/Native American
- Asian
- Asian Indian

- [ ] Hispanic
- [ ] Multi-racial
- [ ] Native Hawaiian/Pacific Islander
- [ ] White/Caucasian/Anglo

Other (please specify)

13. What is the total income for everyone in your household? (choose from a range below)

- under $10,000
- $10,001 - $20,000
- $20,001 - $30,000
- $30,001 - $40,000
- $40,001 - $50,000
- $50,001 - $60,000
- over $60,000

14. What is your age? (Choose from a range below)

- under 18
- 18 - 29
- 30 - 39
- 40 - 49
- 50 - 59
- 60 - 65
- over 65

15. Is there anything else you would like to share?

Thank you for your time to fill out this survey!

Prev Done

Powered by **SurveyMonkey**
Check out our sample surveys and create your own now!

Attachment D:
Oregon Housing and Community Services
Five Year Strategic Plan Public Engagement Summary

Throughout April and into May, the Federal Planning Unit and Public Affairs Staff traveled to the following 11 cities to discuss issues related to housing and homeless services: Ontario, Coos Bay, North Bend, Medford, Klamath Falls, Tillamook, McMinnville, The Dalles, Hood River, Pendleton, and Redmond. Staff asked the same questions in each city. The questions were based on information that HUD requests in the Consolidated Plan and intended to give the department information about community housing priorities.
This document is a summary of the feedback and input the department received. This information will be used in the development of the HUD required Consolidated Plan and our strategic planning efforts.

STATUS OF HOUSING IN REGION/ NEEDS ASSESSMENT

1. What are the most common housing problems you encounter in your region?

Are units fully functional (kitchen, restrooms, and proper facilities)
Are units safe and free from health hazards? (e.g. lead paint, bed bugs)
Is there an issue with unit overcrowding?

-
  - Not enough affordable housing or living wage jobs. "Vicious circle-we keep asking for living wage jobs, but not the education to get those jobs for when they become available".
  - A lot of our students that go away and get educated don't come back.
  - We have a lot of minimum wage jobs- people working multiple jobs, yet still can't survive. How to help them get a better job? Good paying jobs have been replaced by automation and lower wages.
  - Employers having a hard time finding people qualified to work higher wage jobs and having to recruit employees from out of state/area.
  - Lack of affordable housing units. Just don't have a lot of low income housing inventory.
  - Transportation is an issue. Many buses provide limited options for low income.
  - Landlords often set unrealistic expectations for market rents resulting in disparities (rents disproportionately higher than mortgages further limiting access).
  - Haven't had any new housing developments in many years. Limited market stock on hand.

- Payment standards can be onerous. Often the rent meets the requirements, but once we include the high cost of utilities it goes above the payment standard. If utilities go above the payment standard, families are paying 30% (low income) plus the difference.
- If people do get housing, they can't get power service because often they are in arrears.
- Finding Housing that is adequate to house clients. Some landlords don't have the resources to fix up rentals to meet requirements of programs/inspections.
- Many families not receiving assistance are doubling or tripling up to make ends meet – leading to situations of overcrowding.
- A lot of people are coming out of corrections/recovery and it is difficult to access transitional housing. Criminal histories and debt to previous housing authorities making people ineligible for housing.
- Roach/bedbug/mold infestations have become a significant problem. Mold also becomes an issue when tenants don't turn up the heat in the winter (due to utilities costs).
- Nobody to go out to check and verify whether housing is healthy-check molds, etc. Can lead to increased health issues such as asthma. Have general HQS inspections, but can't determine extent.
- High levels of depression, mental illness and physical or intellectual disabilities.
- Substandard homes lacking adequate insulation which increases utilities, etc. 80% of homes built prior to 1970.
- Lack of security deposits to move. Application fees. Tenants do not know their rights. Many people with vouchers paying for/filling out multiple applications. Application fees restrictive. Why are landlords running screening if nothing is available? Landlords don't have control of the screening companies.
- Increase in homeless senior populations
- Extremely low vacancy rate, especially in the "affordable range."
- Housing standards are low outside of regulated housing.
- Existing affordable units being lost
- Landlords discriminating against HUD clients
- The impacts of foreclosure on those now in the rental market, previous homeowners are now renting and competing with low income persons.
- Landlords control/"monopoly" of the rental market
- "Housing First" saves system money.
- Case management /wrap around services critical.
- We have vouchers, but no housing units available. Vouchers aren't any good if there's no housing available.

- Barriers (criminal background, etc.) are hurdles that can be overcome, but no housing stock. Those with a mark on their history live in substandard housing.
- Lot of seniors/disabled come for energy/weatherization assistance, but the grants can be restrictive (have to pay for themselves). Have to use other funding i.e.: resort to CDBG funds through partners (Housing Authorities) due to inhabitability of housing stock.
- Many energy efficiency/weatherization upgrades no longer make sense. Need to look at program.
- Lots of houses that are in need of repair (lots of deferred maintenance, such as roofing, flashings, gutters, etc.), but people don't have the resources to do it on their own especially the older demographics.
- Many residents are proud, older demographics and won't ask for assistance.
- Often it's not worth looking at repairs if it doesn't make affordable housing available.
- Chronic dependence on multiple social service programs.
- Don't have the "housing police" in rural areas to ensure housing is clean, safe, etc. Requires a lot of work for each jurisdiction. Perhaps local mediation a solution? Many times disagreements are expensive and not productive (e.g.: landlords can "wait it out" until the tenants simply wear out/move out).
- What can a tenant do when a rental is finally inspected and marked as "un-occupyable"- forced to move out within 48 hours and unable to find a vacant affordable alternative?
- Lack of affordable housing due to vacation rentals. People are buying second homes in destination and recreation areas. In Hood River 8-12% vacation housing. These were the more affordable homes. Hood River is 440 housing units short. Apartments were turned into condos.
- Workforce/mental health/section 8 – two year waiting list.
- Nowhere to move up from section 8.
- Young men will never be eligible because there are no programs that support them.
- When an affordable housing unit is built the criteria is so strict that most won't qualify. Issues that make them homeless preclude them from qualifying. Rigid criteria and long wait lists.
- The FMRs are an issue. State/local and federal programs. AMI is another issue. Leaves some folks out of the mix.
- Last year the housing choice voucher protection law was passed. Still see issues with discrimination. Especially with the large Spanish speaking populations. Undocumented persons don't speak up for fear of being on the radar. Need to evaluate the success of the protections.
- A formula based on AMI is not fair.

- People are willing to put up with awful situations because the landlord will accept them.
- Families may not qualify.
- People don't have a place to live that's close to work/employers have a hard time hiring
- Tax credit housing is hard to do in Tillamook (big chunk of federal funding) (based on state or local median income – better to base it on state for Tillamook. This structure is a problem for Tillamook.
- Professionals can barely afford to live here as well.
- Weatherization/have to walk away from many because they are too far gone. Big need to rehab. Poor cannot afford to make repairs. Housing stock is slowly going away.
- Impacts every level if there is no housing available. Employers who want to expand can't house employees. Can't afford to live and work in the same community.
- Long waiting list for all programs. Not enough funding.
- Overcrowding is an issue.
- Substandard homes lacking adequate insulation, utilities, etc.
- 80% of homes built prior to 1970.
- Lack of security deposits. Landlord are requiring 3x monthly rent in income.
- Doubled and tripled up household.
- Increase in homeless senior populations
- Bedbugs, need to find a way for nurses to test before they go to shelter.
- Seven people on street because house was condemned
- Lots of substandard housing in Umatilla County
- Where do we put them, how to pay for it, ESG fair market rent does not allow (asking for a waiver from HUD)
- FMV – rents are too high, landlord's market.
- FMV - Monthly rent/utilities median for the area.
- FMV supposed to be rapid rehousing but ties their hands
- Frustrating for a landlord when tenants take advantage
- Educate tenants on rental agreement/accountability
- Hard to get landlords to work with system
- Need for one bedroom or single occupancy units.
- Undocumented unable to access many systems
- Manufactured home that was purchased really needs to be replaced
- Black mold, cockroaches (no other choice).
- Health conditions created by living conditions.
- Educate tenants on rental agreement/accountability.
- Hard to get landlords to work with system.
- Workforce has no housing.

- Reverse mortgage counseling. Foreclosure issues still remain.
- Difficult to engage Latino families in conversation about housing barriers due to cultural barriers.
-

2. **Describe the impact of cost burden for your area?**
    - Many people served by programs do not understand how to budget, or what they can afford. The population coming in asking for services don't really know what affordable housing looks like. Don't really know what percentage of their income should be spent on housing. Can lead to numerous other complications (e.g.: health- can't afford medication because they need to make rent, etc.).
    - "Rent isn't lower because you make less" – rent is rent.
    - Have a lot of older homes that are not well insulated resulting in higher heating costs.
    - Some are opting out of assistance programs to take substandard housing.
    - Some landlords will actually raise rents (in some cases double) for tenants with poor/nonexistent credit. Tight housing markets force some to pay extra (gray market).
    - Teaching classes on how to take care of an apartment would be beneficial for some (e.g.: responsible renter's class). Problem is that you can't make them attend, requires intensive case management, some landlords still won't accept clients.
    - Many social services are trying to work with landlords to reduce rent or pay utilities, but the market doesn't demand their participation (
    - Section 8 is too restrictive: would be nice to rent a room with Section 8 funding (more flexible funding options such as HOPWA, Home at Last guarantee program <$5,000 repairs, etc.) Section 8 won't allow rental from family members, this is especially important for persons with disabilities.
    - A majority of folks are paying more than 30% of income towards rent. In many cases that can go up to 75% of income. Rents often exceed local payment standards.
    - Even with assistance (e.g.: vouchers) people are not able to make ends meet. HUD utility calculations have changed for credits which has led to increased burdens and reduced voucher amounts. Reduced size of rentals available.
    - Apartments cost more for a minimal apartment than many seniors/disabled with SSI get in their entire check. Making it almost impossible to find units.
    - Quick to look at the percent spent on housing. There is more about transportation issues. Look at a broader definition of cost burden (housing/transportation). No public transportation throughout the balance of state areas. . Cost burden should include transportation costs.

- Cost burden should include child care. Child care was cut for families transitioning into self-sufficiency. Fewer child care options for low income persons who have to travel great distances, without reliable transportation.
- People reluctant to leave subsidized housing. Bill in legislature to allow people to stay in the subsidized housing even when their income is raised. Need to incentivize people to move along. Have a lot of rental assistance through CARE. Families put off house payment because of other expenses.
- FMR does not match the utility allowance. Cannot find units that fit into FMR. HUD will not increase the FMR.
- Students working/their budgets are tight. Last choice and first hope (Pell Grant). Students taking just a few courses and working full time to get grants and make ends meet. There needs to be a rural factor.
- Burden of moving into an apartment is too high. First/last/security deposit. Realtors are asking for three times the amount of rent just to move in.
- All income levels affected by the rising costs.
-

3. **Are there any populations or household types that are more affected than others by these problems?**
    - Families with children
    - Disabled elders who are on a fixed income
    - Unaccompanied youth (<18 y.o.)
    - Large families (e.g.: 6+ people)
    - Domestic violence/mental health issues
    - Pet friendly housing
    - Trends to eliminate low-income by out pricing/outsourcing them to other communities. This is disastrous for families and has an exponential negative affect on our children.
    - No quality low and high-end housing compounds these problems
    - Single moms with inadequate incomes (TANF is not sufficient)
    - Veterans
    - Mentally ill persons. Mentally ill populations taking burnt of the issues.
    - Lack of transitional housing units
    - Elderly, disabled
    - Majority in need are working poor, but not getting full time.
    - Domestic Violence survivors
    - Many can’t find living wage or manage integration into programs – continuum.

- Folks coming out of drug and alcohol rehab, out of incarceration, mental health supportive housing, those with criminal backgrounds, high barrier folks
- Both integrated and congregated settings depending on population needs.
-

4. **What are the needs of low income individuals and families with children who are currently housed but are at risk of becoming unsheltered or losing their housing?**

-
    - Subsidy/benefits cliff making folks no longer eligible for anything and the loss of benefits is greater than income increase, not enough income to sustain rent on their own (loss of any subsidy creates housing loss), difficulty navigating bureaucracy, lack of rental and deposit assistance, eviction prevention dollars are limited.
    - Mental health, addictions, criminal background, small town (everyone knows you). The Dalles doesn't have any emergency stopover. Hood River does have a warming center. Community support is demonstrated by this project.
    - In the Dalles or the surrounding four counties no drug treatment/residential facilities.
    - Must serve probation where they originally committed the crime.
    - Undocumented persons need a system to advocate for them.
    - Foster kids aging out/discharge plans can be sleeping on someone's couch. Need more flexible tools to house them.
    - Sufficient employment opportunities with adequate pay (skills seem to be sufficient for the most part)
    - Increased financial education opportunities
    - Rental education (Ready to Rent)
    - Mailing original copies of id's to obtain birth certificates
    - Program requirements can be daunting.
    - Need predictable rent and stable rental environment.
-

5. **What are the needs of low income individuals and families with children who are currently housed but are at risk of becoming unsheltered or losing their housing?**
    - Sufficient employment opportunities with adequate pay (skills seem to be sufficient for the most part)
    - Workforce training and necessary identification is expensive. Mailing original copies of IDs to obtain birth certificates- this is expensive and challenging.
    - Reliable transportation
    - Increased financial education opportunities
    - Rental education (Ready to Rent)
    - A livable wage. Especially families with children/ electric, gas, copay, child care

- Used to have lots of rehab dollars. These dollars have diminished. These dollars help us preserve what we have.
- Health is connected to so many things. The Medicaid population has a continual need. Social determinant of health in this region is driving the health costs. Address their food supply, housing.
- Food on most people's budget is discretionary. They will pay other bills and not buy food. Speaking to groups about food nutrition
- Transportation. Head start does not have transportation. No vehicle, driver's license or car insurance. To have a stipend they must prove they can legally drive. Students who need medical evaluations for free but there is no transportation.
- Dental care for low income.
- Child care is a real barrier for low income. Not a lot of providers, expensive, many children to transport.
- Program requirements can be daunting.
- Because of a lack of resources, some see criminal activity as their only option. They develop criminal histories that further limit what options are available in the future and affects those families with children. Need living wage jobs and options.
- No housing options for people straight out of prison especially with probation requirements and restrictions on where people can live.
- Some families receiving TANF are required to participate in a jobs program but don't have the transportation to do so resulting in decreased benefits.
- Families who quit employment can be ineligible for TANF for up to 120 days. Reasons why people quit can include need for child care, help taking kids to doctors, do not have reliable transportation.
- Foster family/alternative family placements can become financial burden on struggling families.
- Seeing more people come over to Oregon from Idaho because Oregon has more benefits/higher minimum wage.
- Seeing more non-traditional households more often, but not necessarily increased access (still seeing 3-4 x per annum but more nontraditional families).
- Many families see programs as a last resort rather than supplemental and ongoing for them.
- Transitional services between programs are critical for many of these populations.
- Many are living paycheck to paycheck.
- Childcare is staggeringly expensive.
- Many do better by not accepting benefits that can be volatile or non-dependable.

- May find lower cost rentals (e.g.: older), but wind up paying more due to inefficiencies, or transportation costs.
- Some experience moving into a rental only to have the landlord raise rent.
- Permanent supportive housing units.
-

6. What are the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance?

-
- Many do better by not accepting benefits that can be volatile or non-dependable.
- Obtaining additional benefits and/or employment to maintain housing. Work to transition onto HCV waitlist.
- Time allowed on rapid re-housing program is not sufficient
- Money management skills.
- Financial assistance in overcoming barriers (DMV fees, debts owed, medical bills, etc.)
- Need living wage jobs or two minimum wage jobs/40 hours per week.
- DHS is proposing a redesign of the TANF system. When employment raised wouldn't mean the person would be kicked off as soon. Would allow up to $1200, and then stair step down.
- Going to see rising water costs due to water shortage. Landlords raise rent to pay costs.
- More flexible dollars to assist folks in overcoming these barriers (attorney help, financial management, etc.).
- Help with clothes, job training, and education.
- Flexibility to help the whole person.
- Illegal camping fee of $3,000, homeless low income people being fined for having nowhere to go.
- Expunge criminal histories.

7. What are the needs of formerly homeless families and individuals who have successfully moved beyond assistance?

- Help paying back loans. Medical and credit debt is detrimental to rental options.
- Better and more access to IDA's
- Learning to make better life skills education/training (regular daily household skills i.e. Laundry, dishes, paying bills) learning to make better choices
- Requires case management and collaboration amongst areas/programs-finding the "biggest bang for your investments"). e.g. DHS Differential Response
- Support from community. Lack of family or due to generational poverty, family is not a support system.

- Some people have been down so long and are afraid of success-affirmation. Suffering trauma.
- Having a secure base of support for potential crisis-critical time when they are desperate.
- Warmline program- Peers for Peers 24 hour peer support line (e.g.: 211 info).
- Many don't have family or no longer have those connections but still need the social connection (domestic violence, etc.) Many have lost their family.
- Struggling. Graduating young people but there are no jobs.
- DHS people can get work if they come in the door. People can't compete because of their backgrounds. Need to get the people skilled up and provide housing.
- No work readiness training. Community College has a basic program. Closed alternative program in Hood River.
- Community Health Improvement Program seems like a good resource. Use what we've learned from other assessments. (share with OHCS)
- Child care costs and transportation. DHS says there is momentum in the legislature to address the child care issue. Push to increase and improve child care quality. The needs are the same. Same platform they came in on. If they miss a week's work. Surviving on the same platform they came in on. Copay is too high to send children to child care.
- Address the benefits cliff. DHS workers are educating clients on reporting requirements. Need to get the information out to partners. DHS says that they do have transitional benefits to offer to clients to help them stabilize.
- Continuation of scaled benefits as income increases.
- Addressing increased tax liability as income increases
- Support with childcare costs

8. What are the demographic characteristics of the population at-risk of homelessness in your area?

- Lots of single men
- Single moms
- People lacking education
- Disabled
- Households with no children, no disabilities, unemployed. Populations that are not qualified or considered lower priority.
- Teenagers (in particular <18). Foster system identified (IFP system 18-24 y.o.).
- Came out of a non-traditional/multiple-family homes (e.g.: got in a fight and left/couch surfing).
- High teen pregnancy rates impact risk
- Veterans

- Youth- underage minors, foster children
- People discharged from incarceration
- People suffering from mental illness
- People who have suffered foreclosure
- Non English speaking persons
- People suffering addictions
- Domestic violence survivors
- Unemployed
- Family, single people
- Seniors
- More multigenerational families

9. What barriers exist for seniors finding and maintaining affordable places to live? What barriers exist for aging in place?

- A lot of concern because the state has cut down on skilled nursing facilities. More focused on long-term care. Home medical model. Lack of facilities.
- Many seniors are resistant to moving into a smaller unit.
- Seniors want to maintain independence.
- Hoarding/ mental illness.
- Elder abuse.
- Inability to care for the home, lack of money to repair home, pay bills
- financial limitations (real estate market, can't afford care facilities)
- Limitations on pets.
- Accessible housing.
- Move-in costs for those on fixed income.
- Transportation/physically incapacitated/can't do the physical labor required for a housing search. They don't get to use their voucher and remain homeless.
- Successful programs are the minor repair programs.
- Lack of smaller units, lack of senior housing and long waitlists.
- Not much available. Long waiting lists.
- Many units appropriate to age in place. Units are inadequate.

10. Describe coordination with systems of care that may discharge person into homelessness, such as health care, mental health, youth facilities and correction programs and institutions.

- Parole officer is supposed to help those coming out of incarceration to find housing. Corrections system has no plan on how to transfer for housing. Lack of coordination. Persons are often dropped off at shelters, without determining if there is a bed or if they are appropriate for the facility.

- Hospitals do not discharge into an adequate environment. Very often dropping directly onto the street.
- No local drug/alcohol rehab services.
- Get calls from the hospital often because a person is homeless and there is no discharge plan.
- Jail diversion program difficult (come out homeless). Current housing has a lot of mental health clients (vulnerable) and can become complicated integrating the two populations. Then there's LRC transitions- "doesn't work well".
- Need to have a physical place to put them and a program to support them. Can't do that without money.
- No homeless shelter in the area.
- Has to be a community effort and need to include the faith community.
- There has been reluctance in the community to overcome these obstacles/stereotypes.
- Also a fear of "if we build it…they will come"- but they're already here.
- Some of the folks living on the river want to be there. They're fine with that lifestyle. When given the opportunity for something else, they just won't.
- Need for respite care.
- Lack of nursing homes.
- No real discharge planning.
- AMH's AIM High mental health program.
- EDBI (?) corrections pilot project to assist with transitional employment.
- Fast Track (DHS) with community corrections and county mental health.
- Provoking Hope corrections reentry program.
- *They are talking to each other, but there are no resources.*
- The hospital often holds clients without an appropriate discharge
- Need for respite care
- Lack of nursing homes
- CAPECO services are limited. Not a quick response.
- Drug/alcohol/felonies/no children with them yet: need more than a one bedroom, but landlords won't rent because of felony history.
- Helping Hands: Barrier; clients have no income. Organizations can't help because they can only pay first month's rent.
- Blue Mountain: Using Housing first and then look at the future outlook for clients.
- Corrections: Limited/no money/felony – Benefits are suspended and restart 30 days after release.
- Lifeways is the mental health provider, and has expanded in the area

- Many addiction issues.
- To address discharge issues, Homeless Leadership Coalition (HLC) is working on a coordinated entry system, HLC is working with the discharge planning workgroup and facilities coordination.

11. OHCS needs to provide a rational for establishing allocation priorities for funds for rental assistance production of new units, rehabilitation of existing units, and acquisition or preservation. Please tell us your recommendation on allocating funds within these services. How would you prioritize within the priorities?

- Rehab of existing units. Losing units because landlords no longer want to participate or make those investments. Landlords don't need to participate. Can't obligate them. Even if they can't pass inspection, the market is so tight that they can find another renter.
- Acquisition or preservation
- Production of new units
- Funds for rental assistance
- Land use restrictions from the other side of the state make it difficult. Very difficult and expensive to rezone. May be agricultural, but can't grow anything anymore.
- Businesses are leaving, people are staying…there's "no services to get people off the services".
- Rural Oregon issues. Ontario community has more in common with Idaho.
- Rural areas need flexibility to take advantage of opportunities and situations.
- Some states have capped programs such as TANF to 1 year (Oregon has full 5 years) resulting in an influx of traffic from out of state. More competition for scarce resources.
- State should designate $5-$10 Million for a Mitigation Fund to address increased housing costs if the Liquefied Natural Gas terminal development happens.
- Expecting a housing bubble ~ 2 years before development that would melt down the local housing market.
- Encouragement of low-income tax credit development
- Expanded local permitting
- lack of interest at the community and government level/not enthusiastic about low income housing.
- Funds to address the homeless issue sex offenders. No one wants to touch or deal with them. They end up homeless.
- Gap for those with criminal background or bad credit. An incentive program. Let clients prove they are complying so they can get the help they need. Support appeals process.

- 40% employees in Bend earn minimum wage.
- SRO and smaller units for homeless singles.
- Collaboration between gap funding and equity capital.
- Unit minimums can be a barrier.

12. Do you have protocols for service for unaccompanied at risk youth? If so, do the protocols include LGBT youth, youth of color and youth exposed to sexual violence or sex trafficking?

- It's really getting on the phone and finding someone at this point. No real protocols.
- Only for the undocumented youth, but there's no money for it. Have to be working with law enforcement. Helps with short-term necessities. Running into labor trafficking more.
- Unaccompanied youth have been a priority for developing protocols and trying to develop a youth program.
- Coos Bay is starting to develop LGBT group with New Community Coalition.
- Lincoln City's 10 Year-Plan is often cited as a model.
- United Way is starting a significant community collaboration impact project.
- Need a pot of money to do a County wide approach.
- Exodus House, Transitional Living Program (TLP) serves 17-21 y.o. runaway homeless youth, self-referred youth to Community Works.
- Some questions related to LGBT and referrals are made to other agencies based on the answers. Housing option for up to 30 days for those experiencing sexual violence.
- 779-HELP line.
- Difficulty in housing youth due to legal ability to sign for utilities, leases, etc.
- Increase in youth experiencing homelessness due to LGBT.
- Many parents created barriers for their children by putting credit/assistance into the child's name and destroying the credit during that time, starting the youth in debt.
- Have two programs for young men and one for women in The Dalles. Don't prioritize by category. Recognize when these groups come through the door. The region doesn't have specific programs but are culturally sensitive to each group identified.
- Some communities do not work with youth under 18 because they need parental permission.
- Clients use Exodus House.
-

13. Considering the transportation needs in your community, are there places that people need to go, but cannot get to? This could be hours of operation, location or other constraints.

- Even getting our clients to the circuit courthouse (Vale) is 20-30 miles away. The bus is time consuming, very expensive, and limited timing.
- Simple resources such as laundromat, etc. can be expensive due to availability/location.
- OHP+ in some areas provides transportation (to appointments, etc.), if they are on Medicare, etc. they don't qualify for OHP+. Limits access to healthcare, produce, etc.
- Some families are driving upwards of 30-100 miles just for groceries.
- Fresh produce not available at convenience stores.
- Public Transportation is extremely limited. Will not run in evening or only once/twice a day. Some areas no weekend service.
- Bus stops may not be adequate to serve many folks with disabilities.
- Major employers have no transportation to or from locations.
- No safe walking or biking options.
- No bus service to the jail where people have to regularly go for probation meetings.
- Rural areas lack transportation (none available)
- Complicated transportation system.
- Low income families can often not afford bus fare.
- Bus stops are not covered for inclement weather events.

HOMELESSNESS

14. What is your region's strategy to move homeless and temporarily housed individuals and families into permanent housing?

- Fill the gap between being at risk of homelessness to homelessness and assist them up to 3 years to then roll them over into the Section 8 program.
- The whole premise is to case manage people into self-sufficiency so they no longer need our programs. Sometimes 36 months is not enough, but sometimes it's plenty.
- The community is starting to have this question, but no answers yet. Will be more effective if its community driven rather than agency driven
- Many regions need to develop strategies. Many Communities need more coordination.
- More flexible funding is needed.
- 10 Year Plan to End Homelessness, with regular monthly meetings of the Homeless Task Force Coordination.
- Goal to transition to permanent housing. Rapid rehousing program/direct/ESP – transition people in place. Secure successful graduation.
- Warming shelter – everyone came together to make it happen. Huge effort
- Need to establish a regional strategy
- Coordination through the Homeless Leadership Coalition.

15. What are your recommended evidence-based strategies to end homelessness in your region?

- Case management programs
- Community college collection of data (enrollment, attrition, CTE, etc.)
- Poverty to Prosperity welding program at Treasure Valley CC. May take those people out of the area but gives some skills.
- Development of life/trade skills
- Don't know if we really utilize "evidence based" strategies.
- Housing first. However, housing first does not work easily in central Oregon where the vacancy rate is low.
- More housing
- Less restrictions. Would like to use Single Room Occupancy Units or other creative housing options that are not supported by HUD. Low cost housing options.
- General budget funding
- Housing plus services
- No 10 year plan to end homelessness (10 year plan was never developed)

COORDINATION/REGULATIONS

16. Do you have any recommendations to enhance coordination among the Continuums of Care, public and assisted housing providers and private and governmental health, mental health and service agencies?

- Develop a stronger relationship amongst the faith-based community.
- Faith-based community has a tendency to do things isolated. A real need to make the relationship meaningful and relevant.
- Faith community very active in the emergency food pantry.
- Coordination with everyone at the table to facilitate regional collaboration (with help from a facilitator).
- Coordination of state funding (interagency and with other agency)
- Need local political support/participation.
- Provide healthcare at the door. Enhanced services.
- Expand healthcare certifications with non-profits.
- Shared data across health systems.
- See dollars but no admin dollars. Lost TBRA program because they didn't have enough admin dollars ($1800 grant) Had to give money back. There was no staff dollars.
- Why does the community need to come up with a match?
- OHCS could partner with OHA. CCO flexible service/not sure it will count.
- SHAP – flexing program dollar use.

- State study how investment in one thing affects costs and outcomes in other sectors. I.E. study what an incremental investment in housing affect the costs of health care.
- More training on how to talk about the monetary incentive to rehousing people. Formula that gives a dollar and cents outcome to this problem.
- Laws around privacy – how do we share information? Creates stumbling blocks to coordination. Help support entities that have concerns about privacy. One common release.
- Tough in this area. Don't have a system in place. A few nights at a hotel.
- Winter we have warming shelters.
- Limited coordination with hospital.
- Warming station closes and people are out on the street.
- Why do they close? Pendleton closes due to lack of volunteers. The Fire Marshal mandates closure date dependent on the building. Churches could be used.
- There are places, but due to regulations and compliance issues it is difficult to use them.

17. Are there impediments or constraints imposed by HUD in the ways that ESG funds are used in your region?

- Too many different rules and regulations across programs.
- Matching fund requirements.
- Lack of administrative dollars. Not a lot of money in ESG compared to the amount of work required (especially with the rural calculations). Simply not worth it. Too much paper work.
- It would be nice to have the ability to use volunteer time, in kind donations, etc. as match.
- Dealing with HUD there are always challenges: such as the 30% area median income requirement (some have lost benefits for being just $10 over).
- Fair Market Rent Caps.
- Grant timing that affects fair market rent caps.
- The gap in our community are the working poor. They have an income and everything they need. They just don't have a lot of it. A simple thing such as a medical disaster can put them in a crisis for which services don't have the resources to help.
- Often a "one time" issue that causes a downward spiral (car breaking down/one paycheck away).
- ESG funds are so specific they might not be able to meet the need of the community.
- Target those that are "higher" low-income.
- County Commissioners had to approve ESG workplan, seemed silly.
- Not enough admin dollars with ESG.

- FMR, the match dollar, AMI requirement, can't use on a subsidized apartment complex (precludes Hood River),

18. What is needed to support a coordinated housing service system?

- One co-location for all providers
- Local political support.
- Help from the state in assessing what the community needs.
- Acknowledgement of the differences in smaller, rural communities.
- Housing.
- Rural areas housing shortages are compounded by transportation, etc.
- Local area rental vacancy rate is ~0.5%.
- Funding models are set up a little silly- "use it or lose it" for HUD Section 8 vouchers, but by using vouchers can be considered abusive of resources.
- Just not enough housing available.
- Regular coordinating meetings. Some communities have developed very coordinated efforts and others have a lot to go.
- Better research on what works (not just best practices). Many best practices don't work. Working examples of other counties that have turned themselves around.
- Clarification of data such as the one time Point in Time (PIT) count. HUD definition of homelessness is different from local school district. Makes very difficult to measure meaningful data.
- Need a "stick and carrot"- not getting buy in from local, regional, state governments (cities and counties not paying attention).
- Lots of denial and NIMBY-ism.
- Cultural stigmas entrench a prosecuting mindset for helping the homeless (e.g.: it's bad or shameful to help the homeless: county spending $2 million a month on food stamps is looked at as bad, but it helps stimulate the economy which is good).
- Better (more accessible/timely) transportation. Even just 10 minute earlier school bus schedules can lead to 80% increases in school breakfast participation. But, does the city even know?
- Need a fundamental new paradigm shift.
- Idea: creation of a Housing/Homelessness/Attainable Housing Council to facilitate a coalition of community members committed to the issue in Coos County.

19. Are there barriers to the community accessing services from your agency or the Continuums of Care?

- Access to housing
- Lack of funding
- Volatile funding
- Waiting lists on everything (except LIHEAP) - forcing many to go elsewhere (3+ wait lists).

- Growing local populations, but does not look to be getting any more vouchers.
- Documentation systems/requirements
- Income disparities / tourism industry (wineries provide lots of migrant labor reliant on low income jobs)
- Lack of childcare providers, paperwork (intake forms)
- Cannot advertise due to lack of capacity.
- Transportation & other issues already identified
- Changes in local community leading to increased bilingual community, but seeing more refugees (Kenya, Russian, etc.)
- Waiting list is currently closed, but the word in some of these communities is that the list is really short and people are applying from outside of the area (many refugees from Boise or out of state).
- People moving here for additional public assistance resources. Creating resource scarcity and having to refuse servicing people outside the area.
- Many programs heavily dependent on volunteer base that is aging out (70's-90's), and not enough "backfill".
- Inadequate funding to serve/outreach far outlying rural communities.
- Rural nature of outlying communities.
- Zoning issues especially related to persons coming out of jail.
- The rules that must be followed. Hermiston and Walla Walla come to Pendleton and some Pendleton people go there.
- Hurdles from the city.
- Educating people on what is happening in the community.
- People move here thinking they won't be homeless.
- The Condition of housing stock.
- Need CARE Coordinators to work with schools. Have many high school students who are couch surfing.
- Shelter units often have barriers, need wet shelters with low barriers.

Attachment E:
Survey of Latino Community and Service Priorities Final Report: June 10 to July 30, 2015

Methodology and Participation:

The methodology used included a combination of Community Forum Focus Groups and written surveys. For the Community Forum Focus Groups, I was guided by the questions inspired or required by the HUD consolidating planning reports as well as the Spanish on-line survey developed by Oregon Housing and Community Services.

Based on observation and level of participation, it appeared that the target Latino immigrant population were very reluctant to complete a survey in writing or on-line due to literacy issues.

Number of Community Consultations/Focus Groups Completed:

- Woodburn on 6/18/15 with an attendance of 35 people
- Salem on 6/20/15 with an attendance of 20 people
- Salem on 6/26/2015 with an attendance of 10
- Metolius on 6/27/2015 with an attendance of 35 people
- Pendleton on 7/10/2015 with an attendance of 9 people
- Hood River on 7/11/2015 with an attendance of 10 people
- Salem at Oregon State Penitentiary on 7/15/2015 with an attendance of 40 people
- Stayton on 7/18/2015 with an attendance of 10 people
- East Multnomah County on 7/18/2015 with an attendance of 40 people
- Madras on 7/19/2015 with an attendance of 20 people
- West Salem on 7/25/2015 with an attendance of 10 people
- Coos Bay on 7/26/2015 with an attendance of 40 people
- Of the 279 total participants:
- 227 were immigrants from Mexico: 30 were US Born with Mexican born parents
- 11 were immigrants from Guatemala, 8 were immigrants from El Salvador and 3 were immigrants from Honduras
- The average income was in the ranges of:
- From $10,000 to $20,000 per year and from $20,000 to $35,000 per year
- There were only three individuals in the range of $50,000 to $60,000 per year
- The average age of those participating was between the ranges of:
- 30 to 40 years old and from 40 to 50 years old
- The average number of people per household were between 5 and 7
- Out of the 279 people 270 were renting and 9 were homeowners paying a mortgage
- Sixty percent of the participants were living in poverty or extreme poverty

Cities represented	County	Community Forum/Focus Group participation (verbal feedback)	Written Survey Feedback completed at Community Forum/Focus Group
Woodburn	Marion	26	6
Keizer	Marion	4	1
Stayton	Marion	3	
Sublimity	Marion	4	
Aumsville	Marion	4	2
Salem	Marion	66	6
Salem (west area)	Polk	9	
Independence	Polk	4	
Metolius	Jefferson	13	1
Madras	Jefferson	20	
Redmond	Deschutes	18	2
Portland	Multnomah	14	5
Fairview	Multnomah	11	1
Gresham	Multnomah	21	1
Troutdale	Multnomah	1	
Happy Valley	Clackamas	2	2
Pendleton	Umatilla	4	
Hermiston	Umatilla	2	
Hood River	Hood River	10	
La Grande	Union	1	
Boardman	Morrow	2	
Coos Bay	Coos Bay	25	
North Bend	Coos Bay	10	
Lakeside	Coos Bay	5	
23 Cities	11 Counties	Total: 279	Total: 27

What are the most common housing problems you encounter in your region?

- Across all 23 cities
  - High cost of rent for families with children
  - Very difficult to find affordable units for men with criminal records and have families
  - Lack of valid social security number, credit history, and driver's license make it difficult to obtain an apartment or other type of housing
  - I don't get pay on time at my work place and I pay at least an additional $30 dollars in late fees on my rent payment every month.
  - Repairs are not done on time or done right. Most of the time we do the repairs ourselves
  - Landlords take advantage of undocumented immigrants and rent due to the immigration status

- Repairs are not done on time
- The appliances at the apartments are in very poor condition
- Discrimination
- Shortage of available units to rent
- Income is not constant
- Mortgage payments are too high and it's very difficult when payments represent 30 or 40 percent of my monthly income
- The cost of utilities combined with rent payment or mortgage are not affordable
- If you do not have more than three incomes in your household, it becomes more difficult to purchase a home
- Sometimes we have to use the Social Security Number of our US born child in order to apply for an apartment
- In the central Oregon region is very common that only the houses or apartments in the worst conditions are offered or reserved for Latinos
- Not enough housing for farmworkers in rural areas
- If a person has a criminal record, becomes more difficult to rent an apartment
- Sometimes we live in housing which is extremely deteriorated and makes us feel like we are homeless.
- Police harassment
- Drug and gang activity
- People drinking in parking lots and giving a bad example to children and the management doesn't do anything about it
- We follow the process of communication with housing managers and we get frustrated when we don't get a response from them.
- Parking is always a problem and it is very difficult to have visitors. The parking spaces are not adequate.
- Unsafe wiring
- Leaking roofs
- Holes in floors or walls
- Overcrowded apartments
- "We don't have a toilet and we use an outhouse in the property"
- "We leave in isolation"
- Evictions
- Holes in walls
- The air conditioning is out of service most of the time during the summer
- Bugs found in carpets and beds
- Children with rashes and skin problems due to insects in the floor
- Overcrowded apartments
- There is disconnect between the apartment manager and the non-profit who own the apartment units.
- It's easier to talk with the managers and the owners of the privately owned apartments than talking to a Non-Profit Housing Development Corporation manager

or owner.
- There is too much red tape or bureaucracy if we file a complaint or a request for repairs
- The line of communication between the owners and the tenants is almost non-existent in the majority of cases
- The owners of the apartments only come to visit us when they bring special visitors or want photo opportunities for grant proposals that they are submitting to foundations or the government
- If the owners have a meeting room or a recreational room it is very difficult to use it for activities organized by the tenants
- We feel sometimes that there are no avenues to file a report or complaint
- It's difficult to apply for an apartment unit due to the restrictions of immigration status or the type of work that we perform.
- Apartments are only for farmworkers. In some cases if we have only seasonal jobs as farmworkers we are ask to move or pressure to get farm labor jobs.

1. Describe the impact of cost burden?
   - Across all 23 cities
   - Between 30 to 40 percent of our income goes towards rent
   - Rent increases take place without prior notice. In some cases you get a notice of a rent increase the day before the due date for rent payment
   - If somebody gets into an accident and can't work, then it becomes difficult to find an assistance program to pay for rent. Many people are not eligible for Section 8 vouchers
   - Housing for farmworkers is very costly and in poor condition
   - Sometimes we have difficulties finding housing near the work place and the cost of transportation creates a big burden on our family budget
   - Due to the cost of rent we have to limit the purchase of food or medical services
   - If you have a criminal record the cost of rent is higher
   - Landlords take advantage of you and charge higher deposits
   - It is very difficult to rent an apartment in rural areas if you have a child with a developmental disability or an elderly person. Usually landlords don't want to rent to you. Sometimes we don't include a family member in the lease agreement and hide them at the apartment. When the apartment manager finds out, they increase our rent up to $100 dollars more
   - Seasonal farmworker housing is becoming more expensive and the conditions are deplorable. Sometime they charge $300 dollars for a shack in very poor condition
   - Between 40 to 50 percent of our income goes towards rent
   - Salaries are very low
   - Rent increases take place without prior notice. In some cases you get a notice of a rent increase the day before the due date for rent payment
   - If somebody gets into an accident and can't work, then it becomes difficult to find an assistance program to pay for rent. Many people are not eligible for Section 8

vouchers
- Housing for farmworkers is very costly and in poor condition
- Sometimes we have difficulties finding housing near the work place and the cost of transportation creates a big burden on our family budget
- Due to the cost of rent we have to limit the purchase of food or medical services
- If you have a criminal record the cost of rent is higher
- Landlords take advantage of you and charge higher deposits if you do not have any type of "accepted" ID

2. Are there any populations or household types that are more affected than others by these problems?
   - Across all 23 cities
   - Mexican families with children
   - Families with a disabled child or elderly person
   - Single mothers
   - Women survivors of domestic violence
   - Undocumented immigrants with US born children
   - Families with a family member who has a with criminal history
   - Monolingual Mexican immigrants
   - Farmworkers
   - Domestic workers
   - Elderly population
   - Children
   - Families with a disabled adult and child
   - Single mothers with criminal record
   - Single mothers
   - Women survivors of domestic violence
   - Undocumented immigrants with US born children
   - Families with a family member with a criminal history
   - Monolingual immigrants
   - Farmworkers
   - Domestic workers
   - Teen parents

3. What are the most urgent priorities for the homeless population in your community? Across all 23 cities
   - Increase the number of emergency shelters
   - Transitional housing should be increased
   - Addiction services are a priority, particularly in the area of alcoholism
   - Food pantries in rural areas are very limited
   - Dental services are too expensive or non-existent for low-income Latino families
   - Increase the construction of affordable housing. Include those who are homeless in

the construction of the housing. Like the Habitat for Humanity model
- In our community are very few Latino homeless families, most of the time they move in with a friend or other family member
- Section 8 Voucher. The state should create a state funded Section 8 Voucher program
- More and more single young men need shelter during the winter season, due to the lack of work. Many have to migrate to cities like Hood River, Pendleton, Portland, Salem and Eugene.
- Increase the number of emergency shelters
- Transitional housing should be increased
- Addiction services are a priority, particularly in the area of alcohol prevention. We have seen some cases of youth using and selling crystal meth
- Food pantries in rural areas are very limited
- Dental services are too expensive or non-existent for low-income Latino families

4. What are the housing programs that are currently a priority in our community?
   Across all 23 cities
   - Build more affordable housing near or work places. Really affordable!
   - Renovations and repairs at a very affordable cost
   - Assistance with eviction prevention
   - How do I get my deposit back
   - More housing inspections and fines to the landlords that refuse to do maintenance and repairs
   - Better housing access for people with disabilities and the elderly
   - How can I become a homeowner?
   - How do I communicate with the owner of the apartment units? Most of the time if the owner is a business person is easier to communicate than when the apartment is own by a housing organization
   - Who is the person in charge? If the apartment complex is own by a non-profit
   - Services are needed at the apartment complexes, such as English classes, computer training, and children activities
   - Jobs, jobs and jobs!
   - Is there an advocacy organization in my community?
   - Where do I go?
   - “What is a housing authority?
   - “What is a Section 8 voucher?
   - Build more affordable housing near or work places. Really affordable!
   - Renovations and repairs at a very affordable cost
   - Assistance with eviction prevention
   - How do I get my deposit back
   - More housing inspections and fines to the landlords that refuse to do maintenance and repairs

- Better housing access for people with disabilities and the elderly
- How do I communicate with the owner of the apartment units? Most of the time if the owner is a business person is easier to communicate than when the apartment is own by a housing organization
- Who is the person in charge? If the apartment complex is own by a non-profit
- Services are needed at the apartment complexes, such as English classes
- Jobs

5. Are any other services needed in your community?
   Across all 23 cities
   - Food pantries
   - Immigration legal services
   - Recreational and cultural activities for and children and youth
   - Legal services for victims of domestic violence
   - Legal services for public benefits
   - Dental Care
   - Machismo Prevention
   - Job training for single moms
   - More basketball courts
   - More soccer fields
   - Transportation from home to work
   - Discrimination prevention programs
   - Folkloric dance programs
   - Visits of the Consul General of Mexico
   - Driver's license
   - Utilities assistance
   - Parenting education
   - More laundromats near the apartment complexes
   - More communication with the police or sheriff departments
   - Mental health services
   - Vocational trainings
   - Food pantries and medical services
   - Immigration and employment legal services
   - Recreational and cultural activities for and children and youth
   - Legal services for victims of domestic violence
   - Legal services for public benefits
   - Dental Care
   - Job training for single moms
   - More soccer fields
   - Transportation from home to work
   - Visits of the Consul General of Mexico and Guatemala
   - Driver's license eligibility

- Utilities assistance during the winter months
- Parenting education
- More laundromats near the apartment complexes
- More communication with the police or sheriff departments

Languages spoken

At least 10 percent of those participating in the Community Meetings/Focus Groups were more fluent in an indigenous language and Spanish was their second language. Among the languages spoken were:

- Spanish
- English
- Yucatec Maya
- Mixtec
- Nahuatl
- Zapotec
- K'iche' Maya

Incarcerated Populations and their families

Community Forums Focus Groups were conducted with family members of those incarcerated at the Oregon State Penitentiary in Salem on 6/20/2015 with an attendance of 20 and with inmates at the Oregon State Penitentiary on 7/15/2015 with an attendance of 40 inmates. Many of the comments listed in these report above apply to them as well, but these are specific comments related to this population:

- “I don’t have a place to go after I leave the penitentiary”
- “Restraining orders limit the area where I can live”
- “I need a job in the penitentiary to help my family”
- “I will be deported and I need housing, but my children are US born and they are residing with my mother in-law”
- There are no transitions services provided to undocumented immigrant inmates at the Oregon Department of Corrections
- The majority of the inmates at the Oregon State Penitentiary in OSP have US born children.
- Many of our spouses or families of the inmates who live with other family members due to the lack of income and they are residing in overcrowded apartments
- Every inmate has an average of 4 to 6 family members who are residents of the state of Oregon. Approximately 1,500 Oregonians are impacted by the incarceration of 300 Latino inmates at OSP in Salem. The total Population of Latino inmates at Oregon Correctional Facilities is more than 1,800. This number doesn’t include Latinos incarcerated in Federal or County facilities.

Attachment F: Summary of IFA Input for Consolidated Plan

IFA will utilize input from three different activities in preparing the CDBG contributions to the Consolidated Plan.

In the summer of 2014, twelve economic development forums were held around the state. A broad cross-section of public and private sector entities were engaged. Infrastructure was one of the key elements identified for growing Oregon's economy. These broad factors were identified.

- Water policy and planning
- Greater ability to package financing
- Financing for system development charges
- Capacity building in rural areas
- Enhance ability to identify economic impact
- Workforce housing issues
- Catalyst funding for regional priorities
- Local flexibility in regulatory applications
- Funding for regionally significant industrial areas
- Dedicated infrastructure financing source
- Funding and policies to keep on top of broadband capacity
- Re-evaluation of land use policies.

In spring of 2015 IFA organized six partner roundtables (public welcome) around the state to solicit input and comment. Every non-entitlement city and county in Oregon was invited. 33 persons participated, 19 public sector, 11 non-profit, and three consultants.

The majority of questions focused on process and procedure i.e. is the program run on a calendar or fiscal year? What is the process for rating and ranking?

Consensus items were:

- There isn't enough money (CDBG funding has been reduced by over half since 2002)
- The program is highly complicated.
- Competition for funds is daunting, especially for smaller communities and technical assistance is, from a practical point, mandatory.

Suggestions were wide ranging, sometimes conflicting, and included the following.

- There should be greater discretion in allocating funding targets.
- There should be a more rigid approach in allocating funding targets.
- Too much money is set aside for public works.
- Not enough money is available for public works.
- Priorities should be added, such as public services, ADA compliance, energy related work, downtown revitalization, recreational facilities, and more.

Concurrent with the roundtables, IFA conducted an on-line survey of all entities in Oregon eligible for balance of state CDBG funding. The survey was structured to measure support for all Oregon CDBG eligible activities, and also included "open ended" sections where respondents could add priorities if not one of the 30 listed in the survey. 108 participated. One of the closing questions asked participants to choose their number one priority from among all the activities discussed. This is the breakdown of the responses for the top priority use of CDBG.

- Public works 61%
- Community facilities 16%
- Housing 12%
- Downtown revitalization 6%
- All other 5%

Attachment G: OBDD-IFA Partner Outreach Survey

Web-based Survey on Community Develoment Needs for Non-entitlement Cities and Counties

Survey period time: March 5 - March 31, 2015 (108 responder)

Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
Baker City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Boardman	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Brookings	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Canby	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Cannon beach	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Adams	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Amity	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Antelope	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Beaverton	Other	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Coquille	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Cornelius	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Cottage Grove	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Culver	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

City of Falls City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Florence	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
CITY OF GATES	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Gervais	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Glendale	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Glendale	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Helix	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Hermiston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Hermiston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Huntington	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Lafayette	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Lakeside	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Long Creek	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Lowell	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

City of Madras	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Malin	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of MIll City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Mt. Vernon	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Myrtle Point	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Newport	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of North Powder	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Powers	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Prineville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Prineville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Reedsport	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Rogue River	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

City of Seneca	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Sisters	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Sodaville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of St. Helens	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Stanfield	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Sublimity	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Sutherlin	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Tillamook	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Union	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Vale	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Vernonia	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Waterloo	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
city of Weston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
City of Wheeler	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

Clatsop Country	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Coos County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Cottage Grove	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Creswell	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Curry County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Dallas	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Dundee	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
ELGIN	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Estacada	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Falls City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Fossil	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
gaston	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
gladstone,or	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
GRASS VALLEY, SHERMAN COUNTY	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

Haines, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Harney County, Burns/Hines, Oregon	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Heppner	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Independence	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Joseph, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Josephine County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Junction City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Keizer	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Klamath County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Lake County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Lincoln Community Land Trust	Other	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
McMinnville	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Mitchell	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Molalla, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

Monmouth	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Myrtle Creek	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Nehalem	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Oakland	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Oakridge	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Oakridge, Or.	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Philomath	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Polk County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Port Orford	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Port Orford	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Prairie City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Sheridan (city)	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Spray	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

St. Helens	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Sumpter	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Tillamook County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Tillamook County	Other Government - Local County	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Town of Canyon City	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Wasco	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Winston, OR	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Wood Village	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Woodburn	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Woodburn Oregon	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;
Yoncalla	Other Government - Local City	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs;

Attachment G: OBDD-IFA Partner Roundtable

Date of Outreach	Location	Atttendees	Name of Agency	Type of Agency	Section of Plan that was addressed by consultation
March 12, 2015	City of Drain	Barbara Roberts	Lakeside Senior Center	Service - Elderly Persons	NA-50 Non-Housing Community Development Need Assessment; SP05 Strategic Plan; SP-25 Priority Needs; Econmic Development Needs
		Carl Patenode	City of Drain	Other Government - Local City	
		Sean Negherbon	City of Myrtle Creek	Other Government - Local City	
		Vicky Luther	City of Sutherlin	Other Government - Local City	
		Eileen Ophus	CCD Business Development	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Tracy Loomis	CCD Business Development	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
March 19, 2015	City of Huntington				
		Shellie Nash	City of Huntington	Other Government - Local City	
		Tracy McCue	City of Huntington		
		Lynn Findley	City of Vale	Other Government - Local City	
		Judy Moore	The Greater Eastern Oregon Development Corporation	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
April 2, 2015	City of Clatskanie	Susan Conn	City of St. Helens	Other Government - Local City	
		John Walsh	City of St. Helens		
		Josette Mitchell	City of Vernonia	Other Government - Local City	
		Beverly Danner	Community Action Team Inc.	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Susan Wagner	Community Action Team Inc.		
April 8, 2015	City of Donald	Larry Layton	City of Amity	Other Government - Local City	
		Renata Wakeley	Mid-Valley Council of Government	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Darcy Reynolds	Yamhil County Affordable Housing Corporation	Services - Housing; regional organization	
		Kimberly Lyell	Polk Community Development Corporation	Community Development Financial Institution; Other - Grant Administrator; regional Organization	
		Diana Cvitanovich			
		Heidi Bell	City of Donald	Other Government - Local City	
		Angela Lazarean	Department of Land Conservation and Development	Other Government - State	

April 9, 2015	City of La Pine	Ken Mulenex	City of La Pine	Other Government - Local City
		Scott Perkins		
		Tony DeBone	Deschutes County	Other Government - County
		Janet Burton	Economic Development of Central Oregon	Community Development Financial Institution; Other - Grant Administrator; regional Organization
		Vic Russel	Vic Russel Construction	Private business
April 16, 2015	City of Mosier			
		Bil Elfering	Umatilla County	Other Government - County
		Nicholas Ducote	JUB engineers	Private Business
		Jaclyn McCurdy	City of Rufus	Other Government - Local City

ATTACHMENT H: OHCS Partner Survey Questions

DRAFT SURVEY FOR PARTNERS AND AGENCIES

Every five years, Oregon is required by the United States Department of Housing and Urban Development (HUD) to prepare a consolidated plan to address housing, homeless, community and economic development needs and priorities. The process to develop the 2016-2020 plan is underway.

To gather the best data and information, we need the help of agencies, organizations and non-profits that provide housing and human services. Your participation in this survey is critical to our ability to identify community housing needs. Please complete and submit this survey by XXXX. Your responses are very important to this process. The survey should take about 10 minutes to complete.

Your responses will be aggregated with responses from other housing and human services providers. The resulting data will be used to help develop strategies to improve housing services for low- and moderate income people in the community and to set priorities for allocating funds for local housing programs.

Please address any questions you have about the survey to
Shoshanah.oppenheim@oregon.gov

Thank you for your time and assistance.

1. Name and address of agency
(box to specify name and address and separate box for zip code)

2. Type of agency (select all that apply)
Affordable housing developer, owner Manager
Human Services Provider
Other Please specify (box to specify)

3. Name and title of respondent (box to specify)

4. Email address (box to specify)

5. Phone number (box to specify)

6. What primary target population(s) does your agency serve? Please select all that apply.

Elderly
Single Persons
Family
Youth
Non-Families Households
Minority Households
Homeless Persons
Persons with Disabilities (e.g. due to medical status to include HIV, physical and intellectual disabilities and mental illness)
Veterans
Other (insert box)

7. What secondary target population(s) does your agency serve? Please select all that apply

Elderly
Single Persons
Family
Youth
Non-Families Households
Minority Households
Homeless Persons
Persons with Disabilities (e.g. HIV status physical and intellectual disabilities and mental illness)
Veterans
Other (Insert box)

8. What geographic area does your agency serve? Please select all that apply.

List Non entitlement counties
Other- please specify (box to specify)

BARRIERS TO HOUSING

9. What is the most significant barrier to people finding and maintaining housing in your area?

Rent costs
Home purchase price
Home purchase fees
Household credit
Money for utilities and rent deposits
Housing Discrimination
Finding vacant units
Lack of steady household income

Lack of supportive services to help households maintain housing
Other- please specify (box to specify)

10. Please explain why the barrier you selected is the most significant.
(Insert Box)

HOMELESS NEEDS
11. What are the most urgent needs for homeless persons in your community? Please select up to three.

Increase in the number emergency shelter spaces
Increase in the availability of emergency housing (less than 60 day tenancy)
Increase in amount of transitional housing (up to a 2 year tenancy)
Homeless support services (transportation vouchers, service centers)
Medical and dental services
Mental health services
Addiction services
Food services (food boxes, kitchens)
Re-entry Services
Other (insert box)

12. Please describe why you selected those specific services as the most needed (Insert box)

HOUSING AND HOUSING ASSISTANCE
13. What housing programs and activities are most needed in your community? Please select your 1st, 2nd and 3rd choices from the list below.

Additional affordable rental housing
Down payment assistance for first time homebuyers
Emergency home repair programs for low-income owners
Major home repair for low-income owners
Accessibility improvements for renters and homeowners
Homebuyer education
Emergency rental assistance
Long term rental assistance (over x months)
Foreclosure prevention assistance
Housing case-management assistance
Eviction intervention
Security deposit assistance

Energy assistance
Other- please specify (box to specify)

14. Please explain why the service you selected is the highest priority
(insert box)

HOUSING-RELATED SRVICES

15. What Housing related services are most needed in your community? Please select your 1st, 2nd and 3rd choices from the list below.

Credit counseling and repair for renters
Money for utility and rent deposits
Foreclosure counseling
Supportive services and case management
Apartment search and matching services
Emergency housing
Rental assistance
Placement in new housing (Rapid rehousing)
Other- please specify (box to specify)

16. Please explain why the service you selected is the highest priority
(insert box)

SOCIAL SERVICES

17. Which of the following Social Services are the most needed by low income persons in your community?

Food services
Housing services
Veteran services
Mental Health
Dental Care
Addiction services
Youth services
Services for people with disabilities
(e.g. due to medical status to include HIV, physical and intellectual disabilities and mental illness)
Services for victims of domestic or sexual abuse
Legal and confidential services
Services for seniors and elderly
Services for families with children

18. Please describe why you selected these specific services as the most needed. (insert box)

COMMUNITY DEVELOPMENT

19. Which of the following community development activities are most needed in our community now? Please select your 1st, 2nd, and 3rd choices from the list below.

Assist non-profit agencies with facility acquisition or improvements.
Improvements to public infrastructure (streets, curbs, sewer and storm water systems).
Public infrastructure for new affordable housing
Housing rehabilitation
Downtown or main street redevelopment
Neighborhood improvements (parks, community centers, beautification).
Improve substandard or deteriorated properties (non-residential).
Accessibility improvements in public places and buildings.
Other- please specify (box to specify)

20. Please describe why the service you selected is the most needed. (insert box)

ECCONOMIC DEVELOPMENT

21. Which Economic development activities are most needed in your community? Please select three from the list below.

Job creation through micro-enterprise assistance
Job creation through small business assistance
Business training for micro-enterprises
Creating jobs in low-income neighborhoods
Creating jobs for disabled persons (e.g. HIV status physical and intellectual disabilities and mental illness)
.

POPULATIONS IN NEED

22. Which target population(s) in your community are most in needof housing assistance and/or services? Please select up to three.

Elderly
Single Persons
Families with children
Youth
Non-Family Households
Minority Households
Homeless Persons
Persons with Disabilities (e.g.

due to medical status to include HIV, physical and intellectual disabilities and mental illness)

Chronically homeless
Victims of Domestic Violence
Persons with HIV/AIDS
Veterans
Populations transitioning from detention, corrections or treatment services
Other (please specify)

23. Which Populations are you targeting for housing assistance?

Homeless Elderly

- Homeless Single Persons
- Homeless Families with children
- Homeless Youth
- Homeless persons of color
- Homeless Persons with Disabilities (e.g.
- due to medical status to include HIV, physical and intellectual disabilities and mental illness)
- Chronically homeless
- Homeless Victims of Domestic Violence
- Homeless Persons Living with HIV/AIDS
- Homeless Veterans

Elderly at risk of homelessness

- Single Persons at risk of homelessness
- Families with children at risk of homelessness
- Youth at risk of homelessness
- Persons of color at risk of homelessness
- Persons with Disabilities at risk of homelessness (e.g.
- due to medical status to include HIV, physical and intellectual disabilities and mental illness)
- Victims of Domestic Violence at risk of homelessness
- Persons Living with HIV/AIDS at risk of homelessness
- Veterans at risk of homelessness

24. Please describe why you selected those specific target populations as the most in need of housing assistance and/or services. (insert box)

DEMAND FOR SERVICES

25. Has demand for your agency's services changed over the past 12 months?

Yes

No

26. How so? Insert box

CHANGES IN POPULATION SERVED

27. Which population are you serving more often? Select all that apply.

Elderly

Single Persons

Families with children

Youth

Non-Family Households

Minority Households

Homeless Persons

Persons with Disabilities (e.g.

due to medical status to include HIV, physical and intellectual disabilities and mental illness)

)

Victims of Domestic Violence

Persons Living with HIV/AIDS

Veterans

Re-entry

No Changes/Not Applicable

Other (please specify)

None

28. What are the contributing factors for the increase? If you marked "No Change/Not Applicable" above please enter n/a here. Insert box

29. Which populations are you serving less often? Select all that apply.

Elderly

Single Persons

Families with children

Youth
Non-Family Households
Minority Households
Homeless Persons
Persons with Disabilities (e.g.
due to medical status to include HIV, physical and intellectual disabilities and mental illness)
)
Victims of Domestic Violence
Persons Living with HIV/AIDS
Veterans
Re-entry
No Changes/Not Applicable
Other (please specify)
None

30. What are the contributing factors for the decrease? If you marked "No Change/Not Applicable" above please enter n/a here(Insert Box)

31. Are you maintaining a waiting list or have an unmet need for services you provide? (Insert Box)

32. How many people are on the waiting list or are you unable to serve as of Select A Date? (please provide any information about race, color, national origin, sex, age, sexual orientation, familial status or source of income that you have about the persons on your waitlist).
(Insert Box)

33. Do you have any other comments or information you would like to share with us about housing assistance and services in your area? About your agency? Other? (Insert Box)

Attachment I:
OHCS Developer Survey for the Consolidated and Strategy Planning Process

The survey was administered throughout August 2015. Eighty four persons participated in the survey, response rate for each question varied. The survey was publicized through email lists of developers, partners and agencies that provide affordable housing. It was available online or by mail if requested. No one requested a mail version.

1. **What do you see as the highest priority affordable housing needs in the area you serve?**
2.

First
- More affordable housing 68.57%
- Housing with services 40%
- Housing for Seniors 40%

Second
- Housing for Seniors 50%
- Reentry Housing 45.45%
- Housing for people with disabilities, physical or living limitation 34.78%

Third
- Second Chance programs 83.33%
- Housing close to services 64.71%
- Reentry Housing 54.55%

3. **What are your suggestions to address the housing needs identified in the previous question?**

Themes: The clear need for more units and any programs that supports the development of new units. Key ideas have to do with innovation around funding, more funding and reducing impediments to development.

1. We have a lack of supply in comparison to the demand making all types of housing critical. Therefore my suggestions are to seek innovative ways to produce more units than just the 9% program can produce. Currently there is a movement for more/new resources and I'd like to see some of those go towards other financing models.
2. Tax credit allocation to tribes; HUD Native VASH
3. When I enter my comment it tells me that it is in an invalid format
4. More funding available to create affordable housing and less upfront costs to apply for funding. Upfront costs of capital needs assessments, consultants etc. make it difficult to

put smaller projects together and we need smaller projects because not everyone does well in a larger multifamily project.

5. Repurpose old motels, hotels, and senior living facilities, or build new housing for single people who have a low income but need housing.
6. Remove restrictions
7. Promote affordable housing providers and service providers to work together to offer housing resources for individuals with disabilities including mental illness and substance abuse disorders.
8. The Oregon Legislature needs to increase the amount of general fund or lottery back bonds to the development of housing for people with mental illness. The Federal government must increase their contributions as well.
9. Inclusive zoning/permitting
10. Construct high density housing (apartment complexes, etc.) only near good transit, within walking distance to primary need stores (groceries, banking, daycare, etc.) and make that a requirement. Similarly, work to get those basic services anywhere near bigger concentrations of apartments where it is not yet present.
11. Landlord incentive programs
12. We need more affordable apartments. We need inclusionary zoning to help meet housing goals. Affordable housing needs to be seen as "infrastructure" much like sewer, water and roads… a necessity for a healthy community.
13. Property owners should try to connect with agencies that help people with disabilities. Also, the City of Portland should be included in the conversation. Funds should be available to property owners to supplement reduced rentals to people with disabilities. This way, the property owner is not absorbing all the cost.
14. Link services w/housing opportunities
15. I THINK THE CURRENT MARKET ACTIVITIES WILL TAKE CARE OF THE SITUATION.
16. Programs to lift people out of poverty. Education including financial planning and budgeting, Assistance with child care and transportation. On the owner side-incentives for solar and energy efficiency will help cut housing costs for tenants. Giving tenants a goal to get out of poverty and/or assistance with some help up front would be a good program.
17. There needs to be low cost housing available in every new building built with more than nine units. All large existing facilities need to house 10% rented at $500 or less or 50% of market rent values, whichever is greater.
18. Maybe they need more help to offset their needs.
19. A third option for people loosing home for default mortgages
20. More housing vouchers through the federally funded housing authority programs
    8/3/2015 7:50 AM

21. Any rental property owner with multiple units should dedicate a percentage of units for low-income or other needy folks. I do. If everyone who owned residential rental property added a bit to the inventory for low income, much more housing would be available.
22. The market place should control the housing units. If there are not enough units, then zoning & financing should be available for building units more affordable. I don't believe in subdividing rental costs in most cases.
23. Tax relief
24. More equitable funding for communities of color in urban areas.
25. Housing with more intense services, particularly for those with mental health issues is a big need. We are continually housing mental health clients in our Public Housing and then end up having to evict them because they cycle off their medications and their behaviors cause the evictions.
26. Flexible capital to develop additional housing units. Better connection of Goal 10's obligation for localities to plan for a diverse housing supply
27. Increase the volume of development across the board. All sub-populations have needs; many need services, but if we could only go part of the way to meeting the need, do it with general housing
28. State and local funding
29. Reduce cost of building permits units for small developments.
30. Build 4% / Bond program to be more effective, Work with SNAP Bond program to accept more types of funding and more complex structures, continue to work for funding through OHA and AMH and issue through State housing cycles
31. Develop a State LIHTC that parallels the Federal Credit in structure. Link 4% state Bonds with OAHTC to make the 4% credit viable for new construction. Focus the NOFA to reward specific projects on the basis of the priorities established.
32. I believe there needs to be a more collaborative effort between all the state agencies and use the funding resources in a concentrated effort to address the housing needs of low-income, persons with a disability - whether that disability be a mental or physical disability.
33. Working closely with social service elements too address needs of special populations Coordinate resources with other state agencies having an interest in these areas. For example, DHS and OHA can help with supportive services. OHA's AMH can help fund housing for people with a serious mental illness.
34. Create more innovative financing packages to take advantage of the general availability of 4% tax credits. Attaching any kind of service subsidy or other financing to these larger projects would help both nonprofit and for profit developers explore this financing opportunity and increase its use.

35. State Developed Program that is tailored to the rural communities of Oregon and not modeled for Metro area. One size does not fit all.
36. Projects need to be paired with commitments for real, long-term service dollars, including rental assistance, mental health services, and case management.
37. More financial resources - mixed income projects
38. Gap funding for development of all types of housing: multi-family and single family, rentals and ownership.

3. What are the biggest challenges in building affordable housing in the area you serve?

First choice

- Lack of Funding 64. 71%
- Lack of available or affordable land 40.54%
- Zoning 33.33%

Second choice

- Timing of funding 42.86%
- Lack of community support 40%
- Lack of available or affordable land 35.14%

Third choice

- Lack of community support 50%
- Timing of funding 50%
- Neighborhood opposition/land use challenges 40%

Interestingly in each round *zoning* received 33.33% and *neighborhood opposition* grew from 10%, to 40% to 50%

4. What are your suggestions to address the challenges identified in questions above?

Themes: coordination with funding and development, zoning, understanding the pipeline, streamlining applications and processes. Key ideas involved multi agency or new funding streams. A clear funding schedule, coordination with and influence over local jurisdictions.

1. I think we could benefit from having funding cycles twice a year and allowing for a higher set aside for preservation of
   the affordable housing that we have. Having the multiple cycles can allow acquisition to take place when a party is
   ready to sell rather than requesting them to wait a year.
2. More partnerships with local jurisdictions to overcome the barriers to land and land use.
3. As I tried to answer in the previous question, developments run up against the tax credit cap because of the cost of what we are trying to develop. Prioritizing (Metro area) affordable housing in high cost areas only exacerbates the situation.

4. In order to do strategic planning around a pipeline we need to know that funding will be available ahead of time. A funding schedule would also help tie up private property if there was a quicker turn from application to funded.
5. Don't know.
6. Make more funds available to increase the affordable housing stock making units available for supported housing.
7. People do not want to live next to "low income housing" because problems in those areas are higher.
8. More accessible financing
9. The city to look at their land inventory and find tracks for affordable housing projects.
10. Get lawmakers to legislate 10% new and existing housing units to affordable rents at 50% of market rent for more than nine unit housing.
11. There is just no space to build.
12. Create more opportunities for infilling with small plexes, not just single family. Encourage property owners to discount a percentage of their units for low-income.
13. Possibly zoning revisions and access to cheaper financing.
14. Advocate for more funds to be made available for development of affordable housing
15. Better alignment with Goal 10 of state land use laws. Explore flexibility in State resources for funding the production of affordable housing units.
16. All of these are problems, but the biggest is getting the money out the door in the more streamlined and efficient way. I put community support third because getting that support might translate into more money
17. Direct state funding. TIF loans. Transfer tax.
18. Encourage small landlords with help for construction of small plexes. This seems too directed only to large complexes.
19. For lack of funding: see previous question. For Lack of Affordable land: encourage jurisdictions and applicants to land bank, and/or provide different cost/scoring parameters for high opportunity areas, knowing that they will provide better outcomes. For Other: expense and risk of funding applications, institute pre-application process to reduce NOFA risk/cost
20. OHCS could exert influence in local government in a more constructive way.
21. Again, a coordinate effort would be the best approach in addressing the challenges listed above.
22. Find ways to work with other state agencies to develop multi-agency funding sources. These sources should be made available in a single NOFA, rather than having applicants having to seek funding in several different application processes. Also, continue to have someone who can provide technical assistance to those preparing applications. Increase funding rounds to two. One Metro and one Rural. Many scoring items in application are not available in rural areas therefor we are at a disadvantage when we compete with more populated areas.
23. consequences for losing LUBA appeals - pressure on municipalities to increase density goals - easier up zoning processes for infill developments

5. What are the greatest housing-related disparities or inequities in the area you serve? (Choose all that apply, and/or provide an "Other" answer).
NOTE: Greater than 100% because respondents can chose more than one response.

1. Lack of access to affordable housing 68.89%
2. Poverty 57.78%
3. Lack of affordable housing in rural areas 42.22%
4. Lack of access to economic opportunity 40%
5. Gentrification and displacement 37.78%
6. Substandard housing 28.89%
7. Concentration of subsidized housing 22.22%
8. Lack of access to quality health care 17.78%
9. Housing Discrimination 15.56%

6. Are there federal barriers that exacerbate or increase these disparities?
Themes: Lack of coordination, funding not being in sync with state goals. Key ideas are the challenges of using federal money in rural projects.

1. Don't know
2. No
3. I'm not sure.
4. Unknown
5. Need unified application of a 10% subsidized affordable housing rule: all new building over nine units must have 10% offered at 50% of market value rent. Must be federal to be effective and fair.
6. The federal funding takes a long time to process and sometime years to get through all the paperwork for senior.
7. Lack of funding for more HUD housing.
8. Minimum wage.
9. No, federal barriers exacerbate these disparities. Lack of private employers in the rural county exacerbates the disparities.
10. Complexity and costs to issuing bonds.
11. Multiple PJ jurisdictions, Lack of speed or consistency of HUD environmental process and HOME/CDBG interpretation
12. Funding silos and lack of meaningful coordination (regulations, timing of funding cycles, conflicting priorities, inconsistent policies among federal agencies and funding streams.
13. Knowing what the focus is from the federal partners. If the focus of their funding is not in harmony with state goals and funding opportunities.
14. Bonds do not work in rural areas because we do not command high enough rent to service a 51% debt and maintain affordability to residents.
15. lack of funding for HUD programs (including NHTF) - delegate environmental reviews and subsidy layering reviews to local HUD office or state HFAs

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- **7. Are there state barriers that exacerbate or increase these disparities? Please briefly describe (limited to 300 words)**
- Themes: ban on inclusionary zoning, tax inequity, disparity of funding decisions for communities of color, challenges with the NOFA process. Key response was about the risk and expense of the NOFA process.
-

1. Don't know
2. No
3. The prohibition of exclusionary zoning. Lack of teeth in land use planning goals. The goals are good but they are not
   implemented well in communities.
4. I'm not sure.
5. Unknown
6. In Oregon huge disparity in property taxes. Needs a complete regal of tax system. Many good ideas out there. See Portland City club research and Tax Fairness Oregon and OCPP.
7. Same as federal. All the waiting for years to help out the seniors.
8. Laws that prohibit requiring developers to provide 10-20% of affordable units.
9. Zoning restrictions
10. Graft
11. Disparity in funding decisions for communities of color, especially in urban areas.
12. The State barriers would be related to corporate taxes, most likely.
13. Lac of funds.
14. Expense and Risk of NOFA process.
15. The same as federal agencies because often the state is just administering the federal funds. Also when the legislature sets out budgets of state generated funding (Lottery Bonds for example, they never look at coordinating the timing and regulations to leverage existing programs or priorities.
16. For a majority of the time, not knowing what federal funding will be available and the potential focus of that funding may not be in coordination with federal funding.
17. Competing with higher populated areas under the same criteria. Lack of services in rural communities that are available in Metro/suburb areas
18. Keeping up with ever changing NOFA preferences - hard to have a five year development plan in place.
19. Our current land use laws (specifically UGB) have put Bend in a very tight spot.

8. What are the actions that Oregon Housing and Community Services could take to positively impact these disparities or inequities?

Themes: preservation, more affordable housing, use the NOFA scoring system more broadly, even out competition for rural projects. Key ideas are to provide more technical assistance and coordinate better with communities.

1. In the urban areas these disparities are exacerbated by the market (supply/demand). Preservation is a key strategy OHCS can continue to prioritize ensure this isn't further exacerbated.

2. Promote integrated community-based housing for individuals with mental illness and substance abuse disorders in accordable with Olmstead through funding incentives and requirements.
3. Lobby lawmakers for affordable housing.
4. Advocate strongly for affordable housing to be present in all neighborhoods and parts of the City (Portland)!
5. Not sure, maybe more funding for rural projects?
6. Link social services with apt communities & educate.
7. Find and use programs that other areas have successfully used to lift people from poverty. Look at other cities for programs that work.
8. Read reports cited above and act on any good recommendation ASAP.
9. Help the seniors out as they have worked out and they deserve the help and not be kicked out of a long time home.
10. Turnover of staff.
11. Better awareness of funding recommendations that impact these communities. Also, the reprioritization of funding goals.
12. Develop a streamlined box issuance process. Solicit state and local funding
13. Continued support of redevelopment of Rockwood area and stop cramming low income units into East Gresham.
14. Use them as Scoring or discussion parameters in NOFA scoring.
15. Coordinate better with the on the ground community and priorities and offer more technical assistance in creating coherent and leveraged development funding strategies as a partner rather than the distant, arbitrary, inflexible funding source.
16. To the best of their ability, to coordinate the funding resources that meet the needs of housing for Oregon residents and having a clear goal of what types of housing projects are the focus for development within Oregon.
17. Work with local communities to educate about housing opportunities
18. Allow Mixed Income units in rural areas. Have rural areas compete with each other and not with Metro areas under different criteria.
19. Looking forward towards land banking and providing coordinated funding and incentive programs to allow agencies to acquire land. This has the potential to save significant funds in acquisition in the future as well as enable creative temporary uses at properties otherwise derelict or ignored.
20. Increase importance of reaching lower income families and give priority to projects located close to services, jobs and transportation.

9. Describe who/which groups of people most need affordable housing in your local area, and why?

Themes: Everyone needs affordable housing, especially single men, families, seniors and persons with disabilities.

1. They all need housing but there are vast numbers in the elderly, families and minority households in the urban area that need solutions.

2. Young people aging out of the foster care system. No one has taken on this group that usually ends up homeless and on the streets. Our 12 unit project is the 1st in Lane county and the need is so much larger everywhere.
3. Single men, because everyone else seems to come first.
4. Elderly
5. Person with disabilities so these individuals may secure affordable community-based housing with support services available but not required as a condition of occupancy.
6. Minority
7. Our agency services people with mental illness and substance abuse disorders
8. This is a question that has a fact based answer. I do not know the answer.
9. Elderly people need the help the most. Their income is not able to keep up with the market increases, and affordable senior housing is not readily available.
10. families with children
11. The needs are enormous for many individuals, and from many of the listed groups. Each have their own needs, sometimes more driven on individual basis then per group....
12. 1) families with children 2) Persons experiencing homelessness 3) Elderly 4) single person households
13. Elderly, families w/children including Veterans
14. Families and Elderly - limited Income
15. Families with children-usually due to size have limited resources for rent/utilities
16. Young people just starting out and minority housing, but all of the above as well.
17. Single person households have the fewest support.
18. Senior
19. Elderly and people with disabilities Rents are increasing at a rate greater than these groups income
20. All of the above. Property owners need to be more open to accepting (without jeopardizing community safety) to provide housing to a wide variety of people; and need to follow the fair housing laws
21. Families with children because substandard housing or no housing can affect the children, also affordable housing for
    our veterans that have disabilities due to combat deserve affordable housing for their service to our country.
22. Elderly
23. Minority households, families with children, large families, and reentry population.
24. Families with children. Most of our Public Housing is for elderly and disabled. Section 8 Vouchers are being used by. Increasingly more elderly and disabled. That is squeezing out the families with children and they need affordable housing as well.
25. Elderly, growing population on limited incomes, families with children as they will be better positioned to achieve success Persons with disabilities.
26. Every one of these populations desperately needs affordable housing. Pitting the populations against one another is a distraction--trying to focus limited resources to the "best" or "highest" need is part of what keeps the resource

allocation process complex. We also pass on opportunities that would meet needs while holding out for the perfect priority project.

27. Having more units available will help all of the groups. Rent will stabilize and those who have trouble qualifying for a unit will have a better chance.
28. Persons with Disabilities: Affordable Housing close to services within the urban areas. Elderly: Rural ageing in place opportunities. Other: Workforce housing in urban areas (can use lower subsidy amounts).
29. There is no most in need. If anyone doesn't have access to housing then they need help. Community service providers should be the ones guaranteeing the rent to any housing owner for any of these frail folks. Houses operate the property in accordance with their capital investors, lenders, and funders. Service providers are the ones to support
quality of life and successful tenancy.
30. I believe the focus populations should be - Elderly, Persons with a Disability(ies) and Veterans,
31. Single person households, persons with disabilities, persons experiencing homelessness, households with previously incarcerated persons, reentry.
32. Reentry - need is clear but no strong local service provider; homeless - affordability - this group needs a deep subsidy and intensive case management; disabled - need new developments to include more accessible units to make up for the deficit in the existing housing stock
33. The vast majority of households in our service area make less than 60% of median income. Housing stock is old and in disrepair. Every segment listed above struggle to find decent affordable housing within our service area. Two top would be Elderly and Families with Children.
34. While all the populations listed need housing the fact that single family homes and rents are so high puts a significant burden on families forcing choices that are harmful to the development and education of children.
35. Families with children and single person households. Bend's land prices have appreciated so greatly recently that it is an extreme challenge to provide needed units to all demographics, particularly families and working class individuals.
36. Families and Working Households

10. Over the next five-years (2016-2020), affordable housing units may be lost in your local area. Please select the contributing reason for this loss below, or provide an "Other" answer. NOTE: Greater than 100% because respondents can chose more than one response.

1. Loss of federal subsidy 44.44%
2. Expiring project-based contracts 40.74%
3. Maturing mortgages 37.04 %
4. Lack of strong partnerships with service providers 25.93%
5. High vacancy rate 3.70 %

11. How do HUD's HOME rents and Fair Market Rents (FMRs) measure up against local market housing rents in your local area?

1. Market rents are higher than FMRs 42.42 %
2. Market rents are much higher than FMRs 39.39 %
3. Market rents are about the same as FMRs 18.18 %
4. Market rents are below FMRs 0%

12. Are there any local initiatives or funding opportunities in your area that would benefit from the development of affordable housing? (Select all that apply from options below, or provide an answer in "Other")
NOTE: Greater than 100% because respondents can chose more than one response.

1. Investment in employment 56.67%
2. Investment in education 53.33%
3. Investment in health systems 30%
4. Health investments 26.27%
5. Public/private partnerships 20 %
6. Employees moving to area 13.33 %

14. Are there market conditions in your local area that will influence, either positively or negatively, the use of funding for rental assistance, production of new affordable units, rehabilitation of existing housing, acquisition, or preservation (defined as preserving existing federal project based rental subsidy)? Please briefly describe in 400 words or less.

Themes: rents are high, demand is high and vacancy rates are low.

1. High rents; barriers to securing rental housing including bad credit history and criminal history; discrimination
2. High Rents
3. Housing is very scarce, so rents are being pushed up more and more.
4. need transportation increased for people to work, shop, get around
5. Demand for housing is high.
6. Skyrocketing rents in Portland area increase opposition to affordable housing by developers with power of $ buying political influence
7. There is an access to the freeway that goes to several access areas for services. However, with seniors they may need more rides to places like Dr. Etc. some things are within walking distances that is helpful.
8. Property owners tend to exploit market conditions to maximize rent
9. employment
10. Rents are increasing and that will affect the Section 8 voucher available since the funding for Vouchers is level funding. Fewer families will be assisted due to rising rents.

11. Vacation and short term rentals put an added pressure on our existing market and makes it a bigger challenge to compete for rentals and development
12. We expect continuing pressure on rents. This will reduce open market affordable units; put more pressure to opt out of subsidies, increase homelessness.
13. Exploding home prices and rents.
14. High market rents and High cost of urban land in urban settings, Low rents and high operating costs in rural locations, Low "sweet spot" on unit counts under 9% LIHTC program which drives up per unit operating and resident services costs
15. City has donated land, passed property tax exemption, paid for environmental remediation, supported efficient land use approvals
16. the ultra-low vacancy rate inhibits the use of s8 vouchers; production is limited by availability of capital; we have an active owner occupied rehab program in both counties funded by CDBG; preservation needs are adequately met
17. Not that I am aware of.
18. Only a handful of the project based vouchers are able to be utilized because of the significant lack of units available.
19. Our land values in Bend, the only area with services, is skyrocketing, making development nearly impossible.

15. What market conditions in your local area negatively affect your ability to increase the supply of affordable housing (select all that apply below, or provide an answer in "Other")?
NOTE: Greater than 100% because respondents can chose more than one response.

1. Land costs 59.38%
   Lack of access to capital 53.13%
2. Development costs 46.88%
3. High rents 40.13%
4. Low rents 3.13%
5. High vacancy rate 0%

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16. Please explain your answer about the market conditions in your local area that negatively affect your ability to increase the supply of affordable housing in 400 words or less.
Themes: the cost of land and development. Low rents make it difficult to develop.

1. Same as noted before regarding urban challenges given the hot real estate market at this time.
2. Don't know
3. Funding of the OHA Supported Housing Rental Assistance Program is stretched thin in areas of high housing costs
4. Rental Market is very good for investors
5. If it were cheaper to buy land and develop housing, it would be economically viable to do so and set the rents at a level that is considered affordable. Because it costs so much

to develop housing now, one will either have to charge high rents or accept to take a loss on the investment.

6. Land is very expensive and limited.
7. Not a developer myself, just own one house
8. Development costs because it costs a lot to builds big unit in the area.
9. Loans for small business.
10. Lack of funding, impact fees and environmental design requirements.
11. Purchasing or building new units would use capital I don't have and add stress I don't want.
12. Urban Areas: Land Costs. Rural Areas: Low Rents. All areas: Rising Construction Costs
13. High SDC's, inefficient permit process, lack of affordable land, and design requirements that are costly
14. We endeavor to have land for a 5 year development pipeline - high costs make this problematic
15. Rents are high, because demand for housing is high and the availability of housing is tight. With the vacancy rate being less than 1% in a number of urban areas across Oregon.
16. Our service areas are small populations. Projects developed need to meet the needs of those communities and yet be economically feasible. Mixed income properties to meet requirements as well as rural completion only funding would go a long way.
17. The price of land is simply climbing quickly with the growth in population and incomes for a portion of the population. Leveraged capital is available but without true equity projects are not readily possible

- **17. Is there anything else you would like to share?**
    1. It would be helpful if future surveys could be seen so that the time and answers can be planned instead of just going through as time allows.
    2. See my 10% solution in other areas of this survey. Percentages can be changed but federal action would be required.to prevent states competing for lower affordable housing development. Business tax credits and other tax credits have impoverished state governments and lowered revenues for schools and social services. Federal max limit on all cumulative tax credits any state can give out would help housing and many other social service funding issues!!!!
    3. Yes, we really need federal and state services for the elderly. It is just sad to see the elderly be evicted from their homes of many years because of their health costs are too high and the housing costs become too high for them.
    4. Lack of housing for all ranges of the needy is largely a lack of imagination on the part of property owners and the programs that support low income folks.
    5. If people had jobs that pay a wage assistance would not be as needed.
    6. Federal dollars for capital improvements for public housing is shrinking; making it more difficult to maintain over time. May need another source to prevent the loss of many affordable units in our Public Housing.
    7. We need to do more ourselves without federal subsidies.

8. Much more work needs to be done to make the process of affordable housing development strategic, responsive to opportunity, more flexibility and more sustained involvement financially by the human and health services providers to achieve successful, stable residents and communities through long term rent and service support. Thriving communities takes teamwork, innovation, and long-term partnership.
9. We are having fun and making incremental progress

ATTACHMENT J:
Citizen Input, Survey and Outreach Analysis

This section summarizes the citizen participation and consultation process for the Five-year 2016-2020 Consolidated Plan for the State of Oregon, including findings from public meetings, focus groups, expert interviews and comments submitted through the public comment period.

Process Overview

The public participation and stakeholder consultation process for the Consolidated Plan integrates findings from numerous recent sources including:

- Community conversations led by OHCS about housing and homeless services in Coos Bay, The Dalles, Hood River, Klamath Falls, McMinnville, Medford, North Bend, Ontario, Pendleton, Redmond and Tillamook—over 300 residents and stakeholders participated in these April and May 2015 events; and

- A stakeholder survey (172 participants) and a community survey (658 participants) fielded by OHCS for the development of the Consolidated Plan.

The community conversations and OHCS surveys fielded for the Consolidated Plan development are supplemented by other relevant recent resident and stakeholder research. This includes:

- Resident and stakeholder focus groups, online and telephone surveys, and interviews conducted in January through April 2015 in support of the State of Oregon Analysis of Impediments to Fair Housing Choice, or AI (referred to as the 2015 Oregon Nonentitlement Resident Telephone Survey in this section);

- Findings from surveys and focus groups conducted with farmworkers in support of the Oregon Human Development Corporation's 2013 Farmworker Service Agency needs assessment; and,

- Resident and stakeholder outreach and client surveys conducted for the development of needs assessments by regional community action organizations and counties in 2014 and 2015.

Participant Profile

Nearly 1,000 Oregon residents and stakeholders from across the state participated in public input and stakeholder consultation opportunities to inform development of the Consolidated Plan.

Community conversations. The OHCS community conversations were conducted across the state in 10 communities representing the state's geographic and demographic diversity: Coos Bay, The Dalles, Hood River, Klamath Falls, McMinnville, Medford, North Bend, Ontario, Pendleton, Redmond and Tillamook. The conversations included two meetings in each location: a partner forum and a community event. The forums included a partner roundtable where members of the continuum of care, public safety, health and human services, domestic violence prevention and services, youth, homeless services, elected officials and faith community discussed the priority needs for housing and homeless services. For the community meetings, some cities hosted a panel of local housing and service experts, while others had community conversation and screened the film American Winter followed by a discussion about priority needs. Participants in the dialogues included nonprofit leaders, representatives of the private housing market, interested residents, and local housing and human service agency staff.

OHCS Partner Survey. The nearly 200 stakeholders who responded to the OHCS Partner Survey represent professionals working across the housing, human services and community development spectrum in the public, private and nonprofit sectors. The respondents provide services across the state of Oregon, serving the needs of diverse low income and special needs populations—seven in 10 serve families; 50 percent provide housing or services to persons with disabilities; one-third serve veterans and more than half work with persons experiencing homelessness. Other populations served include elderly (35%), youth (47%) and special needs populations such as survivors of domestic violence; Limited English Populations; migrant or seasonal farmworkers; pregnant and parenting women and teens; individuals released from corrections or under criminal justice system supervision; foster families; and youth aging out of the foster care system.

OHCS Community Survey. Respondents to the 2015 OHCS Community survey are predominantly renters (51%) and one in 10 does not have a permanent place to live. All household sizes are represented: 15 percent live alone and 15 percent have households of five or more members. Nearly one in five respondents have a household income of less than $20,000 and an additional 20 percent have incomes of $20,000 up to $30,000. Participating residents are geographically dispersed across Oregon; responses were received from 21 of the state's 36 counties. About 25 percent of respondents live in Portland, 18 percent in Bend and nearly 60 percent in the balance of state.

Housing and Economic Context

This is the state's second Consolidated Plan cycle since the Great Recession (December 2007-June 2009), and the impacts of the financial and mortgage crisis are still felt. As in many states, the extent of recovery varies, with some communities experiencing strong growth while others continue to lag behind. The same is true for the state's low and moderate income residents. From Oregon's coastal communities north to the Portland area, across Central Oregon and to the south and east, many stakeholders and residents describe an urgent need for affordable housing. The specific nature of the affordable housing need ranges from a lack of units affordable to a specific low income population to units that are unsafe or need repair. Other barriers to housing are not linked to a physical unit but a household's background, particularly those with poor (or no) rental histories, bad credit or past convictions; others need emergency assistance or case

management or other supportive services to maintain housing. More than 70 percent of stakeholders report an increase in demand for their organization's services in the past year.

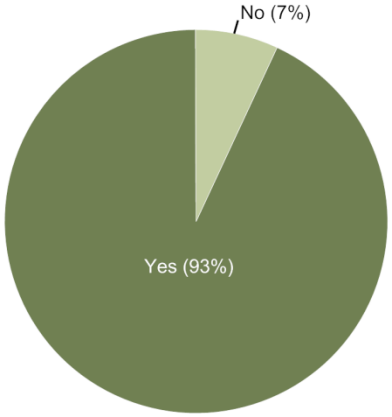
In surveys and community conversations, stakeholders and residents described their local housing market and conditions. Most described changes in housing markets driven by increased demand for rental housing—a finding consistent with stakeholder and resident consultation for the 2015 AI.

Increased demand for affordable rental housing. By far, the majority of stakeholders' characterizations of the most significant changes in local housing markets related to an increased demand for rental housing, and affordable rental housing in particular. Stakeholders associated the increased demand with several factors, including foreclosures shifting households into the rental market; lack of product for first-time homebuyers; stricter lending requirements for homeownership overall (e.g., size of down payment, credit scores); flat or falling household income; and population growth. Nearly all respondents to the OHCS Community Survey had either personally experienced or knew someone who had difficulty finding affordable housing in the past five years.

Figure 1.
Have you or someone you know had difficulty finding housing that's affordable in the past five years?

Note:
n=658.

Source:
BBC Research & Consulting from 2015 OHCS Community Survey.



Rising cost of rental housing and low vacancy rates. The increased demand for rental housing has resulted in very low vacancy rates in some areas, increasing rents and increases in the number of applicants for a given unit. In many places, HUD's Fair Market Rents have not kept pace with the rental market.

Other barriers to obtaining housing. Histories of foreclosure, eviction, bad credit and previous criminal convictions or probation create significant barriers to households seeking rental housing. This is exacerbated in communities with tight rental markets, as private landlords can quickly fill units with applicants that meet their credit and income standards.

Barriers to maintaining housing. Health crises and challenges with transportation, wages and child care put economically or socially vulnerable households at risk of losing their housing.

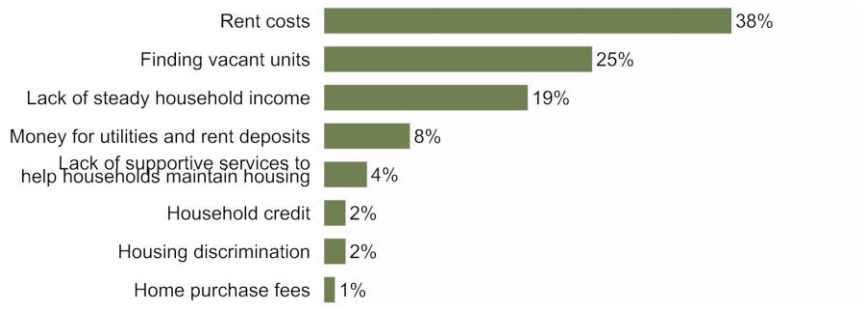
Housing, Community Development and Public Services Needs and Priorities

As described above, demand for affordable housing exceeds supply in most parts of the state. Stakeholders and residents described barriers to finding and maintaining housing, and the types of housing programs and other services most needed in their community. A more detailed description of needs and priorities for those experiencing homelessness is presented after this section.

Barriers to finding and maintaining housing. Stakeholders and residents identified the factor they believe is the most significant barrier to finding and maintain housing.

Stakeholder perspective. Respondents to the OHCS stakeholder survey identified the most significant barrier residents of their community encounter when trying to obtain or maintain housing. Rent, finding vacant units and lack of steady household income comprise the top three barriers.

Figure 2.
Most Significant Barrier to Finding and Maintaining Housing: Stakeholders



Note: n=165.

Source: BBC Research & Consulting from the 2015 OHCS Partner Survey.

Stakeholders described their reasoning for selecting the factor they considered the most significant barrier to finding and maintaining housing. Common themes include rental markets with very low vacancy rates, insufficient affordable housing stock, lack of steady household income or wages that have simply not kept pace with rent increases. Move in costs (e.g., first and last month's rent, security deposit, utility connections) can be prohibitive for low income households, including those with housing subsidies. For stakeholders serving low income special needs populations, such as homeless or clients with mental illness, housing market challenges are exacerbated by needing to pair housing with supportive services or by market prices that exceed fair market rents for housing subsidies. Stakeholders in coastal areas shared that their housing market is in "crisis"—low income renters being asked to pay $2,500 cleaning deposits and some landlords taking advantage of vulnerable tenants, particularly Spanish speakers.

- *"A lot of low income people in this area have poor credit. They are unable to pay for their bills (like medical) and incur collection fees and so forth. Then when they do find a house/apartment that they can afford there is an extra deposit or extra month's rent to pay due to poor credit." (OHCS Partner Survey respondent)*

- *"A lot of people are coming out of corrections/recovery and it is difficult to access transitional housing. Criminal histories and debt to previous housing authorities making people ineligible for housing." (OHCS Community Conversation participant)*

- *"As our clients are slowly squeezed out of the rental market, I hear them complain that they could barely afford utilities and basic needs as it was, then the landlord raised the rent beyond their means. They were forced to move in with friends, family, or any other temporary housing." (OHCS Partner Survey respondent)*

- *"Lack of affordable housing due to vacation rentals. People are buying second homes in destination and recreation areas. In Hood River we have 8-12% vacation housing. These were the more affordable homes. Hood River is 440 housing units short. Apartments were turned into condos." (OHCS Community Conversation participant)*

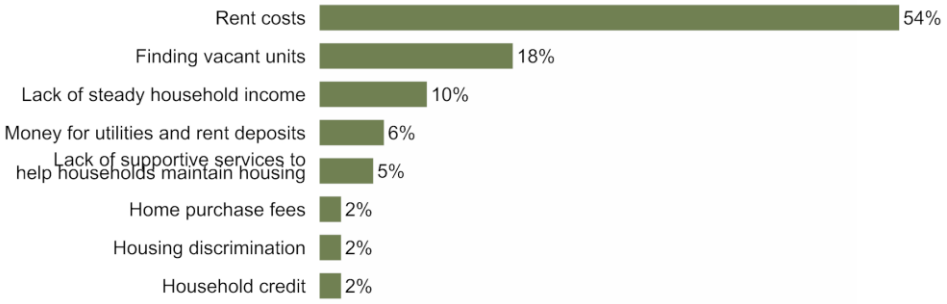
- *"People are willing to put up with awful situations because the landlord will accept them." (OHCS Community Conversation participant)*

- *"Rent costs have increased far more than wages have increased. Few jobs above minimum wage available in Polk County and rents are beyond affordable for minimum wage earners." (OHCS Partner Survey respondent)*

- *"Section 8 is too restrictive: would be nice to rent a room with Section 8 funding (more flexible funding options such as HOPWA, Home at Last guarantee program <$5,000 repairs, etc.) Section 8 won't allow rental from family members, this is especially important for persons with disabilities." (OHCS Community Conversation participant)*

Resident perspective. An even greater proportion of residents (54%) than stakeholders chose rent costs as the most significant barrier to finding and maintaining housing in their community.

Figure 3.
Most Significant Barrier to Finding and Maintaining Housing: Residents



Note: n=649.

Source: BBC Research & Consulting from 2015 OHCS Community Survey.

When asked to explain why the barrier they selected was most significant, residents shared stories ranging from how rent increases have impacted them personally to the challenges they have getting into a unit (i.e., saving for deposits, utility hook ups, etc.).

- *"Affordable housing does not seem to exist in Central Oregon anymore." (OHCS Community Survey respondent)*

- *"Almost all my friends have moved either to different areas of the state or out of state altogether because of the housing cost. An apartment that used to be $650 a month is now $950. Another friend of mine ended up living in a trailer in my drive way for 6 months because she couldn't even find a room to rent that she could afford her budget was $650 a month! That should get you more than a room. After she left I had four other people approach me within two days to move into the trailer. It has no bathroom, no water, no appliances—only light and a space heater and people are offering $100 a week. People are desperate." (OHCS Community Survey respondent)*

- *"Income requirements by landlords. Even in so called low income housing there is an income requirement that the tenant earn 2½ to 3 times the rent. At rents of $850+ that means a tenant must earn at least $2,125 per month or $13.28 per hour (figured at 2½ times rent). Many single parent families do not earn these wages. I was told that to rent from one apartment complex—I was $30 under the required monthly income—I must have six months of rent in my savings account or $5,100. Add to that the costs of moving into an apartment and families must have close to $8,500 if they earn marginally under the earnings requirements. It takes a so-called low income apartment and prices it for only those who are not low income. It makes renting an apartment impossible if you are truly low income." (OHCS Community Survey respondent)*

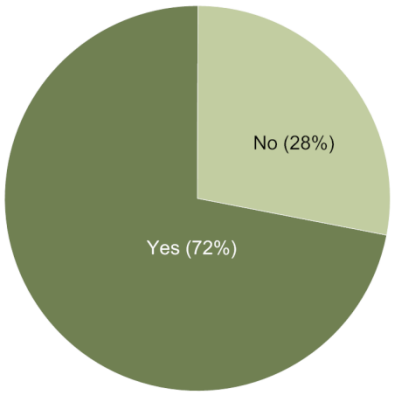
- *"Smaller rural communities in Oregon have little to no multifamily housing units. Those that do, are frequently properties that are older and in poor condition, even if they were originally built with government funding. Without housing, communities cannot grow, even when there are job opportunities. And with an aging housing stock, health considerations need to be taken into consideration." (OHCS Community Survey respondent)*

Demand for assistance services. Overall, 72 percent of respondents to the OHCS Partner Survey stated that demand for their organization or agency's services had changed compared to last year. Of those experiencing a change in demand (116 respondents), 86 percent reported increased demand for their services in the past 12 months.

Figure 4.
Has demand for your agency's services changed over the past 12 months?

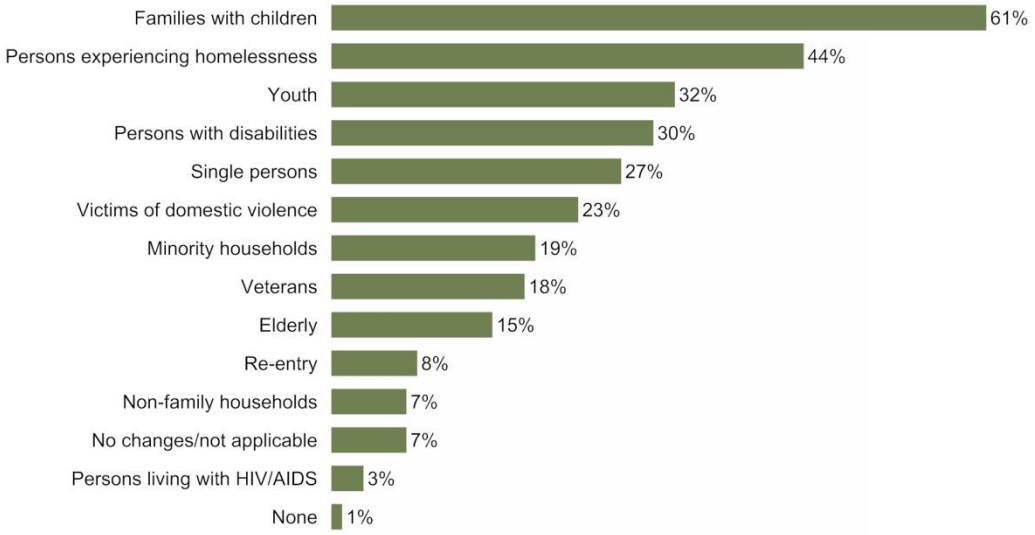
Note:
n=162.

Source:
BBC Research & Consulting from the 2015 OHCS Partner Survey.



By far, the greatest proportion of stakeholders (61%) reported that they are serving families more often, followed by persons experiencing homelessness, youth, persons with disabilities and single persons (Figure 5.) When asked which populations (if any) they're serving less, nearly half of participating stakeholders have not seen a decrease in any populations served. About 20 percent are each serving fewer elderly, HIV/AIDS, veterans and 10 to 16 percent are serving fewer single persons, re-entry populations, non-family households and youth.

Figure 5.
Which population are you serving more often?



Note: n=162.
Source: BBC Research & Consulting from the 2015 OHCS Partner Survey.

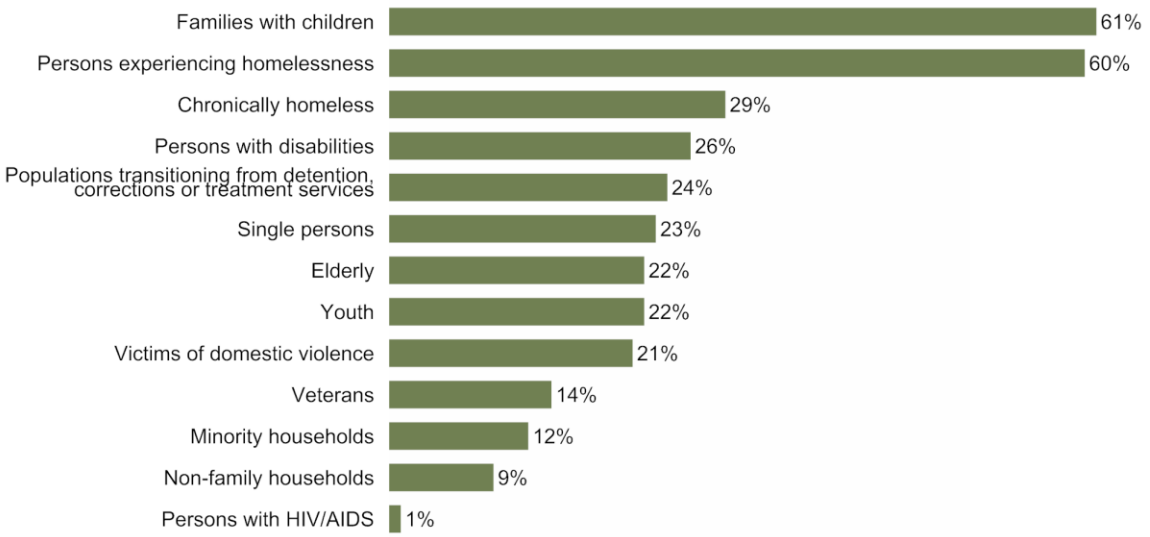
Stakeholders attributed the increase in demand for programs and services to a range of factors. These include wages not keeping pace with the cost of housing, policy changes (such as Affordable Care Act implementation), lingering or delayed impacts from the recession, and demographic trends (i.e., aging Baby Boomers).

- *"Continued unemployment, lack of good paying jobs, lack of affordable housing, high rental move-in costs." (OHCS Partner Survey respondent)*

- *"During the recent push and resourcing from the VA to eliminate Veteran homelessness we have seen an increase of veterans served and single adults served." (OHCS Partner Survey respondent)*
- *"More mentally disabled are trying to move into independent living arrangements rather than remain in group homes or supervised environments." (OHCS Partner Survey respondent)*
- *"New employment opportunities have helped decrease the SNAP and TANF population. Additional Case Management staff has added to the success of reducing the TANF caseload." (OHCS Partner Survey respondent)*
- *"The aging of the population, people with disabilities living longer, plus our area is the most service-rich, so migration to our area." (OHCS Partner Survey respondent)*
- *"We have many veterans returning from the war in Afghanistan; we have many individuals and families who have lost their homes due to foreclosure; and we have seen many applicants who have recently relocated to Jackson County." (OHCS Partner Survey respondent)*

Populations most in need of housing and services. Three in five stakeholders identified families with children and persons experiencing homelessness as the populations most in need of housing assistance and/or services. Persons who are chronically homeless, persons with disabilities, and individuals re-entering the community after detention, corrections or treatment services, single persons, elderly, youth and victims of domestic violence are the populations considered most in need of housing and services by at least one in five stakeholders.

Figure 6.
Which target population(s) in your community are most in need of housing assistance and/or services?



Note: n=165. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from the 2015 OHCS Partner Survey.

Most needed housing programs and activities. With respect to the types of housing programs and activities most needed locally, both the majority of stakeholders' and residents' top priority is additional affordable rental housing. Because of their relative levels of expertise, the choices for prioritization of housing programs and activities are similar between the Partner and Community surveys, but not identical.

Stakeholder perspective. Figure 7 presents stakeholders' prioritization for the most needed housing programs and activities locally. As shown, additional affordable rental housing was the first choice of nearly two in three stakeholders, followed by emergency rental assistance. Homebuyer education and foreclosure prevention were considered a priority by the smallest proportion of stakeholders.

Figure 7.
What housing programs and activities are most needed in your community? Stakeholders

	1st Choice	2nd Choice	3rd Choice	Overall
Additional affordable rental housing	64%	9%	6%	80%
Emergency rental assistance	11%	16%	8%	36%
Long term rental assistance (over 24 months)	5%	16%	12%	34%
Permanent housing	13%	13%	6%	32%
Eviction prevention/rent assistance	10%	10%	11%	30%
Housing case management assistance	10%	8%	12%	30%
Medium term rental assistance (3-24 months)	5%	13%	11%	29%
Security deposit assistance	7%	6%	6%	19%
Energy assistance	5%	6%	5%	16%
Down payment assistance for first time homebuyers	2%	6%	6%	13%
Emergency home repair programs for low income owners	1%	6%	6%	13%
Major home repair for low income owners	1%	1%	9%	11%
Accessibility improvements for persons with disabilities	2%	4%	5%	11%
Homebuyer education	1%	2%	6%	9%
Foreclosure prevention assistance	1%	3%	4%	8%

Note: n=171. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from 2015 OHCS Partner Survey.

Examples of the reasons for stakeholder housing program and activities priority choices include need for additional affordable units and stressed the importance of case management/supportive services to help families maintain their housing. Homeless prevention services such as emergency rental assistance are seen as a critical need, as well as deposit and utility assistance.

- *"There is less than a 2% vacancy rate for rental units. This leads to a need for more permanent housing. In addition, while we receive emergency rental assistance, it is never enough to meet the demands within our population." (OHCS Partner Survey respondent)*

- *"I can't say this enough! All of the above is important as a palette of measures that can be used for different people's specific problem. Preventative is most important. If we can prevent people going homeless it is much more cost effective." (OHCS Partner Survey respondent)*

- *"In our rural community, the lack of low income housing that will pass inspections is a large problem. Once a client is able to find housing, case management is a critical piece of the process of helping a household become self-sufficient." (OHCS Partner Survey respondent)*

- *"No emergency housing shelter here, so emergency rental assistance is highest need. Housing Authority waiting lists are about 12 months, so medium-term rental assistance is second. We see a number of households who lose housing assistance due to the family's failure to abide by rental agreement behavior rules and this might be prevented if there were better intervention services available." (OHCS Partner Survey respondent)*

- *"We have a permanent homeless population that is unable to be housed. We really need a variety of emergency, legal shelter year-round and lack transitional, single-occupancy housing options for individuals, and permanent housing for families with mental health and drug addiction issues." (OHCS Partner Survey respondent)*

- *"We have several people that cannot afford a cleaning deposit let alone the first month rent." (OHCS Partner Survey respondent)*

Resident perspective. More than four in five residents selected additional affordable rental housing as the top priority for housing programs and activities most needed in the community. Emergency rent assistance, security deposit assistance, down payment assistance and help with utility and energy bills are all needs identified by at least 30 percent of residents overall.

Figure 8.
What housing programs and activities are most needed in your community? Residents

	1st Choice	2nd Choice	3rd Choice	Overall
Additional affordable rental housing	81%	6%	3%	90%
Emergency rental assistance	13%	18%	11%	42%
Security deposit assistance	11%	15%	15%	42%
Down payment assistance for first time homebuyers	8%	17%	11%	36%
Assistance with utilities and energy bills	7%	8%	15%	30%
Eviction prevention	7%	10%	10%	28%
Repairs/renovation of affordable rental units	5%	12%	7%	24%
Housing case management assistance	6%	7%	8%	22%
Foreclosure prevention assistance	6%	7%	7%	20%
Emergency home repair for low income home owners	5%	8%	6%	20%
Major home repair programs for low income home owners	5%	7%	7%	18%
Homebuyer education	5%	7%	5%	16%
Accessibility improvements for renters with disabilities	5%	7%	5%	16%
Accessibility improvements for owners with disabilities	4%	4%	4%	12%

Note: n=660. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from 2015 OHCS Community Survey.

Most needed housing-related programs and services. Figure 9 presents stakeholders' choices for the most needed housing-related programs and services in the communities served. Overall, greatest proportion of stakeholders identified utility and rent deposits (60% of stakeholders), rental assistance (59%) and supportive services and case management (55%) as the most needed housing-related programs and services.

Figure 9.
What housing-related services are most needed in your community? Stakeholders

	1st Choice	2nd Choice	3rd Choice	Overall
Money for utility and rent deposits	22%	14%	23%	60%
Rental assistance	22%	21%	16%	59%
Supportive services and case management	20%	20%	15%	55%
Emergency housing	24%	12%	9%	45%
Placement in new housing (Rapid rehousing)	18%	14%	7%	38%
Apartment search and matching services	8%	10%	12%	30%
Credit counseling and repair for renters	7%	12%	8%	27%
Foreclosure counseling	1%	2%	7%	10%

Note: n=169. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from 2015 OHCS Partner Survey.

Stakeholders shared their perspectives on the housing-related services they prioritized:

- *"Deposit assistance would be huge for our clients. The next is supportive services with case management, which seems to help a lot of our clients. Even on the Hotline, when clients come in with financial assets, they find it helpful when we sit down with them and troubleshoot their situations. Finally, rental assistance is always beneficial as it can help us get people into a place, or keep them in it." (OHCS Partner Survey respondent)*

- *"Bad credit and criminal history is huge barrier and landlords want some guarantee they won't get burned by renters." (OHCS Partner Survey respondent)*

- *"Housing assistance is the largest unmet need in our community. Our agency receives as many as 50-60 calls a month for housing assistance and is able to provide help to 6 - 10 households depending on program availability. Case management, is a critical piece of the process of helping a household become self-sufficient." (OHCS Partner Survey respondent)*

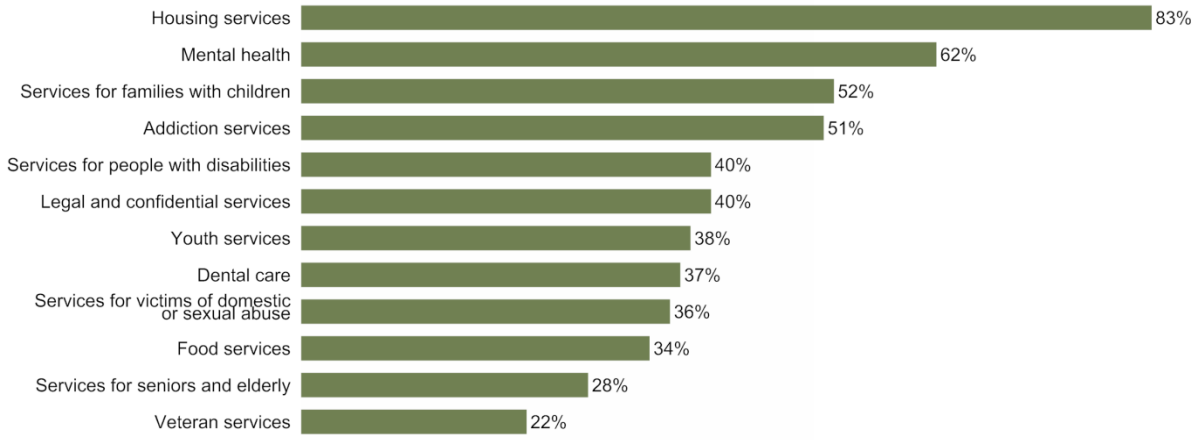
- *"I don't think putting more money towards rental assistance programs or apartment search services is the answer. There's just not enough housing (within the FMRs) available. I think we need to build more apartments and negotiate with landlords. Maybe help remodel some apartments, but have the landlord agree to accept a certain amount of people with barriers (poor credit, criminal history, etc.) for a certain amount of years." (OHCS Partner Survey respondent)*

- *"We have had families with 4 or more children not be able to find a place and are living in their vehicle — this should not be happening — if she takes her children to the homeless shelter her family is split up because of the age of her oldest boys — at the time when the family needs the most support we are ripping them apart and not helping to support long term goals of permanent housing, this is a family that was living in an apartment complex for 9 years and it is being remodeled and they are being kicked out — this is not ok." (OHCS Partner Survey respondent)*

Most needed social services. Similar proportions of stakeholders (83%) and residents (85%) named housing services as the most needed social service locally.

Stakeholder perspective. In addition to housing services, at least half of stakeholders identified mental health, services for families with children and addiction services as the most needed social services for low income persons locally (Figure 10).

Figure 10.
Which of the following social services are the most needed by low income persons in your community? Stakeholders



Note: n=167. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from 2015 OHCS Partner Survey.

Explanations for stakeholders' determination of most needed social services for low income residents locally tended to focus on services needed to either help residents get housing or to sustain current housing situations.

- *"All of these services are really interlinked. Our community no longer has a behavioral health unit that provides inpatient mental health. We also do not have a detox for opiate users." (OHCS Partner Survey respondent)*

- *"I think mental illness is a huge area in Oregon that needs to be addressed. There are a lot of homeless people in Oregon that struggle with mental illness. They run in to the same issues as I've mentioned above... lack of available housing, criminal history. But I think there needs to be more in place to help this population because many aren't capable of maintaining housing on their own. More adult group homes could be a solution, having someone (home manager) to*

help keep an eye on these individuals. Something other than DHS Seniors and People with Disabilities because I don't think it's easy for someone with mental health issues to navigate that system. I'm a housing coordinator and I've struggled myself trying to understand how that agency can help serve a particular individual that I was working with." (OHCS Partner Survey respondent)

- *"Our area is fortunate to have the VA in White City for veterans' services and there are many local charities that provide food and other services listed. In the words of one of our local homeless men, 'We have a lot of places to go— we can go here for food, there for a shower, there for medical services.... what we need is a place to BE.' Housing is desperately needed, many need the opportunities for mental health and addiction services once they are stably housed." (OHCS Partner Survey respondent)*

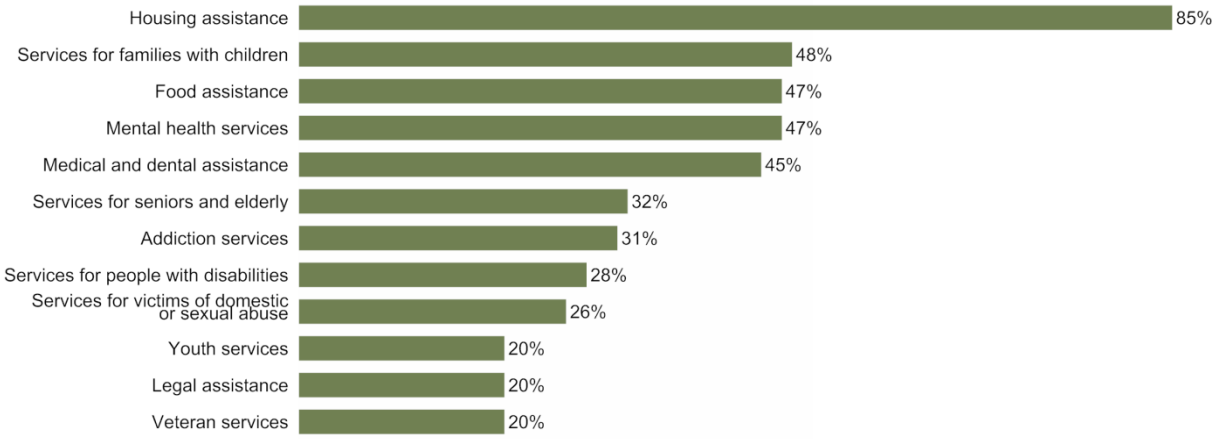
- *"We are in desperate need of low income housing that has a case management component. Most of our community members who live on the edge of poverty all the time need legal assistance and have no way of obtaining this. Families need to know the services that are available and those services need to be consistent to all families. We have many elderly people in homes that they can no long maintain and they need help with this. We have a large homeless youth population and I believe our Maslow project should have a teen shelter component. Mental Health Services in our area is terrible and we need a complete change of guard in that agency for anything to change." (OHCS Partner Survey respondent)*

- *"There are a significant number of households who have difficulty getting into housing due to addiction or mental health issues. The services are limited making it difficult to assist those in need that are in that situation." (OHCS Partner Survey respondent)*

- *"I'm very rarely able to adequately resolve these three issues —housing, dental needs, and legal advice) for my clients. It's heartbreaking." (OHCS Partner Survey respondent)*

Resident perspective. With respect to the share of residents selecting particular social services as most needed in their community, residents' choices are very similar to those of stakeholders with one noticeable difference. Nearly half of residents (47%) considered food assistance to be most needed, compared to 34 percent of stakeholders. One possible explanation may be that residents are less knowledgeable than stakeholders of existing resources for food assistance (beyond mainstream programs like SNAP). In addition to the social services listed in Figure 11, residents described the need for case management in general; services for single women with no children; transportation assistance; child care; life skills classes; and job training.

Figure 11.
Which of the following social services are the most needed by low income persons in your community? Residents



Note: n=640. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from 2015 OHCS Community Survey.

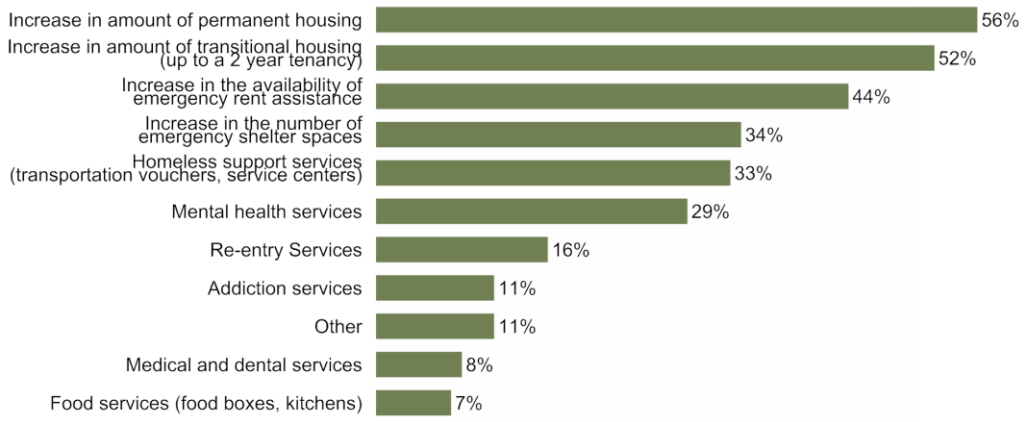
Persons Experiencing Homelessness

Stakeholders and residents provided additional detail related to the needs of persons experiencing homelessness and residents who are at-risk of homelessness.

Highest priority homeless housing or services. The greatest proportion of both stakeholders and residents selected increase in the amount of permanent housing as their highest priority for housing or services for persons experiencing homelessness.

Stakeholder perspective. Stakeholders identified up to three housing types or services they consider highest priority for persons experiencing homelessness in their area. Half considered an increase in the amount of permanent housing or an increase in the amount of transitional housing to be the highest priority housing types or services for persons experiencing homelessness locally. Emergency rent assistance, emergency shelter and support services were considered a priority by at least one-third of stakeholders.

Figure 12.
What are the highest priority housing types or services for persons experiencing homelessness in your community? Stakeholders



Note: n=167. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from the 2015 OHCS Partner Survey.

Stakeholders shared their reasoning for the priorities selected, particularly the need for prevention, case management and a lack of emergency shelter options. Because these individuals and families are heterogeneous; one size does not fit all. Examples include the wide range of circumstances contributing to the homeless episode, family composition not "fitting" with program rules, housing policies or funding requirements and so forth. The challenge of housing these individuals and families is compounded by policies in conflict with market realities—FMRs, time limits on case management, and client histories creating barriers to renting in both private and public housing.

- *"Most local emergency rent resource agencies do not offer assistance high enough to cover a full months' rent. Shelter space for families is grossly lacking to where some families would have to be broken up between several shelters, which is often unsafe and forces a break in cohesiveness and efficacy of families remaining together. Permanent housing is basic need and foundation which often allows individuals to feel they can seek help for mental health, addictions, work and other needs if they are not trapped in simply surviving and solely focused on the next meal and next place of shelter." (OHCS Partner Survey respondent)*

- *"The number of shelter units for families has decreased dramatically within the last several years. Families need a place to be that qualifies them as literally homeless in order to be eligible for the Rapid Rehousing and Permanent Supportive Housing Funds in our community." (OHCS Partner Survey respondent)*

- *"There is a huge lack of available rentals in Lane County. This makes it very difficult to move households into housing quickly. The 30 day limit on case management before a household is housed is unreasonable for our housing market. It takes much longer than this to find a landlord willing to rent to a person who is homeless." (OHCS Partner Survey respondent)*

- *"There needs to be more low-income housing for those with disabilities and living on fixed incomes, as well as families trying to make it on minimum wage. The rental assistance programs we do have still eliminate many people because of Fair Market Rent limits and other eligibility factors. Because of these two things, we still need more temporary shelter beds until more assistance and more affordable housing becomes available." (OHCS Partner Survey respondent)*

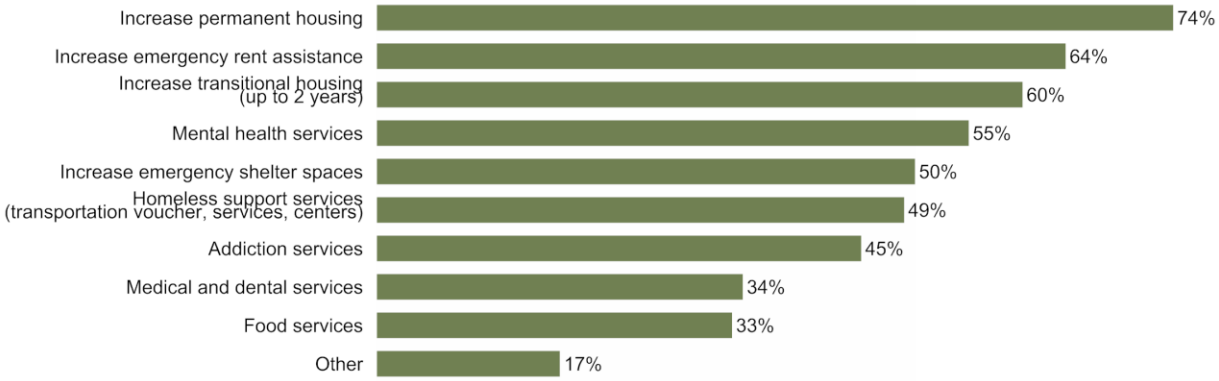
- *"Those who are re-entering from prison, jail, or out of crowded living households have a great number of barriers which are deeply rooted. There is a lack of addiction services (inpatient) treatment here so those who do access services also must re-enter from a distance. Both of these populations require transitional housing with support to make a long lasting change." (OHCS Partner Survey respondent)*

- *"We do not have enough Permanent Supportive Housing units, especially units designed specifically for people exiting homelessness. All of the programs we currently have depend on renting units in the private market. This is very difficult for many of our participants. They frequently do not have the skills to live in a unit rented from a private landlord and frequently are evicted making it even harder to house them again in the future." (OHCS Partner Survey respondent)*

- *"When an affordable housing unit is built the criteria is so strict that most won't qualify. Issues that make them homeless preclude them from qualifying. Rigid criteria and long wait lists." (OHCS Community Conversation participant)*

Resident perspective. Oregon residents also identified their suggestions for the most urgent priorities for persons experiencing homelessness. As shown in Figure 13, three in four residents identified an increase in permanent housing as a most urgent priority, followed by an increase in rental assistance, increase in transitional housing and mental health services.

Figure 13.
What are the most urgent priorities for people experiencing homelessness in our community? Residents



Note: n=637.

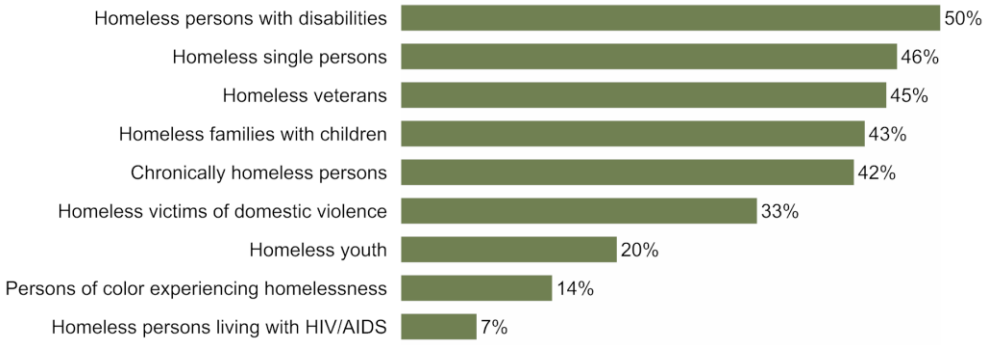
Source: BBC Research & Consulting from 2015 OHCS Community Survey.

Residents' reasoning for their priority selections had several themes related to causes of homelessness, homelessness prevention, and services needed to successfully maintain housing. Several attributed family homelessness to a lack of affordable housing while others emphasized the importance of both addiction treatment and ongoing supports once a person exits treatment. Examples include:

- *"Child care! Transportation! Life skills." (OHCS Community Survey respondent)*
- *"Job training, work ethic training, budgeting and understanding how to pay bills." (OHCS Community Survey respondent)*
- *"Lack of housing for people that are unable to live on their own due to mental health conditions." (OHCS Community Survey respondent)*
- *"Lincoln County has no Homeless Shelter and needs one desperately." (OHCS Community Survey respondent)*
- *"We need more shelter options NOW, but the only way to solve homelessness is with housing where the rent is affordable. That's permanent housing. But we also need more rent assistance to prevent people from falling into homelessness. The rent assistance we have is very limited and doesn't work sometimes until someone becomes homeless." (OHCS Community Survey respondent)*
- *"We need to increase emergency shelters tenfold to meet demand. Shelters for women and children are woefully unavailable, and I assume shelters for men are in the same situation." (OHCS Community Survey respondent)*
- *"We need affordable units and landlords willing to work with programs and people that are not 'perfect'." (OHCS Community Survey respondent)*

Segments of the population targeted by current homeless programs. Stakeholders identified the population segments targeted by current homeless programs. As shown in Figure 14, between two in five and half of stakeholders' programs target homeless: persons with disabilities, single persons, veterans, families with children and chronically homeless programs. One in five stakeholders identified homeless youth as a target of current programs for housing assistance.

Figure 14.
Which segments of the homeless population are you targeting for housing assistance?

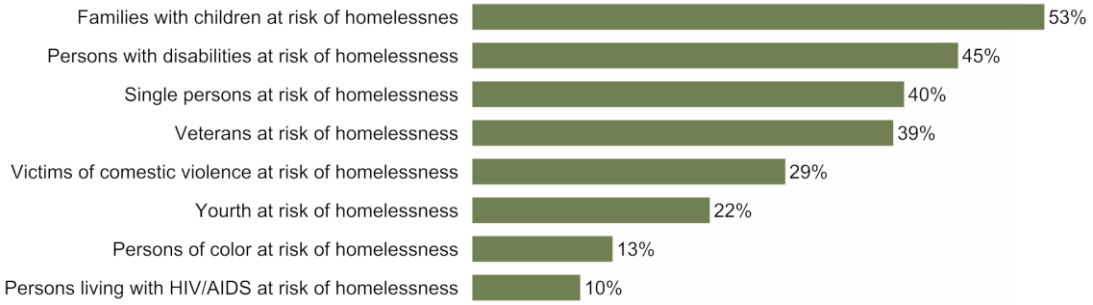


Note: n=122. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from the 2015 OHCS Partner Survey.

Segments of the population at-risk of homelessness targeted for housing assistance. Figure 15 presents the population segments at risk of homelessness stakeholders' current programs target for housing assistance. Slightly more than half target at risk families with children and about two in five target at risk persons with disabilities, single persons, and veterans.

Figure 15.
Which populations at risk of homelessness are you targeting for housing assistance?



Note: n=120. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting from the 2015 OHCS Partner Survey.

In community conversations, participants described the varied needs of low income households at risk of homelessness:

- *"Families who quit employment can be ineligible for TANF for up to 120 days. Reasons why people quit can include need for child care, help taking kids to doctors, do not have reliable transportation." (OHCS Community Conversation participant)*
- *"Foster kids—the aging out/discharge plans can be sleeping on someone's couch. Need more flexible tools to house them." (OHCS Community Conversation participant)*
- *"In the Dalles, or the surrounding four counties, there are no drug treatment/residential facilities." (OHCS Community Conversation participant)*

- *"Mental health, addictions, criminal background. And, it's a small town—everyone knows you." (OHCS Community Conversation participant)*
- *"Must serve probation where they originally committed the crime." (OHCS Community Conversation participant)*
- *"Some families receiving TANF are required to participate in a jobs program but don't have the transportation to do so resulting in decreased benefits." (OHCS Community Conversation participant)*
- *"Subsidy/benefits cliff making folks no longer eligible for anything and the loss of benefits is greater than income increase, not enough income to sustain rent on their own—loss of any subsidy creates housing loss—difficulty navigating bureaucracy, lack of rental and deposit assistance, eviction prevention dollars are limited." (OHCS Community Conversation participant)*

Public Comments on the Draft Document

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Homelessness in Oregon

2015 Point in Time Count

Each year, during the last week of January, there is a nationwide effort to count every homeless people across the country.[1] This Point-in-Time count attempts to capture both sheltered and unsheltered homeless people to provide a snapshot of homelessness in the United States. In 2015, volunteers across Oregon conducted a street count people considered to be unsheltered, meaning they are living outside, and data was collected on the homeless population living in emergency shelters and transitional housing throughout the state. In addition to the total number of sheltered and unsheltered homeless people, information was gathered on a wide range of characteristics of the homeless population including age, gender, race, ethnicity, veteran status, and disability status. Oregon Housing and Community Services (OHCS) obtained data from every Continuum of Care (CoC) in the state and provides these estimates at the county and state level.

On a single night in January 2015:

- 13,176 people were homeless in Oregon; 44% or 5,819 were sheltered and 56% or 7,357 were unsheltered.
- Seventy-two percent, or 9,441 people, were individuals, and of those 43% were sheltered and 57% were unsheltered (Figure 1).
- The other 28%, or 3,735 people, were members of families, and were more likely than individuals to be sheltered, with 47% in shelters and 53% living in an unsheltered location (Figure 1).
- The number of homeless people counted fell from 13,822 in 2013 to 13,176 in 2015, a decline of 5%. Most of the decrease was driven by the fall in the sheltered population, which went from 6,432 to 5,819 (Figure 2).[2]

See Charts and graphs on next page -

[1] A Point-in-Time count is conducted every year, but HUD only requires counts of the unsheltered population every other year.
[2] Comparisons are done to 2013 because while HUD requires sheltered counts every year, they only require unsheltered counts every other year, and thus the count in 2014 is not comparable to the count in 2015.

EQUAL HOUSING OPPORTUNITY

Figure 1: Percent of Homeless People by Household Type, By Sheltered Status, 2015

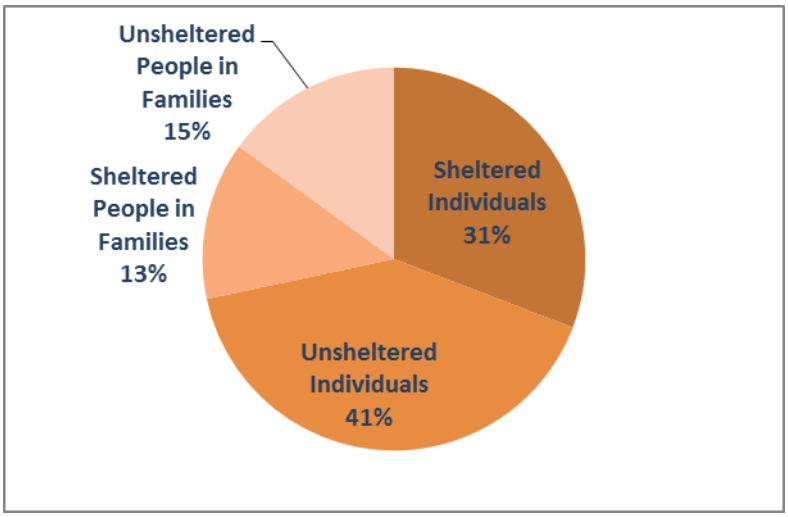
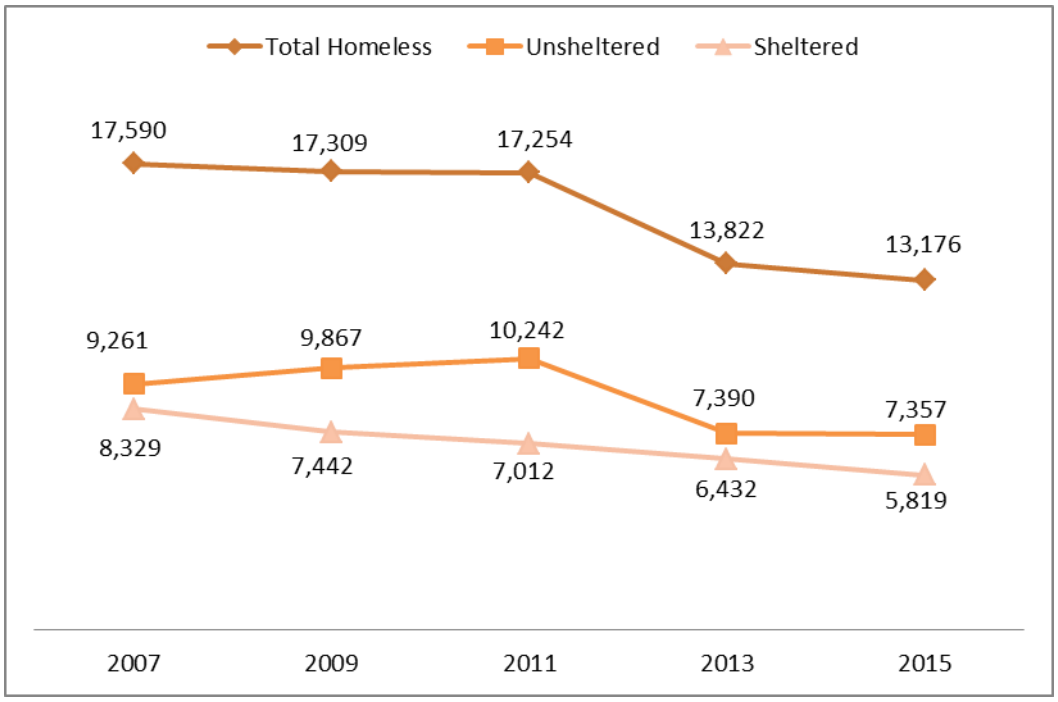


Figure 2: Estimates of Homeless People, by Sheltered Status, 2007-2015



Selected Demographics of the Homeless Population:

- The majority of homeless people (71%) were over the age of 24, while 19% were under 18 and 9% were 18-24.[3]
- Men made up 60% of the homeless population, women represented 38% of all homeless people, and transgender people made up 0.4% of the homeless population. The remaining 1.6% had missing gender information.
- 1,317 homeless people (10%) identified as Hispanic or Latino, 5% did not report an ethnicity, and the remaining 85% were Non-Hispanic/Non-Latino.
- The breakdown of the homeless population by race shows that 79% were white, 6% were African American, 5% were two or more races, 4% were Native American, 1% were Asian, 1% were Native Hawaiian/Other Pacific Islander, and the remaining 4% had missing data on race.
- All homeless people of color, except Native Americans, were more likely than white homeless people to be sheltered than unsheltered. For example, 56% of African American homeless people were sheltered compared to 44% of white homeless people.
- All people of color, except Asians, are overrepresented in the homeless population. For example, African Americans make up just 1.8% of the population in Oregon, but make up 6% of the homeless population in Oregon and Native Americans make up 1.2% of the total population and 4.3% of the homeless population (Table 1).

Table 1: Homeless and Total Population by Race

Race	% of Homeless Population	% of Total Population
White	79.0%	85.2%
African American	6.1%	1.8%
Asian	0.7%	3.8%
Native American	4.3%	1.2%
Native Hawaiian	1.0%	0.4%
Multiple Races	4.9%	3.8%
Missing Race/Other Race*	3.9%	3.7%

* ACS data includes an "Other Race" category not included in the Point-in-Time count and the Point-in-Time count has some missing data on race, while the ACS does not have missing data, so this is not an exact comparison.
Source: 2015 Point-in-Time Count and American Community Survey 2009-2013

[3] The remaining 1% had missing dates of birth, so their age could not be determined.

Homelessness among Subpopulations

- There were 3,991 chronically homeless people, making up 30% of the total homeless population.[4] Three-fourths of this population was unsheltered and 88% were individuals, not in families.
- Fourteen percent of all homeless people in Oregon have a serious mental illness and 11% have substance abuse disorder. Fifty-one percent of those with a substance abuse disorder were sheltered, compared to 42% of those with serious mental illness.
- Forty-nine people reported that they have HIV/AIDS. Twenty of these were sheltered and 29 were unsheltered.
- 2,484 homeless people (19%) reported being victims of domestic violence and 58% were unsheltered.

Table 2: Homelessness among Subpopulations, by Sheltered Status

Subpopulation	Total	% Sheltered	% Unsheltered
Chronically Homeless	3,991	25%	75%
Victims of Domestic Violence	2,484	42%	58%
Adults with Serious Mental Illness	1,891	42%	58%
Adults with Substance Abuse Disorders	1,508	51%	49%
Veterans	1,467	53%	47%
Unaccompanied Youth (Under 18)	396	18%	82%
Adults with HIV/AIDS	49	41%	59%

Homeless Veterans

- There were 1,467 homeless veterans in Oregon on a single night in January. This is 11% of the entire homeless population. Fifty-three percent of these homeless veterans were sheltered and 47% were living in unsheltered locations.
- The vast majority (89% or 1,302) of homeless veterans were men, but 156 were women and 5 were transgender.
- Forty percent of homeless veterans were chronically homeless, and chronically homeless veterans make up 62% of the unsheltered homeless veteran population

Unaccompanied Youth and Parenting Youth

- There were 1,572 unaccompanied youth and parenting youth experiencing homelessness.
- Unaccompanied youth make up 80% of this population (1,280 people) and most of these unaccompanied youth (69%) are adults aged 18-24, while the remaining 31% are children under 18.
- A significant majority (82%) of unaccompanied youth under 18 are unsheltered, compared to 58% of unaccompanied youth aged 18-24.

[4] Chronically homeless is defined by HUD as those with a disability who have either been continuously homeless for a year or more or who have experienced at least four episodes of homelessness in the last three years.

- All 135 of the parents in parenting youth households are adults aged 18-24 and they are parents to 157 children under 18.
- Parenting Youth are more likely than unaccompanied youth to be sheltered, with 65% living in shelters.

Homelessness by County

- Multnomah County had 3,801 homeless people on a single night in January, representing 29% of the state's homeless population. The counties with the largest homeless populations after Multnomah were Lane (1,473), Josephine (883), Marion (682) and Clatsop (682).
- The five counties with highest percentage of Hispanic homeless people were Malheur (44%), Yamhill (16%), Hood River (16%), Grant (14%), and Washington (14%).
- Three counties have a higher percentage of African American homeless people than the state average of 6%: Multnomah (15%), Union (11%), and Washington (7%).
- Jefferson and Klamath counties have the highest percentage of Native American homeless at 44% and 17% respectively, Umatilla has the highest percentage of Native Hawaiian or Other Pacific Islander homeless (12%), and Yamhill has the high percentage of Asian homeless at 3%.
- There are four counties where chronically homeless people make up at least half of the homeless population: Curry (64%), Polk (62%), Hood River (54%) and Benton (50%).
- Homeless veterans make up 35% of the homeless population in Lincoln County and 30% of the homeless population in Jackson County. In Lincoln County, all 19 of these homeless veterans are unsheltered.
- The counties with the largest percentage of unaccompanied youth and parenting youth are Coos (42%), Hood River (38%), and Malheur (28%).

See Point-in-Time Count Tables on pages 6-8.

Table 3: Point-in-Time Count of Homeless People, January 2015

County	Total Homeless People 2015	Total Sheltered People 2015	Total Unsheltered People 2015
Oregon	**13,176**	**5,819**	**7,357**
Baker	14	13	1
Benton	127	74	53
Clackamas	494	186	308
Clatsop	682	393	289
Columbia	317	43	274
Coos	612	33	579
Crook	36	9	27
Curry	86	0	86
Deschutes	503	176	327
Douglas	404	206	198
Gilliam	0	0	0
Grant	7	7	0
Harney	6	4	2
Hood River	69	4	65
Jackson	679	349	330
Jefferson	55	4	51
Josephine	883	124	759
Klamath	252	76	176
Lake	6	0	6
Lane	1,473	757	716
Lincoln	54	27	27
Linn	222	154	68
Malheur	104	50	54
Marion	732	573	159
Morrow	0	0	0
Multnomah	3,801	1,914	1,887
Polk	42	9	33
Sherman	0	0	0
Tillamook	106	6	100
Umatilla	52	24	28
Union	75	29	46
Wallowa	23	11	12
Wasco	47	14	33
Washington	591	196	395
Wheeler	0	0	0
Yamhill	495	246	249
No County	127	108	19

Table 4: Point-in-Time Count of Homeless Individuals, January 2015

County	Total Individuals 2015	Total Individuals Sheltered 2015	Total Individuals Unsheltered 2015
Oregon	**9,441**	**4,060**	**5,381**
Baker	3	2	1
Benton	115	65	50
Clackamas	357	76	281
Clatsop	421	251	170
Columbia	190	28	162
Coos	418	19	399
Crook	17	7	10
Curry	43	0	43
Deschutes	324	139	185
Douglas	205	117	88
Gilliam	0	0	0
Grant	1	1	0
Harney	2	0	2
Hood River	66	4	62
Jackson	583	297	286
Jefferson	42	4	38
Josephine	349	85	264
Klamath	176	61	115
Lake	2	0	2
Lane	1,250	606	644
Lincoln	29	6	23
Linn	187	140	47
Malheur	53	15	38
Marion	600	444	156
Morrow	0	0	0
Multnomah	3,132	1,403	1,729
Polk	38	9	29
Sherman	0	0	0
Tillamook	42	1	41
Umatilla	37	14	23
Union	31	9	22
Wallowa	4	0	4
Wasco	37	8	29
Washington	399	97	302
Wheeler	0	0	0
Yamhill	228	105	123
No County	60	47	13

Table 5: Point-in-Time Count of Homeless People in Families, January 2015

County	Total People in Families 2015	Total People in Families Sheltered 2015	Total People in Families Unsheltered 2015
Oregon	**3,735**	**1,759**	**1,976**
Baker	11	11	0
Benton	12	9	3
Clackamas	137	110	27
Clatsop	261	142	119
Columbia	127	15	112
Coos	194	14	180
Crook	19	2	17
Curry	43	0	43
Deschutes	179	37	142
Douglas	199	89	110
Gilliam	0	0	0
Grant	6	6	0
Harney	4	4	0
Hood River	3	0	3
Jackson	96	52	44
Jefferson	13	0	13
Josephine	534	39	495
Klamath	76	15	61
Lake	4	0	4
Lane	223	151	72
Lincoln	25	21	4
Linn	35	14	21
Malheur	51	35	16
Marion	132	129	3
Morrow	0	0	0
Multnomah	669	511	158
Polk	4	0	4
Sherman	0	0	0
Tillamook	64	5	59
Umatilla	15	10	5
Union	44	20	24
Wallowa	19	11	8
Wasco	10	6	4
Washington	192	99	93
Wheeler	0	0	0
Yamhill	267	141	126
No County	67	61	6

ATTACHMENT L
Other Plans Consulted with Descriptions

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
2016-2020 Analysis of Impediments to Fair Housing Choice (AI)	OBDD-IFA	The AI is a comprehensive look at the barriers to access fair housing. The AI focuses on the non-entitlement areas, those areas that are not covered by any participating jurisdiction's (PJs) own analysis. PJs receive funding directly from HUD and are designated as entitlement areas. The focus on non-entitlement areas was supplemented by a review of the AI's completed by the PJs. The 2016-2020 AI includes a Fair Housing Action Plan, which outlines how to remove barriers over the next five years. The plan is very specific about the multiple impacts that discrimination and lack of housing choice have on opportunity for people of color, people with disabilities, mental illness and intellectual disabilities and returning form community from incarceration. The goals of reducing barriers to access housing choice compliment the goals of the Consolidated Plan.
Economic Forecast for Oregon (May 2015)	Oregon Department of Administrative Services	The forecast provides information about the health of the Oregon economy. The report tracks job creation, and strength of the labor market. Additionally, the forecast analyzes revenue receipts and population growth. The overview of the health of the economy is an important factor to consider when determining how to stabilize peoples housing choice and determining how to move people out of poverty. The economy continues to improve, but wages are not keeping pace with the cost of housing and basic needs. The forecast outlines key areas that will need to be incorporated into strategies that will help people stabilize their housing and move out of poverty.

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
10- Year Plan for Oregon (2014 Update)	State of Oregon	The plan identifies key strategies to achieve goals across five sectors: economy and jobs, education, healthy environment, healthy people, and public safety. The strategies seek to improve the lives of all Oregonians, with particular focus on low income Oregonians. Key areas of overlap with the goals of the Consolidated Plan are the importance of quality living wage jobs and quality education. The plan recognizes the key role that housing plays as a determinant for health. The 10-Year Plan for Oregon states that housing has a direct impact on health, but the demand for decent housing far outstrips the supply. To achieve the strategy to improve access to housing and nutrition, the plan outlines the following tactics: • replace substandard, unhealthy housing and incentivize building healthy affordable homes, • improve access to housing for seniors, • improve access for people in recovery from addiction and mental illness and those re-entering the community from corrections or healthcare systems • implement statewide nutrition policy • develop strategic solutions for chronic homelessness and the newly homeless • improve access to food. The plan supports the Consolidated Plan's goals to stabilize peoples housing, increase housing choice and help people move out of poverty.
2015-2018 Behavioral Health Strategic Plan 2015-2018 Behavioral Health Strategic Plan (continued)	Oregon Health Authority	Key themes considered in the development of the plan included the need that Oregonians get: • The right care - behavioral health care should be culturally appropriate, person centered and trauma informed. • In the right place - people should have access to behavioral health regardless of where they live, and they should receive services in their community whenever possible, keeping people out of the emergency departments and the State Hospital who do not need to

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		be there. • At the right time - catch illnesses early and prevent behavioral conditions from developing in the first place, through promotion and early intervention especially with children, youth and families. Initiative #4 of the plan states: the behavioral health system supports recovery and life in the community. Goal #4.1 is to increase access to safe, affordable housing for people in recovery. Supplemental Social Security is not enough to cover rent and other living expenses. Apartments with affordable rents are in short supply statewide. Individuals with addictions, living in recovery or mental illness may have difficulty securing and maintaining housing supportive services are not available. Landlords may be reluctant to rent to individuals with behavioral health issues. People with mental illness prefer to live in their own homes rather than congregant settings. Supportive housing reduces the use of shelters and reductions in hospital admissions. Investments in housing and social services for individuals in recovery can result in reductions in the public cost for medical and criminal justice services. The goals of the 2015-2018 Behavioral Health Strategic Plan compliment the Consolidated Plan's priority to stabilize people's housing, which is a key aspect to promoting healthy living.

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
Path to Prosperity: Four strategies to reduce Oregon's poverty rate to less the 10% by 2020 (December 2013)	Oregon Business Plan/ECO Northwest	The Plan seeks to create jobs, raise persona income and reduce poverty. These three goals work together to improve Oregon. The report finds that one in five Oregonians participate in the SNAP program compared to one in seven nationally. Safety net design includes disincentives for work, especially as families attempt to move from 100 percent to 200 percent over the federal poverty level. The marginal tax rate has a negative effect on low income families. When a family moves from earning $30,000 to $35,000, $4,650 of the new earnings is lost through increased tax liabilities. The report outlines the following strategies to reduce poverty: 1. Recognize poverty's diverse demography and geography, and customize programs to meet the range of needs. Focus on teens as an early leverage points with immediate payoffStart early for long term success. 2. Steer education and workforce initiatives to provide skills needed for family wage jobs. 3. Build an economy that offers more paths out of poverty. Focus on manufacturing and natural resource industry. 4. Provide adequate support for those in need and make work pay. Additional challenges for Oregonians in poverty include the high cost of housing and access to affordable child care. The report supports the goals of the Consolidated Plan to promote housing choice, stabilize people's housing and to move people out of poverty; reducing the impact of poverty on the lives of Oregonians.

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
In It together: Policy Playbook (January 2015)	Oregon Business Plan	The report finds that the safety net is a patchwork of services without coherent design. As Oregonians work their way out of poverty, increasing wages can lead to significant loss of benefits that off sets most of the gains. The report recommendations: • Redesign the TANF program to improve work incentives and tailor jobs training to local economies.
In It together: Policy Playbook (Continued)	Oregon Business Plan	• Expand availability of high quality childcare to low income working parents. • Extend and expand the IDA program. • Increase the Earned Income Tax Credit and Working Families Child Care Credit. The plan supports the Consolidated Plan's goals to stabilize people s housing, increase housing choice and help move people out of poverty. This legislative session the IDA program was expanded to help people save for first/last month's rent and deposits, paying educational or medical debt, and improving credit histories.
Oregon's Workforce Development Strategic Plan 2012-2022	Oregon Workforce Investment Board	The plan lays out the following goals: • Oregonians have the skills they need to fill current and emerging high-wage, high demand jobs. • Employers have the skilled workforce they need to remain competitive and contribute to local prosperity. • The workforce system is aligned, provides integrated services, and makes efficient and effective use of resources to achieve better outcomes. The plan strives to develop the following outcomes: • Oregon's workers possess the skills and abilities required by business • Oregonians see higher earnings • Workforce participants are satisfied with workforce development services and results. The plan supports the Consolidated Plan's goals by

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		providing access to higher wage in demand jobs. These jobs will allow people to stabilize their housing, increase housing choice, and help move people out of poverty.
2015 State of Black Oregon	Urban League	Urban renewal and other government policies have displaced black communities in the name of removing blight. Housing is the most basic element of security and too many Blacks are precarious in their homes. Safe, decent and affordable housing has been at the core of community development programs. A stable housing priority needs a strong anti-displacement component, including a right to return for those involuntarily relocated through public policies and its market consequences. Lifting people up requires resources for education, workforce development and job placement in growth industries to ensure Black participation in emerging areas. Displacement occurs in part due to lack of ownership of homes and businesses. Black Community development should encompass a range of possibilities, including individual and collective and community ownership. When receiving subsidies, Developers must address social impacts in return for public dollars. No cause evictions compound issues of gentrification. Housing Policy Priorities: • Prevent and reverse the detrimental effects of gentrification through multilevel

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		community development by: • Advocating for community owned/cooperatively controlled land bank/trust to fulfill community development needs and neighborhood stabilization. • Implement a Right to the City policy – to reconnect Black people to the heart of Black Community. • Adopting HUD Mandate to Affirmatively Furthering Fair Housing, which will de concentrate poverty and increase integration by creating affordable housing in areas of high opportunity • Engage community in building supportive institutions like schools. • Strengthen hosing stability and choice though polices such as rent control, just cause evictions controls and enforcement of fair housing laws. The report supports the Consolidated Plan's goals to stabilize peoples housing, increase housing choice and help people move out of poverty.
The High cost of Low Wages in Oregon (2014)	University of Oregon Labor Education and Research Center	• Over 400,000 Oregonians are employed in low wage work. Low wage work is a growing share of Oregon's Economy. When wages are set far below the cost needed to raise a family, means the demand for public services is set at a record high. • Over one million Oregonians rely on food stamps and other assistance to feed their families. • Women are more likely than men to end up in low wage jobs. Low wages, irregular hours and part time work compound issues. • 45% of Latinos, 50% of African Americans are employed in low wage industries. • People of color historically constituted a disproportionate share of the low wage work force. • Majority of low wage workers are adults over the age of 20, many whom have a

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
The High cost of Low Wages in Oregon (continued)		college degree or some level of higher education. National data is that the average minimum wage worker is a 35 year-old woman. • 197,000 Oregonians receiving public assistance in 2014 worked in the previous year. • Major corporatizations reliance on low wage employment is increasing, and low wage employment is replacing work that used to pay a middle class salary. • Taxpayers spend $1.7 billion on providing assistance to working families. • Oregon has one of the highest participation rates in SNAP, 21 percent of the population receiving monthly benefits. • 45 percent of all vacancies for jobs paying less that $15 an hour were for part time work. • Part time work requires working multiple jobs to make ends meet. This report outlines the difficulty Oregonians have paying for housing and basic services. This reports overlaps with the goals of the Consolidated Plan's priority to promote housing choice, stabilize peoples housing, and to move people out of poverty, reducing the impact of poverty on the lives of Oregonians.
Oregon Healthy Homes Strategic Plan (September 2013)	OHA	• Connection between inadequate housing and poor health is well established, numerous housing related hazards pose a threats to human health. • Oregon has a higher percentage for lifetime and current asthma in adults than the overall US. • Asthma costs $6.1 million dollars for Medicaid and OHP. • Oregonians in the lowest income brackets more likely to have asthma than Oregonians in higher incomes. Most common predictor

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Oregon Healthy Homes Strategic Plan (continued)		for asthma is living in poverty. High correlation children living where there is smoking in home, and living in dwellings with carpeting. • Lead poisoning is decreasing but reporting may not be accurate and underestimate number of children impacted. • Lack of in home safety has impact on health of residents. Leading causes of injury for children is drowning, pedestrian or bike injuries, fire or burns, poisoning, access to firearms, and motor vehicle crashes. • Poor air Quality and indoor air pollution is recognized as one of the most serious health impacts. Inadequate ventilation, chemicals, mold, tobacco smoke and combustion/ heat sources are key contributors to poor health. • Radon is estimated to cause 10% of lung cancers diagnosed each year. • Tobacco use kills 7,000 Oregonians each year and second hand smoke kills another 800. • Houses that are poorly constructed have significant impact on the health and safety of residents. Low incomes populations and communities of color suffer disproportionately from housing quality concerns. • Medicaid enrollees and non-white Oregonians more likely to experience overcrowding. • Shortage of affordable housing limits housing choice, as a result more often lower income persons are frequently forced to live in unhealthy housing, in unsafe neighborhoods with higher poverty rates with fewer resources such as jobs and education. • Unaffordable housing can also prevent families from meeting their basic needs such as nutrition and health care, and can result in housing instability and homelessness.

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		Residence in high poverty neighborhoods is linked to increased mortality, poor physical and mental health, negative health behavior and limited access to resources such as education and employment. This report outlines the difficulty Oregonians have paying for housing and basic services. Importantly this report highlights the impact of poor quality housing on health. This reports overlaps with the goals of the Consolidated Plan's priority to promote housing choice, stabilize peoples housing and to move people out of poverty, reducing the impact of poverty on the lives of Oregonians.
Oregon Early Childhood Comprehensive System Plan (Year unknown) Oregon Early Childhood Comprehensive System Plan (continued)	Oregon Department of Human Services	The plan identifies the many systemic issues in delivering services. The safety net is a patchwork of services without coherent design. As Oregonians work their way out of poverty increasing wages can lead to significant loss of benefits that off sets most of the gains. • "Just in time scheduling" (where an employer does not provide a set schedule) is a growing trend creating erratic and unstable work hours. • Low wage workers don't have access to protected/paid sick time or health care benefits. • Lack of health care, family friendly policies leads to high turnover, loss of wages and higher medical costs. • Over one million Oregonians rely on food stamps and other assistance to feed their families • Women are more likely than men to end up in low wage jobs. Low wages, irregular hours and part time work compound issues. • 45% of Latinos and 50% of African Americans are employed in low wage industries. • People of color historically constitute a disproportionate share of low wage work force.

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		• Majority of low wage workers are adults over the age of 20, many whom have a college degree or some level of higher education. National data is that the average minimum wage worker is a 35 year-old woman. • 197,000 Oregonians receiving public assistance in 2014 worked in the previous year. • Major corporatization's reliance on low wage employment is increasing, and low wage employment is replacing work that used to pay a middle class salary. • Taxpayers spend $1.7 billion on providing assistance to working families. • Oregon has one of the highest participation rates in SNAP, 21 % of the population receiving monthly benefits. • 45 % of all vacancies for jobs paying less that $15 an hour were for part time work. Part time work requires working multiple jobs to make ends meet. The plan supports the goals of the Consolidated Plan to promote housing choice, stabilize people's housing and to move people out of poverty; reducing the impact of poverty on the lives of Oregonians. Specifically, the plans together recognize the limitations low wage jobs have on families and person seeking to move out of poverty.
Oregon Housing and Community Services Agency Redesign (February 2014) Oregon Housing and Community Services Agency Redesign (continued)	OHCS	Refocus the agency to be a facilitator of local and regional prosperity efforts. Create a housing policy commission to integrate the housing continuum with related state polices. Instill mutual accountability for our major funding streams. Continue aligning and coordinating throughout state government. OHCS is committed to building a stronger agency by driving alignment, accountability and innovation. We have a long term agenda to ensure that low-income Oregonians who rely on the services funded by OHCS have the opportunity to gain prosperity. OHCS and our community partners

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		are committed to this hard work. We're committed because housing is foundational to successfully achieving health, safety, education, and economic outcomes for families and communities. **Homelessness:** • Simplify and align eligibility and reporting • Integrate with OHA and DHS to align administration and encourage local compacts • Improve data systems, create long term plan for data integration. • Establish outcome based metrics and transition to performance based contracting **Energy Assistance:** • Integrate with OHA and DHS to align administration and encourage local compactsWeatherization: • Find ways to leverage and integrate with CCO's for health homes initiative **Multi-Family housing finance:** • Target priority populations within competitive funding process • Facilitate workforce and mixed income housing by using non-competitive resources more strategically • Simplify and align state funded grants **Homeownership Assistance:** • Expand single family bond program to better serve target populations • Simplify grants administration HCS is in the second year of implementing the agency redesign. The plan overlaps with the goals of the Consolidated Plan by aligning services for persons served by housing programs and homeless services. Becoming more integrated with partners and data driven are cornerstones of this report.
The Self –Sufficiency Standard 2014	Worksystems, Inc.	The self-sufficiency standard for Oregon defines the income needed to realistically support a family, without public or private assistance. • In Oregon, the amount needed to be

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
		economically self-sufficient varies considerably by geographic location. For instance, the amount needed to make ends meet for one adult and one preschooler varies from $11.73 per hour ($24,765 annually) in Malheur County to $22.54 per hour ($47,571 annually) in Washington County, or from 157% of the Federal Poverty Level to 302% of the Federal Poverty Level. • The Standard also varies by family type, such as how many adults and children are in a family and the age of each child. One adult living in Multnomah County needs an hourly wage of $9.47 ($19,993 annually) to meet basic needs. For families with children, the amount needed to cover basic needs increases considerably. If the adult has a preschooler and a school-age child, the amount necessary to be economically secure more than triples, increasing to $28.42 per hour ($60,025 annually) in order to cover the cost of child care, a larger housing unit, and increased food and health care costs. For families with young children, the cost of housing and child care combined typically make up about 50% of the family's budget. For example, for this family type in Multnomah County, child care is 35% of the family's budget while housing is 18%. Food costs take up 12% and health care is 8% of the family's budget. • The Federal Poverty Level for three-person families ($19,790 annually) is 57% of the Standard for one adult, one preschooler, and one school-age child in Marion County ($16.30 per hour and $34,432 annually). • The amount needed to meet the costs of basic needs increased between 2008 and 2014 in all Oregon counties, despite the financial crisis. • The 2014 Self-Sufficiency Standard for one adult with one preschooler and one school-age child in Portland ($28.42 per hour) is comparable to Seattle, WA ($28.19 per hour). • Of the top ten most common occupations in Oregon (measured by the number of workers), only one—registered nurses—has median wages above the Standard for a family of three in Multnomah County.

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
		• With the help of child support, child care assistance, food assistance (SNAP and WIC), and Medicaid, a single adult supporting one preschooler and one school-age child and living in Multnomah County who is transitioning from welfare to work would be able to meet her family's needs with a wage of $10.61 per hour, significantly less than the full Self-Sufficiency Wage of $28.42 per hour. • A single parent with one preschooler and one school-age child living in Multnomah County and working a full-time minimum wage job earns only 38% of the income needed to meet her family's basic needs if she is not receiving any work supports. • "Work support" programs can offer stability and help a family retain employment. These include: child care assistance, healthcare, food assistance, and housing assistance. This reports overlaps with the goals of the Consolidated Plan's priority to move people out of poverty, reducing the impact of poverty on the lives of Oregonians. By highlighting the wage needed to be self-sufficient, this reports demonstrates how difficult it is to provide stable housing and basic necessities when working in low wage jobs.
Moving from Poverty to Prosperity in Oregon: 2015 Poverty Report	Community in Action/OHCS	The report provides readers with the most current information available on poverty rates, characteristics of people living in poverty in Oregon and household incomes. The report is part of the Community Services Block Grant program.

ATTACHMENT M:

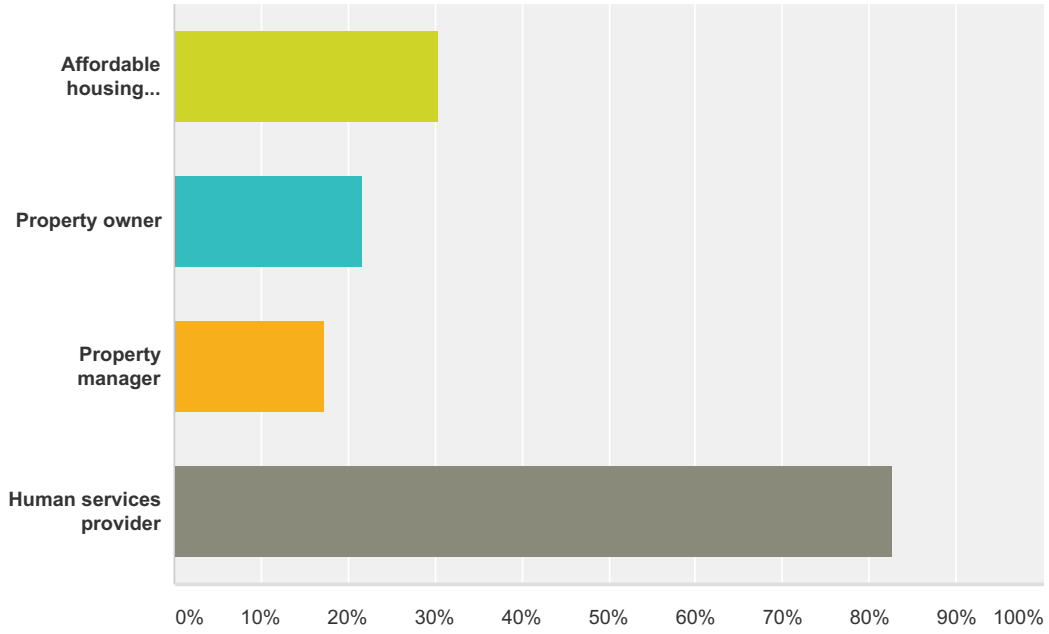
HUD Table 3 – Homeless Prevention Services Summary

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X		X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

ATTACHMENT N: Partner Survey Data Summary

Q2 Choose your agency type (select all that apply, or type it in "other" box below).

Answered: 46 Skipped: 20



Answer Choices	Responses	
Affordable housing developer	**30.43%**	14
Property owner	**21.74%**	10
Property manager	**17.39%**	8
Human services provider	**82.61%**	38
Total Respondents: 46		

#	Other (please specify)	Date
1	Community Corrections (Parole, Probation & Post-Prison Supervision)	4/24/2015 10:24 AM
2	Develop & allocate funding for affordable housing & human services	4/20/2015 11:04 AM
3	Early childhood education	4/20/2015 9:40 AM
4	PreSchool for low income familes	4/20/2015 8:07 AM
5	Head Start	4/15/2015 2:28 PM
6	Head Start	4/14/2015 9:54 AM
7	pre-school	4/13/2015 2:17 PM
8	Low income resources (rental assistance, LIHEAP, Cover Oregon, Weatherization, Res. Rehab, etc.)	4/13/2015 2:07 PM
9	Community Action Agency	4/13/2015 2:05 PM
10	Community Health Worker	4/13/2015 1:50 PM
11	Veteran employment services	4/13/2015 1:24 PM

12	City	4/10/2015 9:13 AM
13	Government: housing subsidy provider	4/9/2015 8:51 AM
14	Homeless shelter	4/7/2015 8:54 AM
15	DV/SA adv.	4/6/2015 4:49 PM
16	Youth Shelter, Host family program	4/6/2015 8:43 AM
17	IDA Fiduciary Organization	4/3/2015 1:45 PM
18	Public Housing Agency	4/2/2015 6:52 PM
19	Developmental Disability Services	3/31/2015 4:09 PM
20	School Dist. Homeless Liaison	3/31/2015 12:28 PM
21	HOMELESS PERMANENT SUPPORTIVE HOUSING	3/31/2015 12:17 PM
22	Public Health Department	3/31/2015 12:11 PM
23	Community Action Agency	3/30/2015 2:15 PM
24	supportive services	3/30/2015 10:00 AM
25	CDBG Program Administrator	3/30/2015 9:56 AM
26	housing rental assistance program	3/30/2015 8:58 AM
27	CAP agency	3/28/2015 2:47 PM
28	Community Action Agency	3/27/2015 2:32 PM
29	Veteran Benefits	3/27/2015 1:39 PM
30	Community Action Partnership agency: WX; Housing; Food Bank; energy assistance	3/27/2015 1:37 PM
31	Government Lender	3/27/2015 10:57 AM

Q3 Please provide your contact information:

Answered: 64 Skipped: 2

Answer Choices	Responses	
Name	**100.00%**	64
Title	**98.44%**	63
E-mail	**98.44%**	63
Phone	**96.88%**	62

#	Name	Date
1	Katie Cardwell	4/27/2015 1:04 PM
2	Sean Hubert	4/24/2015 5:16 PM
3	Larry	4/24/2015 10:24 AM
4	Susan Thomas	4/23/2015 10:35 AM
5	Micheline Proctor	4/21/2015 8:59 AM
6	Heidi Parker	4/20/2015 11:04 AM
7	Rich Rohde	4/20/2015 9:40 AM
8	Susan Bash	4/20/2015 8:36 AM
9	Lee MUrphy	4/20/2015 8:07 AM
10	Deborah Sayre	4/17/2015 1:07 PM
11	Ellen Marks	4/17/2015 9:48 AM
12	Jaimee Cordero	4/17/2015 8:29 AM
13	Michelle Webb	4/15/2015 2:28 PM
14	Lynne McConnell	4/14/2015 12:38 PM
15	Vicky Espinoza	4/14/2015 9:54 AM
16	Anna Klug	4/13/2015 2:17 PM
17	Maribel Ramirez	4/13/2015 2:07 PM
18	Anissa Harden	4/13/2015 2:05 PM
19	Crystal Clifford	4/13/2015 1:50 PM
20	Jane Padgett	4/13/2015 1:31 PM
21	Linda Chase	4/13/2015 1:24 PM
22	Jessica Soltesz	4/13/2015 12:16 PM
23	Jaime Valero	4/13/2015 10:23 AM
24	Ric Ingham	4/10/2015 9:13 AM
25	Kris Harvey	4/9/2015 8:51 AM
26	Margaret Jonsson	4/7/2015 5:39 PM

27	Jeffrey Puterbaugh	4/7/2015 1:50 PM
28	Kathleen Callero	4/7/2015 8:54 AM
29	Barbara Johnson	4/6/2015 5:40 PM
30	Center for Hope and Safety	4/6/2015 4:49 PM
31	Stephen Goins	4/6/2015 10:40 AM
32	Lyn Morris-Holman	4/6/2015 10:00 AM
33	Barbara Erazo	4/6/2015 9:01 AM
34	Kevin Lamson	4/6/2015 8:43 AM
35	Tina Grissom	4/6/2015 8:39 AM
36	Felicity Elworthy	4/5/2015 8:39 PM
37	Donna Kinnaman	4/3/2015 4:29 PM
38	Lisa Rogers	4/3/2015 1:45 PM
39	Stephen Custer	4/3/2015 1:16 PM
40	David Ruelas	4/3/2015 11:40 AM
41	Linda Jennings	4/2/2015 6:52 PM
42	Jill Smith	4/2/2015 1:36 PM
43	Dale Inslee	4/2/2015 11:49 AM
44	Leigh Madsen	4/1/2015 3:20 PM
45	Lynn Boose	3/31/2015 4:09 PM
46	Darlene Urbach	3/31/2015 12:28 PM
47	HEATHER EVERETT	3/31/2015 12:17 PM
48	Sarah Decker	3/31/2015 12:11 PM
49	Laura Moore	3/30/2015 2:15 PM
50	Jennifer Spatz	3/30/2015 11:03 AM
51	Mel Parker	3/30/2015 10:09 AM
52	Carrie Phillips	3/30/2015 10:00 AM
53	Angela Durant	3/30/2015 9:56 AM
54	Sara Carrillo	3/30/2015 8:58 AM
55	Angela Quattlebum	3/30/2015 8:41 AM
56	Lee Honore Means	3/28/2015 2:47 PM
57	Kathy Armstrong	3/27/2015 4:14 PM
58	Mary Li	3/27/2015 2:32 PM
59	Marc Huchette	3/27/2015 1:39 PM
60	Corenne Stewart	3/27/2015 1:37 PM
61	Kim McCarty	3/27/2015 10:57 AM
62	Nick Sauvie	3/26/2015 4:10 PM
63	Lisa Drayton	3/26/2015 1:55 PM
64	DeeDee Johnson	3/26/2015 12:15 PM

#	Title	Date
1	Crisis Intervention Worker	4/27/2015 1:04 PM
2	Chief Housing and Employment Officer	4/24/2015 5:16 PM
3	Bennett	4/24/2015 10:24 AM
4	Family Advocate	4/23/2015 10:35 AM
5	Human Service Assistant/ Accomodation Aide	4/21/2015 8:59 AM
6	HHSC Commissioner	4/20/2015 11:04 AM
7	Family Advocate	4/20/2015 9:40 AM
8	Family Advocate	4/20/2015 8:36 AM
9	Family Advocate	4/20/2015 8:07 AM
10	Family Advocate	4/17/2015 1:07 PM
11	Family Advocate	4/17/2015 9:48 AM
12	Family Advocate	4/17/2015 8:29 AM
13	Health/Nutrition Specialist	4/15/2015 2:28 PM
14	Assoc. Director of HomeSource and Assets	4/14/2015 12:38 PM
15	Family Services Specialist	4/14/2015 9:54 AM
16	OSC	4/13/2015 2:17 PM
17	Housing Advocate	4/13/2015 2:07 PM
18	Housing Advocate	4/13/2015 2:05 PM
19	Community Health Worker	4/13/2015 1:50 PM
20	Program Manager	4/13/2015 1:24 PM
21	District Manager	4/13/2015 12:16 PM
22	Workforce Consultant	4/13/2015 10:23 AM
23	City adminstrator	4/10/2015 9:13 AM
24	OHOP Program Support Specialist	4/9/2015 8:51 AM
25	Director, Housing Development and Management	4/7/2015 5:39 PM
26	Interim Director - Money Follows the Person	4/7/2015 1:50 PM
27	Case Manager	4/7/2015 8:54 AM
28	Director of Victim Services	4/6/2015 5:40 PM
29	DV/SA	4/6/2015 4:49 PM
30	Social Service Program Manager	4/6/2015 10:40 AM
31	RN Care Coordinator	4/6/2015 10:00 AM
32	Crisis Intervention Worker (financial)	4/6/2015 9:01 AM
33	Executive Director	4/6/2015 8:43 AM
34	Victim Services Specialist	4/6/2015 8:39 AM
35	Parent, Family and Community Engagement Manager	4/5/2015 8:39 PM
36	CEO	4/3/2015 4:29 PM
37	Deputy Director	4/3/2015 1:45 PM

38	Director of Broadway Life Center	4/3/2015 1:16 PM
39	Housing Director	4/3/2015 11:40 AM
40	Executive Director	4/2/2015 6:52 PM
41	COO	4/2/2015 1:36 PM
42	Executive director	4/2/2015 11:49 AM
43	Exective Director ACRC	4/1/2015 3:20 PM
44	CEO	3/31/2015 4:09 PM
45	Homeless Liaison	3/31/2015 12:28 PM
46	PROGRAM DIRECTOR	3/31/2015 12:17 PM
47	HIV Case Manager	3/31/2015 12:11 PM
48	Data Compliance Specialist/Case Manager	3/30/2015 2:15 PM
49	Director of Housing and Emergency Services	3/30/2015 11:03 AM
50	Housing Coordinator- Region 4	3/30/2015 10:09 AM
51	Care Coordiantor	3/30/2015 10:00 AM
52	Grants Administrator	3/30/2015 9:56 AM
53	Housing Coordinator	3/30/2015 8:58 AM
54	Homeless Liaison	3/30/2015 8:41 AM
55	Executive Director	3/28/2015 2:47 PM
56	Deputy Director	3/27/2015 4:14 PM
57	Community Action Director	3/27/2015 2:32 PM
58	Public Information/Public Affairs	3/27/2015 1:39 PM
59	Housing Programs Coordinator	3/27/2015 1:37 PM
60	Program Manager	3/27/2015 10:57 AM
61	Executive Director	3/26/2015 4:10 PM
62	Manager Member	3/26/2015 1:55 PM
63	Homeowner Services Manager	3/26/2015 12:15 PM
#	**E-mail**	**Date**
1	kcardwell@nwhumanservices.org	4/27/2015 1:04 PM
2	sean.hubert@ccconcern.org	4/24/2015 5:16 PM
3	larry.w.bennett@doc.state.or.us	4/24/2015 10:24 AM
4	Susan.Thomas@socfc.org	4/23/2015 10:35 AM
5	micheline.n.proctor@state.or.us	4/21/2015 8:59 AM
6	parkershames@gmail.com	4/20/2015 11:04 AM
7	rich.rohde@socfc.org	4/20/2015 9:40 AM
8	susan.bash@socfc.org	4/20/2015 8:36 AM
9	lee.murphy@socfc.org	4/20/2015 8:07 AM
10	Deborah.Sayre@SOCFC.org	4/17/2015 1:07 PM
11	Ellen.Marks@socfc.org	4/17/2015 9:48 AM

12	jaimee.cordero@socfc.org	4/17/2015 8:29 AM
13	mwebb@mccdc.org	4/15/2015 2:28 PM
14	lynnem@neighborimpact.org	4/14/2015 12:38 PM
15	vespinoza@mccdc.org	4/14/2015 9:54 AM
16	aklug@mccdc.org	4/13/2015 2:17 PM
17	maribel@communityinaction.info	4/13/2015 2:07 PM
18	anissa@communityinaction.info	4/13/2015 2:05 PM
19	cclifford@lifeways.org	4/13/2015 1:50 PM
20	jane.padgett@state.or.us	4/13/2015 1:31 PM
21	lchase@or.easterseals.com	4/13/2015 1:24 PM
22	jessica.m.soltesz@state.or.us	4/13/2015 12:16 PM
23	Jaime.Valero@ohdc.org	4/13/2015 10:23 AM
24	ringham@ci.veneta.or.us	4/10/2015 9:13 AM
25	kris.a.harvey@state.or.us	4/9/2015 8:51 AM
26	margaret.jonsson@cascadiabhc.org	4/7/2015 5:39 PM
27	Jeffrey.L.Puterbaugh@state.or.us	4/7/2015 1:50 PM
28	kathleen@sfsssalem.org	4/7/2015 8:54 AM
29	bjohnson@community-works.org	4/6/2015 5:40 PM
30	info@cenerforhopeandsafety.org	4/6/2015 4:49 PM
31	sgoins@nwhumanservices.org	4/6/2015 10:40 AM
32	lyn.morris-holman@ah.org	4/6/2015 10:00 AM
33	berazo@nwhumanservices.org	4/6/2015 9:01 AM
34	kevin@hearts With A Mission.org	4/6/2015 8:43 AM
35	tina@hopeandsafety.org	4/6/2015 8:39 AM
36	felworthy@socfc.org	4/5/2015 8:39 PM
37	dkinnaman@capeco-works.org	4/3/2015 4:29 PM
38	lrogers@casaoforegon.org	4/3/2015 1:45 PM
39	scuster@salemalliance.org	4/3/2015 1:16 PM
40	druelas@bienestar-or.org	4/3/2015 11:40 AM
41	LJennings@wvpha.org	4/2/2015 6:52 PM
42	jill.smith@homeforward.org	4/2/2015 1:36 PM
43	dinslee@gmail.com	4/2/2015 11:49 AM
44	lmadsen@accesshelps.org	4/1/2015 3:20 PM
45	lboose@cs-inc.org	3/31/2015 4:09 PM
46	durbach@culver.k12.or.us	3/31/2015 12:28 PM
47	info@rogueretreat.com	3/31/2015 12:17 PM
48	sarah.decker@co.jefferson.or.us	3/31/2015 12:11 PM
49	lmoore@orcca.us	3/30/2015 2:15 PM

50	jspatz@orcca.us	3/30/2015 11:03 AM
51	cphillips@hivalliance	3/30/2015 10:00 AM
52	angela.durant@cityofmedford.org	3/30/2015 9:56 AM
53	sara.d.carrillo@state.or.us	3/30/2015 8:58 AM
54	angela.quattlebum@redmond.k12.or.us	3/30/2015 8:41 AM
55	leem@yamhillcap.org	3/28/2015 2:47 PM
56	kathy@proudground.org	3/27/2015 4:14 PM
57	mary.li@multco.us	3/27/2015 2:32 PM
58	marc.d.huchette@state.or.us	3/27/2015 1:39 PM
59	corennes@mccac.com	3/27/2015 1:37 PM
60	kjmccarty@comcast.net	3/27/2015 10:57 AM
61	nick@rosecdc.org	3/26/2015 4:10 PM
62	ldrayton@qwestoffice.net	3/26/2015 1:55 PM
63	djohnson@bendhabitat.org	3/26/2015 12:15 PM
#	**Phone**	**Date**
1	5035815535	4/27/2015 1:04 PM
2	503.200.3892	4/24/2015 5:16 PM
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5	541-482-1520	4/20/2015 11:04 AM
6	541-621-6647	4/20/2015 9:40 AM
7	541-830-3673	4/20/2015 8:36 AM
8	541-592-3161	4/20/2015 8:07 AM
9	541-772-7707 x2008	4/17/2015 1:07 PM
10	541-482-5931	4/17/2015 9:48 AM
11	541-664-4585	4/17/2015 8:29 AM
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13	541-323-6569	4/14/2015 12:38 PM
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17	208-991-8494	4/13/2015 1:50 PM
18	541-889-8657	4/13/2015 1:31 PM
19	541-776-6060 x 246	4/13/2015 1:24 PM
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21	541-881-1506	4/13/2015 10:23 AM
22	541-935-2191	4/10/2015 9:13 AM
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26	503-930-7737	4/7/2015 8:54 AM
27	541-779-2393	4/6/2015 5:40 PM
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36	503-537-0319 ext 306	4/3/2015 1:45 PM
37	503-581-2129, x 223	4/3/2015 1:16 PM
38	503-820-8522	4/3/2015 11:40 AM
39	503-623-8387 Ext.14	4/2/2015 6:52 PM
40	503 802-8565	4/2/2015 1:36 PM
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43	503 693 7269	3/31/2015 4:09 PM
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45	541-499-0880	3/31/2015 12:17 PM
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49	melissa.m.parker@state.or.us	3/30/2015 10:09 AM
50	541-342-5088 x 163	3/30/2015 10:00 AM
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52	503-589-9339	3/30/2015 8:58 AM
53	541-316-2848	3/30/2015 8:41 AM
54	503-883-4172	3/28/2015 2:47 PM
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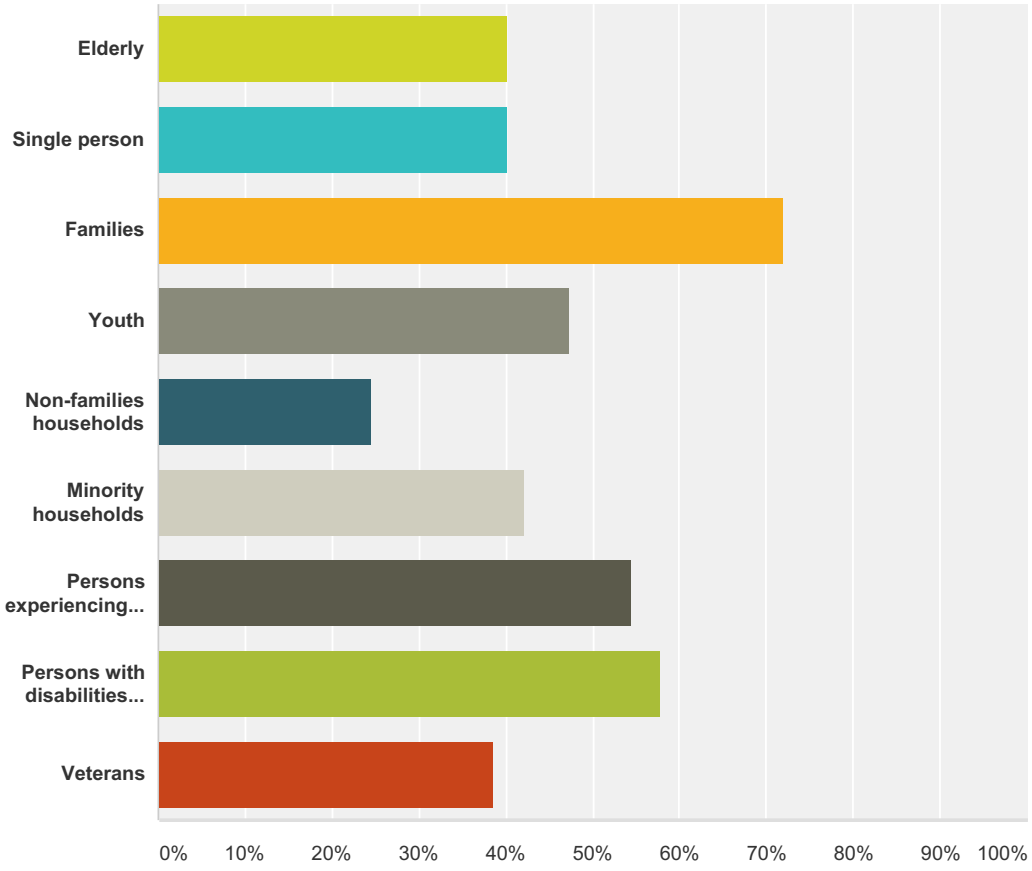
61	541-504-2617	3/26/2015 1:55 PM

62	541 385 5387 ext. 103	3/26/2015 12:15 PM

Q4 What primary target populations(s) does your agency serve? Check all that apply.

Answered: 57 Skipped: 9



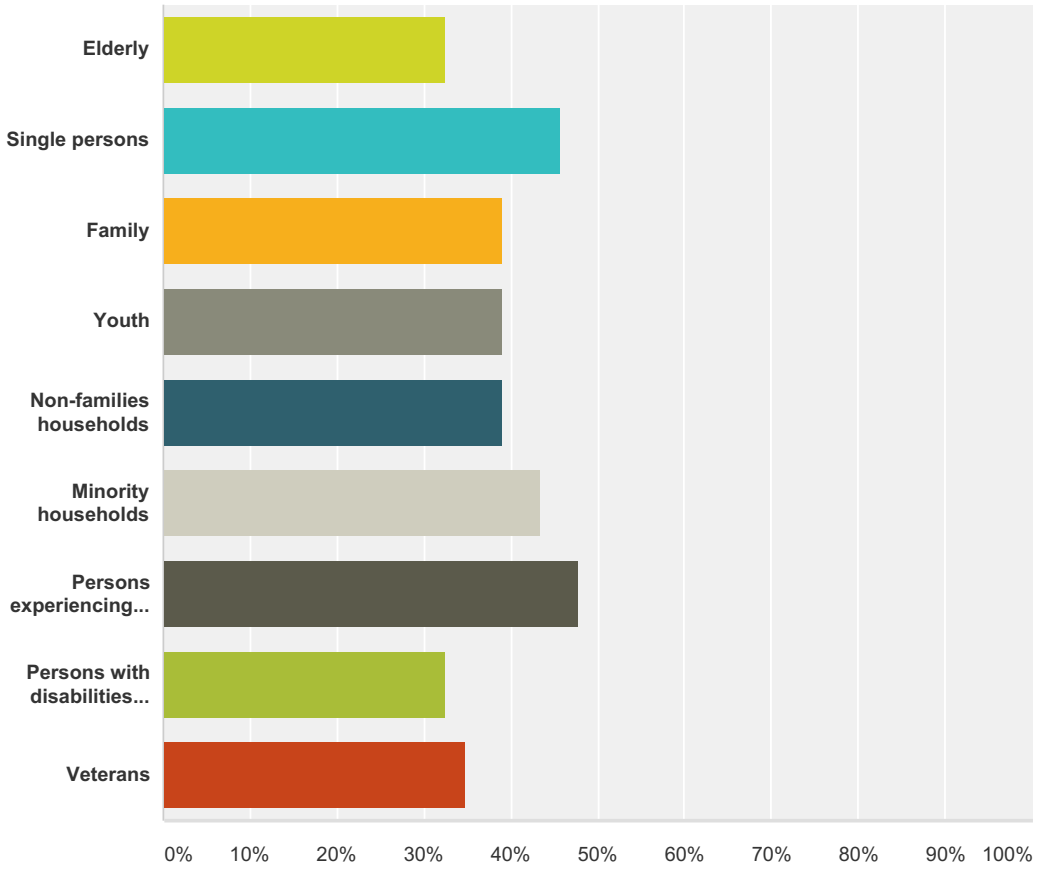
Answer Choices	Responses	
Elderly	**40.35%**	23
Single person	**40.35%**	23
Families	**71.93%**	41
Youth	**47.37%**	27
Non-families households	**24.56%**	14
Minority households	**42.11%**	24
Persons experiencing homelessness	**54.39%**	31
Persons with disabilities (e.g. HIV status, physical and intellectual disabilities and mental illness).	**57.89%**	33
Veterans	**38.60%**	22
Total Respondents: 57		

#	Other (please specify)	Date

1	Those releasing from prison nad under the supervision of county community corrections agencies	4/24/2015 10:24 AM
2	children	4/23/2015 10:35 AM
3	Pregnant and Parenting Teens	4/13/2015 1:50 PM
4	Migrant/Seasonal farmworkers	4/13/2015 10:23 AM
5	All community residents	4/10/2015 9:13 AM
6	all DV/SA victims	4/6/2015 4:49 PM
7	all of the above	4/6/2015 9:01 AM
8	Survivors of DV and SA	4/6/2015 8:39 AM
9	low income	4/5/2015 8:39 PM
10	Agricultural Workers	4/3/2015 1:45 PM
11	Low income	3/30/2015 11:03 AM
12	Public	3/30/2015 9:56 AM
13	Low/moderate-income, first-time homebuyers	3/27/2015 4:14 PM
14	people living in homelessness	3/27/2015 1:37 PM

Q5 What secondary target populations(s) does your agency serve? Check all that apply.

Answered: 46 Skipped: 20

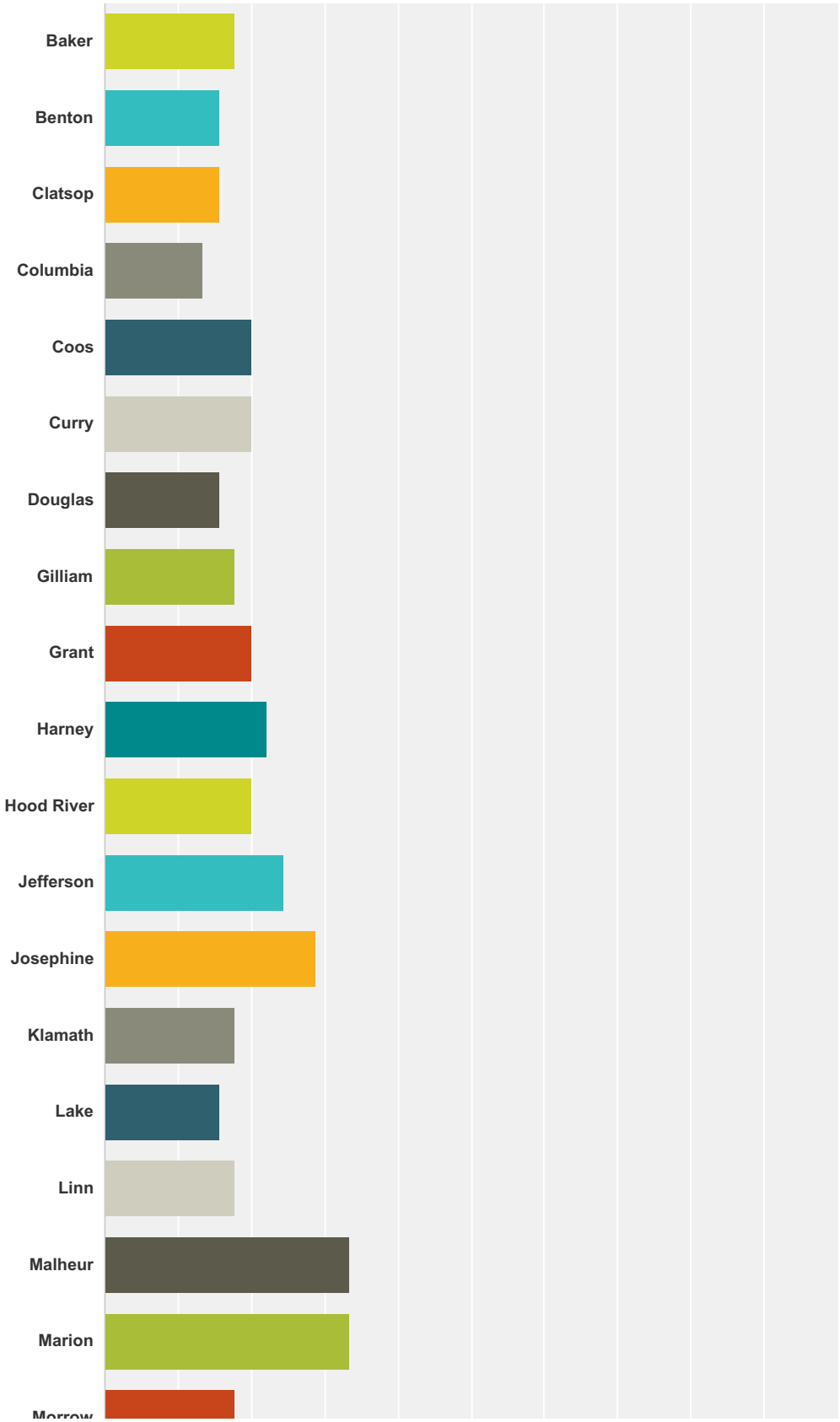


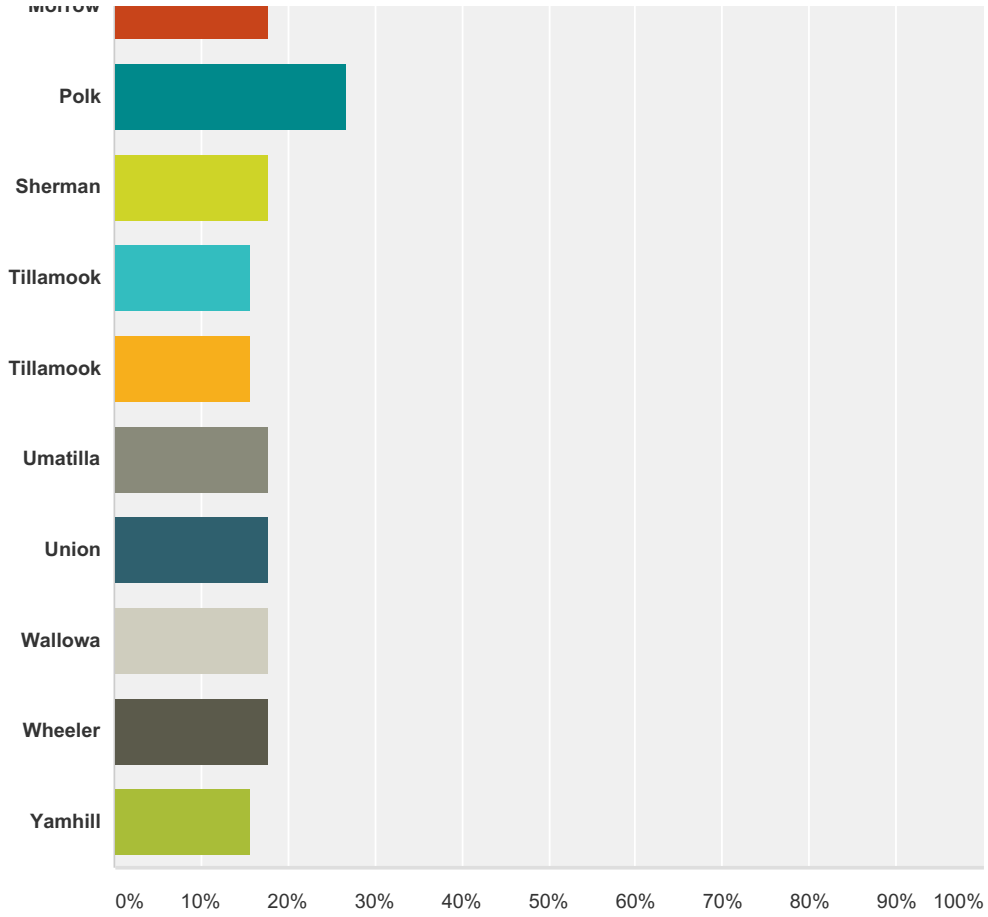
Answer Choices	Responses	
Elderly	**32.61%**	15
Single persons	**45.65%**	21
Family	**39.13%**	18
Youth	**39.13%**	18
Non-families households	**39.13%**	18
Minority households	**43.48%**	20
Persons experiencing homelessness	**47.83%**	22
Persons with disabilities (e.g. HIV status, physical and intellectual disabilities and mental illness).	**32.61%**	15
Veterans	**34.78%**	16
Total Respondents: 46		

#	Other (please specify)	Date
1	low income	4/13/2015 2:17 PM
2	Ontario High School Students and their Parents	4/13/2015 1:50 PM
3	All community residents	4/10/2015 9:13 AM
4	any low income person who qualifies for an IDA or membership in a Manufactured Home Cooperative	4/3/2015 1:45 PM
5	people at risk of homelessness	4/1/2015 3:20 PM
6	Non-profit agencies	3/30/2015 9:56 AM
7	Those involved with DHS - child welfare and self-sufficiency. Public school districts	3/27/2015 2:32 PM
8	same as above	3/27/2015 1:37 PM

Q6 What geographic area does your agency serve? Check all that apply.

Answered: 45 Skipped: 21





Answer Choices	Responses	
Baker	**17.78%**	8
Benton	**15.56%**	7
Clatsop	**15.56%**	7
Columbia	**13.33%**	6
Coos	**20.00%**	9
Curry	**20.00%**	9
Douglas	**15.56%**	7
Gilliam	**17.78%**	8
Grant	**20.00%**	9
Harney	**22.22%**	10
Hood River	**20.00%**	9
Jefferson	**24.44%**	11
Josephine	**28.89%**	13
Klamath	**17.78%**	8

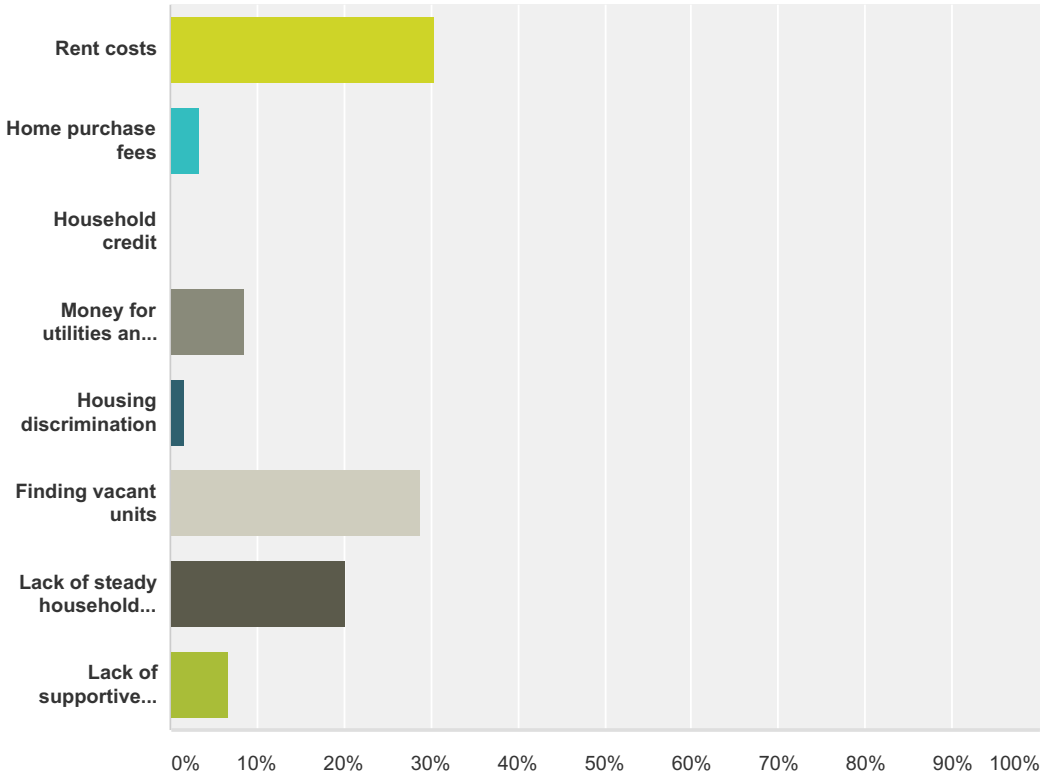
Lake	**15.56%**	7
Linn	**17.78%**	8
Malheur	**33.33%**	15
Marion	**33.33%**	15
Morrow	**17.78%**	8
Polk	**26.67%**	12
Sherman	**17.78%**	8
Tillamook	**15.56%**	7
Tillamook	**15.56%**	7
Umatilla	**17.78%**	8
Union	**17.78%**	8
Wallowa	**17.78%**	8
Wheeler	**17.78%**	8
Yamhill	**15.56%**	7
Total Respondents: 45		

#	Other / Participating Jurisdictions	Date
1	Multnomah and Clackamas	4/24/2015 5:16 PM
2	Jackson County	4/23/2015 10:35 AM
3	City of Ashland & Jackson County	4/20/2015 11:04 AM
4	Jackson County	4/20/2015 9:40 AM
5	Jackson	4/20/2015 8:36 AM
6	Jackson	4/17/2015 1:07 PM
7	Jackson County	4/17/2015 9:48 AM
8	Jackson	4/17/2015 8:29 AM
9	Deschutes, Crook, and Jefferson Counties	4/14/2015 12:38 PM
10	District 14 is 3 counties in Eastern Oregon	4/13/2015 1:31 PM
11	Jackson county and Grants Pass (city)	4/13/2015 1:24 PM
12	Washington	4/13/2015 12:16 PM
13	Municapality of Veneta	4/10/2015 9:13 AM
14	Lincoln, Lane, Jackson, Crook, Wasco, Deschutes	4/9/2015 8:51 AM
15	Tri-county Metro, Lane	4/7/2015 5:39 PM
16	Jackson County	4/6/2015 5:40 PM
17	Jackson	4/6/2015 8:43 AM
18	Jackson County	4/5/2015 8:39 PM
19	All or Oregon	4/3/2015 1:45 PM

20	Multnomah County	4/2/2015 1:36 PM
21	Jackson county, Ashland	4/1/2015 3:20 PM
22	Multnomah, Washington, Clackamas	3/31/2015 4:09 PM
23	JACKSON COUNTY	3/31/2015 12:17 PM
24	Jackson	3/30/2015 9:56 AM
25	Lane county	3/30/2015 8:58 AM
26	Deschutes	3/30/2015 8:41 AM
27	Proud Ground is exploring providing services to regions throughout the state. Our "community" could be any potential service area.	3/27/2015 4:14 PM
28	multnomah	3/27/2015 2:32 PM
29	Wasco county	3/27/2015 1:37 PM
30	Portland	3/26/2015 4:10 PM
31	Deschutes, Crook	3/26/2015 1:55 PM

Q7 What is the most significant barrier to people finding and maintaining housing in your area?

Answered: 59 Skipped: 7



Answer Choices	Responses	
Rent costs	**30.51%**	18
Home purchase fees	**3.39%**	2
Household credit	**0.00%**	0
Money for utilities and rent deposits	**8.47%**	5
Housing discrimination	**1.69%**	1
Finding vacant units	**28.81%**	17
Lack of steady household income	**20.34%**	12
Lack of supportive services to help households maintain housing	**6.78%**	4
Total		**59**

#	Other (please specify)	Date
1	Rents, especially in Ashland, are astronomical.	4/17/2015 9:48 AM
2	livable wage	4/6/2015 8:43 AM

3	And rent costs	4/5/2015 8:39 PM
4	It really varies based on the household and all could apply.	4/3/2015 4:29 PM
5	finding available, decent, affordable units in rural Oregon	4/3/2015 1:45 PM
6	Many landlords to not want persons with MI or IDD living in proximity to others; leased housing subjects them to loss of housing	3/31/2015 4:09 PM
7	denials based on past criminal history	3/31/2015 12:17 PM
8	Quality of rental units available	3/31/2015 12:11 PM
9	criminal history	3/30/2015 8:58 AM
10	rent costs and criminal background issues	3/27/2015 1:37 PM
11	lack of steady income, no vacant units, rent costs, discrimination	3/26/2015 1:55 PM

Q8 Please explain why the barrier, selected above, is the most significant.

Answered: 60 Skipped: 6

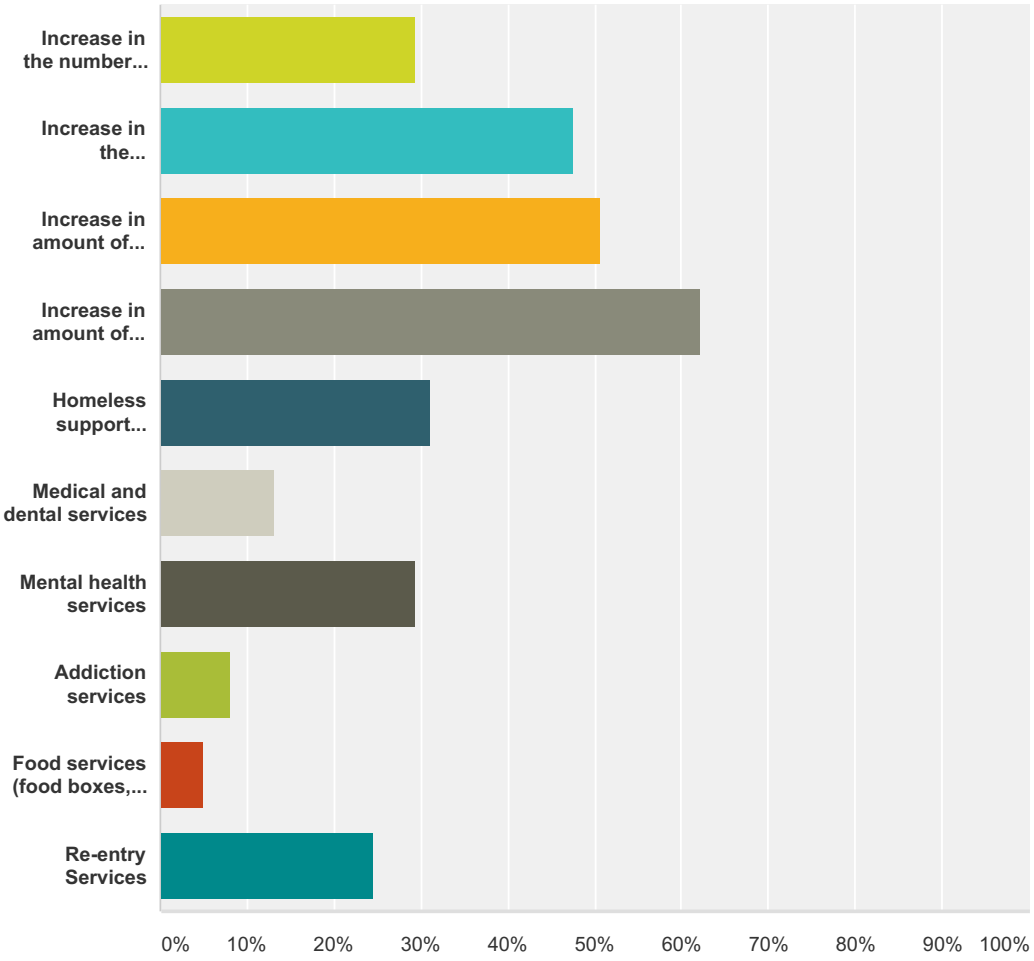
#	Responses	Date
1	The majority of our clients are low income. In order to qualify for our services, they have to be below 80% of median income, but most of our clients are below 50%. They're bringing in less than $1000 for households of one or more people, and moving into a new home is almost impossible if for some reason their current housing becomes unavailable. Not only is first and last month's rent often required (so if rent is 500/month, there's $1000 right there) but then a $500-700 security deposit on top of it makes move-in costs impossible to achieve for the majority of our population.	4/27/2015 1:04 PM
2	Rents have increased over 65% in the metro region over the past 6 years.	4/24/2015 5:16 PM
3	The vast majority of offenders releasing from prison lack employment and therefore the ability to support themselves.	4/24/2015 10:24 AM
4	some families have felony backgrounds which limit housing choices, lack of steady income	4/23/2015 10:35 AM
5	Many of our clients are stuck in a vicious cycle of not having employment to pay for housing that would stabilize their lives and enable them to better seek employment.	4/21/2015 8:59 AM
6	Ashland real estate is very high-priced for the average wage earner.	4/20/2015 11:04 AM
7	Low wage economy	4/20/2015 9:40 AM
8	There is a lack of rental housing in general and particularly affordable housing	4/20/2015 8:36 AM
9	Rent costs for a 3 bdrm home in this area are far higher than the average family can afford	4/20/2015 8:07 AM
10	family income too low	4/17/2015 1:07 PM
11	There are many that are significant; however, I find that, as a professional, I see families and individuals struggle most with obtaining the finances to move, make deposits, or pay 1st month's rent most often.	4/17/2015 8:29 AM
12	Because we are a small community, we do not have a lot of housing available	4/15/2015 2:28 PM
13	We have extremely low vacancy rates, so all of the other factors play in to inability to find housing but lack of units is the largest factor.	4/14/2015 12:38 PM
14	Not very many jobs in our area.	4/14/2015 9:54 AM
15	There are not many homes available in Vale.	4/13/2015 2:17 PM
16	I believe there is a housing shortage in Malheur County. The housing that may be available does not meet HQS Standards most of the time for Section 8 Program Subsidy. The landlords that may have rentals, don't have the funding to fix them up to meet HQS Standards.	4/13/2015 2:07 PM
17	Affordable vacant units are in high demand	4/13/2015 2:05 PM
18	Over the last few months I have come to discover getting assistance with housing is not too difficult, but finding available units to fit the family sizes is very difficult. Currently in Malheur County there are no 3 bedroom homes or apartments available. Additionally, I have come across many agencies that will not pass the housing inspection and they do not plan to make improvements as they do not want to take section 8. This is a loop hole the agencies have found to help them avoid being required to accept section 8 housing.	4/13/2015 1:50 PM
19	Our clients are homeless or at risk of homelessness due to no or low income.	4/13/2015 1:24 PM
20	Our services are needs based, so all of our clients have very low income. If they also need services, they are only allowed to keep a very small portion of their income and the rest goes to paying for their in-home care providers. When rent is higher than the amount allowed, many are forced into care facilities.	4/13/2015 12:16 PM
21	Not enough housing, homes in the area.	4/13/2015 10:23 AM
22	Rural area that does not provide many of the housing services available in the larger urban communities.	4/10/2015 9:13 AM

23	Our program must stay within FMR guidelines.	4/9/2015 8:51 AM
24	Not enough housing units for people with Chronic mental illnesses and they can't afford market rate.	4/7/2015 5:39 PM
25	Most of the population we serve are on limited income and affordable housing and housing assistance is very hard to locate or obtain in a reasonable amount of time.	4/7/2015 1:50 PM
26	Families with low income cannot pay the rent required to stay in their apartments.	4/7/2015 8:54 AM
27	There is not just one barrier, but rather a domino of barriers with lack of vacant units as top, then credit history, rent costs, high and discriminating deposits, horrible bus service, and lack of supportive services to help households maintain housing.	4/6/2015 5:40 PM
28	low income/lack of refferences, bad credit	4/6/2015 4:49 PM
29	For the particular population we serve it is difficult to narrow down the 'most significant' barrier. Many of the homeless and chronic mentally ill are on SSI and can't afford to pay the cost of rent and take care of their other basic needs (hygiene/household items, utilities, food, etc.) Finding vacant units that are willing to rent to individuals w/various challenges can be just as difficult. Similarly, without income equivalent to 3x cost of rent most places will not rent to those we serve. This may fall under housing discrimination, but its also smart housing management, because the risk is much greater for turnover and tenant issues. This of course speaks to the need of supportive services to help households maintain housing (and access/obtain housing as well). The need is high for adequate and expansive supportive services that bridge fragmented services and fill program gaps. Note, my response isn't hierarchical and we find equally as many people struggling at one or more of these at any given time.	4/6/2015 10:40 AM
30	A rental can sometimes be located but the initial deposits and payments for establishing utilities are just too costly for even those with a decent income. A person already living payroll to payroll is not able to establish enough savings to get into an apt./home.	4/6/2015 10:00 AM
31	the people we serve are at 80% of median income or lower. this is usually not enough to support a family and pay rent,	4/6/2015 9:01 AM
32	Costs of homes, and limited rentals	4/6/2015 8:43 AM
33	Rent is high and incomes are too low to sustain them.	4/6/2015 8:39 AM
34	Although significant numbers of houses stand vacant due to foreclosure, the availability of moderately sized, affordable units in our area is totally inadequate for the demand. In addition, most families who are eligible for rental assistance are unable to access it due to lengthy wait lists. Even those who acquire rental assistance may be unable to find an appropriate unit in time.	4/5/2015 8:39 PM
35	Many households get into housing but it is unaffordable and they have issues to overcome. Supportive services assist by determining the actual need and provide an avenue to strengthen the household unit to sustain housing.	4/3/2015 4:29 PM
36	Smaller rural communities in Oregon have little to no multifamily housing units. Those that do, are frequently properties that are older and in poor condition, even if they were originally built with government funding. Without housing, communities cannot grow, even when there are job opportunities. And with an aging housing stock, health considerations need to be taken into consideration.	4/3/2015 1:45 PM
37	Many of our students work low-wage, hourly jobs that fluctuate wildly throughout the year.	4/3/2015 1:16 PM
38	It is very difficult for low-income families to compete for housing when very little vacancy exists.	4/3/2015 11:40 AM
39	Rent costs have increased far more than wages have increased. Few jobs above minimum wage available in Polk County and rents are beyond affordable for minimum wage earners.	4/2/2015 6:52 PM
40	vacancy rate is low, students take much of what is available Landlords not wanting HCV clients	4/2/2015 11:49 AM
41	Ashland has a very high cost of living, housing costs, however the primary employment is our service sector. These minimum wage jobs do not meet the income requirements for even the low cost rental units. There are long wait lists for income based housing.	4/1/2015 3:20 PM
42	Persons with significant IDD & chronic Mental Illness need special facility adaptations not generally built into commercially developed housing.	3/31/2015 4:09 PM
43	We have a lack of rentals available	3/31/2015 12:28 PM

44	There is a 1% vacancy rate in our community, even less for affordable housing. The competition for housing is extreme, and if you have any past criminal history you are denied for housing even if you meet all other criteria. There is a lack of affordable housing and second chance landlords. Every program has waiting lists, there is NO PLACE TO GO.	3/31/2015 12:17 PM
45	Much of the available housing consists of units with virtually no insulation or in such a state of disrepair that utility costs are outrageous. I also often hear complaints of odors permeating from neighboring units which are not conducive to healthy living.	3/31/2015 12:11 PM
46	There are NOT enough jobs - especially living wage jobs in our area.	3/30/2015 2:15 PM
47	Our local landlords have recently been increasing rent amounts due to a new "facility" being brought in to our are (which has not moved forward yet). These rent amounts do not fall within our current FMRs so we cannot help folks as we are bound to stay within the FMRs.	3/30/2015 11:03 AM
48	There is a lack of affordable housing. If you can locate a unit the fits within the FMR there are at least 10-20 applications already submitted. Add in the barriers assoiciatied with bad credit, low to no income and crimminal background and it at times feels hopeless.	3/30/2015 10:09 AM
49	Many individuals cannot afford safe housing in the community, and do not qualify for housing programs. If people qualify for housing programs there is a lack of physical dwellings within allowable limits.	3/30/2015 10:00 AM
50	Low/Mod income residents struggle finding and securing steady employment that will allow them to be more self-sustaining and less reliant upon assistance.	3/30/2015 9:56 AM
51	There's a very low vancancy rate in most counties in Oregon which makes it extremely difficult to find affordable housing that fits within the fair market rents set by HUD. Clients must locate housing within the FMR guideliens in order to be eligible for rental assistance. Client's criminal history and poor credit is also a huge barrier in finding housing. With the tight housing market landlords have been less willing to work with someone that has a criminal charges on their record.	3/30/2015 8:58 AM
52	we are at 1% available rental market.	3/30/2015 8:41 AM
53	It actually isn't but there was no way to choose several. There is no one solution or cause. It depends on the people who are homeless and what caused them to be homeless.	3/28/2015 2:47 PM
54	Wages are simply not keeping pace with home prices--the new middle class cannot afford homeownership. Homeownership is a key part of the housing continuum, playing a vital role in providing opportunities for wealth-building and stability for families with stable jobs & steady incomes--families who can qualify for a mortgage, just not at market-rate. Communities benefit, too: employees do better at their jobs, kids do better in schools, homeowners participate in their neighborhoods and contribute to local economies in much greater ways than renters.	3/27/2015 4:14 PM
55	Even when financial resources are available, housing units are not.	3/27/2015 2:32 PM
56	Most support services to veterans in housing are geared around once they loose their housing instead of being preventive and keep them in their existing home.	3/27/2015 1:39 PM
57	Without steady income, people cannot attain or maintain housing. That said, other issues are equally important. But you asked us to choose only one.Equally important are the following: rent costs;lack of vacant units; lack of supportive services to keep people in housing; lack of emergency housing/shelters to house people while the search for permanent housing can happen; lack of access to addiction services; discrimination against renters with criminal background and credit issues.	3/27/2015 1:37 PM
58	Portland has had the highest rent increases in the country and OHCS's response has been to de-prioritize housing in Portland, a catastrophic decision.	3/26/2015 4:10 PM
59	A prudent landlord cannot rent unless a person can afford these things, but many times low income people cannot afford them.	3/26/2015 1:55 PM
60	No affordable units available	3/26/2015 12:15 PM

Q9 What are the highest priority for persons experiencing homelessness in your community? Please select up to three.

Answered: 61 Skipped: 5



Answer Choices	Responses	
Increase in the number emergency shelter spaces	**29.51%**	18
Increase in the availability of emergency rent assistance	**47.54%**	29
Increase in amount of transitional housing (up to a 2 year tenancy)	**50.82%**	31
Increase in amount of permanent housing	**62.30%**	38
Homeless support services (transportation vouchers, service centers)	**31.15%**	19
Medical and dental services	**13.11%**	8
Mental health services	**29.51%**	18
Addiction services	**8.20%**	5
Food services (food boxes, kitchens)	**4.92%**	3

Re-entry Services	**24.59%**	15
Total Respondents: 61		

#	Other (please specify)	Date
1	Services for youth in transitional living	4/6/2015 8:43 AM
2	qualified units to live in	4/3/2015 4:29 PM
3	A safe place to be, a sanctioned camp or tiny house village.	3/31/2015 12:17 PM
4	Improve existing renatal properties	3/31/2015 12:11 PM
5	.	3/28/2015 2:47 PM
6	NA to our program	3/27/2015 4:14 PM
7	Domestic violence and trauma informed services	3/27/2015 2:32 PM
8	felony-friendly employers and housing management companies	3/27/2015 1:37 PM

Q10 Please describe why you selected those specific services as the highest priority.

Answered: 45 Skipped: 21

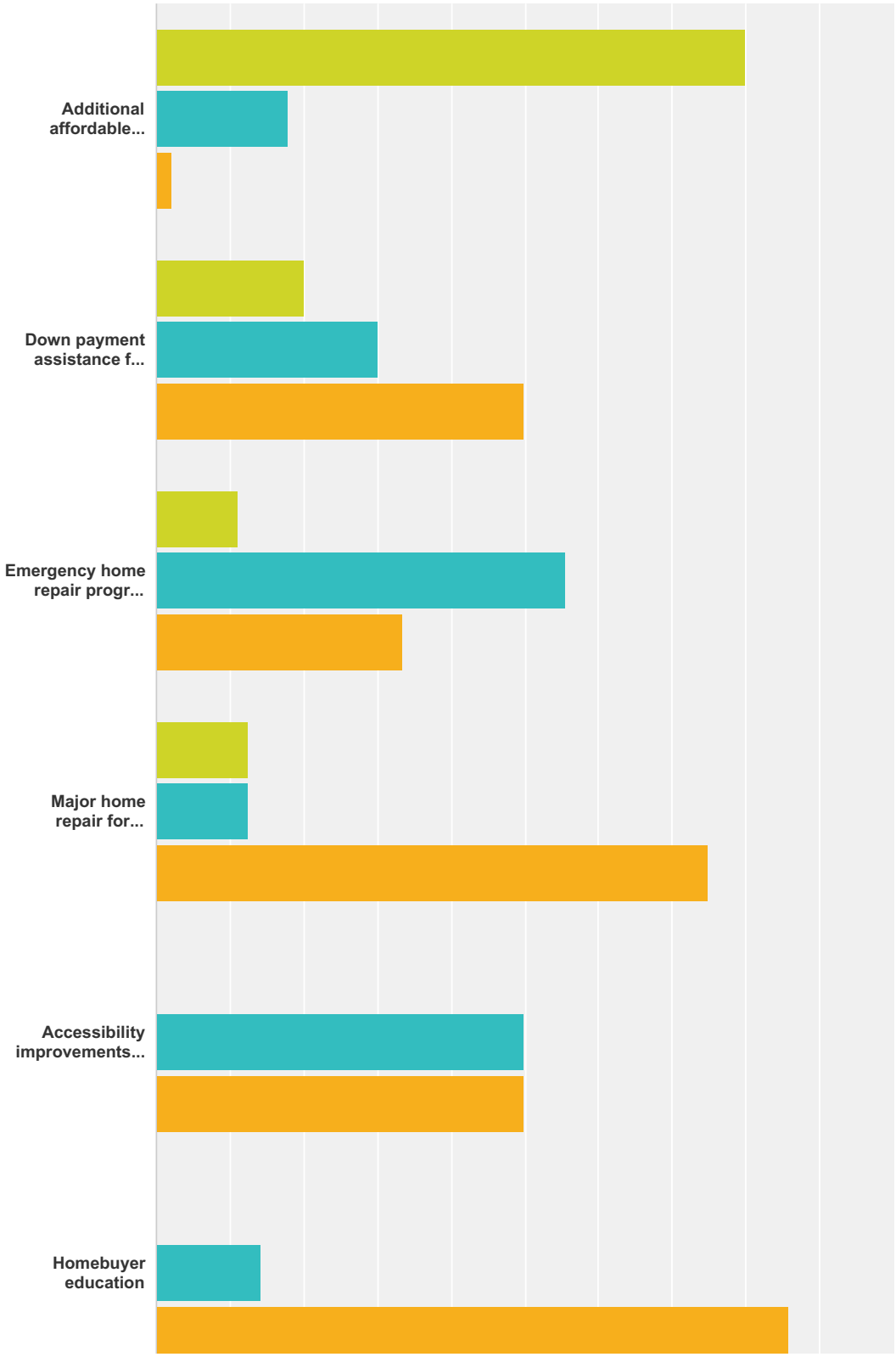
#	Responses	Date
1	I selected food, medical, mental health, and dental first because our clients cannot even really begin to think about housing until their physical needs are met. It is Maslow's Hierarchy of needs. Physical needs come first, followed by shelter/security, then higher functioning options such as a job, better support systems, engaging in the community, etc. Without basic needs being met, our clients cannot even begin to conceive of getting out of their situation into housing. We just recently conducted a survey at our homeless day center which confirmed this.	4/27/2015 1:04 PM
2	There is a severe shortage of housing options (over 30,000 units) available for homeless households with low income and housing barriers.	4/24/2015 5:16 PM
3	Transitional housing for those re-entering their community from prison is severely lacking in many if not most counties.	4/24/2015 10:24 AM
4	Most are the services that my agency is not generally able to help with that clients most often ask for. The rest are services that I feel would help the people I serve be better equipped to stabilize their lives.	4/21/2015 8:59 AM
5	Our current overnight homeless shelters only operate 6 mos./yr. & are packed. We have no permanent shelters and no transitional housing. Our current service center is doing a great job of coordinating service providers with those in need but their funds are limited. Lack of Mental Health services is always an issue with the homeless.	4/20/2015 11:04 AM
6	High rent and low vacancy rates in moderate rental housing	4/20/2015 9:40 AM
7	housing is limited and expensive	4/20/2015 8:36 AM
8	In addition to high rent costs, rental availability is very very poor!!! There is very limited assistance to families for rental costs or move in costs.	4/20/2015 8:07 AM
9	People who are homeless and/or addicted need help transitioning to jobs and need access to affordable housing while they are getting on their feet.	4/17/2015 9:48 AM
10	There are too many factors in homelessness for there to be only one priority such as housing, assistance, and food. Additionally, our community has established agencies that provide these services. The biggest priority for anyone without support system(s) is health and safety.	4/17/2015 8:29 AM
11	Because families need a place to stay in case of an emergency and who's going to pay for that. We don't have many agencies who have funds to pay for a nights stay at a hotel. Or they may pay for a nights stay but they really need housing. Its all short term for families and they can not stay for very long in someone else's home.	4/14/2015 9:54 AM
12	I selected re-entry services, because the service is not offered in this community and those exiting institutions do not have support to be successful. Then I selected Emergency Rent and Shelter, because one bad occurrence may through a family off their plan and the family can end up in a far worst situation that what they are use to.	4/13/2015 2:07 PM
13	Individuals applying for section 8 housing are able to be approved very quickly but the housing options available are extremely small. Additionally, the apartments and agencies that take section 8 are all full and have waiting lists that are months long.	4/13/2015 1:50 PM
14	Homeless community unable to progress beyond day to day subsistence.	4/10/2015 9:13 AM
15	Primary hindrances to housing stability	4/9/2015 8:51 AM
16	There are not enough affordable units available to house people with mental illness, therefore they become homeless and don't receive proper mental and physical healthcare.	4/7/2015 5:39 PM
17	Providing stable and affordable housing is critical for individuals who are experiencing homelessness. Permanent housing and appropriate services and supports help to stabilize.	4/7/2015 1:50 PM

18	affordability and availability seems to be the greatest barriers to permanent and stable housing for families experiencing homelessness. Our community also needs services, either mental health or financial health classes to those who have been homeless to deal with the long-term emotional effects of homelessness.	4/7/2015 8:54 AM
19	Our clients are wanting to move out of homelessness and into transitional and ultimately permanent housing. Our focus is on providing this for homeless youth (16-22 yrs) and adult survivors of domestic and sexual abuse and their family.	4/6/2015 5:40 PM
20	victims face lots of barriers to find housing	4/6/2015 4:49 PM
21	As an agency providing homeless support services we've found that there just isn't enough support to meet the need. Transitional housing and respite would be a great way to help stabilize an individual to allow supportive services to increase their effectiveness.	4/6/2015 10:40 AM
22	If you do not have your health, the rest of the other issues in your life,become even more difficult to deal with or focus on. You need transportation to get to your appointments and for getting to locations that can provide shelter or just to get groceries.	4/6/2015 10:00 AM
23	never enough room in the shelters, especially in bad weather. this is true for men and women, very few transitional housing opportunities. Salem has many mentally ill on the streets as there is a stigma about renting to them.	4/6/2015 9:01 AM
24	Most NEEDED	4/6/2015 8:43 AM
25	Emergency shelter spaces have decreased dramatically leaving few options for those in need. Those that can't find emergency shelter do not have the savings or income needed to procure housing. Many of them also are in need of mental health services that have made it difficult to keep and sustain housing.	4/6/2015 8:39 AM
26	The majority of homeless families we serve (as defined by McKinney Vento) are unable to find appropriate affordable units for rent in our area, or unable to maintain them through periods of financial insecurity due to lack of emergency supports.	4/5/2015 8:39 PM
27	In rural areas there are limited funded for emergency rental assistance and housing units that meet the housing quality standards. The system creates more stress on households since there are minimal funds for prevention and has lead to an increase in homelessness rather than being able to address it prior to happening. Re-entry services are a necessity to help successfully channel the household. Additionally the match requirements for grants have taken away flexibility of our other resources to holistically address homelessness.	4/3/2015 4:29 PM
28	Polk County has no emergency housing shelter except for victims of domestic violence so all of the items listed relate to emergency shelter needs.	4/2/2015 6:52 PM
29	When we look for housing in Ashland it we must increase the inventory of housing that is affordable to our citizens who have limited income, SSI, SSID, TANF, minimum wage jobs. Today the landlords can filter out all applicants that are low income and have barriers, we need inventory directed toward our homeless and extremely low income residents if we are to truly address housing in Ashland. In our first year of operations most of the families we have housed who were living in Ashland are now housed in Medford because Medford has inventory and low rent factor. Ashland residents should be able to be rehoused in Ashland!	4/1/2015 3:20 PM
30	Generally, persons with IDD or chronic MI are dependent on SSI or if employed low wages and cannot acquire housing, depend on special needs housing availability, and require ongoing support services to maintain sustainable independence	3/31/2015 4:09 PM
31	Lack of housing available	3/31/2015 12:28 PM
32	They need a temporary place until more permanent solutions can be fournd or while they are on waiting lists for someplace to be. Right now there are a lot of people illegally camping in our parks and recreation areas with no safety or sanitation services.	3/31/2015 12:17 PM
33	These are what I see as the biggest needs through listening to our clients.	3/30/2015 11:03 AM
34	I cover over 18 Oregon Counties- within those there are only 5 shelters who provide emergency shelter- and of those many require a drug test and criminnal background.	3/30/2015 10:09 AM
35	Most local emergency rent resource agencies do not offer assistance high enough to cover a full months rent.Shelter space for families is grossly lacking to where some families would have to be broken up between several shelters, which is often unsafe and forces a break in cohesiveness and efficacy of families remaining together. Permanent housing is basic need and foundation which often allows individuals to feel they can seek help for mental health, addictions, work and other needs if they are not trapped in simply surviving and solely focused on the next meal and next place of shelter.	3/30/2015 10:00 AM

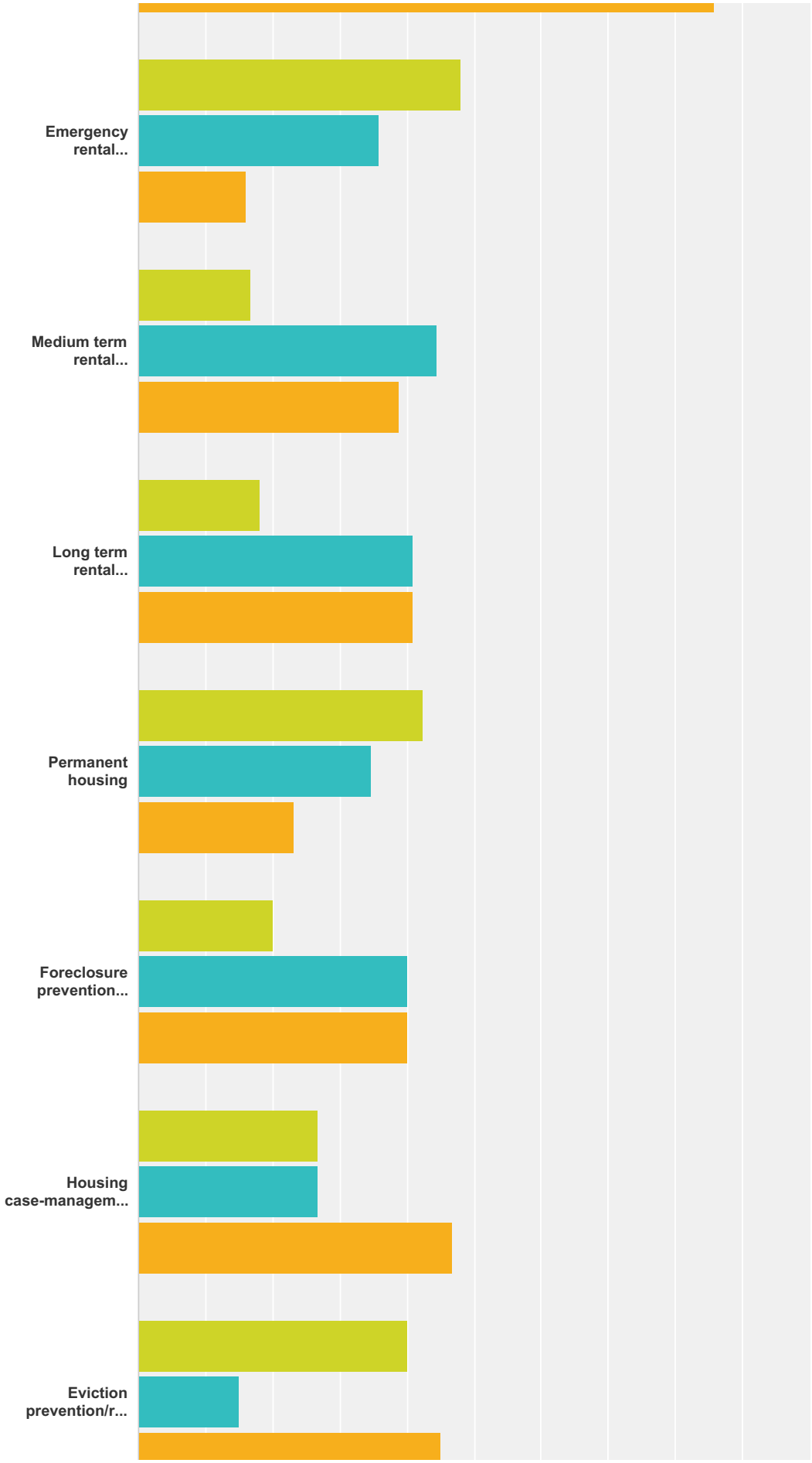
36	Most homeless have expressed the need for emergency shelter that will be available longer than 30 day. When extended transitional housing is combined with homeless support services, we have a higher chance of developing more self-sustaining individuals.	3/30/2015 9:56 AM
37	Oregon needs more permanent housing within the FMRs and landlords that are willing to rent to someone that has a criminal record and/or poor credit. Clients have been unable to use their housing vouchers because they can't find an apartment within the FMR and a landlord willing to rent to them.	3/30/2015 8:58 AM
38	We need an increase in housing and programs to help people stay in that housing when landlords raise the rent.	3/30/2015 8:41 AM
39	Again, it depends on the cause. A felon getting out of jail has a very different problem then a senior whose spouse died and one SS check won't pay the rent. There is NO one solution fits all.	3/28/2015 2:47 PM
40	NA	3/27/2015 4:14 PM
41	They reflect the needs of our community and those we currently serve.	3/27/2015 2:32 PM
42	Many homeless veterans don't qualify or can't get in existing shelters. Also the veteran housing vouchers and waitlists don't serve the immediate need.	3/27/2015 1:39 PM
43	I thought about everyone I have met over 9 years who was homeless, including the results of our annual PIT count where we ask "how did you become homeless and what barriers do you experience to getting/keeping housing?" and anyone I had ever met (on the job) who couldn't get into housing or who lost their housing and could not get re-housed and the reasons why and these were what I selected. I cannot select but three, as there are just so many real barriers for people in our community.	3/27/2015 1:37 PM
44	Housing first models have been demonstrably effective in reducing homelessness.	3/26/2015 4:10 PM
45	Housing vacancy rate extremely low and services for mentally ill difficult to afford as well	3/26/2015 12:15 PM

Q11 What housing programs and activities are most needed in your community? Please select your 1st, 2nd and 3rd choices from the list below.

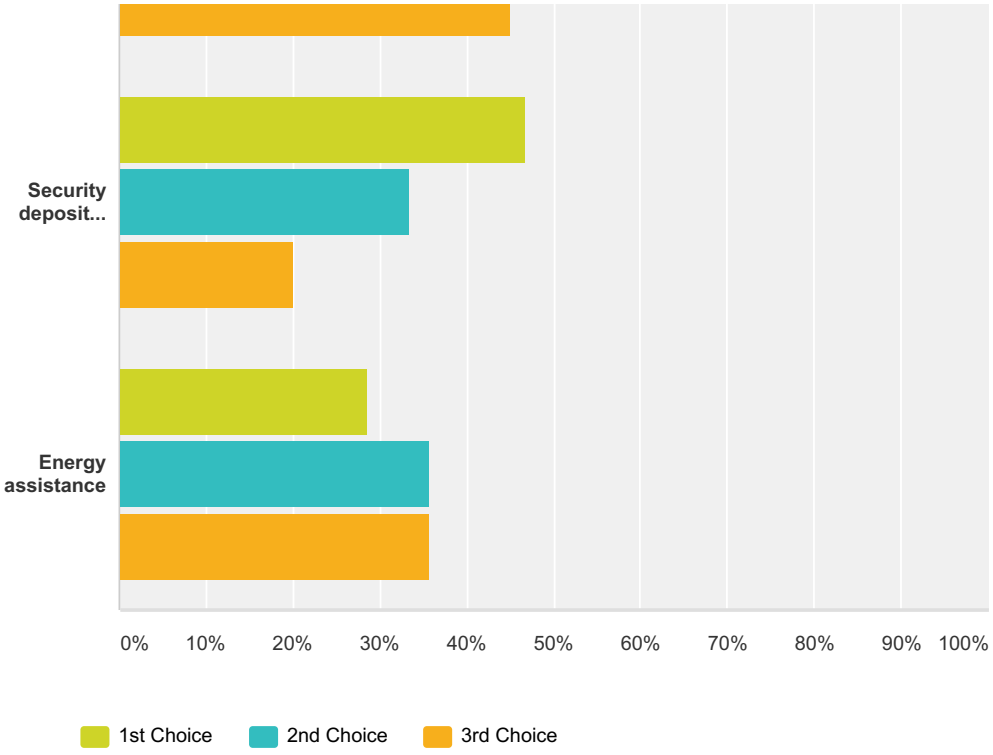
Answered: 63 Skipped: 3



Partner Survey: Tell us about your housing need in your community!



Partner Survey: Tell us about your housing need in your community!



	1st Choice	2nd Choice	3rd Choice	Total
Additional affordable rental housing	**80.00%** 40	**18.00%** 9	**2.00%** 1	50
Down payment assistance for first time homebuyers	**20.00%** 2	**30.00%** 3	**50.00%** 5	10
Emergency home repair programs for low-income owners	**11.11%** 1	**55.56%** 5	**33.33%** 3	9
Major home repair for low-income owners	**12.50%** 1	**12.50%** 1	**75.00%** 6	8
Accessibility improvements for renters and homeowners for persons with disabilities	**0.00%** 0	**50.00%** 2	**50.00%** 2	4
Homebuyer education	**0.00%** 0	**14.29%** 1	**85.71%** 6	7
Emergency rental assistance	**48.00%** 12	**36.00%** 9	**16.00%** 4	25
Medium term rental assistance (3-24 months)	**16.67%** 3	**44.44%** 8	**38.89%** 7	18
Long term rental assistance (over 24 months)	**18.18%** 4	**40.91%** 9	**40.91%** 9	22
Permanent housing	**42.31%** 11	**34.62%** 9	**23.08%** 6	26
Foreclosure prevention assistance	**20.00%** 1	**40.00%** 2	**40.00%** 2	5
Housing case-management assistance	**26.67%** 4	**26.67%** 4	**46.67%** 7	15

Eviction prevention/rent assistance	**40.00%**	**15.00%**	**45.00%**	
	8	3	9	20
Security deposit assistance	**46.67%**	**33.33%**	**20.00%**	
	7	5	3	15
Energy assistance	**28.57%**	**35.71%**	**35.71%**	
	4	5	5	14

#	Other (please specify)	Date
1	Transitional housing for re-entry is first choice	4/24/2015 10:24 AM
2	3rd - Helping landlords accept people with no or bad credit history	4/6/2015 5:40 PM
3	Behavior modification counseling as eviction prevention	4/2/2015 6:52 PM
4	Rental units that cost $200 per month.	4/1/2015 3:20 PM

Q12 Please explain why the services, you selected above, are in the highest priority.

Answered: 43 Skipped: 23

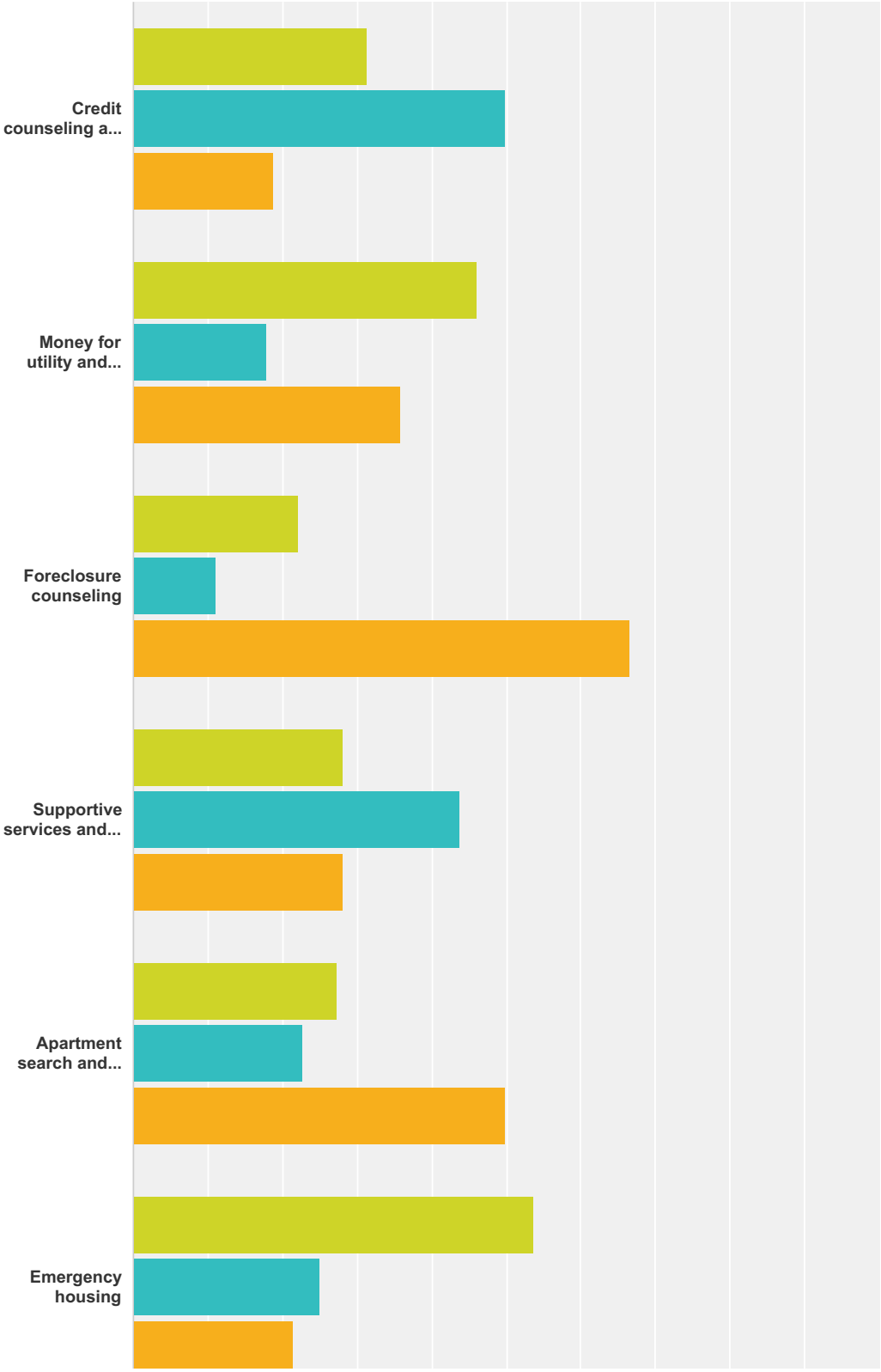
#	Responses	Date
1	Security deposit assistance is something we get a lot of requests for but have zero funding coming in for this service. The next is emergency rental assistance, because keeping people in their homes can seriously benefit them in the long run. When they are able to keep a roof over their head they can focus on problem solving instead of worrying about being homeless. Finally, it would be interesting and potentially beneficial to have more access to temporary, longer term rental assistance. This would be great for our clients who have been out of work and are just getting back into a job, because covering rent for them would let them begin to build savings. Off-setting costs so our clients who are working can stop living paycheck to paycheck, barely scraping by, would be extremely beneficial in the short run for them. Longer term programs, however, may breed dependence, so it is a fine line to walk.	4/27/2015 1:04 PM
2	Supply and access constraints are the biggest immediate challenges faced by our clients.	4/24/2015 5:16 PM
3	many families lack steady income to sustain	4/23/2015 10:35 AM
4	These are barriers we often see people facing that prevent them from being able to fully participate in our services.	4/21/2015 8:59 AM
5	We have a permanent homeless population that is unable to be housed. We really need a variety of emergency, legal shelter year-round and lack transitional, single-occupancy housing options for individuals, and permanent housing for families with mental health & drug addiction issues.	4/20/2015 11:04 AM
6	Low wage, high rent needs more housing and more rental assistance	4/20/2015 9:40 AM
7	lack of affordable housing	4/20/2015 8:36 AM
8	We have a great need for more affordable housing in our area. When low income people have adequate housing, they sometimes need assistance in order to keep it.	4/17/2015 9:48 AM
9	Most of these programs exist in our service area but are significantly underfunded, with the exception of actual units available. It is challenging to name just three. Nearly all of the listed programs and activities need to be bolstered to improve the circumstances in Central Oregon.	4/14/2015 12:38 PM
10	Rent is expensive in our area, Families need a place to stay in case of an emergency.	4/14/2015 9:54 AM
11	Our community could use more rental units that are affordable to the population. Our community does not have down payment assistance for 1st time homeowners. Then I picked eviction prevention/rent assistance, because through case management and other supportive services, eviction may be prevented.	4/13/2015 2:07 PM
12	There are not enough decent, affordable housing units in the area. We need more! There are no existing down payment assistance programs in our area and some of our residents could manage a moderate house payment w/down payment assistance. Those folks would pay property taxes and increase revenue for the area. Eviction prevention dollars would be helpful to fund case management activities and prevent eviction BEFORE homelessness.	4/13/2015 2:05 PM
13	Not enough housing available to individuals who qualify for section 8 and rental assistance.	4/13/2015 1:50 PM
14	#1 = primary program focus, hindered by #2, can be helped with greater availability of #3 while clients on wait list.	4/9/2015 8:51 AM
15	We need more housing units for people with chronic mental health challenges and they need case management to help them access proper service providers and eviction prevention to teach them how to stay housed.	4/7/2015 5:39 PM
16	Again, stability in housing is very important and helps to assist individuals in being successful in maintaining their being engaged in their community.	4/7/2015 1:50 PM
17	We do not have enough affordable housing in Salem. Those fortunate enough to have a housing voucher are being priced out of the market. The occupancy rate is high and the demand for affordable housing is rising. Once people who have experienced homelessness, getting a home is not the only solution to the problem. We must also address the reason for their homelessness as well as their mental health issues so they don't keep repeating the same pattern of behavior. Long term case management could help with that.	4/7/2015 8:54 AM

18	The choices are because this is what we are seeing most for our clients.	4/6/2015 5:40 PM
19	these are some of the barriers that prevent clients to get housing	4/6/2015 4:49 PM
20	We distribute aid for rent and utilities and it seems we are able to help meet the needs; with the help of community partners also distributing EA funds. Where is see the need is getting people off the streets to help reengage their frontal lobes and allow the supportive services to take hold, assist in stability (MH, substance abuse, skill building, etc) and begin the reintegration process. It's extremely difficult to work with people who are constantly in a state of crisis and seeking ways to self-regulate their psychological pain/distress. Without a means to establish a foundation to begin the engagement process much of supportive services are rendered ineffective. Self-regulation precedes trust, autonomy, and initiative in developmental theory. If you can't help people 'self-regulate', you wont be able to establish 'trust', and help them become more 'autonomous' and take 'initiative' in their lives.	4/6/2015 10:40 AM
21	Most people need someone to assist with jumping through the hoops/regulations to get the housing assistance they need and someone who is an expert in knowing what is available.The paper work can be very difficult. Many people need assistance with repairs to keep their home habitable.They have no back up funds for repairs.Many people are in homes without electricity.	4/6/2015 10:00 AM
22	LIMITED HOUSING	4/6/2015 8:43 AM
23	The need of more affordable rental units is my first choice because we have so many families that use our program that have a hard time finding units they can sustain on public assistance or on very limited budgets. If we had the other assistance programs to help with deposits and and long term rental assistance we would be able to help more and more people in the search for housing.	4/6/2015 8:39 AM
24	same as reasons above. The majority of homeless families at Head Start are doubled up. They have some money, just not enough to commit more than 30% of adjusted gross income on an ongoing basis.	4/5/2015 8:39 PM
25	Looking at the community as a whole I see for many low income households the need for emergency rental assistance. Then others are being faced with foreclosure. Then for low-income homeowners, they need funds to address emergency issues in their home.	4/3/2015 4:29 PM
26	The need for available decent affordable housing in rural areas is very high.	4/3/2015 1:45 PM
27	The problem, from my point of view, is not so much resources as it is the ability of low-income people to make the right decisions. They need education and someone walking them through the process of making decisions that will result in stable housing. If you can figure out how to do this effectively, bottle it up and sell it to get rich . . .	4/3/2015 1:16 PM
28	No emergency housing shelter, so emergency rental assistance is highest need. Housing Authority waiting lists are about 12 months wait, so medium-term rental assistance is second. We see a number of households who lose housing assistance due to the family's failure to abide by rental agreement behavior rules and this might be prevented if there were better intervention services available.	4/2/2015 6:52 PM
29	We have funds to place homeless families in homes, we can assist them in managing their income to pay rent, we do not have units available that are affordable to our low income residents.	4/1/2015 3:20 PM
30	IDD & MI can be disruptive to other CB living and eviction is a constant risk	3/31/2015 4:09 PM
31	We need more affordable housing stock. However, those who are coming off the streets and emergency shelters typically have zero income until they can get into housing and find jobs. Many have barriers they are unable to navigate on their own and need the support of case management services to address them.	3/31/2015 12:17 PM
32	It takes time to readjust to living inside if you have been homeless for any amount of time. Longer case management would be very helpful to some of them!	3/30/2015 2:15 PM
33	My first choices are all of the things i am aware of and see on a daily basis in the counties where i work, what people have the most difficulty with.	3/30/2015 10:00 AM
34	Keeping residents in housing in addition to making more affordable housing available will allow those residents to maintain employment. However, education and life skills training should be a requirement if utilizing emergency services to ensure sustainability.	3/30/2015 9:56 AM
35	If more affordable housing is available, landlords won't have as much of an opportunity to screen those with barriers out. .	3/30/2015 8:58 AM
36	When people actually find and get approves for housing the deposits are really high and landlords are constantly raising rent.	3/30/2015 8:41 AM

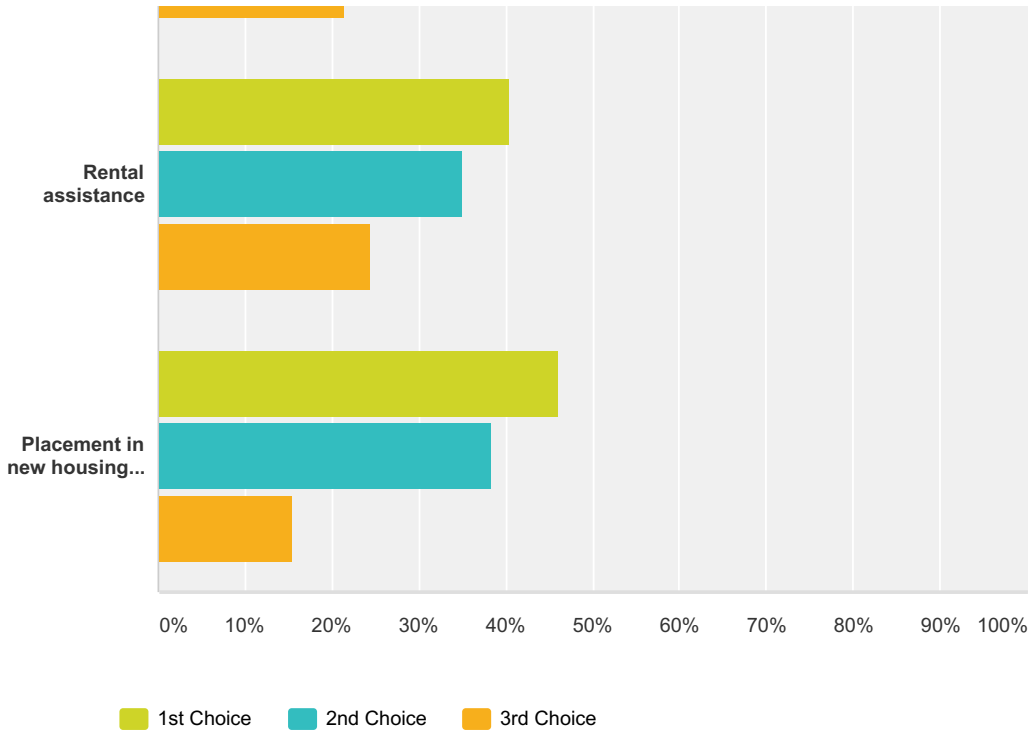
37	I can't say this enough! All of the above is important as a palette of measures that can be used for different people's specific problem. Preventative is most important. If we can prevent people going homeless it is much more cost effective.	3/28/2015 2:47 PM
38	Homeownership is key to diverse, vibrant, complete communities, and historically hasn't received anywhere near the amount of funding required to counter the rapid escalation of home prices. Rents are out of control.	3/27/2015 4:14 PM
39	See answer #10	3/27/2015 2:32 PM
40	These are the areas that seem to have gaps for veterans	3/27/2015 1:39 PM
41	I have already enumerated on this.	3/27/2015 1:37 PM
42	There is an extreme shortage of rental housing in my community and those most affected are at the lowest income levels.	3/26/2015 4:10 PM
43	No affordable rental units or housing available. And fixed income and seniors cannot afford repairs	3/26/2015 12:15 PM

Q13 What housing related services are most needed in your community? Please select your 1st, 2nd and 3rd choices from the list below.

Answered: 62 Skipped: 4



Partner Survey: Tell us about your housing need in your community!



	1st Choice	2nd Choice	3rd Choice	Total
Credit counseling and repair for renters	**31.25%**	**50.00%**	**18.75%**	
	5	8	3	16
Money for utility and rent deposits	**46.15%**	**17.95%**	**35.90%**	
	18	7	14	39
Foreclosure counseling	**22.22%**	**11.11%**	**66.67%**	
	2	1	6	9
Supportive services and case management	**28.13%**	**43.75%**	**28.13%**	
	9	14	9	32
Apartment search and matching services	**27.27%**	**22.73%**	**50.00%**	
	6	5	11	22
Emergency housing	**53.57%**	**25.00%**	**21.43%**	
	15	7	6	28
Rental assistance	**40.54%**	**35.14%**	**24.32%**	
	15	13	9	37
Placement in new housing (Rapid rehousing)	**46.15%**	**38.46%**	**15.38%**	
	12	10	4	26

#	Other (please specify)	Date
1	Reform housing laws. Introduce inclusionary zoning laws. Provide more rental assistance and IDAs for eligible families.	4/5/2015 8:39 PM
2	Managed housing programs and related support services	3/31/2015 4:09 PM
3	JOBS JOBS JOBS JOBS	3/30/2015 2:15 PM

Q14 Please explain why the services, you selected above, were of highest priority.

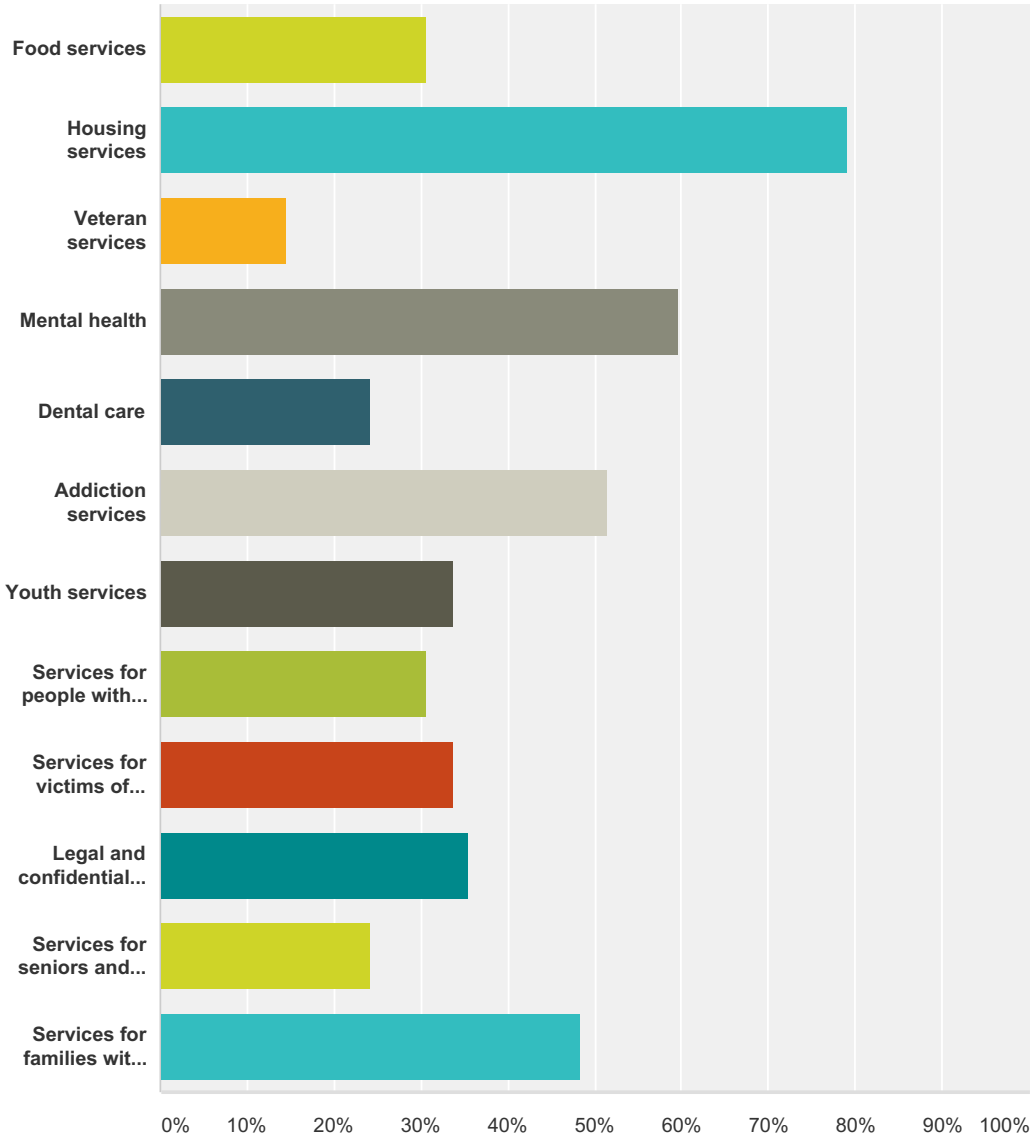
Answered: 30 Skipped: 36

#	Responses	Date
1	Again, I'm becoming a broken record but deposit assistance would be huge for our clients. The next is supportive services with case management, which seems to help a lot of our clients. Even on the Hotline, when clients come in with financial assists, they find it helpful when we sit down with them and troubleshoot their situations. Finally, rental assistance is always beneficial as it can help us get people into a place, or keep them in it.	4/27/2015 1:04 PM
2	same as above	4/23/2015 10:35 AM
3	First, get the un-housed into a variety of transitional housing, then wrap supportive services around them to keep them housed, & finally provide rental assistance to keep them. We need housing options for everyone.	4/20/2015 11:04 AM
4	We need a larger supply of affordable housing and rental assistance	4/20/2015 9:40 AM
5	there is a need for help finding afforable housing	4/20/2015 8:36 AM
6	Many low income folks struggle to make their rent and electric bills, as rents are high and wages are low.	4/17/2015 9:48 AM
7	Budgeting is a need, how to manage their money. We need assistance with emergency housing in our area.	4/14/2015 9:54 AM
8	I selected placement in new housing as being the 1st choice because the cost to rehousing individuals is high. The second choice was credit counseling because by making improvements, obtaining housing may be easier. The 3rd choice was housing search and placement,so that clients are educated about what housing affordability looks like.	4/13/2015 2:07 PM
9	Once a person is approved for section 8 or housing assistance the search for a home or apartment that meets the housing requirements is up to the community member and there is no real assistance in finding the rental units.	4/13/2015 1:50 PM
10	#1 low-income = primary barrier, #2 = ongoing assistance for the same reason as #1, #3 = liaison between housing providers and clients helpful for ongoing housing stability.	4/9/2015 8:51 AM
11	It is imperative that we get the homeless housed, get them proper services to stabilize their lives, and rehouse them when they lose their housing.	4/7/2015 5:39 PM
12	Ability to achieve stability is critical.	4/7/2015 1:50 PM
13	First we need to deal with their immediate needs and then have housing available. Next step is to help them remain in their homes.	4/7/2015 8:54 AM
14	Again, this is what we are hearing from our clients that are their needs.	4/6/2015 5:40 PM
15	Agencies providing supportive services need more housing options, and financial assistance to cover entry expenses and costs of utilities.	4/6/2015 10:40 AM
16	Again as above assistance with finding and obtaining housing can be difficult without help.People need help getting into housing and then sometimes assistance to stay in their housing.	4/6/2015 10:00 AM
17	Rent deposits are very high in this area, too high for most people with limited income. Emergency housing would benefit folks that are unable to find housing on their own in a short time frame. Case management would help people that are unable to navigate the housing system on their own or with little support.	4/6/2015 8:39 AM
18	We are in a crisis. People need immediate resources while public policy id revised to address the issues at a systemic level.	4/5/2015 8:39 PM
19	People consistently identify a need for rental assistance and supportive services/case management to sustain housing. Additionally, there are more and more households needing foreclosure counseling.	4/3/2015 4:29 PM
20	Investment is rural communities for new or renovated housing is needed. The rental assistance makes it affordable, and needs to be preserved..	4/3/2015 1:45 PM

21	We have seen a new trend where folks with housing vouchers are being turned away more due to bad credit. Many low income have bad credit and that is preventing them from attaining housing. Second is that they also lack sufficient resources to pay for utility and rent deposits. Supportive services and case management might also help determine why they are being turned down and counsel them to remedy the problem.	4/2/2015 6:52 PM
22	Housing first is the best m,odel for our homeless guests.	4/1/2015 3:20 PM
23	We need more affordable housing stock. However, those who are coming off the streets and emergency shelters typically have zero income until they can get into housing and find jobs. Many have barriers they are unable to navigate on their own and need the support of case management services to address them.	3/31/2015 12:17 PM
24	My first choices are the things i see that are first and most commong people can not obtain housing	3/30/2015 10:00 AM
25	Providing supportive services will help increase program sustainability. Offering rental deposits will allow those in need to secure housing and rapid rehousing will reduce homelessness.	3/30/2015 9:56 AM
26	I don't think putting more money towards rental assistance programs or apartment search services is the answer. There's just not enough housing (within the FMRs) available. I think we need to build more apartments and negotiate with landlords. Maybe help remodel some apartments, but have the landlord agree to accept a certain amount of people with barriers (poor credit, crimnal history, etc) for a certain amount of years.	3/30/2015 8:58 AM
27	It take 2-3 hours to search through all the property management companies and craigslist. Not everyone has access to the internet for that amount of time. Or they don't know how to navigate the internet or have the patience.	3/30/2015 8:41 AM
28	See answer #10	3/27/2015 2:32 PM
29	These are the areas that most veterans struggle with	3/27/2015 1:39 PM
30	These are the most useful tools for people in poverty.	3/26/2015 4:10 PM

Q15 Which of the following social services are the most needed by low income persons in your community? Check all that apply.

Answered: 62 Skipped: 4



Answer Choices	Responses	
Food services	30.65%	19
Housing services	79.03%	49
Veteran services	14.52%	9
Mental health	59.68%	37
Dental care	24.19%	15

Addiction services	**51.61%**	32
Youth services	**33.87%**	21
Services for people with disabilities (e.g. HIV status, physical and intellectual disabilities and mental illness).	**30.65%**	19
Services for victims of domestic or sexual abuse	**33.87%**	21
Legal and confidential services	**35.48%**	22
Services for seniors and elderly	**24.19%**	15
Services for families with children	**48.39%**	30

Total Respondents: 62

#	Other (please specify)	Date
1	SERVICES FOR YOUTH	4/6/2015 8:43 AM
2	Payee assistance	4/3/2015 4:29 PM

Q16 Please describe why you selected these specific services as the most needed.

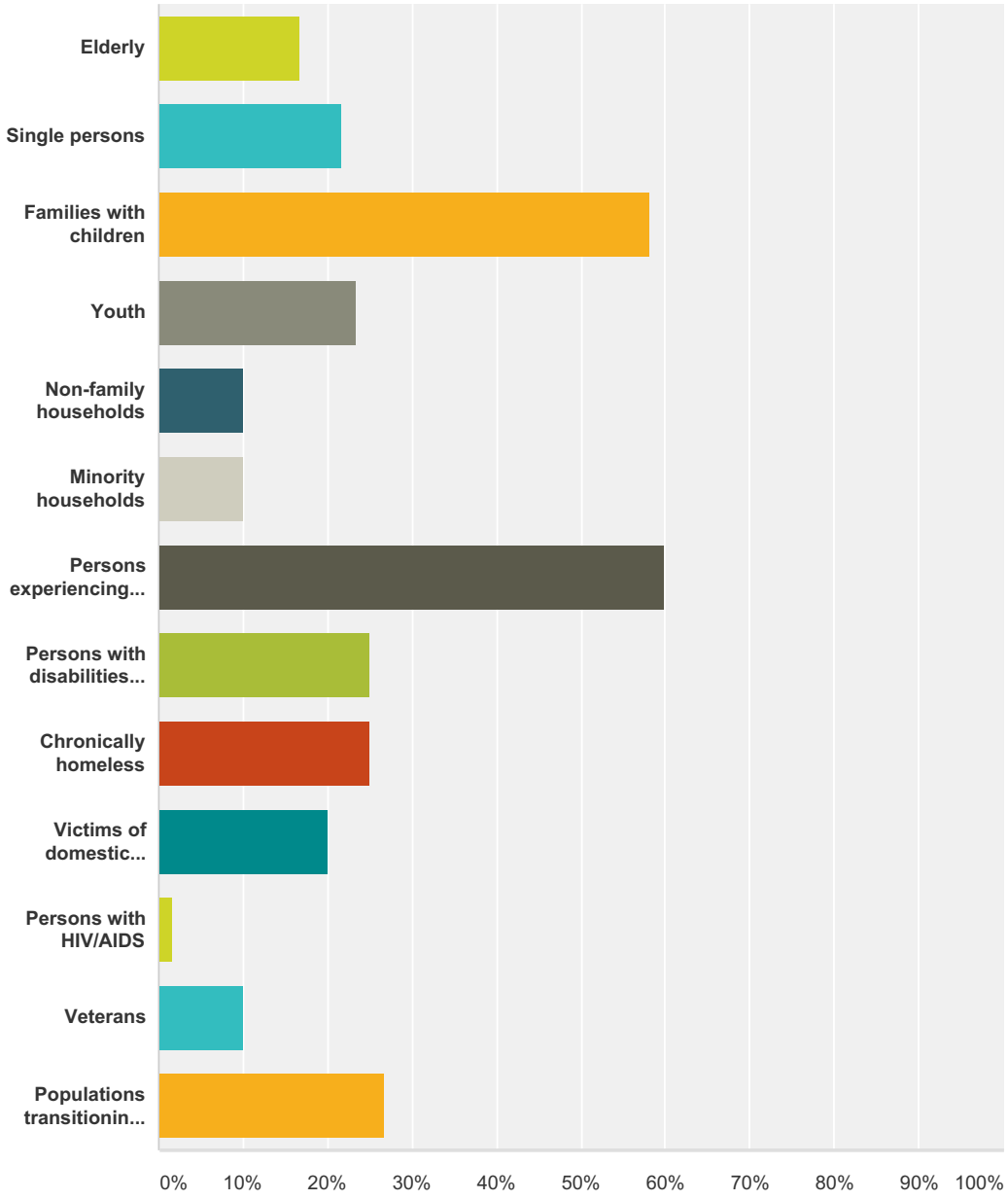
Answered: 32 Skipped: 34

#	Responses	Date
1	These are all the services which seem to be the most requested by our clients.	4/27/2015 1:04 PM
2	All un-housed people have mental health issues, and sometimes addiction issues as well. They don't have the skills or abilities to hold a permanent job. We need a variety of housing options for them first to become stable, rent assistance, then counseling, support, and job training. We have more options for veterans now, but few resources for others.	4/20/2015 11:04 AM
3	Those are the most needed services because we have large need in those areas	4/20/2015 9:40 AM
4	there is a housing crisis with no options available	4/20/2015 8:36 AM
5	Housing is a huge issue in our area. We also have many people with addictions and disabilities, and it is hard to find adequate housing.	4/17/2015 9:48 AM
6	We have a strong food distribution system but the need is not decreasing with the rebounding economy. Housing and legal services are exceptionally important and scarce as well.	4/14/2015 12:38 PM
7	There are not very many places to go for mental health services and families, they would like to have a choice. There are not very many low income housing in our area.	4/14/2015 9:54 AM
8	The choices above are seen largely throughout the low income population in our county.	4/13/2015 2:07 PM
9	Legal services are in highly needed as many of the individuals (adult) that live in Malheur County do not have legal citizen ship and struggle with getting proper medical care because of this. Housing options once approved for section 8 are extremely limited and many people are living in home that are not safe because there is no where else to live and section 8 will not pay for those homes because they will not pass inspection.	4/13/2015 1:50 PM
10	Dental has repeatedly been identified as the highest unmet need.	4/9/2015 8:51 AM
11	The majority of people in the homeless population have either mental illness or addiction challenges so that is a much needed service. The amount of people not getting adequate food is well documented.	4/7/2015 5:39 PM
12	The services chosen can lead to a resident/client achieving stability and success in maintaining their connection with their community.	4/7/2015 1:50 PM
13	They are the population most in need and most at risk for homelessness. Homeless children become homeless adults and the cycle begins.	4/7/2015 8:54 AM
14	I hear from partnering agencies the strong need for these areas. I also see first hand from the 100 people who visit our day center each day, that these are highly in need.	4/6/2015 10:40 AM
15	Close to no services for dental care for low income persons.Unaware of area youth services.There are still large numbers of proud seniors living in proverty and unable to afford food and medications.	4/6/2015 10:00 AM
16	We experience it everyday inour work	4/6/2015 8:43 AM
17	In my line of work survivors of DV and SA are almost always in need of safe housing and are many times not prepared financially to pay for deposits or sustain rent on their own right away. They are also in much need of legal services to help them with many barriers such as custody, divorce, and housing.	4/6/2015 8:39 AM
18	The population we serve is in need of stable housing first and foremost. Many of the other services listed above would become unnecessary if housing costs were reasonable and housing situations normalized.	4/5/2015 8:39 PM
19	The services selected are what people seek or need the most when delivering case management at our agency.	4/3/2015 4:29 PM
20	Low income people in rural areas are usually in food deserts, with a lack of decent affordable housing, affordable medical facilities or affordable day care for the working poor.	4/3/2015 1:45 PM
21	We need more help for low-income people needing immigration legal help.	4/3/2015 1:16 PM

22	The majority of low income need food services to help stretch their resources. The main reasons we see people struggle with keeping their housing relate to behavior issues related to mental illness and drug addictions.	4/2/2015 6:52 PM
23	These are not available to our guests in Ashland, and very limited to the rest of Jackson County.	4/1/2015 3:20 PM
24	Our area is fortunate to have the VA in White City for veterans services and there are many local charities that provide food and other services listed. In the words of one of our local homeless men, "We have a lot of places to go- we can go here for food, there for a shower, there for medical services.... what we need is a place to BE." Housing is desperately needed, many need the opportunities for mental health and addiction services once they are stably housed.	3/31/2015 12:17 PM
25	My choices are based on what i see lacking for individuals/families that prevents them from being able to focus on finding a job or other basic needs.	3/30/2015 10:00 AM
26	All essential services are needed to allow for complete self-sufficiency. Proper management and bundling of these services is essential to overall success.	3/30/2015 9:56 AM
27	I think mental illness is a huge area in Oregon that needs to be addressed. There are a lot of homeless people in Oregon that struggle with mental illness. They run in to the same issues as I've mentioned above... lack of available housing, criminal history. But I think there needs to be more in place to help this population because many aren't capable of maintaining housing on their own. More adult group homes could be a solution, having someone (home manager) to help keep an eye on these individuals. Something other than DHS Seniors and People with Disabilities because I don't think it's easy for someone with mental health issues to navigate that system. I'm a housing coordinator and I've struggled myself trying to understand how that agency can help serve a particular individual that I was working with.	3/30/2015 8:58 AM
28	Services for Seniors and veterans are very easy to find. It is the working poor that get overlooked here.	3/30/2015 8:41 AM
29	See answer #10	3/27/2015 2:32 PM
30	These are the areas that most veterans struggle with	3/27/2015 1:39 PM
31	all equally needed and important	3/27/2015 1:37 PM
32	These services are the most under-funded in our community.	3/26/2015 4:10 PM

Q17 Which target population(s) in your community are most in need of housing assistance and/or services? Please select up to three.

Answered: 60 Skipped: 6



Answer Choices	Responses	
Elderly	16.67%	10
Single persons	21.67%	13
Families with children	58.33%	35

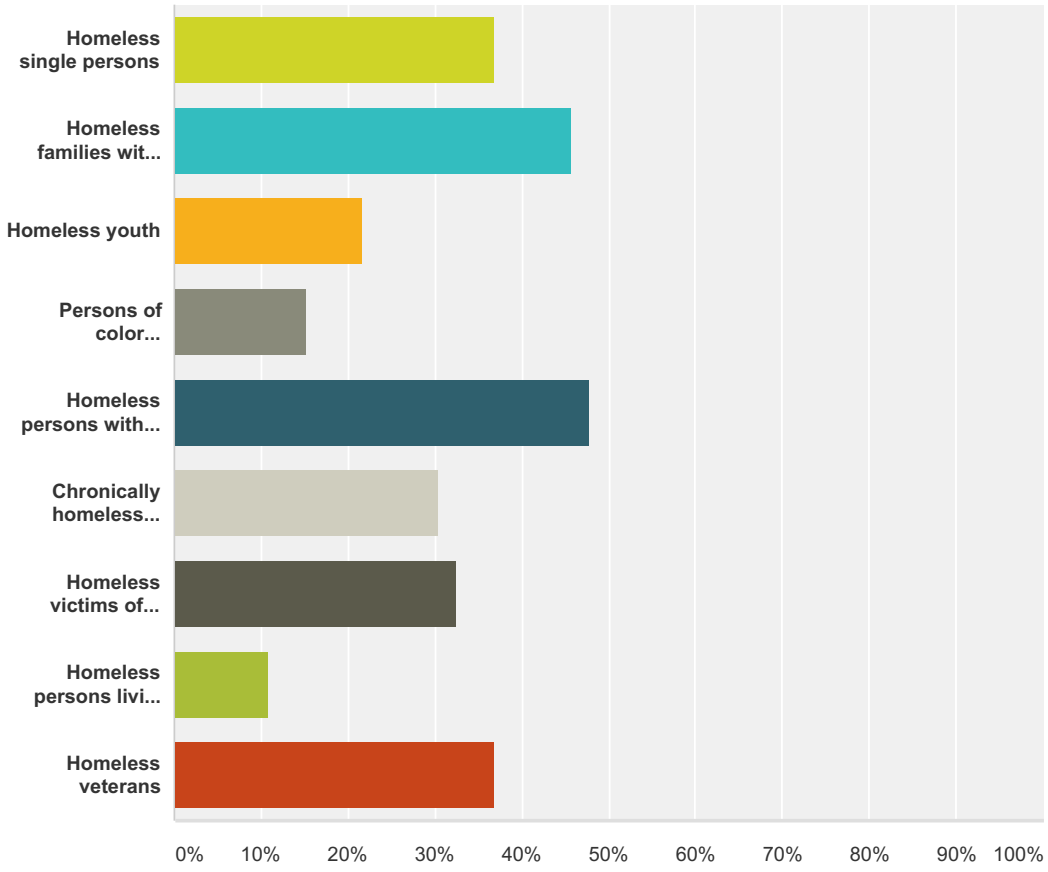
Youth	**23.33%**	14
Non-family households	**10.00%**	6
Minority households	**10.00%**	6
Persons experiencing homelessness	**60.00%**	36
Persons with disabilities (e.g. HIV status, physical and intellectual disabilities and mental illness).	**25.00%**	15
Chronically homeless	**25.00%**	15
Victims of domestic violence	**20.00%**	12
Persons with HIV/AIDS	**1.67%**	1
Veterans	**10.00%**	6
Populations transitioning from detention, corrections or treatment services	**26.67%**	16

Total Respondents: 60

#	Other (please specify)	Date
1	Those releasing from prison	4/24/2015 10:24 AM
2	I don't have enough information to say which population is the most needy.	4/13/2015 12:16 PM

Q18 For Homeless Elderly: Which populations are you targeting for housing assistance? (Check all that apply)

Answered: 46 Skipped: 20

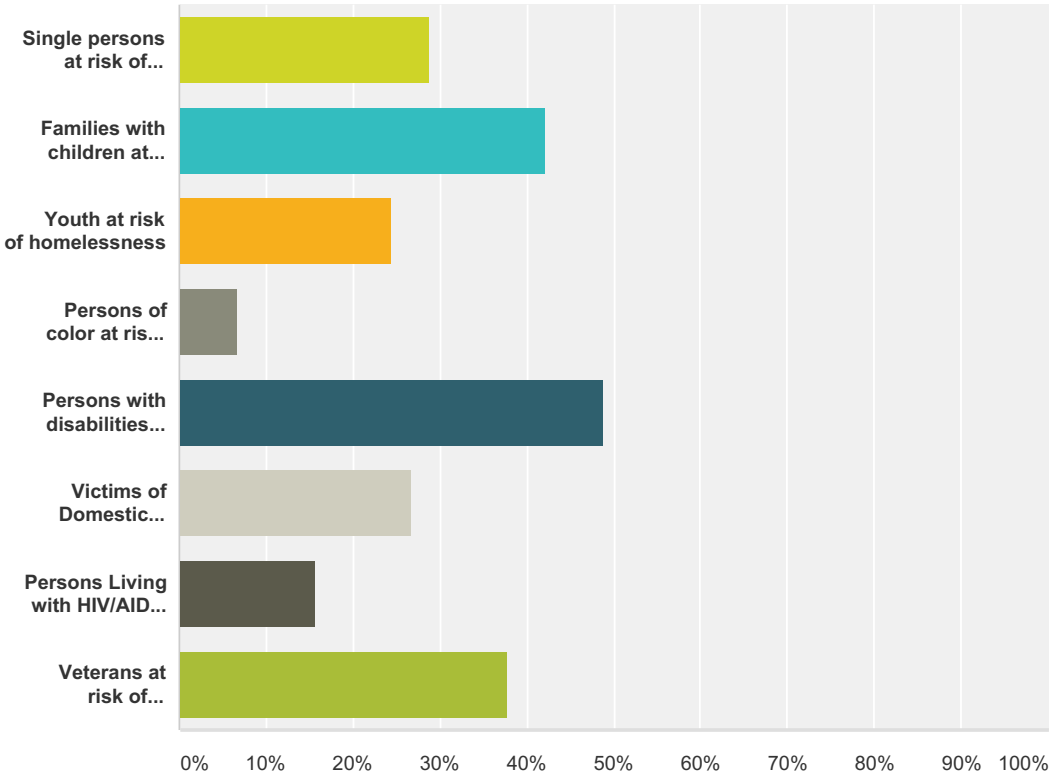


Answer Choices	Responses	
Homeless single persons	36.96%	17
Homeless families with children	45.65%	21
Homeless youth	21.74%	10
Persons of color experiencing homelessness	15.22%	7
Homeless persons with disabilities (e.g. HIV status, physical and intellectual disabilities and mental illness).	47.83%	22
Chronically homeless persons	30.43%	14
Homeless victims of domestic violence	32.61%	15
Homeless persons living with HIV/AIDS	10.87%	5
Homeless veterans	36.96%	17

Total Respondents: 46

Q19 For Elderly at risk of homelessness: Which populations are you targeting for housing assistance? Check all that apply.

Answered: 45 Skipped: 21

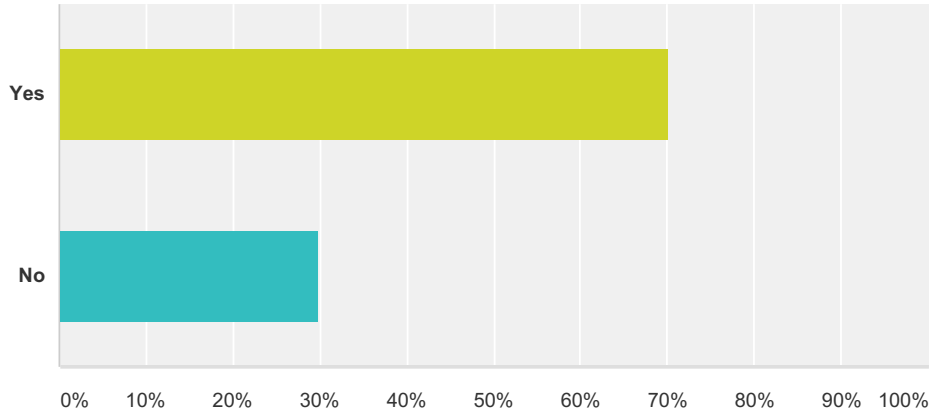


Answer Choices	Responses	
Single persons at risk of homelessness	28.89%	13
Families with children at risk of homelessness	42.22%	19
Youth at risk of homelessness	24.44%	11
Persons of color at risk of homelessness	6.67%	3
Persons with disabilities at risk of homelessness (e.g. HIV status, physical and intellectual disabilities, and mental illness).	48.89%	22
Victims of Domestic Violence at risk of homelessness	26.67%	12
Persons Living with HIV/AIDS at risk of homelessness	15.56%	7
Veterans at risk of homelessness	37.78%	17

Total Respondents: 45

Q20 Has demand for your agency's services changed over the past 12 months?

Answered: 57 Skipped: 9



Answer Choices	Responses	
Yes	**70.18%**	40
No	**29.82%**	17
Total		**57**

Q21 If yes, how so?

Answered: 42 Skipped: 24

#	Responses	Date
1	Federal Rent assistance has become more difficult to use due to rapidly rising rents above payment standards, leading to longer wait times and growing waiting lists.	4/24/2015 5:16 PM
2	We have had an increase in people seeking services, many of whom are in need of many more services than we can provide.	4/21/2015 8:59 AM
3	We have more requests for money & grants to provide transitional housing & services for the homeless	4/20/2015 11:04 AM
4	More family apply than can be served	4/20/2015 9:40 AM
5	increased	4/17/2015 1:07 PM
6	Less housing in our area.	4/17/2015 9:48 AM
7	We serve a population that is continuously changing. In order to provide the best support to our families, we must understand that each family, individual, and child is unique in their situation. As a result, the services may vary and should pertain to the need(s) of our families.	4/17/2015 8:29 AM
8	It continues to increase dramatically in nearly every area, with the exception of energy assistance which has not been as busy due to mild weather.	4/14/2015 12:38 PM
9	There have been more inquiries for services. The households have lost their rental subsidy due to criminal activity.	4/13/2015 2:07 PM
10	unknown	4/13/2015 1:31 PM
11	Our caseloads are growing at a rapid pace both with seniors and people with disabilities.	4/13/2015 12:16 PM
12	Not enough people come into the office.	4/13/2015 10:23 AM
13	We don't deliver services directly.	4/10/2015 9:13 AM
14	Increased by 30% due to the ACA	4/7/2015 5:39 PM
15	Lack of income and housing impact the need for services for persons receiving services and supports.	4/7/2015 1:50 PM
16	There have been 2 family shelters that have closed and nothing to fill the need.	4/7/2015 8:54 AM
17	With domestic and sexual abuse survivors we are seeing more problems with mental illness and intellectual disabilities. Many the result of years of brain trauma from abuser(s). While Jackson County Mental Health is available, the waiting period can be 3-5 months for someone who is not suicidal. PTSD is prevalent in every client we work with, and there are not enough resources in this county to help them.	4/6/2015 5:40 PM
18	more homelessnes/ mental illness	4/6/2015 4:49 PM
19	We have gone from 40 people served a day to 100 over the past year. Changes in services as a result of funding, as left many homeless in need of supports to address their physical needs. This has also left us short of case management to handle the increase. The need for 'peer support' has increased as well. Care support through comprehensive health care calls for a level of assistance that only peer support can provide. Peer support specialist are effective with engagement, task follow-through, decreased recidivism/relapse, and lower no-show rates.	4/6/2015 10:40 AM
20	We are seeing more patients in need of dental and medication assistance.	4/6/2015 10:00 AM
21	Increased	4/6/2015 8:43 AM
22	Many more people are reporting DV and SA. This trend could be because of the rising media coverage of the problem and survivors knowing there are services that can help them.	4/6/2015 8:39 AM
23	Increased	4/5/2015 8:39 PM

24	Previously, one to two USDA RD Section 515 property owners per year requested help to preserve their affordable rural rental projects. Over the last 12 months five different properties in this situation have come to us for help. We expect a significant increase in the next five years.	4/3/2015 1:45 PM
25	It has increased.	4/3/2015 1:16 PM
26	We see a higher number of mentally disabled applying for housing assistance.	4/2/2015 6:52 PM
27	Our daily count of visitors has doubled and our count of new guests each month has doubled	4/1/2015 3:20 PM
28	Increased numbers served under K Plan	3/31/2015 4:09 PM
29	Increased dramatically.	3/31/2015 12:28 PM
30	We receive more requests for all of our services.	3/30/2015 2:15 PM
31	It has increase dramatically in all areas. Our once "middle class" are now needing services that have never needed them before.	3/30/2015 11:03 AM
32	My case load has doubled in the last 6 months	3/30/2015 10:09 AM
33	I am not certain.	3/30/2015 10:00 AM
34	The number of people I serve has doubled.	3/30/2015 8:41 AM
35	We still have long waiting lists.	3/28/2015 2:47 PM
36	Much greater.	3/27/2015 4:14 PM
37	Marked increase in need	3/27/2015 2:32 PM
38	It has increased tremendously	3/27/2015 1:39 PM
39	It has dramatically increased, and the cost to stabilize a family has also dramatically increased.	3/27/2015 1:37 PM
40	For the first time in our 23 year history, we have had to close all of our waiting lists. The demand for affordable rental housing has never been higher.	3/26/2015 4:10 PM
41	Critical need because of rental houses being sold	3/26/2015 1:55 PM
42	Increased number of calls, requests and lack of funding for services	3/26/2015 12:15 PM

Q22 What are the contributing factors for the increase? If you marked "No Change/Not Applicable" above, please enter n/a here

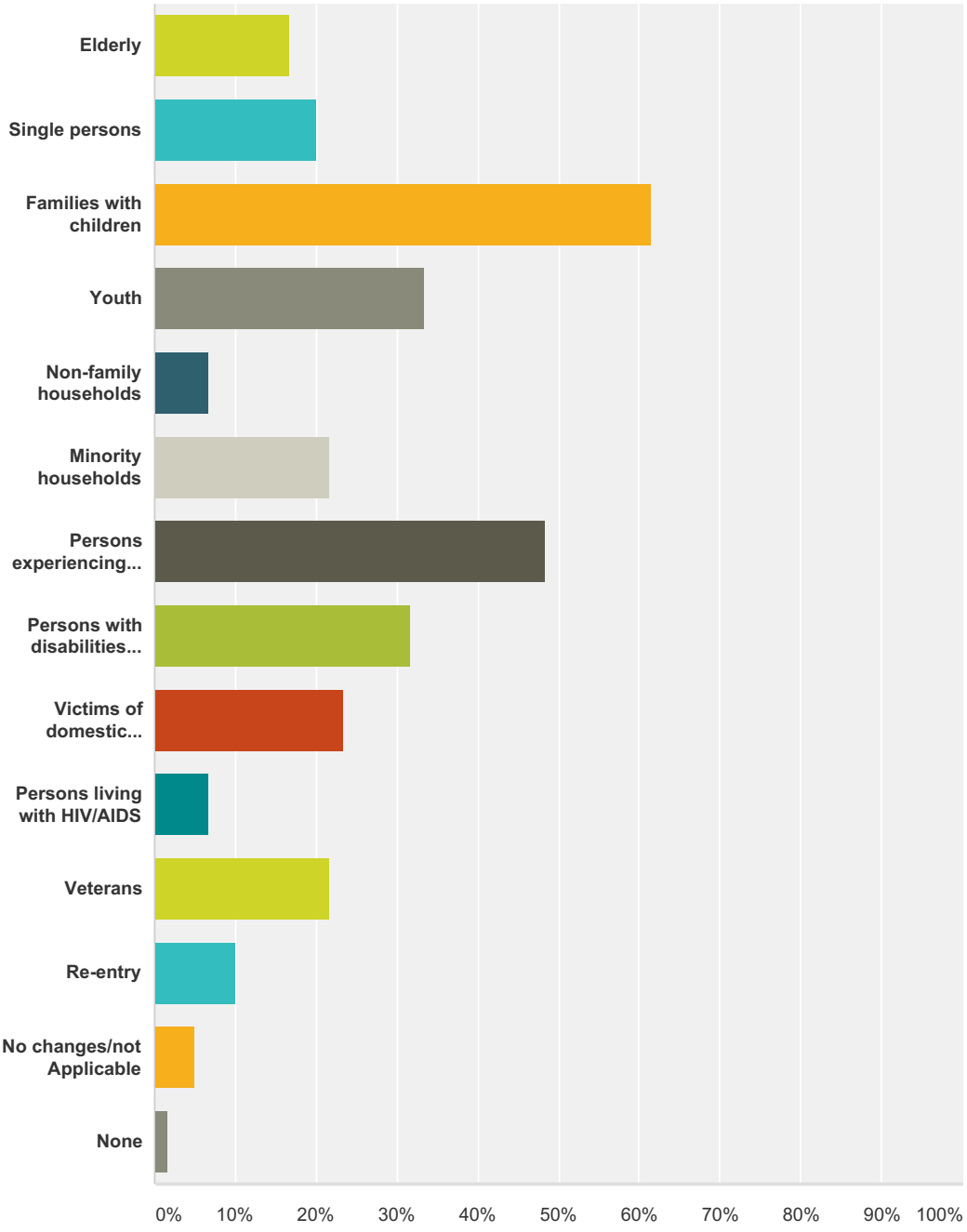
Answered: 52 Skipped: 14

#	Responses	Date
1	N/A	4/27/2015 1:04 PM
2	N/A	4/24/2015 10:24 AM
3	NA	4/23/2015 10:35 AM
4	More IDD clients seeking employment, maybe more people knowing about our services.	4/21/2015 8:59 AM
5	Greater awareness of the needs	4/20/2015 11:04 AM
6	More poverty	4/20/2015 9:40 AM
7	n/a	4/20/2015 8:07 AM
8	income/no job	4/17/2015 1:07 PM
9	The housing market has continued to become tighter over the past year which has lead to increased demand in nearly all of our services. Clients are paying more and more of their income for rent or mortgage. Deposits are growing and requirements to enter housing are becoming increasingly strict. It is nearly impossible for clients with moderate credit scores, any criminal history, or substance problems to find housing.	4/14/2015 12:38 PM
10	n/a	4/14/2015 9:54 AM
11	n/a	4/13/2015 2:17 PM
12	The changes in the populations we served have stayed the same. We are able to serve a limited number of households.	4/13/2015 2:07 PM
13	N/A	4/13/2015 1:50 PM
14	unknown	4/13/2015 1:31 PM
15	n/a	4/13/2015 1:24 PM
16	Baby boomers	4/13/2015 12:16 PM
17	Don't know.	4/13/2015 10:23 AM
18	N/A	4/9/2015 8:51 AM
19	ACA, increase in homelessness, increases in mentally not being housed	4/7/2015 5:39 PM
20	Lack of affordable housing options,which can and does impact the ability to receive supports and services on a frequent basis.	4/7/2015 1:50 PM
21	High unemployment, increase in rent, less available affordable housing.	4/7/2015 8:54 AM
22	Abusers are cereal perpetrators and if they go to jail they come out and re-victimize. There needs to be stronger laws that protect the victim and stop the criminals.	4/6/2015 5:40 PM
23	DV, Mental illness, lack of ablity to get into a place	4/6/2015 4:49 PM
24	Changes in social service programs.	4/6/2015 10:40 AM
25	Unsure.Perhaps more people unable to afford medications because they now have access to health care and need medications.Dental has always been an issue.	4/6/2015 10:00 AM
26	N/A	4/6/2015 9:01 AM

27	lack of resources	4/6/2015 8:43 AM
28	see above	4/6/2015 8:39 AM
29	increase in number of families eligible for service	4/5/2015 8:39 PM
30	Many of the USDA Section 515 properties with Rental Assistance are about to pay off. If that happens the Rental Assistance goes away and the low income residents will likely become homeless if someone does not preserve them. Most of the owners are, or were, private parties, who are older and no longer want to own the asset. Non profits and housing authorities are identifying these properties in their communities and requesting we help them preserve the units. Most need renovation.	4/3/2015 1:45 PM
31	Job prospects are increasing and people want education to get a better job.	4/3/2015 1:16 PM
32	Wage inequities and low number of units available.	4/3/2015 11:40 AM
33	More mentally disabled are trying to move into independent living arrangements rather than remain in group homes or supervised environments.	4/2/2015 6:52 PM
34	n/a	4/2/2015 11:49 AM
35	More people are homeless, we have earned a reputation for serving homeless and therefore attract additional attention.	4/1/2015 3:20 PM
36	Broader coverage and funding under new CMS waivered KPlan	3/31/2015 4:09 PM
37	Increase in homelessness	3/31/2015 12:28 PM
38	N/A	3/31/2015 12:17 PM
39	na	3/31/2015 12:11 PM
40	there are not enough JOBS - especially living wage jobs - for people in our community.	3/30/2015 2:15 PM
41	Stores closing, higher rents and not enough employment	3/30/2015 11:03 AM
42	Drug addiction, chronic homelessness, lack of affordable housing	3/30/2015 10:09 AM
43	n/a	3/30/2015 10:00 AM
44	No change	3/30/2015 8:58 AM
45	Lack of affordable housing, rising rent prices	3/30/2015 8:41 AM
46	N/A	3/28/2015 2:47 PM
47	See all comments above, re: home prices are sky-high with no signs of slowing.	3/27/2015 4:14 PM
48	Continued economic conditions	3/27/2015 2:32 PM
49	more veterans trying to connect with the benefits they have earned	3/27/2015 1:39 PM
50	lack of jobs; decreased hours at work; unemployment ended and no further extensions, plus no new job opportunities; increased struggle with addiction and mental health issues; rising cost of available housing and in general a shrinking availability of rentals. Many people with a HUD section 8 voucher cannot find a rental in FMR, or cannot be screened through due to criminal background issues and/or credit problems.	3/27/2015 1:37 PM
51	Demand far exceeds supply. The response from government at all levels has been poor.	3/26/2015 4:10 PM
52	No units available	3/26/2015 12:15 PM

Q23 Which population are you serving more often? Check all that apply.

Answered: 60 Skipped: 6



Answer Choices	Responses	
Elderly	16.67%	10
Single persons	20.00%	12
Families with children	61.67%	37

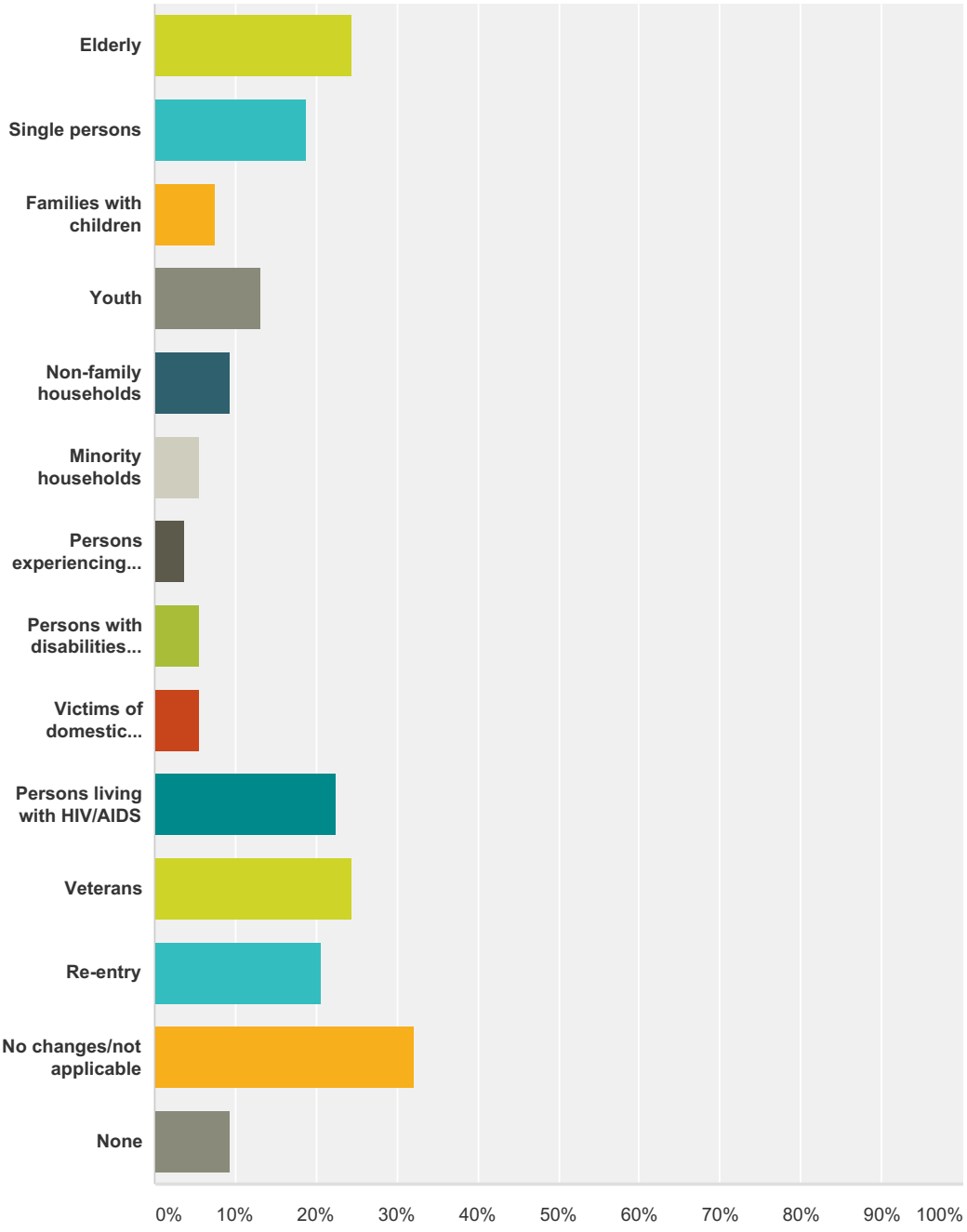
Youth	**33.33%**	20
Non-family households	**6.67%**	4
Minority households	**21.67%**	13
Persons experiencing homelessness	**48.33%**	29
Persons with disabilities (e.g. HIV status, physical and intellectual disabilities and mental illness).	**31.67%**	19
Victims of domestic violence	**23.33%**	14
Persons living with HIV/AIDS	**6.67%**	4
Veterans	**21.67%**	13
Re-entry	**10.00%**	6
No changes/not Applicable	**5.00%**	3
None	**1.67%**	1

Total Respondents: 60

#	Other (please specify)	Date
1	Those	4/24/2015 10:24 AM
2	We serve every population listed here, but are forced to narrow to these categories due to significant funding constraints.	4/14/2015 12:38 PM
3	Agricultural workers	4/3/2015 1:45 PM
4	It is not that we are serving them more often: we lack the funds to serve them, but the above mentioned populations are seeking assistance more often than ever.	3/27/2015 1:37 PM

Q24 Which populations are you serving less often? Select all that apply.

Answered: 53 Skipped: 13



Answer Choices	Responses	
Elderly	24.53%	13
Single persons	18.87%	10
Families with children	7.55%	4

Youth	**13.21%**	7
Non-family households	**9.43%**	5
Minority households	**5.66%**	3
Persons experiencing homelessness	**3.77%**	2
Persons with disabilities (e.g. HIV status, physical and intellectual disabilities and mental illness).	**5.66%**	3
Victims of domestic violence	**5.66%**	3
Persons living with HIV/AIDS	**22.64%**	12
Veterans	**24.53%**	13
Re-entry	**20.75%**	11
No changes/not applicable	**32.08%**	17
None	**9.43%**	5

Total Respondents: 53

#	Other (please specify)	Date
1	Not sure	4/6/2015 10:00 AM
2	N/A	3/27/2015 1:39 PM

Q25 What are the contributing factors for the decrease? If you marked "No Change/Not Applicable" above, please enter n/a here.

Answered: 31 Skipped: 35

#	Responses	Date
1	N/A	4/27/2015 1:04 PM
2	N/A	4/24/2015 10:24 AM
3	n/a	4/20/2015 9:40 AM
4	n/a	4/15/2015 2:28 PM
5	n/a	4/14/2015 9:54 AM
6	We are serving less single person's and re-entry person's because they will not be able to obtain subsidy from other sources within the limited amount of time.	4/13/2015 2:07 PM
7	I work specifically with pregnant and parenting teens, high school students, and their parents.	4/13/2015 1:50 PM
8	n/a	4/13/2015 1:24 PM
9	N/A	4/9/2015 8:51 AM
10	n/a	4/7/2015 5:39 PM
11	Lack of funding and resources to coordinate better with the Veteran population.	4/7/2015 1:50 PM
12	not applicable	4/6/2015 4:49 PM
13	Getting their needs met elsewhere. Special programs available.	4/6/2015 10:40 AM
14	NA	4/6/2015 10:00 AM
15	don't know	4/6/2015 9:01 AM
16	Our ages are 10-24	4/6/2015 8:43 AM
17	n/a	4/3/2015 1:45 PM
18	We had to cut a basic job skills class so we don't reach the same demographic.	4/3/2015 1:16 PM
19	A higher number of mentally disabled applying for housing assistance and both the elderly and disabled remain on housing for longer time periods. Since the number of Vouchers are staying the same, it means fewer families with children are getting onto the program.	4/2/2015 6:52 PM
20	families find it harder to work and find housing	4/2/2015 11:49 AM
21	Not sure	4/1/2015 3:20 PM
22	N/A	3/31/2015 12:17 PM
23	na	3/31/2015 12:11 PM
24	n/a	3/30/2015 11:03 AM
25	n/a	3/30/2015 10:09 AM
26	No change	3/30/2015 8:58 AM
27	I have never served this population.	3/30/2015 8:41 AM
28	N/A	3/27/2015 2:32 PM
29	N/A	3/27/2015 1:39 PM

30	n/a	3/26/2015 4:10 PM
31	n/a	3/26/2015 12:15 PM

Q26 Are you maintaining a waiting list or have an unmet need for services you provide?

Answered: 53 Skipped: 13

#	Responses	Date
1	Yes and no. Hotline doesn't technically have a waitlist but we do ask people to call back the following month when we run out of money in the hopes that we'll be able to help them then. We always have unmet needs.	4/27/2015 1:04 PM
2	Yes	4/24/2015 5:16 PM
3	Any waiting lists would be maintained by the various county community corrections offices.	4/24/2015 10:24 AM
4	yes	4/23/2015 10:35 AM
5	We schedule initial appointments further and further out.	4/21/2015 8:59 AM
6	No, but the agencies that we help to provide supportive housing & services for the needy have long waiting lists for transitional & emergency housing. We are unable to meet their need for funds to purchase buildings that would consolidate & provide these services.	4/20/2015 11:04 AM
7	yes	4/20/2015 9:40 AM
8	yes	4/20/2015 8:07 AM
9	no	4/17/2015 1:07 PM
10	Yes	4/17/2015 8:29 AM
11	Waiting list	4/15/2015 2:28 PM
12	Absolutely, yes.	4/14/2015 12:38 PM
13	We have a waitlist for children 3 -5 year olds.	4/14/2015 9:54 AM
14	No	4/13/2015 2:07 PM
15	Yes, an unmet need list.	4/13/2015 2:05 PM
16	No	4/13/2015 1:50 PM
17	waitlist	4/13/2015 1:24 PM
18	We don't turn anyone away who is eligible, but the increase in work makes it difficult for the workers to keep up with the pace of the increase in need which can at times delay service.	4/13/2015 12:16 PM
19	Waiting list.	4/13/2015 10:23 AM
20	Yes	4/9/2015 8:51 AM
21	yes, but they are frequently closed for housing due to unmet demand	4/7/2015 5:39 PM
22	I am not sure.	4/7/2015 1:50 PM
23	We maintain a wait list	4/7/2015 8:54 AM
24	The domestic/sexual violence shelter has times when we are too full to help. It's exception, and usually they get in within a couple of days.	4/6/2015 5:40 PM
25	not applicable	4/6/2015 4:49 PM
26	Yes. We need more case managers and peer support specialists.	4/6/2015 10:40 AM
27	Mental Health services with wait list but are hiring another LMSW.	4/6/2015 10:00 AM
28	no	4/6/2015 9:01 AM

29	yes	4/6/2015 8:43 AM
30	no	4/6/2015 8:39 AM
31	Yes	4/5/2015 8:39 PM
32	We have a huge unmet need of one time rental assistance.	4/3/2015 4:29 PM
33	We are an intermediary who works with other non profits to develop and preserve affordable housing in Oregon. The current demand is greater than the resources available, with the maturing loans on the privately held units in rural Oregon that demand will only become greater.	4/3/2015 1:45 PM
34	We have a waiting list for our English classes from people calling outside of our regular terms, ie. calling in June to start in September. We are not at capacity in our classes, however.	4/3/2015 1:16 PM
35	Yes	4/3/2015 11:40 AM
36	Yes, we have waiting lists for both Section 8 vouchers and for getting into our Public Housing units.	4/2/2015 6:52 PM
37	yes we have multiple waiting lists	4/2/2015 1:36 PM
38	yes	4/2/2015 11:49 AM
39	We have 100 active guests. We have applied to several places for housing for these and others. I have families on the waiting list for Hope House, Rogue Retreat, Home At Last, Housing Authority od Jackson County, and others.	4/1/2015 3:20 PM
40	Yes, our waiting list is over a year long for subsidized housing.	3/31/2015 12:17 PM
41	There is an OHOP waitlist I refer my clients to	3/31/2015 12:11 PM
42	Yes, only for HTBA program	3/30/2015 11:03 AM
43	yes	3/30/2015 10:09 AM
44	We maintain a wait list that we prioritize based on housing acituity, Those that are homeless are placed at the top of our wait list and are served very quickly. Those that are housed, but struggling are placed lower on our wait list.	3/30/2015 8:58 AM
45	no	3/30/2015 8:41 AM
46	Yes - a large waiting list for our transitional shelters and any housing assistance.	3/28/2015 2:47 PM
47	Yes, and it would be much larger if we didn't limit our outreach, which we are compelled to do due to our limited housing pipeline.	3/27/2015 4:14 PM
48	Yes.	3/27/2015 2:32 PM
49	Not for the services we provide, however there are areas where support is needed in lanes that are traditionally not our expertise	3/27/2015 1:39 PM
50	NO waitlists for housing funds seekers, but we do keep assistance forms on file which demonstrate the need and various causes of the need, even though we can only serve a small percentage of those who ask for help.	3/27/2015 1:37 PM
51	We have closed all of our waiting lists because it will take years to get through them.	3/26/2015 4:10 PM
52	Not Applicable	3/26/2015 1:55 PM
53	yes	3/26/2015 12:15 PM

Q27 If your agency maintains a waiting list, how many people are currently on the waiting list. If no list, please let us know if you have any data on the number of people your agency is unable to serve each year. (Please provide any information about race, color, national origin, sex, age, sexual orientation, familial status or source of income that you have about the persons on your wait list.)

Answered: 38 Skipped: 28

#	Responses	Date
1	N/A	4/27/2015 1:04 PM
2	CCC has over 1,500 on its waiting lists. This does not reflect the serveral thousand people being served through our health services which are unhoused.	4/24/2015 5:16 PM
3	unknown	4/23/2015 10:35 AM
4	N/A	4/20/2015 11:04 AM
5	unknown	4/20/2015 8:07 AM
6	NA	4/17/2015 1:07 PM
7	66 persons	4/15/2015 2:28 PM
8	Our waitlist is 27 eligible children, ages range from 3 -4 year olds. Families that are on our waitlist are either below the income poverty guideline, receiving TANF, SSI.	4/14/2015 9:54 AM
9	N/A	4/13/2015 2:07 PM
10	N/A	4/13/2015 1:50 PM
11	10	4/13/2015 1:24 PM
12	n/a	4/13/2015 12:16 PM
13	3 families	4/13/2015 10:23 AM
14	85	4/9/2015 8:51 AM
15	469, the other info is not readily available	4/7/2015 5:39 PM
16	Not sure that we are collecting this data.	4/7/2015 1:50 PM
17	12 families	4/7/2015 8:54 AM
18	not applicable	4/6/2015 4:49 PM
19	75 to 85% of those we serve (single/partnered adults, homeless, w/mental illness) will not gain housing. 50% of those in case management will disengage. Majority of those in case management continue to wait on waiting lists for public housing.	4/6/2015 10:40 AM
20	I am unsure of the numbers.I am an employee that has noticed changes due to the calls I am receiving not actual data.	4/6/2015 10:00 AM
21	none	4/6/2015 8:43 AM
22	2000 families are eligible for service. We only serve 1107.	4/5/2015 8:39 PM

23	About 20-30 for each property.	4/3/2015 11:40 AM
24	As of February 28, 2015, our Section 8 Waiting List had 671 applicant households and our Public Housing Waiting List had 92 applicant households. Of the 92 applicant households, 73 were one-bedroom applicants, while 19 applicant households were for two+ bedrooms (who are primarily families with children). We can provide more details on our waiting lists but not in this small comment box. Contact me if you wish the more details on our waiting lists.	4/2/2015 6:52 PM
25	multiple lists with standard waits of 3+ years.	4/2/2015 1:36 PM
26	We have over 100 waiting services. I can share with you my Service Point records using the Clients served report for your demographics. Please send a separate request for this report. It includes information on nearly 700 guests from Feb 2014 to present.	4/1/2015 3:20 PM
27	Homeless Permanent Supportive Housing program Eligible applicants are all homeless, under 50% AMI. Occupancy standard, 2 people per bedroom regardless of age or gender. 86 applications on our one bedroom list 57 applications on our two bedroom list	3/31/2015 12:17 PM
28	51	3/30/2015 11:03 AM
29	In my Region - 30	3/30/2015 10:09 AM
30	We typically have about 100 people on our wait list	3/30/2015 8:58 AM
31	I serve all families that have children in the School District.	3/30/2015 8:41 AM
32	For the 3 Transitional Shelters, 20-25 families on the waiting list.	3/28/2015 2:47 PM
33	350 households, again, could be 10 times this amount. 65% households of color, 70% households with children. This is for the Portland Metro region only.	3/27/2015 4:14 PM
34	Unable to provide, varies by system of care and population.	3/27/2015 2:32 PM
35	Not Available	3/27/2015 1:39 PM
36	WE could compile such information off of our housing information sheets that people who are seeking housing assistance turn on. In many such cases (of unserved need) we do not know ethnicity, age, sexual orientation. But approximate income and sources of income, family composition; housing status, and other details are recorded and could be compiled.	3/27/2015 1:37 PM
37	Not Applicable	3/26/2015 1:55 PM
38	We have increased number of applicants for our programs (home repair and housing)	3/26/2015 12:15 PM

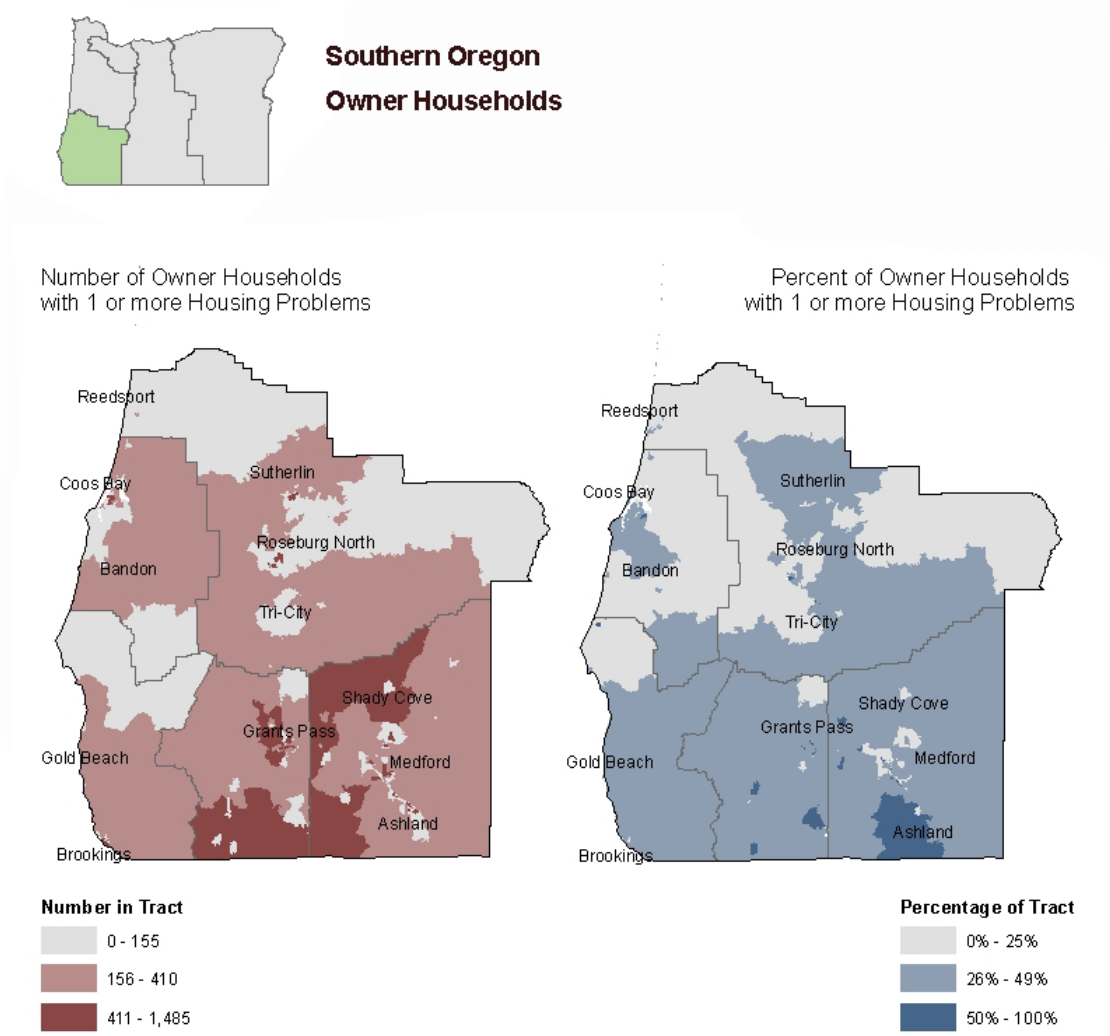
Q28 Do you have any other comments or information that you would like to share with us about housing assistance and services in your area? About your agency? Other?

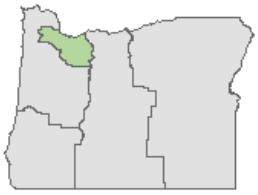
Answered: 20 Skipped: 46

#	Responses	Date
1	The Hotline is unique in that clients can call in 24/7 to be screened for various forms of emergency assistance. Housing is almost always one we get a lot of requests for and don't usually have the resources to fulfill. We can do minimal assists with current funding toward 72hr eviction notices or first month's rent, but unless we get a federal allotment, we're really unable to help people who are trying to get into a better situation. The resources just aren't there.	4/27/2015 1:04 PM
2	State government should look at the whole population of the state and prioritize funding & services for populations that are most under-served and have the greatest need, e.g. the homeless, elderly, mentally/emotionally handicaped. We need a greater variety of housing options for the poor and unhoused: SRO's, transitional housing, legal camping options, small house villages, affordable housing for the working poor, inclusionary zoning, etc.	4/20/2015 11:04 AM
3	We are in crisis mode in Central Oregon around housing at all levels, from rentals to home ownership. Families who are interested and who should be able to purchase are remaining in rentals because the market is so tight. Our home purchase clients regularly work with us for 2 - 3 years because they can't find a home in their price range. We turn people away every day from our rental programs because we do not have funding to support the demand. Seniors are using reverse mortgage as a foreclosure prevention tool because frequently there is no option for them if they are foreclosed upon. Foreclosure generally is still very prominent in Central Oregon, particularly in the rural areas, but assistance and home owner programs (tax relief, etc) are drying up. We simply need more housing and more support for people to access housing.	4/14/2015 12:38 PM
4	We are a head start agency.	4/14/2015 9:54 AM
5	N/A	4/13/2015 2:07 PM
6	Not at this time.	4/7/2015 1:50 PM
7	Not at this time.	4/6/2015 10:40 AM
8	For the people providing housing, provide more protections concerning misuse of their properties.Perhaps classes for renter on what is expected of them in order to keep their housing. Several times I have talked with people being evicted because they have pets, smoke in a nonsmoking apt.,and have allowed trash to pile up.	4/6/2015 10:00 AM
9	no	4/6/2015 9:01 AM
10	HUD programs have huge demands on the agency with the match requirement and lack of adequate administrative funding. We are delighted to receive funding but find the match requirement is utilizing all of our flexible funding; therefore, we are unable to meet the one time assistance need of people who have an emergency and it makes them spiral to homelessness. The match should be lessened so that agency have more latitude to provide a full continuum rather than sectors.	4/3/2015 4:29 PM
11	Agricultural workers are still disproportionately under served and live in deplorable conditions. Frequently, those conditions can include no running water or sewer to their unit, multiple families living together, etc.	4/3/2015 1:45 PM
12	We give preference on our Section 8 waiting list for victims of domestic violence or if they have been accepted into an approved "transitional" housing development, which are primarily small projects with additional supportive services from either Polk County Mental Health or Polk County Addiction Services. That is why those populations are the ones being primarily served. Also, 90% of our Public Housing is one-bedroom units serving the elderly and disabled. So, we are seeing fewer and fewer families with children being served as the elderly and disabled are taking up a larger portion of our housing vouchers. The number of public housing units and the number of Section 8 vouchers has remained the same for the past 20 years.	4/2/2015 6:52 PM

13	$200/month, this is a target for rent that can be met by our low income residents. We must find solutions that do not rely on ever increasing federal support for rent and begin to see how housing costs can be borne by the families living in the units. Truly affordable housing must reflect the ability of rentaers to pay not a percentage of the mean cost of houses or any other arbitrary percentage of costs.	4/1/2015 3:20 PM
14	Due to increased emphasis on CBC for IDD & MI youth under the Title 19 K Plan, a special fund is needed to make in home adaptations of physical plant configuration to facilitate effective care and maintenance of such youth by families / providers.	3/31/2015 4:09 PM
15	Please reinstate the Housing PLUS program.	3/31/2015 12:17 PM
16	Questions not applicable were left blank.	3/30/2015 9:56 AM
17	More affordable housing needs to be built.	3/30/2015 8:41 AM
18	Your survey is not asking the questions from our view. Housing first model works ONLY for a very few, well adjusted people/families. Most need extensive time with case managers to negotiate budgets, job searches, parenting skills, ready to rent, etc. Mentally ill are filling our jails and cant be maintained in housing unless they have a mental health practioner working with a case manager. Felons can't find jobs or housing. You need to look at a wide variety of solutions that can be adapted.	3/28/2015 2:47 PM
19	No.	3/27/2015 2:32 PM
20	We (our agency) need more flexible funds that can be used for one-time assistance or short-term rental assistance (3 months) without the strings the ESG HUD SHP grants require. We need the ability to pay off back balances that are sometimes several thousand dollars in value, so as to stabilize families going forward and keep them in the home they already have. As the economy worsens, some landlords cut renters slack until they get very deep in debt, only finally proceeding with the eviction process. What 10 years ago $400 would fix, now demands $3,500, and even then the future is unsure, due to a lack of jobs and the rising cost of living. Food stamps often do not cover the cost of food for a month and many working people struggling to get by are paying out of pocket for food, thereby compromising their ability to pay rent, car insurance, daycare, transportation, etc. costs. We need more jobs and better/more comprehensive and affordable transportation options for people; we need felony-friendly landlords and employers; we need an emergency shelter to house the homeless while other services can be lined up; we need shelters that accommodate people's pets/service animals. we need people to have better access to addiction/recovery services that are within the community, and we need the option of secular-based (as opposed to religion-affiliated) clean and sober housing. Our match demands (ESGP, HSP and HUD SHP grants) eat up the more flexible dollars (EHA and SHAP), making it much tougher to serve people and forcing us to serve only limited populations with contract rents at FMR minus utilities, which are almost nonexistent here. Most available rentals far exceed FMR, especially if utility allowances must come out of the FMR and the majority of our housing dollars are already earmarked for programs requiring FMR minus utility contract rents.	3/27/2015 1:37 PM

ATTACHMENT O:
Supplemental Maps of Housing Problems

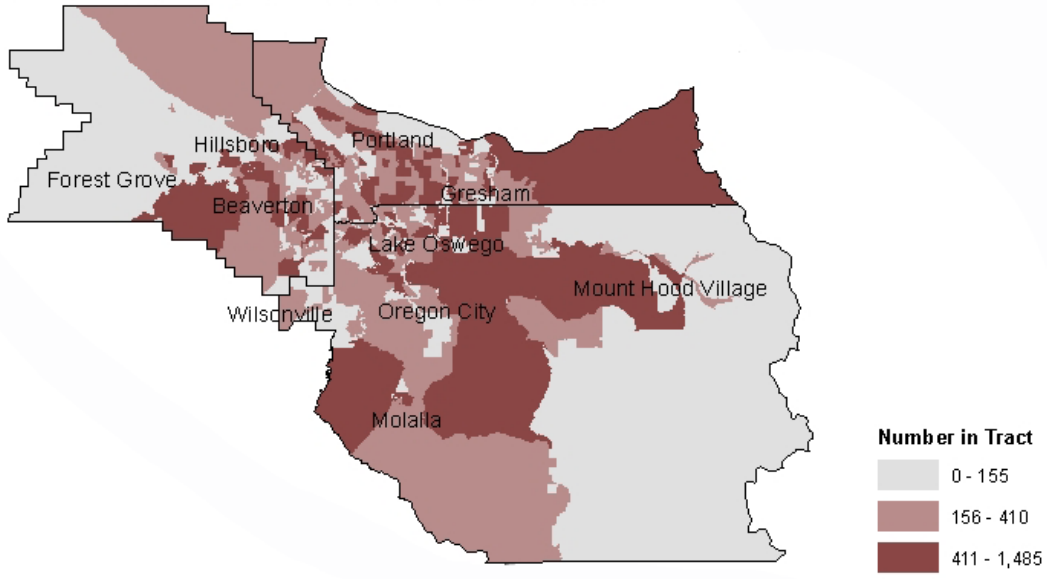




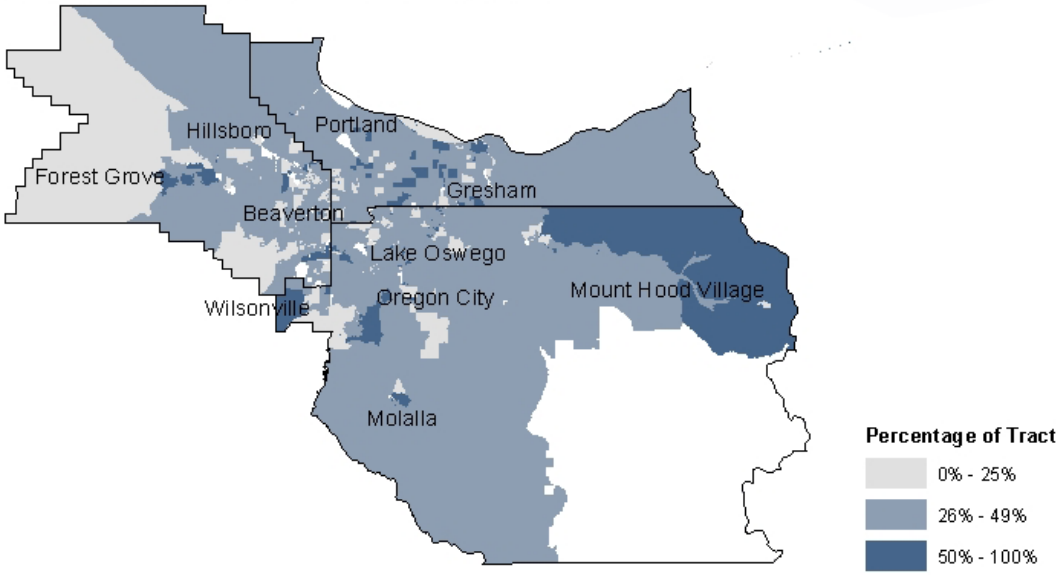
Metro Oregon

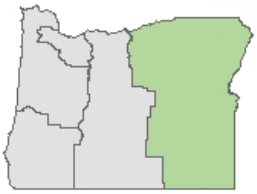
Owner Households

Number of Owner Households with 1 or more Housing Problems



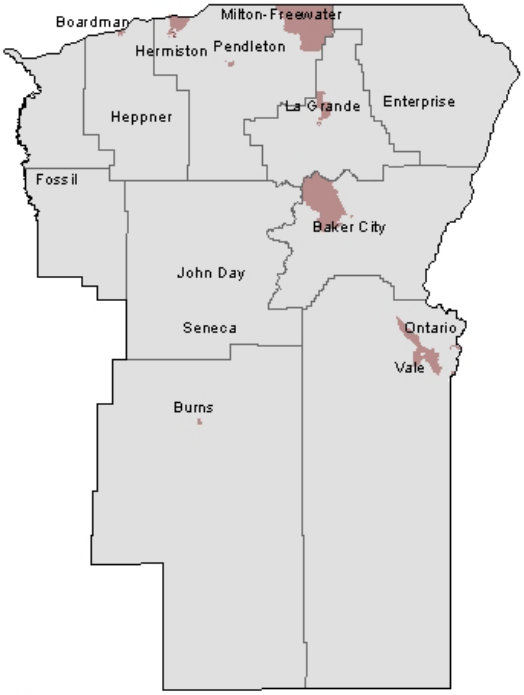
Percent of Owner Households with 1 or more Housing Problems





Eastern Oregon
Owner Households

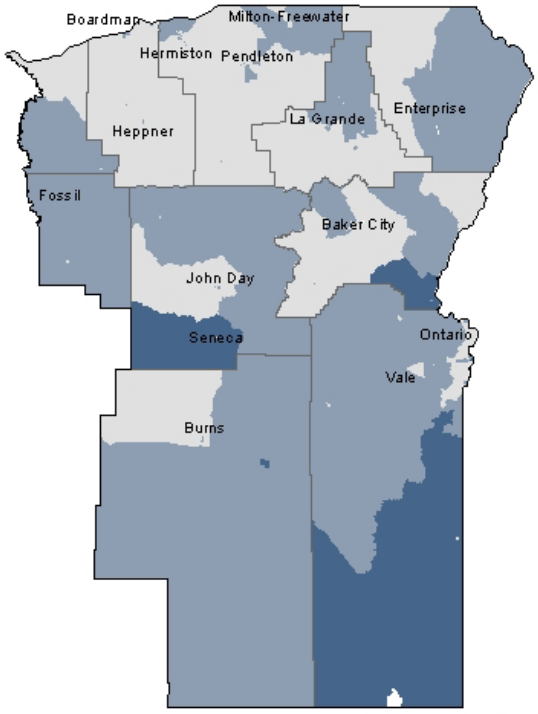
Number of Owner Households
with 1 or more Housing Problems



Number in Tract

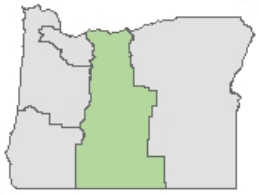
- 0 - 155
- 156 - 410
- 411 - 1,485

Percent of Owner Households
with 1 or more Housing Problems



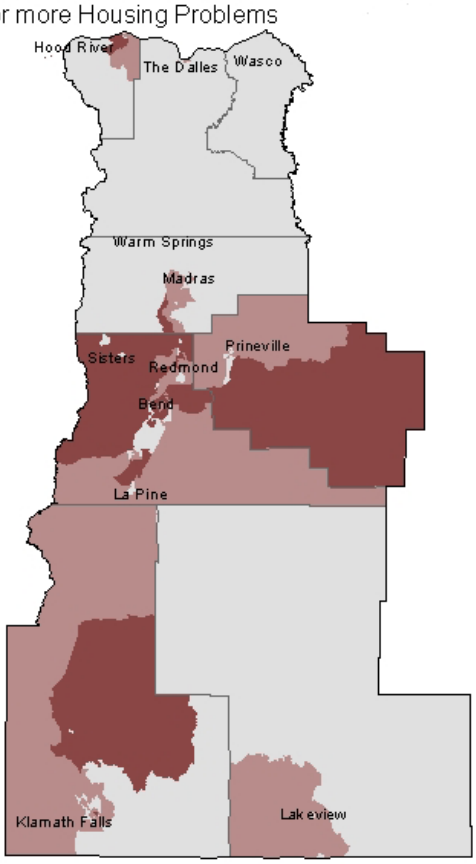
Percentage of Tract

- 0% - 25%
- 26% - 49%
- 50% - 100%

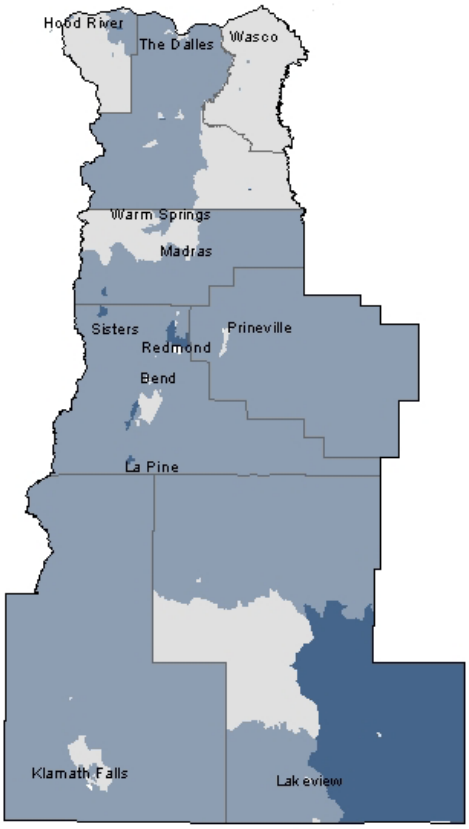


Central Oregon Owner Households

Number of Owner Households with 1 or more Housing Problems



Percent of Owner Households with 1 or more Housing Problems

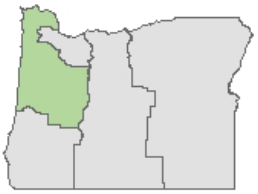


Number in Tract

- 0 - 155
- 156 - 410
- 411 - 1,485

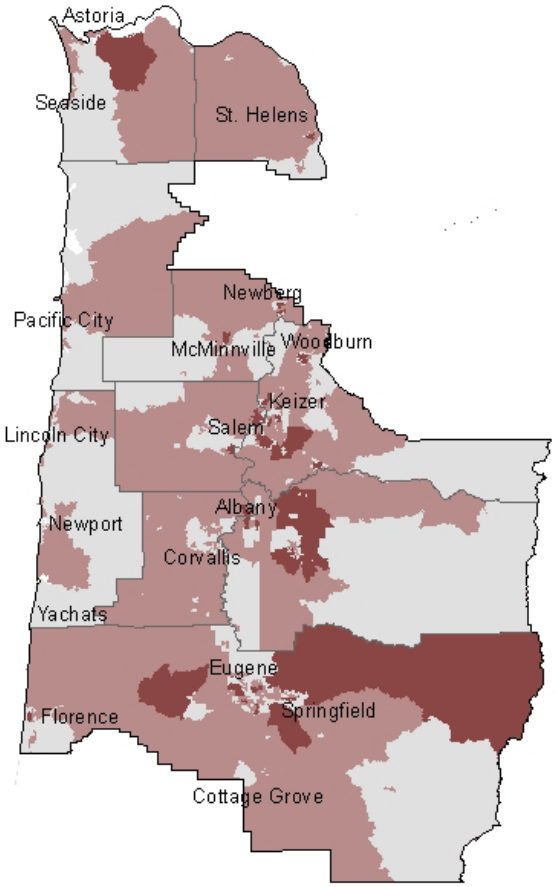
Percentage of Tract

- 0% - 25%
- 26% - 49%
- 50% - 100%

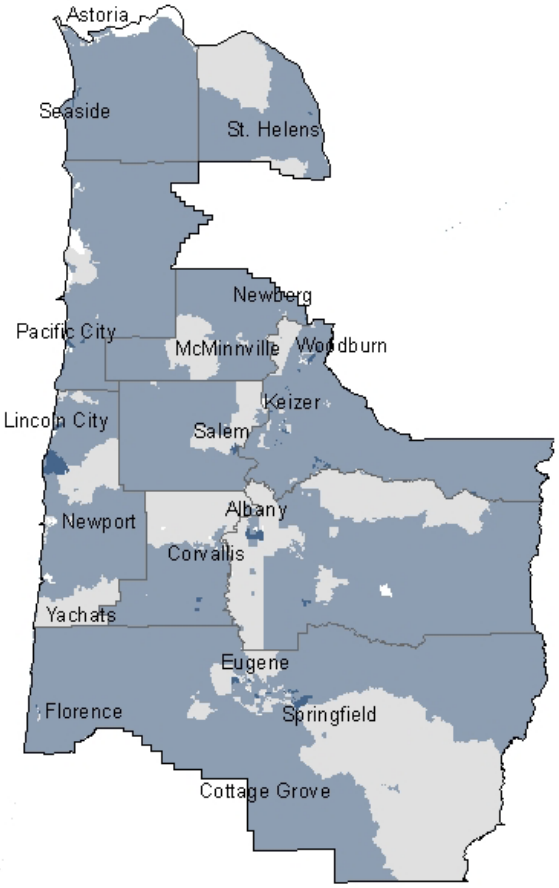


Valley/Coast Oregon
Owner Households

Number of Owner Households
with 1 or more Housing Problems



Percent of Owner Households
with 1 or more Housing Problems



Number in Tract

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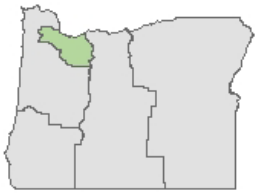
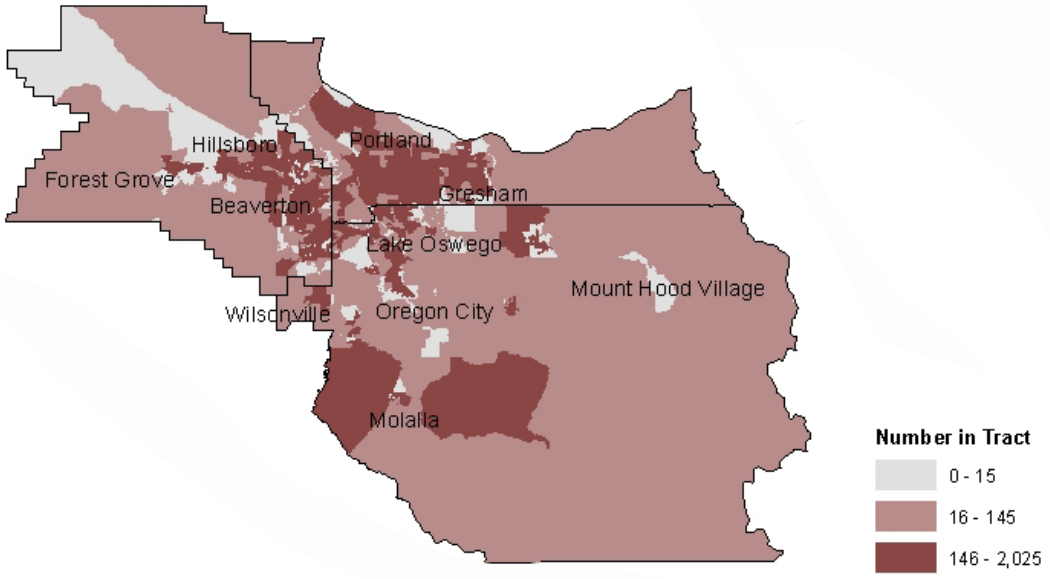


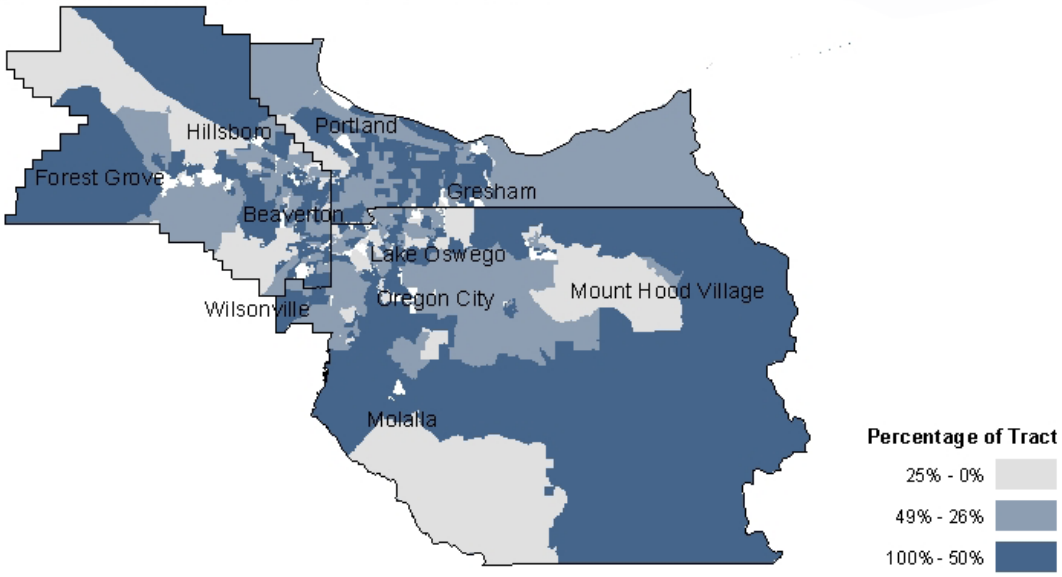
Metro Oregon

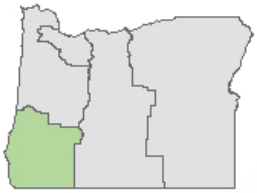
Renter Households

Number of Renter Households with 1 or more Housing Problems



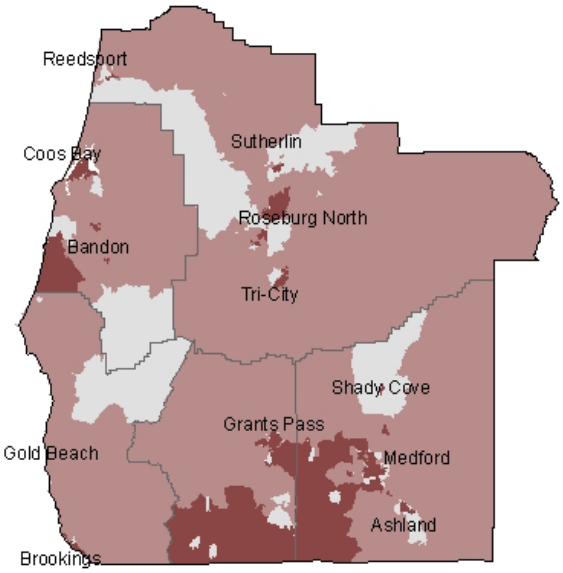
Percent of Renter Households with 1 or more Housing Problems



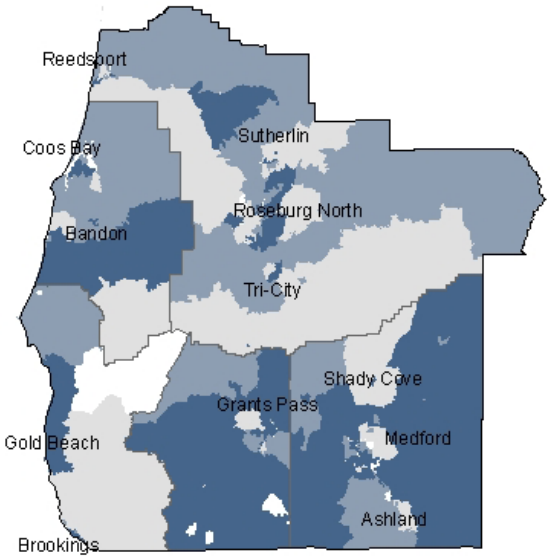


Southern Oregon
Renter Households

Number of Renter Households
with 1 or more Housing Problems



Percent of Renter Households
with 1 or more Housing Problems

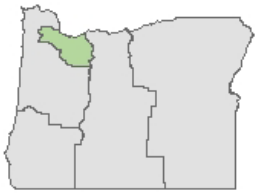


Number in Tract

- 0 - 15
- 16 - 145
- 146 - 2,025

Percentage of Tract

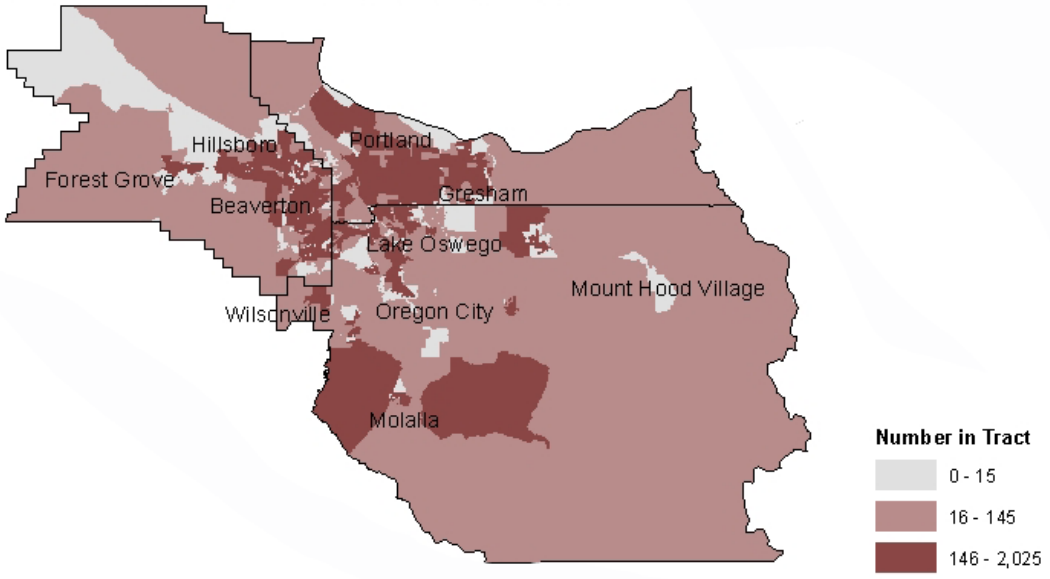
- 25% - 0%
- 49% - 26%
- 100% - 50%



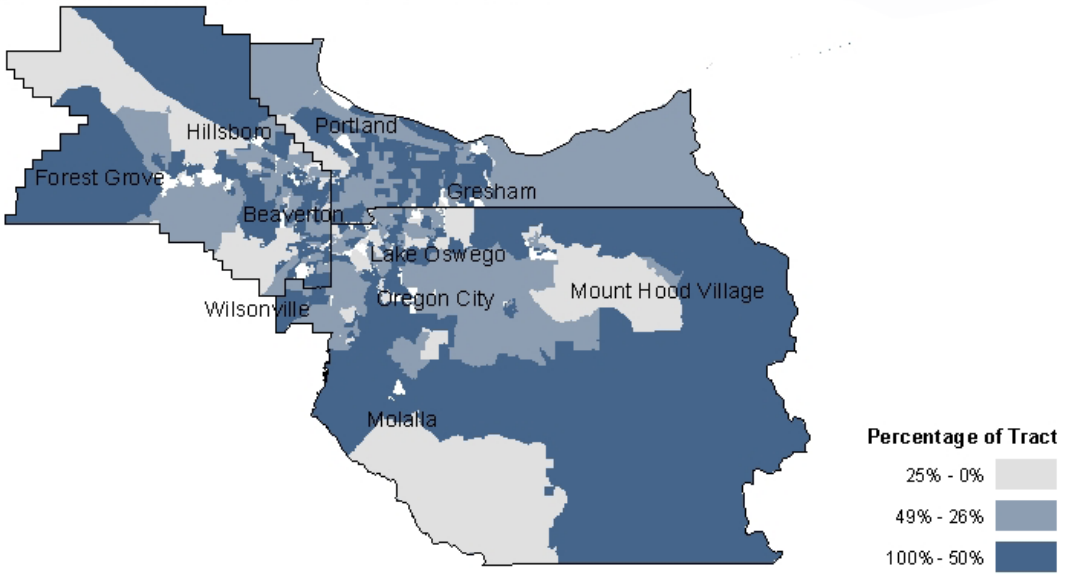
Metro Oregon

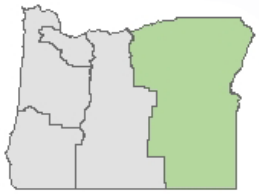
Renter Households

Number of Renter Households with 1 or more Housing Problems



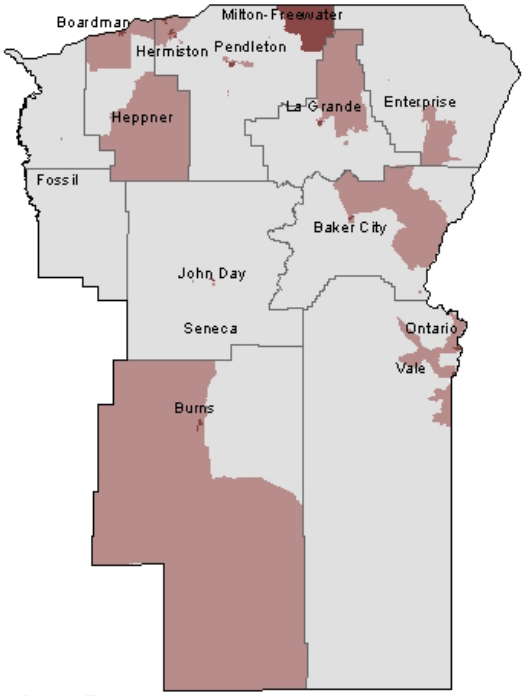
Percent of Renter Households with 1 or more Housing Problems



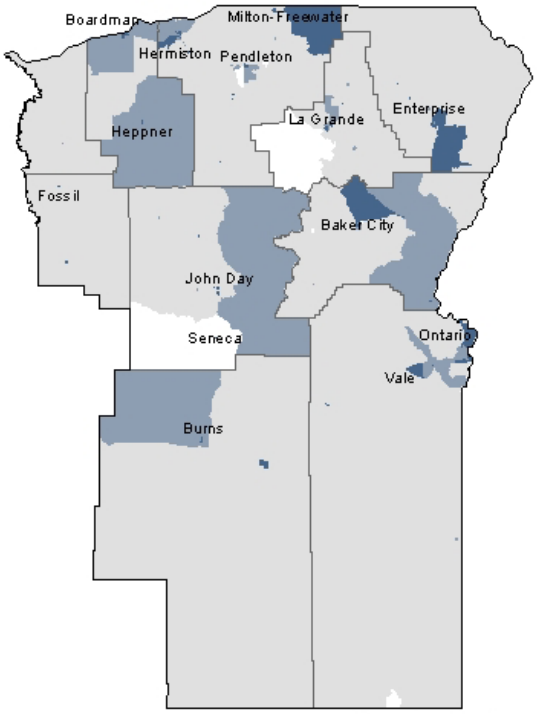


Eastern Oregon
Renter Households

Number of Renter Households
with 1 or more Housing Problems



Percent of Renter Households
with 1 or more Housing Problems

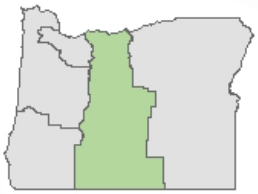


Number in Tract

- 0 - 15
- 16 - 145
- 146 - 2,025

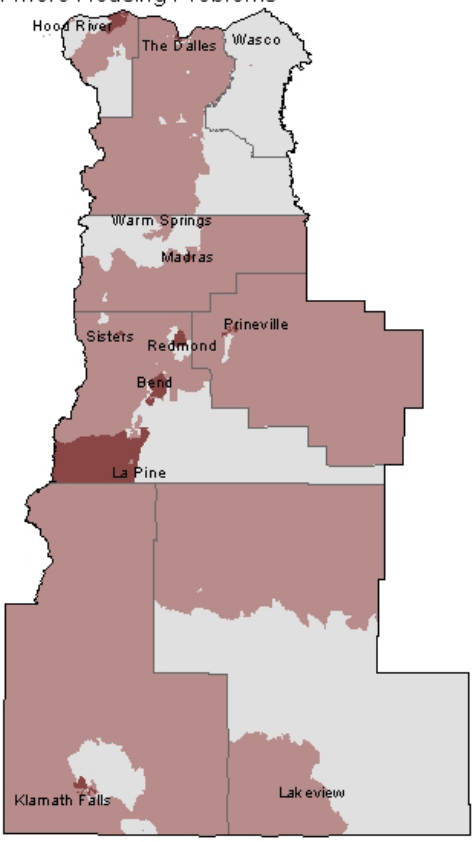
Percentage of Tract

- 25% - 0%
- 49% - 26%
- 100% - 50%

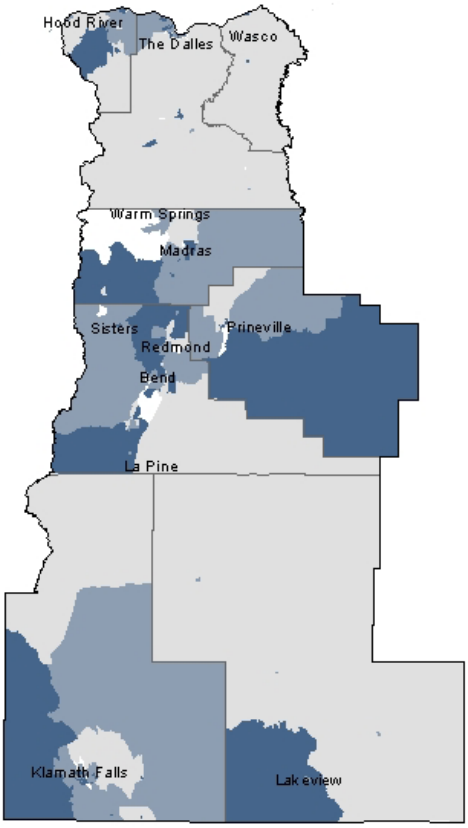


Central Oregon
Renter Households

Number of Renter Households
with 1 or more Housing Problems



Percent of Renter Households
with 1 or more Housing Problems



Number in Tract

- 0 - 15
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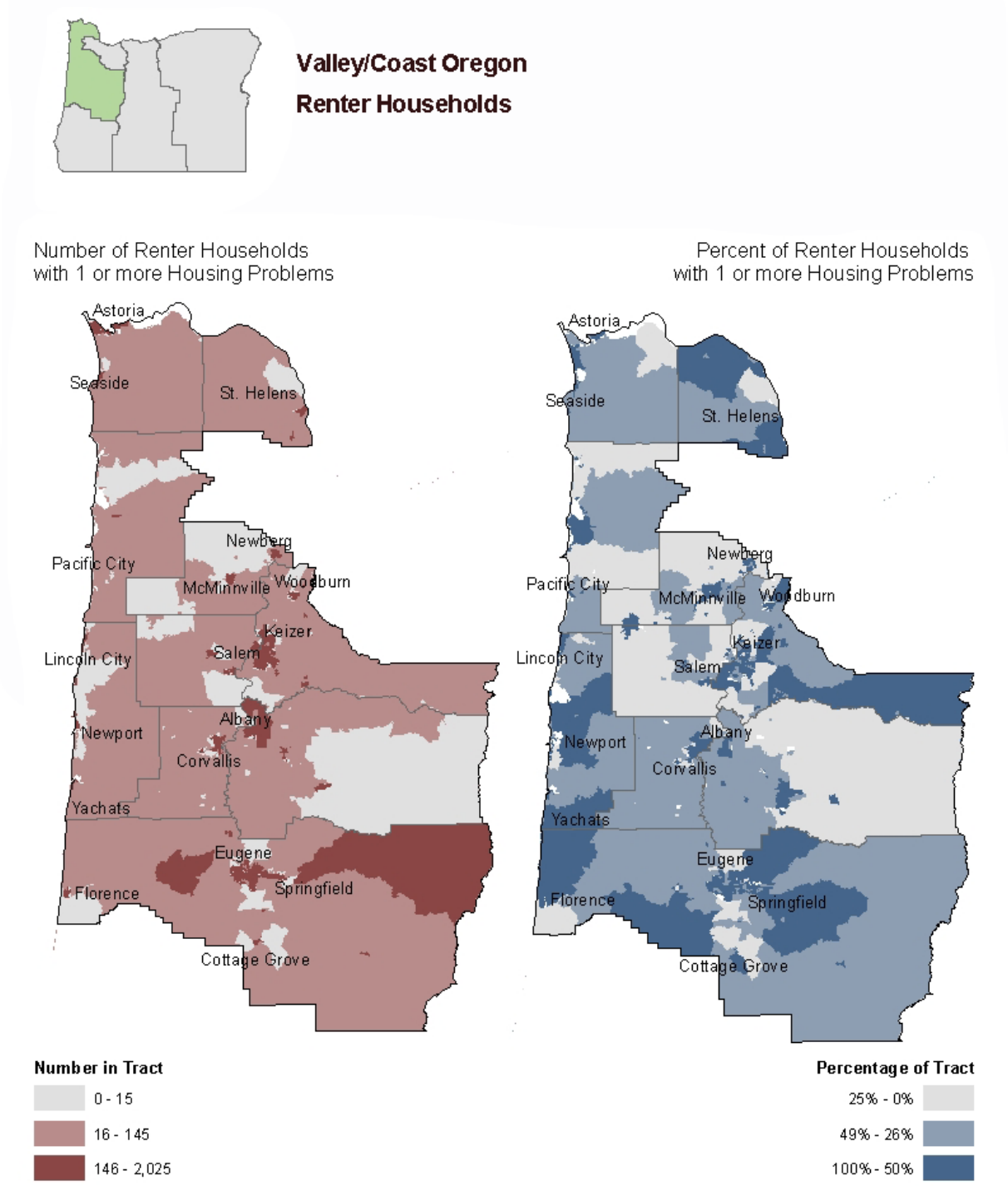

Valley/Coast Oregon
Renter Households
Number of Renter Households with 1 or more Housing Problems
Percent of Renter Households with 1 or more Housing Problems
Astoria
Seaside
St. Helens
Newberg
Pacific City
McMinnville
Woodburn
Keizer
Salem
Lincoln City
Albany
Newport
Corvallis
Yachats
Eugene
Florence
Springfield
Cottage Grove
Number in Tract
0 - 15
16 - 145
146 - 2,025
Percentage of Tract
25% - 0%
49% - 26%
100% - 50%

2016-2020 Analysis of Impediments to Fair Housing Choice

Executive Summary
State of Oregon 2016-2020 Analysis of Impediments to Fair Housing Choice

Fair and equal housing choice is the cornerstone of the State of Oregon's work to provide safe, decent and affordable places for our residents to live. Providing stable housing is critical to addressing poverty and creating access to opportunity. Children and families deserve an opportunity to succeed. Rental vacancy rates in some parts of Oregon are less than one percent, fixing rents far above what most low income households can afford. It is becoming increasingly difficult for renters to remain housed or would-be-homeowners to find an affordable home. Those who put more than half their income towards rent are forced to choose which bills they can pay, which necessities, food or healthcare they will forgo to avoid getting evicted or becoming homeless. This is the lens we use to examine and address impediments to fair housing.

This report, the Analysis of Impediments to Fair Housing Choice, or AI, is a HUD-required assessment of barriers to fair housing choice. The State of Oregon is required to conduct an AI every five years as a condition of receiving federal block grants funds for housing and community development.

The AI was a **joint effort** between **three state agencies:**

- **Oregon Infrastructure Finance Authority**
- **Oregon Housing and Community Services**
- **Oregon Health Authority**

Since the last AI was conducted in 2010, the State of Oregon has invested many resources toward addressing the identified impediments to fair housing choice. In sum, the state has:

- Funded a wide range of fair housing outreach and education and capacity-building activities;
- Funded audit testing to identify where issues of concern or discriminatory activities may exist;
- Examined and enhanced resources available to non-English speaking residents;
- Expanded the state's source of income protections to include income from the Housing Choice Voucher, or Section 8, program, or other local, state, or federal rent assistance;
- Changed how landlords may treat past evictions and criminal histories of rental applicants;[1] and

[1] Residents with criminal histories are not a protected class; however, there can be overlap with protected class categories, most commonly disability and race/ethnicity.

- Continued programs to ensure that subsidized housing is available in a wide variety of neighborhoods.

Our work continues. The state is committed to work to recommit ourselves to reducing barriers to housing choice.

Affirmatively Furthering Fair Housing choice (AFFH)

is a ***complicated*** effort: Housing choices **are affected by** a variety of **market conditions and actions** by both residents and the industry—**not all** of which are **within the state's control.**

Research Methodology

- Statistically significant survey of 600 residents in nonentitlement areas
- Survey of 485 industry specialists
- Six focus groups with stakeholders and residents in rural areas
- Segregation analysis
- Housing program concentration analysis
- Analysis of home mortgage loan denials
- Review of fair housing complaints and legal cases
- Review of relevant state regulations and policies

2016 Impediments to Fair Housing Choice

The 2016 impediments are organized around the primary research findings from the AI.

Impediments
to housing choice:

are **barriers that affect protected classes** covered under state and federal fair housing laws.

Barriers
to housing choice:

may not affect one or more **protected classes** directly; instead they **limit housing opportunities** for households **in general**.

Key to the definition of **"impediment"** is the effect on protected classes.

In certain circumstances, ***when disparately impacting a certain resident group*** *protected by fair housing laws,* ***they may become impediments****.*

Research Finding #1: Persons with disabilities face widespread barriers to housing choice statewide.

54% of complaints filed in Oregon concern discrimination based on disability.

#1 barrier identified by stakeholders: Limited resources for persons with disabilities to transition out of institutional settings.

#2 barrier identified by stakeholders: Lack of housing for persons with disabilities to transition out of institutional settings.

20% of residents' homes in rural areas do not meet their family's disability needs.

46% of persons with disabilities who want to move can't afford to move or live anywhere else in their community.

- **Impediment 1-1.** Lack of affordable, accessible housing, including housing available for persons with disabilities who wish to leave nursing homes or other institutional settings.
- **Impediment 1-2.** Refusal of some landlords to make reasonable accommodations for persons with disabilities.
- **Impediment 1-3.** Persons with disabilities who desire to transition out of institutional settings are limited by the lack of supportive services in housing, in addition to financial and emotional support to assist them in their transitions.
- **Impediment 1-4.** Housing choices for persons with disabilities are severely limited by lack of sidewalks, paved roads and reliable and sufficient public transportation.

- **Impediment 1-5.** Local zoning and land use regulations and/or inexact application of state laws may impede the siting and approval of group homes.

Research Finding #2: Discrimination against protected classes persists statewide.

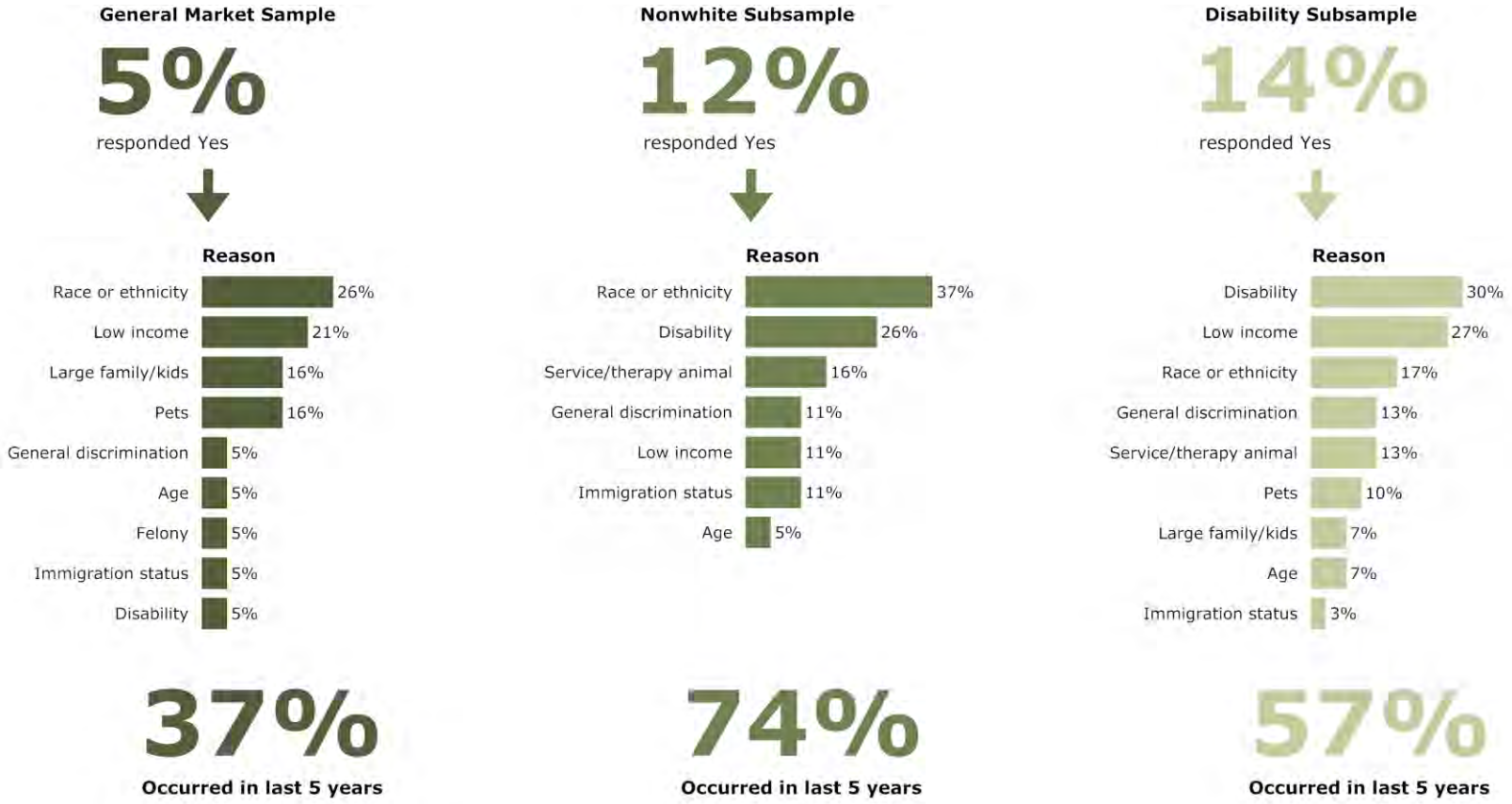
25% of audit tests in rural areas statewide found race-based discrimination may exist in leasing activities or transactions.

Nonwhite and residents with disabilities surveyed for the AI report higher levels of housing discrimination than for Oregonians overall (see Figure ES-1 on the following page).

- **Impediment 2-1.** Lack of enforcement of fair housing violations persists statewide.

- **Impediment 2-2.** Limited housing options for persons most vulnerable to housing discrimination: non-English speakers, persons of Hispanic descent, Native Americans, African Americans, large families and, as discussed above, persons with disabilities.

Figure ES-1.
When you looked for housing in your community, did you ever feel discriminated against?



Note: General market sample n=379, 19 and 19; nonwhite sample n=156, 19 and 19; disability sample n=218, 30 and 30.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Research Finding #3. Residents lack knowledge of their fair housing rights, are not empowered to take action and have very limited fair housing resources locally.

39% of residents overall in rural areas would "do nothing" if faced with housing discrimination.

53% of nonwhite residents in rural areas would "do nothing" if faced with housing discrimination.

Most residents do not know where to turn for help if they've experienced discrimination.

- **Impediment 3.1.** Local fair housing resources statewide are limited. This is particularly true in rural communities.

Research Finding #4. In many rural areas, credit is limited for residents who want to buy homes and developers who want to build multifamily housing.

HOMEOWNERSHIP

Provides residents **residential stability**

AND

Is **the surest way to build wealth** in America

Although differences have declined since 2010, African American, Hispanic and Native American borrowers still face higher denial rates on mortgage loans.

The top counties for lending disparities were all rural.

Disparities in denial rates persist even at high income levels (>$75,000/year).

Very high rates of denials for home improvement loans: Native Americans=51%, Hispanics=43%, African Americans=42%.

Bank mergers, lack of local lenders and local economic conditions → limited capital for both residential and multifamily housing

Inability to get home improvement loans can **affect** neighborhood conditions ***overall.***

Reasons for denials:

Lack of credit, poor credit, high debt-to-income ratios, lack of collateral.

40% of Hispanic residents in Oregon
do not use traditional **banks** (FDIC).

- **Impediment 4.1.** Limited credit alternatives for households in rural areas who seek homeownership.
- **Barrier 4.2.** Lack of capital to develop multifamily housing in rural areas.

Barriers to Fair Housing Choice

Research Finding #5. Condition of affordable housing is generally poor in rural areas.

#4 barrier identified by stakeholders: Poor condition of some affordable housing.

Condition challenges raised frequently by stakeholders and residents in focus groups.

Research Finding #6. Oregon's state laws may limit the ability of cities and counties to employ programs that are known to create a significant amount of affordable units in many other jurisdictions.

Barrier 6.1. The state's ban on the use of inclusionary zoning limits municipalities' ability to employ flexible tools and incentives to increase the number of affordable units built. Lack of affordable units limits housing choice for persons of color and low income persons.

Impediment 6-2. The lack of affordable units significantly limits housing choice for persons of color and low income persons.

Research Finding #7. State laws and local practices, coupled with lack of housing in rural areas; create impediments to housing choice for persons with criminal backgrounds.

Oregon requires that for a minimum of six months after release from prison, a person must reside in the county they were last supervised or lived at the time the offense.

Residency condition requirement can complicate the process of finding housing upon re-entry in housing markets where housing supply is limited and/or costly.

Barrier 7.1. To the extent that certain residents are disproportionately likely to be incarcerated, the residency requirement may disproportionately impact housing choice for protected classes. Persons with criminal backgrounds have few, if any housing options.

Fair Housing Action Plan for 2016-2020

The Fair Housing Action Plan (Action Plan) is a tool to address identified impediments is detailed in Figure ES-1. Activities in the Action Plan will be implemented, monitored and reported on annually as part of the state's Consolidated Plan requirements.

The Action Plan is an ambitious approach to improving access to housing for Oregonians who face barriers to housing choice and are most vulnerable to experiencing housing discrimination. The Action Plan will complement many other state efforts to address broader housing and community development needs. Solving the critical problems of access to housing and housing choice requires partnership and commitment throughout the state. The partners to this report are invested in the results of Oregon's fair housing work.

FOCUS AREAS
for the
2016-2020 Action Plan
for access to fair housing

- **Improve persons with disabilities' access to housing**
- **Reduce discriminatory actions in housing transactions**
- **Improve fair housing knowledge of residents, industry, and local governments**
- **Improve condition of affordable housing**
- **Make regulatory improvements to fair housing protections**

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SECTION I.
Demographic and Housing Profile

An important starting point for the Analysis of Impediments to Fair Housing Choice is a review of the socioeconomic environment in a state, including trends in demographics and income levels. Both affect access to housing choice.

This section has three purposes: 1) to provide an overview of the demographic and economic characteristics of Oregon residents that influence housing choice; 2) to analyze racial and ethnic segregation/integration in Oregon; and 3) to discuss segregation/integration for persons with disabilities.

The section also explores if certain households have disproportionate rates of housing program use. The extent to which certain protected classes benefit from housing subsidies and how subsidies are employed to further economic opportunity is of growing interest to HUD. Surveys of residents and stakeholders conducted for the Analysis of Impediments supplement the housing analysis by providing additional data on the housing choices and needs of different protected classes.

Demographic Summary

Oregon's population grew by almost 450,000 residents between 2000 and 2013, representing a 13 percent increase. Over 19 percent of the state's residents live in Multnomah County, followed by Washington County (14%) and Clackamas County (10%)—each part of the greater Portland area. The 2010 Census reported 81 percent of Oregon residents live in urban areas and 19 percent reside in rural locations.[1]

Race and ethnicity. Figure I-1 presents the racial and ethnic composition of state residents and how the composition has changed since 2000.[2] The Hispanic population comprises 12 percent of all Oregon residents, making it the largest minority group in the state. The Hispanic population grew by more than 185,000 people between 2000 and 2013, equaling a 68 percent increase. This was the highest numerical change of any minority group in the state.

The Asian population is the second largest minority group with almost 150,000 residents, accounting for four percent of all residents. This racial group also grew quickly between 2000 and 2013 (46% increase).

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[1] The 2009-2013 ACS does not report on the urban/rural population distribution.

[2] It should be noted that Census data on race and ethnic identification vary with how people choose to identify themselves. The U.S. Census Bureau treats race and ethnicity separately: the Bureau does not classify Hispanic/Latino as a race, but rather as an identification of origin and ethnicity. In 2010 the U.S. Census Bureau changed the race question slightly, which may have encouraged respondents to check more than one racial category.

The largest population group in the state remains residents who report their race as white, non-Hispanic. Although the percentage growth of white, non-Hispanic residents was slower than many minority groups, numerical growth was the highest because these residents make up so much of the state's residents.

Figure I-1.
Race and Ethnicity, State of Oregon, 2000 and 2013

	2000		2013		2000-2013 Numerical Change	2000-2013 Percent Change
	Number	*Percent*	*Number*	*Percent*		
Total population	**3,421,399**	**100%**	**3,868,721**	**100%**	**447,322**	**13%**
Race						
American Indian and Alaska Native	45,211	1%	47,411	1%	2,200	5%
Asian	101,350	3%	147,986	4%	46,636	46%
Black or African American	55,662	2%	70,328	2%	14,666	26%
Native Hawaiian and Other Pacific Islander	7,976	0%	14,993	0%	7,017	88%
White	2,961,623	87%	3,297,149	85%	335,526	11%
Some other race	144,832	4%	145,000	4%	168	0%
Two or more races	104,745	3%	145,854	4%	41,109	39%
Ethnicity						
Hispanic or Latino	275,314	8%	461,901	12%	186,587	68%
Non-Hispanic White	3,146,085	92%	3,406,820	88%	260,735	8%

Note: The ACS question on Hispanic origin was revised in 2008 to make it consistent with the 2010 Census Hispanic origin question. As such, there are slight differences in how respondents identified their origin between the 2000 Census and 2013 ACS.

Excludes "Some Other Race" category due to inconsistency of reporting between 2000 Census and 2013 ACS.

Source: 2000 U.S. Census, 2009-2013 ACS.

The concentrations of residents by race and ethnicity, in addition to measures of segregation, are discussed in latter parts of this section (beginning on page 14).

Age. According to the 2013 ACS, the median age of residents in Oregon is 38.7, roughly one year older than the national median age (37.3). Figure I-2 shows that a resident between the ages of 25 and 44 years old is the largest cohort in the state, representing 27 percent of the population. The second largest cohort consists of residents under the age of 14 years old, at 18 percent of the population. The fastest growing age cohort between 2000 and 2013 was residents between the ages of 55 and 64 years old, increasing by 71 percent.

Figure I-2. Age, State of Oregon, 2000 and 2013

Source:

2000 U.S. Census, 2009-2013 ACS.

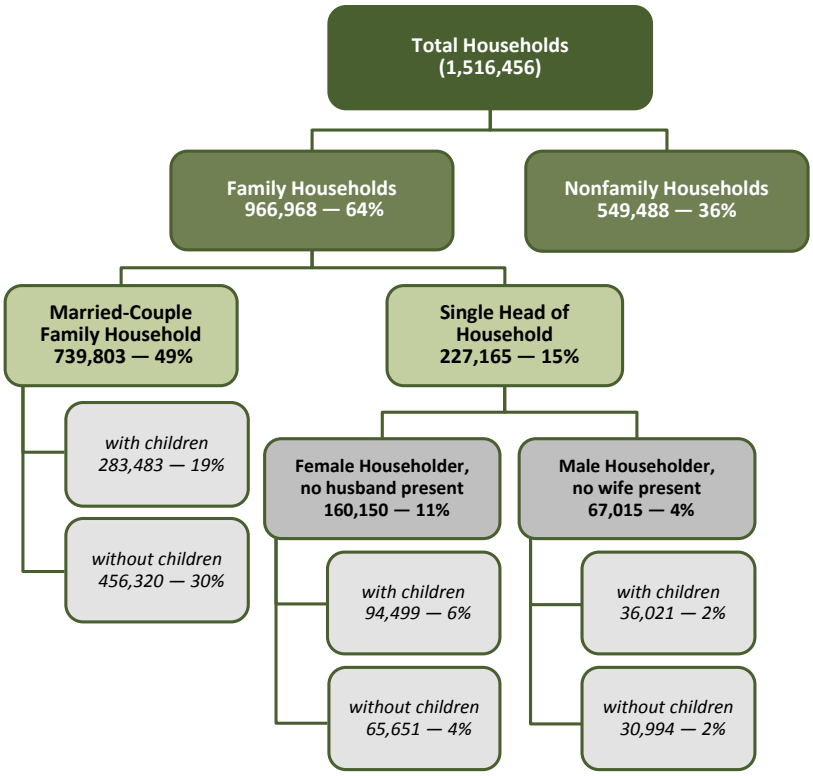
	2000		2013		2000-2013 Numerical Change	2000-2013 Percent Change
	Number	*Percent*	*Number*	*Percent*		
Under 14 years	699,577	20%	714,179	18%	14,602	2%
15 to 24 years	474,833	14%	510,709	13%	35,876	8%
25 to 44 years	997,269	29%	1,033,248	27%	35,979	4%
44 to 54 years	507,155	15%	529,199	14%	22,044	4%
55 to 64 years	304,388	9%	521,313	13%	216,925	71%
65 years and over	438,177	13%	560,073	14%	121,896	28%

The significant increase in Oregon residents over the age of 54 is due to the aging Baby Boomer generation. While the combined age cohorts of 55 to 64 years and 65 years and over currently make up around 27 percent of state residents, this number will continue to increase in coming years. Growth in this age demographic, especially among those ages 65 and older, underscores the importance of housing and community policies and investments that incorporate the needs of older residents, including housing and public infrastructure accessibility and public transportation.

Household composition. According to the 2013 ACS, there are over 1.5 million households in Oregon. Thirty-six percent of households in Oregon are non-family households, which includes unrelated persons living together or individuals living alone. The remaining 64 percent of households are family households. The average household size is 2.5 people and the average family size is 3.0 people. More than a quarter (27%) of all households in Oregon has children (married couple and single parent households). Single parent households make up eight percent of all Oregon households. Figure I-3 displays the state's 2013 household composition.

Figure I-3.
Household Composition,
State of Oregon, 2013

Source:
2009-2013 ACS.



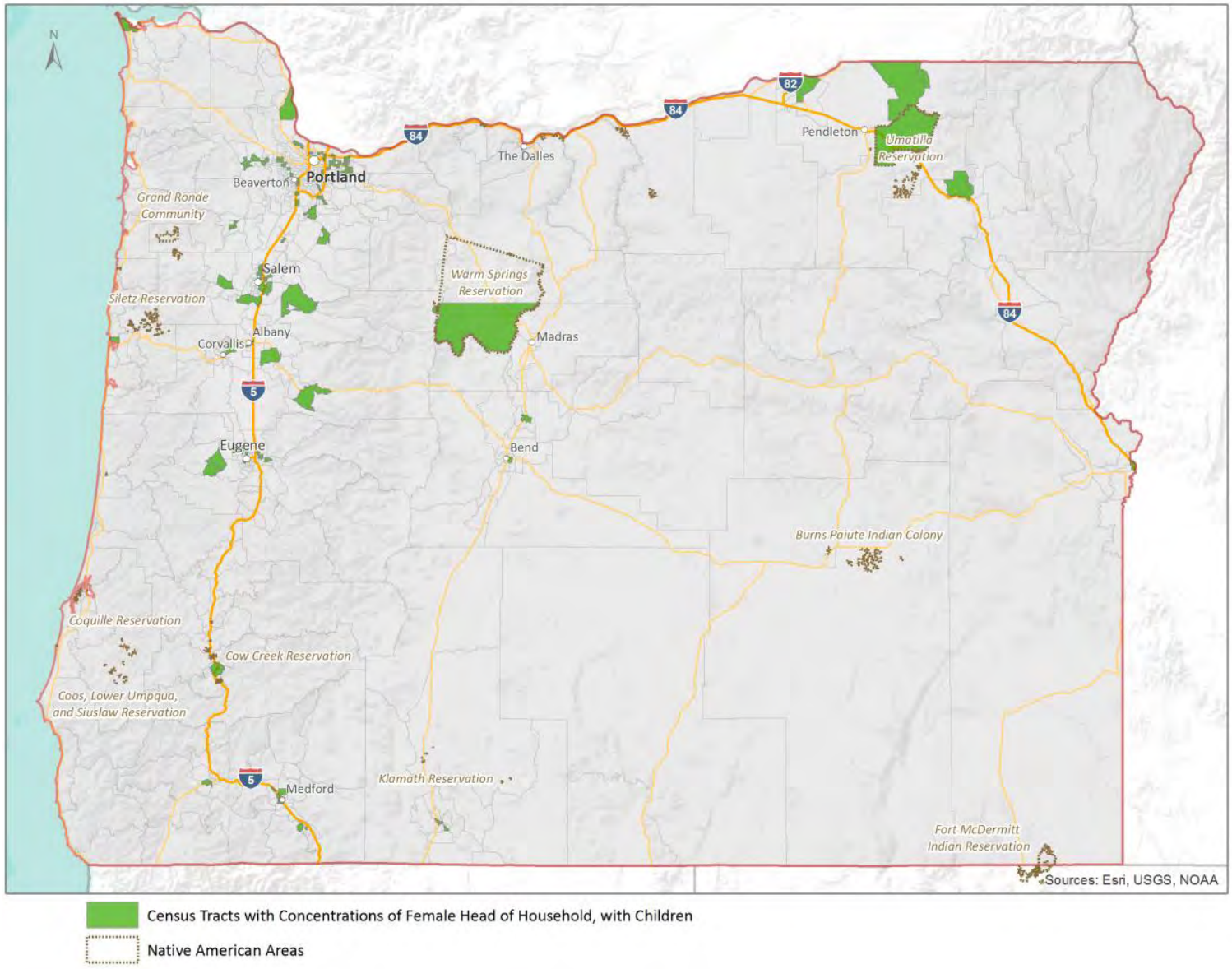
Single parent households—especially those with single mothers—have some of the highest rates of poverty in most communities. As such, they generally have greater needs for social services (child care, transportation, etc.) and affordable housing. Familial status is also a protected class under fair housing law and, in some communities, one of the most common reasons for fair housing complaints. Single parent households may therefore be vulnerable to fair housing discrimination and often have fewer choices in the housing market because of their lower income levels.

Statewide, 6.2 percent of households are single female head of households with children present. Figure I-4 presents Census tracts where more than 10 percent of households are single mother households. Clusters of concentrated single mother households are found in the eastern Portland area, specifically south of I-84 and north of US 26, and between Beaverton and Hillsboro. Census tracts along the I-5 corridor—Salem, Eugene, Medford, etc.—also have concentrations of single mother households. East of I-5, single mother concentrated areas are limited, with Census tracts around Klamath Falls, Bend, Pendleton (Umatilla Reservation) and Ontario.

Figure I-4. Concentrations of Female Head of Household with Children, State of Oregon, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.



Limited English proficiency and linguistically isolated households. With the growing minority population in Oregon, especially Hispanics, it will become increasingly important to ensure fair housing information and materials are available and accessible in multiple languages (e.g. Spanish). Knowing where non-English speakers are located also allows for information and materials to better align socially and culturally, increasing the efficacy and effectiveness of the disseminated information.

Figure I-5 shows limited English proficiency—persons five years and over speaking English less than "very well"—concentrated areas (over 10% limited English proficiency in Census tract). The statewide limited English proficiency average is 2.9 percent. Limited English proficiency concentrated areas are mostly found in the greater Portland area, Salem, Hood River, Klamath Falls, Ontario and the Boardman/Irrigon area.

Figure I-5. Concentrations of Limited English Proficiency Individuals, State of Oregon, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.

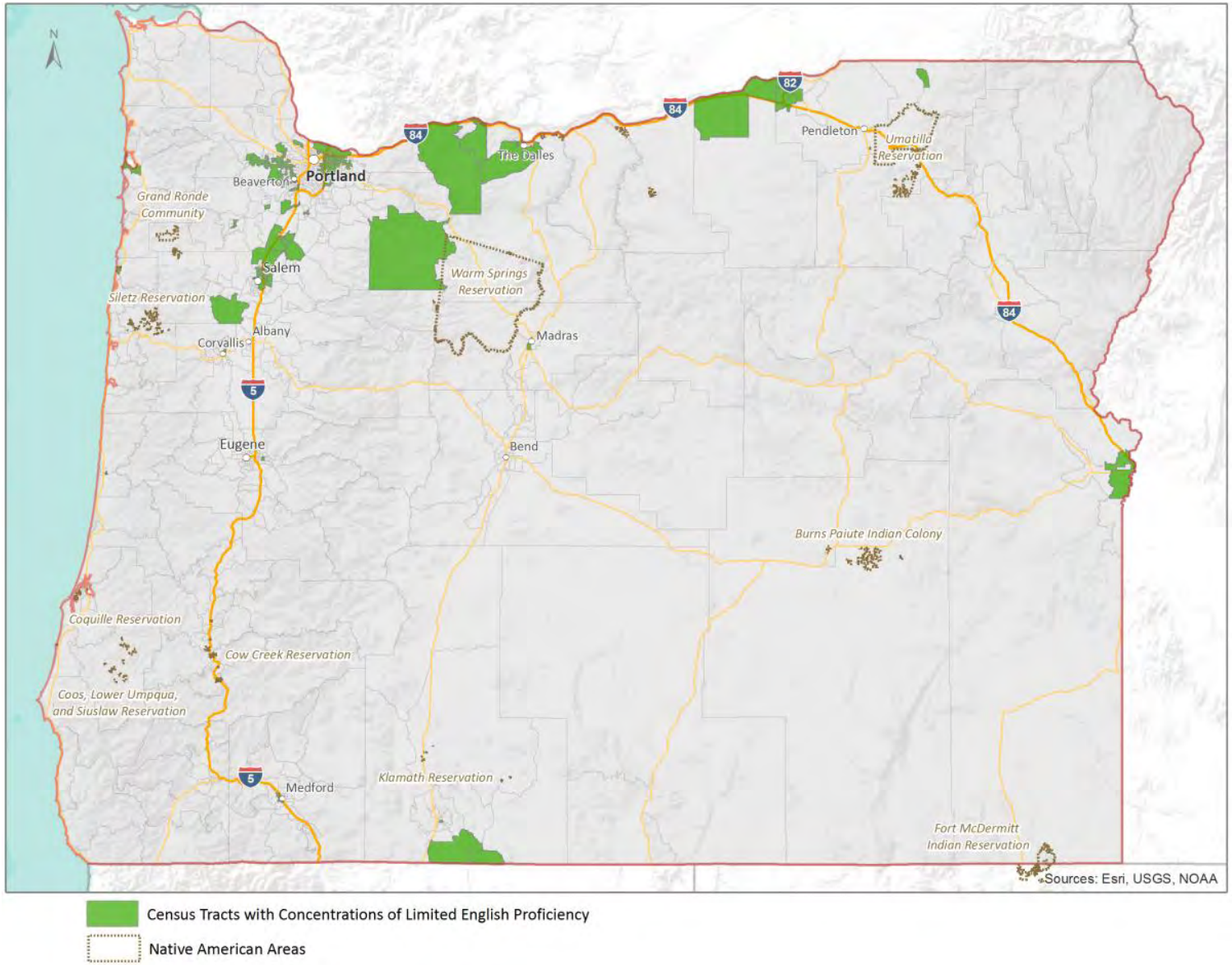
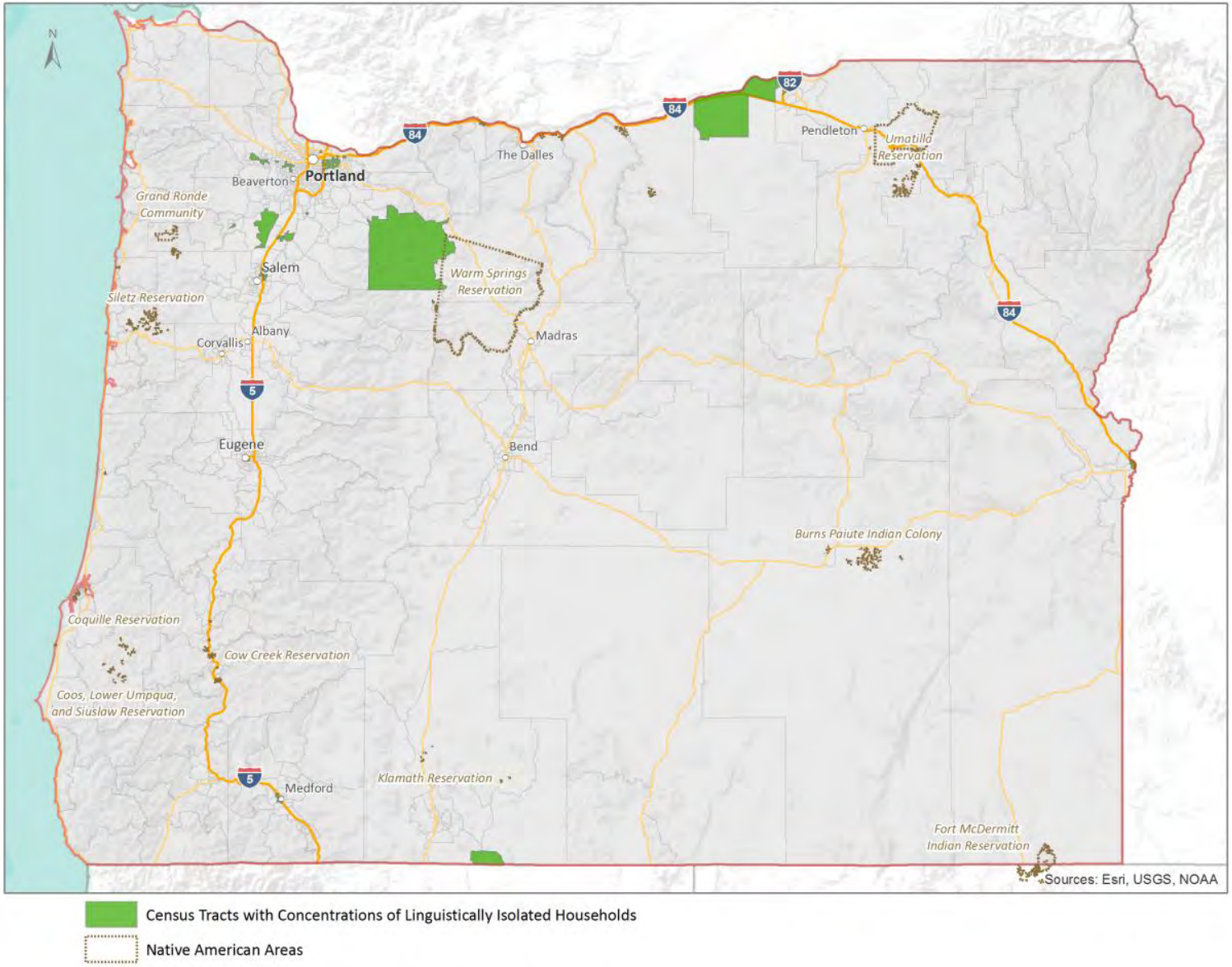


Figure I-6 presents areas where greater than 10 percent of households are defined as linguistically isolated households—all household members 14 years old and over speak English less than "very well." The linguistically isolated household statewide average is 6.2 percent. This map is highly correlated with the above figure, but fewer concentrations are seen because all household members must speak English less than "very well" to fit the linguistically isolated definition.

Figure I-6. Concentrations of Linguistically Isolated Households, State of Oregon, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.



Disability. Figure I-7 presents the number of individuals by age group in Oregon living with a disability. Around 14 percent of all Oregon residents have a disability, with over a third (38%) of all seniors (65 years and over) living with at least one disability. Seniors are most affected by physical (ambulatory and hearing) disabilities and children are most affected by cognitive disabilities.

Figure I-7.
Incidence of Disability by Age

Source:
2009-2013 ACS.

	No. of Residents	% of Residents
Total Residents with a Disability	**526,868**	**14%**
Residents 5 years and younger	**3,041**	**1%**
Residents 5 to 17 years	**35,734**	**6%**
Hearing	3,810	1%
Vision	5,183	1%
Cognitive	27,875	4%
Ambulatory	4,017	1%
Self-care	5,774	1%
Population 18 to 64 years	**280,616**	**12%**
Hearing	69,007	3%
Vision	46,238	2%
Cognitive	126,567	5%
Ambulatory	132,757	6%
Self-care	47,590	2%
Independent living	90,064	4%
Population 65 years and over	**207,477**	**38%**
Hearing	99,550	18%
Vision	35,921	7%
Cognitive	55,352	10%
Ambulatory	126,128	23%
Self-care	47,536	9%
Independent living	82,600	15%

Persons with disabilities are typically more vulnerable to housing discrimination than others, often due to housing providers' lack of knowledge about reasonable accommodation provisions in fair housing laws. Persons with disabilities also face challenges finding housing that is affordable, accessible and located near transit and supportive services.

The high percentage of seniors living with disabilities, coupled with the significant population growth among this age group in Oregon, suggests that the number of total residents living with a disability will increase in the future.

Poverty. The economic ability to rent or purchase housing is a strong determinant of where one lives within a community. Figure I-8 and Figure I-9 below present the percentage of individuals living in poverty within each Census tract. Statewide, about 16 percent of individuals live in poverty. Concentrated areas of poverty—defined as those where more than 40 percent of individuals in live in poverty—are found in the greater Portland area, Salem, Corvallis, Eugene, Klamath Falls and Ontario.[3]

In addition to housing choice, neighborhoods with poverty rates exceeding 40 percent are regarded by social researchers as being areas that are "socially and economically dysfunctional."[4] High poverty is linked to high crime, high rates of unemployment and low educational attainment, all of which have costs to the public. High poverty also impacts community health and food security, frequently culminating in malnutrition among children.[5]

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[3] It is important to note that areas with a college/university, such as Corvallis and Eugene, typically experience inflated poverty rates due to the large number of college students claiming residence in the area.

[4] The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline." In Nicolas P. Retsinas and Eric S. Belsky, eds., Revisiting Rental Housing: Policies, Programs, and Priorities. Washington, DC: Brookings Institution, 116–9.

[5] Understanding the Link between Poverty and Food Insecurity among Children: Does the Definition of Poverty Matter? Vanessa Wright, et. al., Journal of Children and Poverty, 1-20. 2014.

Figure I-8. Percentage of Individuals Below Poverty Rate, State of Oregon, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.

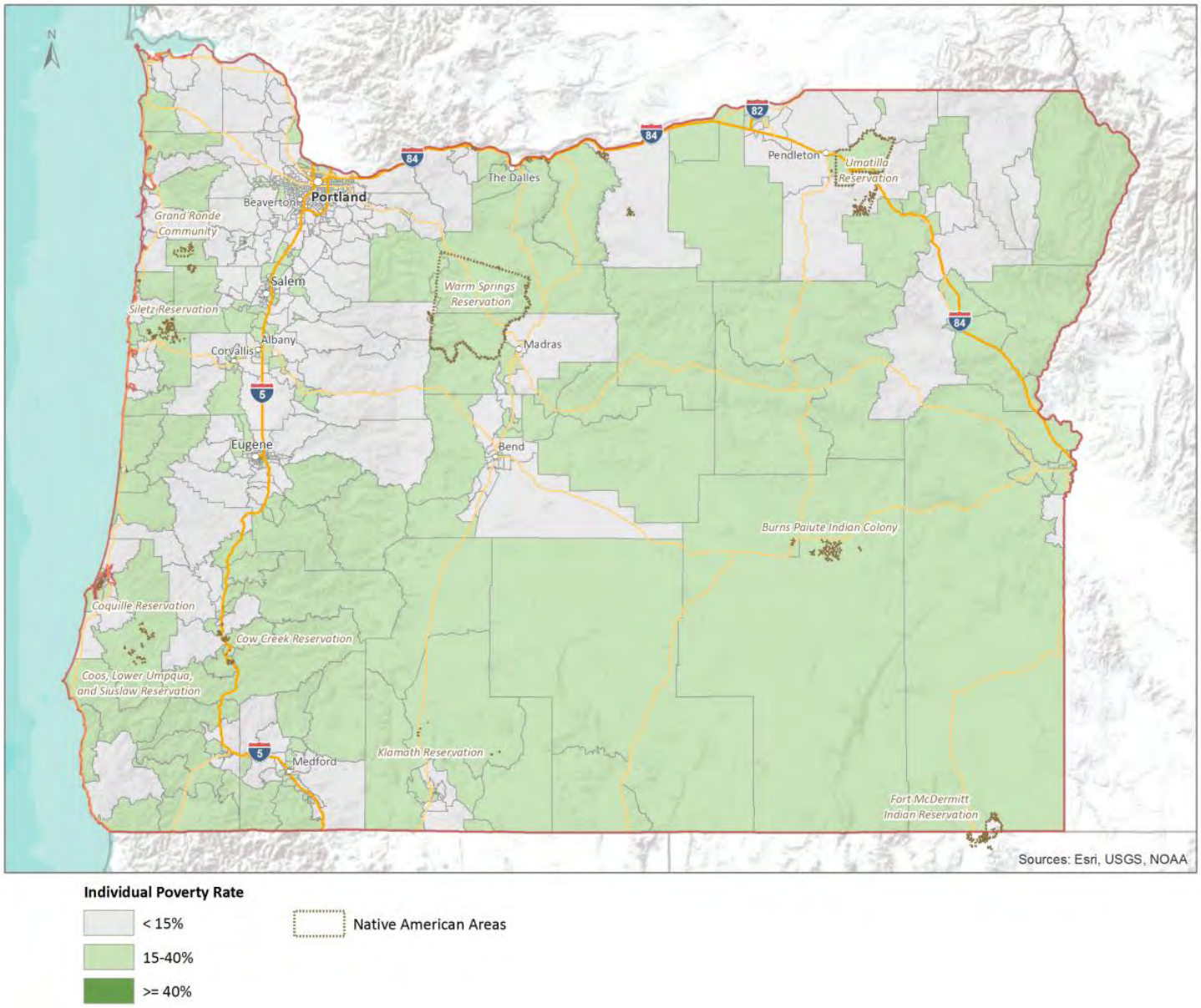
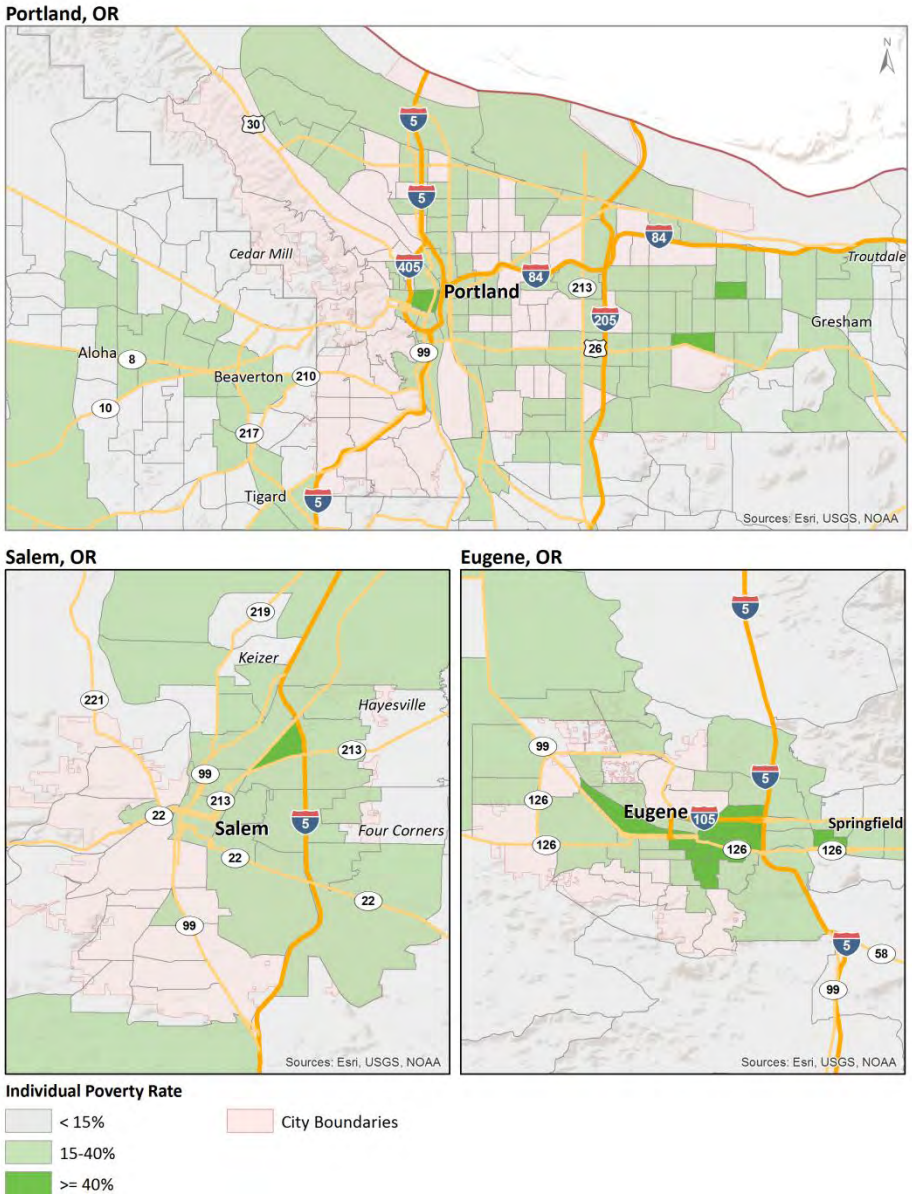


Figure I-9. Percentage of Individuals Below Poverty Rate, Greater Portland, Salem and Eugene Areas, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.



Segregation/Integration Analysis

This section discusses racial and ethnic segregation/integration in Oregon. HUD defines "integrated" geographic areas as those which do not contain high concentrations of protected classes when compared to the representation in a jurisdiction as a whole. "Segregation" occurs when concentrations of protected classes are a result of fair housing barriers or impediments.

Metrics. For this analysis, two measures are used to identify concentrations and segregation.

Concentrations are identified as:

- Census tracts in which the proportion of a protected class is 20 percentage points higher than that in the county overall, and
- Census tracts that are more than 50 percent minority—minority residents defined as those identifying as Hispanic/Latino and/or a non-white race.

Segregation is measured by the dissimilarity index. The dissimilarity index is a way to measure the evenness of minority resident distribution across geographic units—such as Census tracts—that make up a larger geographic area—such as a county. The index compares the proportion of the total population of a minority group in a Census tract and the proportion of the total number of whites in that same Census tract.

Dissimilarity index. The dissimilarity index is a metric used by researchers to measure racial and ethnic integration. The index is measured between 0 and 1. An index of 0 indicates perfect distribution of racial and ethnic groups across all Census tracts in a region; conversely, an index of 1 indicates complete segregation of racial groups across the region. HUD's ratings of dissimilarity are determined by the following score ranges: "Low Dissimilarity"—below 0.40; "Moderate"—between 0.40 and 0.54; and "High"—above 0.54. The U.S. cities found to be the most segregated using the dissimilarity index (Milwaukee, New York and Chicago) have indices approaching 0.8.

Figure I-10 presents the dissimilarity index for Oregon counties. Hispanic populations are well distributed throughout each county, with only Morrow County having a "Moderate" dissimilarity index rating. The dissimilarity index ratings for African Americans throughout the states show seven counties have relatively high levels of segregation, with Curry County and Columbia County having dissimilarity scores over 0.7. Asian and Native American populations are generally more integrated than African Americans, but less integrated than Hispanics. The overall minority dissimilarity index score and rating is heavily weighted towards Hispanics because they comprise a much higher share of minority residents (an aggregate of all minority races and ethnicities) than any other single minority group.

While dissimilarity index ratings may indicate a level of segregation between whites and minority residents, it does not identify the underlying causes for the segregation. It is plausible that some minority residents actively seek housing in neighborhoods (Census tracts) where individuals with similar backgrounds as themselves are living and where familiar cultural amenities can be found (religious centers, specialized supermarkets, etc.). On the other hand,

discriminatory practices could be occurring that steer minority residents towards certain neighborhoods regardless of their actual preferences.

Figure I-10.
Dissimilarity Index by County, State of Oregon, 2013

County	Minority/NHW Dissimilarity Index		Hispanic/NHW Dissimilarity Index		African American/NHW Dissimilarity Index		Asian/NHW Dissimilarity Index		Native American/NHW Dissimilarity Index	
	Index	Rating	Index	Rating	Index	Rating	Index	Rating	Index	Rating
Baker	0.32	Low	0.37	Low	0.47	Moderate	0.37	Low	0.49	Moderate
Benton	0.21	Low	0.36	Low	0.48	Moderate	0.35	Low	0.40	Moderate
Clackamas	0.24	Low	0.33	Low	0.50	Moderate	0.44	Moderate	0.51	Moderate
Clatsop	0.21	Low	0.28	Low	0.38	Low	0.41	Moderate	0.33	Low
Columbia	0.20	Low	0.26	Low	0.72	High	0.25	Low	0.38	Low
Coos	0.23	Low	0.31	Low	0.56	High	0.28	Low	0.29	Low
Crook	0.17	Low	0.26	Low	0.41	Moderate	0.30	Low	0.21	Low
Curry	0.11	Low	0.14	Low	0.73	High	0.49	Moderate	0.31	Low
Deschutes	0.19	Low	0.26	Low	0.44	Moderate	0.35	Low	0.36	Low
Douglas	0.18	Low	0.20	Low	0.60	High	0.34	Low	0.29	Low
Gilliam	N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT	
Grant	0.07	Low	0.13	Low	0.22	Low	0.34	Low	0.12	Low
Harney	0.13	Low	0.11	Low	0.21	Low	0.44	Moderate	0.32	Low
Hood River	0.24	Low	0.26	Low	0.42	Moderate	0.24	Low	0.74	High
Jackson	0.29	Low	0.39	Low	0.52	Moderate	0.39	Low	0.37	Low
Jefferson	0.50	Moderate	0.37	Low	0.32	Low	0.56	High	0.77	High
Josephine	0.16	Low	0.22	Low	0.47	Moderate	0.35	Low	0.30	Low
Klamath	0.22	Low	0.31	Low	0.37	Low	0.40	Low	0.39	Low
Lake	0.06	Low	0.17	Low	0.28	Low	0.23	Low	0.04	Low
Lane	0.18	Low	0.31	Low	0.51	Moderate	0.40	Moderate	0.42	Moderate
Lincoln	0.22	Low	0.30	Low	0.60	High	0.41	Moderate	0.39	Low
Linn	0.25	Low	0.35	Low	0.38	Low	0.36	Low	0.33	Low
Malheur	0.26	Low	0.29	Low	0.46	Moderate	0.31	Low	0.37	Low
Marion	0.35	Low	0.40	Low	0.51	Moderate	0.37	Low	0.37	Low
Morrow	0.38	Low	0.40	Moderate	0.43	Moderate	0.07	Low	0.32	Low
Multnomah	0.27	Low	0.35	Low	0.47	Moderate	0.34	Low	0.45	Moderate
Polk	0.23	Low	0.32	Low	0.33	Low	0.34	Low	0.46	Moderate
Sherman	N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT	
Tillamook	0.26	Low	0.31	Low	0.40	Moderate	0.44	Moderate	0.42	Moderate
Umatilla	0.31	Low	0.38	Low	0.46	Moderate	0.38	Low	0.69	High
Union	0.17	Low	0.27	Low	0.58	High	0.28	Low	0.27	Low
Wallowa	0.16	Low	0.14	Low	0.28	Low	0.27	Low	0.47	Moderate
Wasco	0.22	Low	0.25	Low	0.31	Low	0.45	Moderate	0.55	High
Washington	0.24	Low	0.35	Low	0.41	Moderate	0.35	Low	0.57	High
Wheeler	N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT	
Yamhill	0.23	Low	0.27	Low	0.58	High	0.35	Low	0.44	Moderate

Note: NHW is non-Hispanic white. Some dissimilarity index scores and ratings may not align in the table due to score rounding.

Source: 2009-2013 ACS; BBC Research & Consulting.

Racial/ethnic concentrations. Racial/ethnic concentrations (a census tract in which the proportion of a protected class is 20 percentage points higher than that in the county overall)

exist for Hispanic, African American, Asian and Native American populations in Oregon. Unlike the dissimilarity index, concentrations are not a measure of segregation, but rather a geographic analysis tool to understand where minority neighborhoods exist within the community. Figure I-11 through Figure I-16 present concentrations for each race/ethnicity. The following is a summary of the racial and ethnic concentrations that exist in Oregon:

Hispanic concentrations

- There are 33 Hispanic concentrated Census tracts throughout the state; and
- Clusters of Hispanic concentrated Census tracts exist in the greater Portland area, Hillsboro, The Dalles, Salem, Medford, Klamath Falls and Ontario.

African American concentrations

- There are three African American concentrated Census tracts in Oregon; and
- All three Census tracts are in close proximity (two are adjacent) and are in the north Portland area.

Asian concentrations

- Three Asian concentrated Census tracts exist in the state; and
- Two are located in the Hillsboro area, while the third is west of Portland near the intersection of I-205 and US 26.

Native American concentrations

- There are two Native American concentrated Census tracts in Oregon; and
- Both are Census tracts located within an American Indian Reservation (Warm Springs Reservation and Umatilla Reservation).

Figure I-11. Hispanic Concentrations, State of Oregon, 2013

Source:
2009-2013 ACS; BBC Research & Consulting.

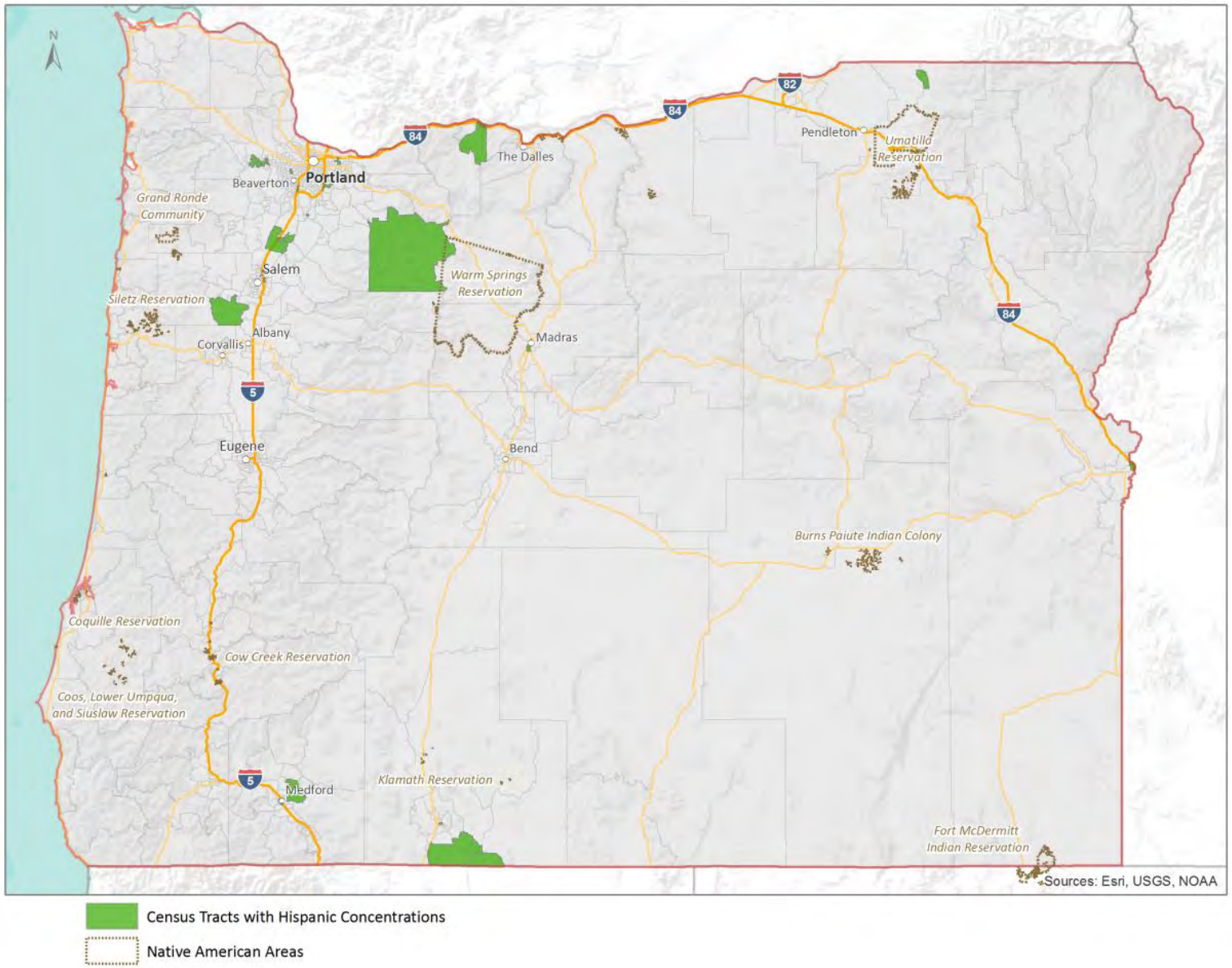


Figure I-12. African American Concentrations, State of Oregon, 2013

Source:
2009-2013 ACS; BBC Research & Consulting.

Figure I-13. African American Concentrations, Greater Portland Area, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.

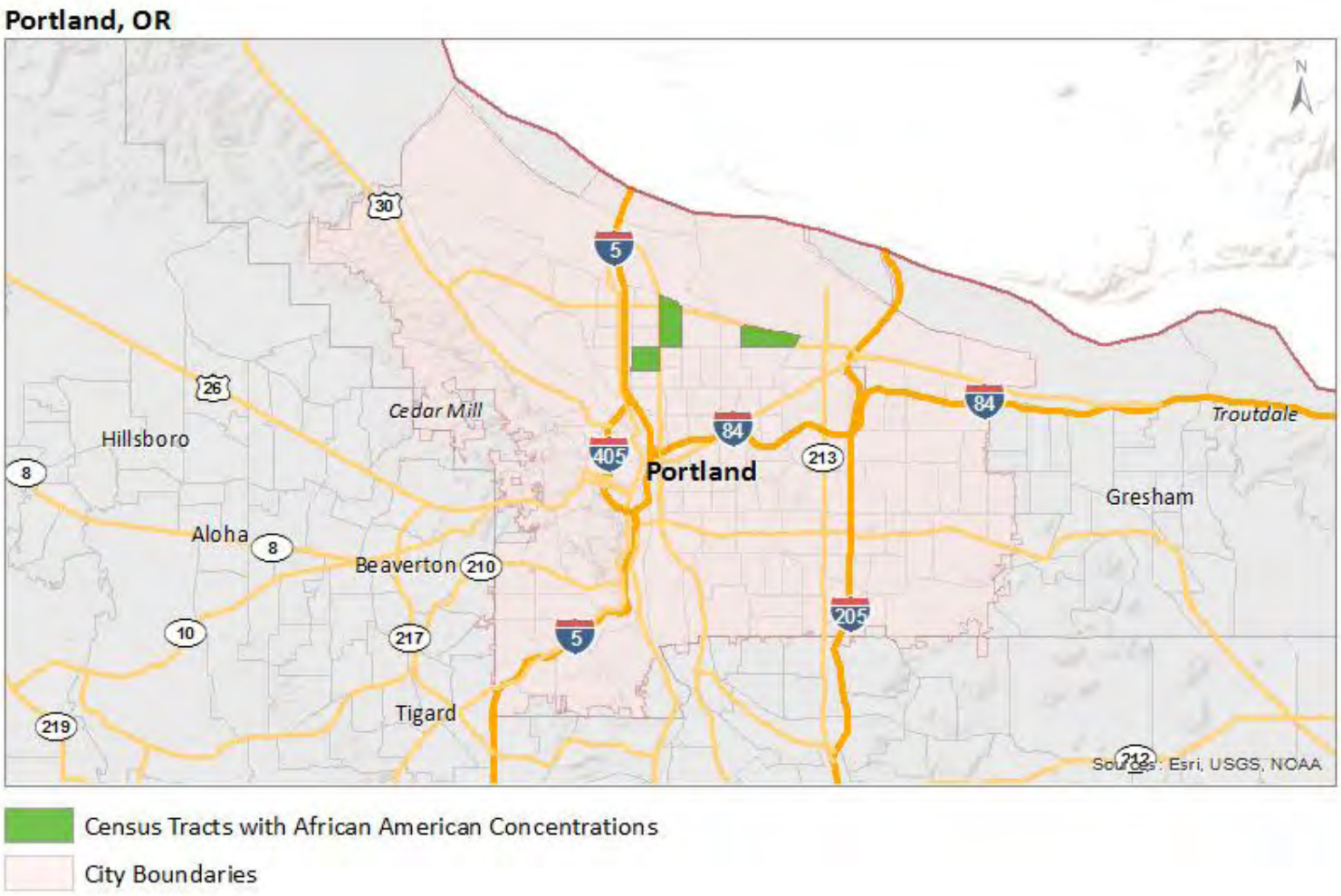


Figure I-14. Asian Concentrations, State of Oregon, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.

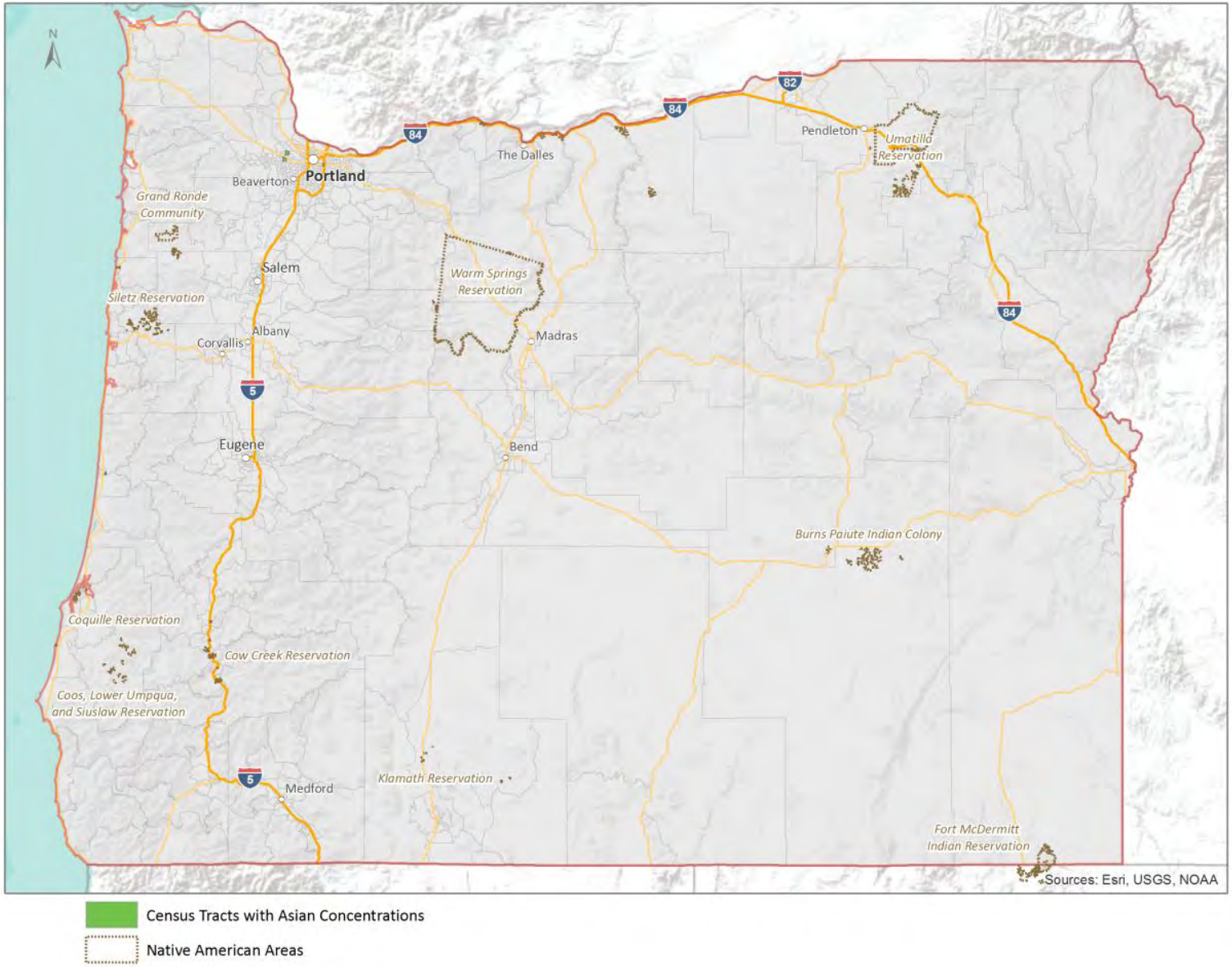


Figure I-15. Asian Concentrations, Greater Portland Area, 2013

Source:
2009-2013 ACS; BBC Research & Consulting.

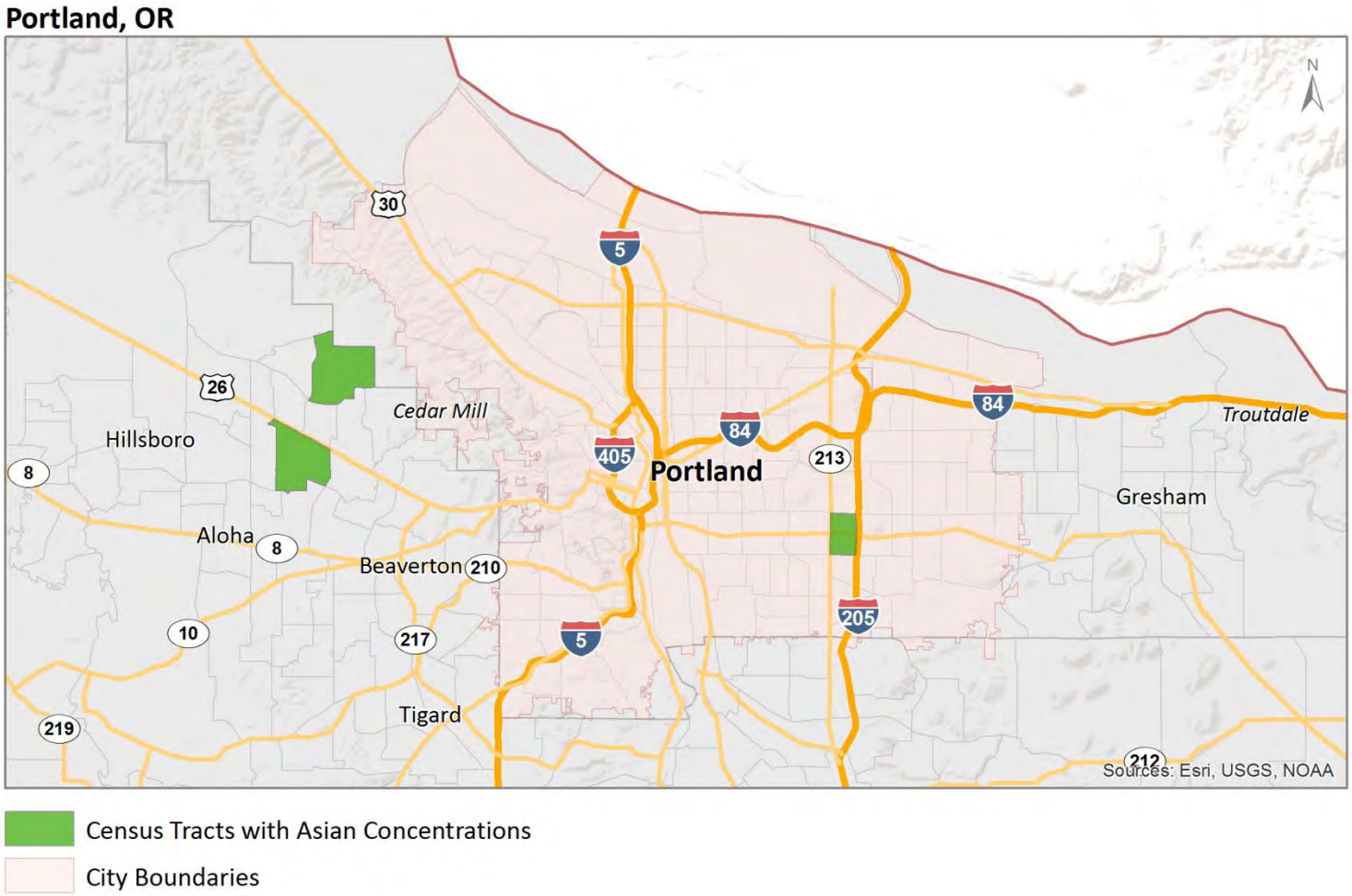
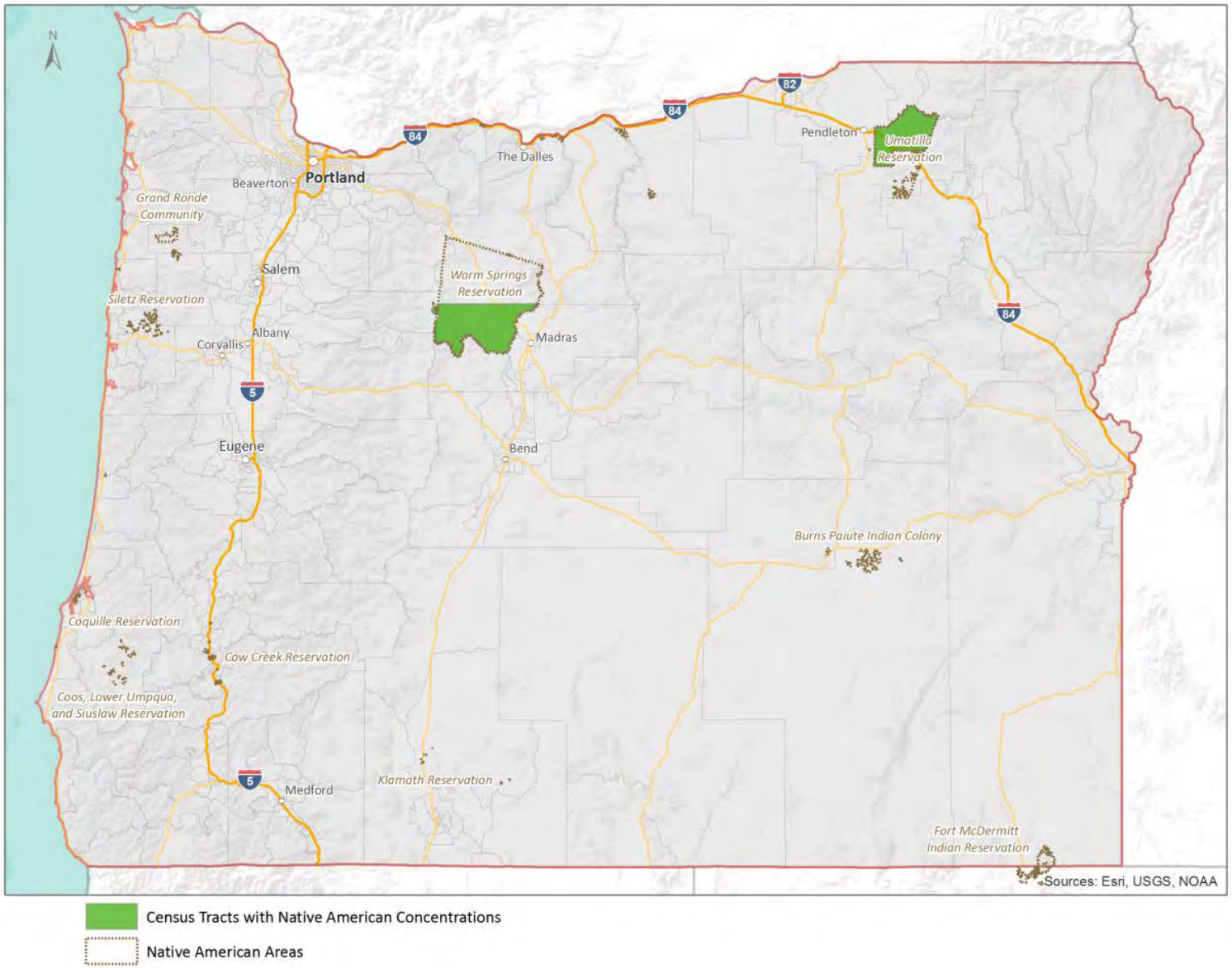


Figure I-16. Native American Concentrations, State of Oregon, 2013

Source:
2009-2013 ACS; BBC Research & Consulting.



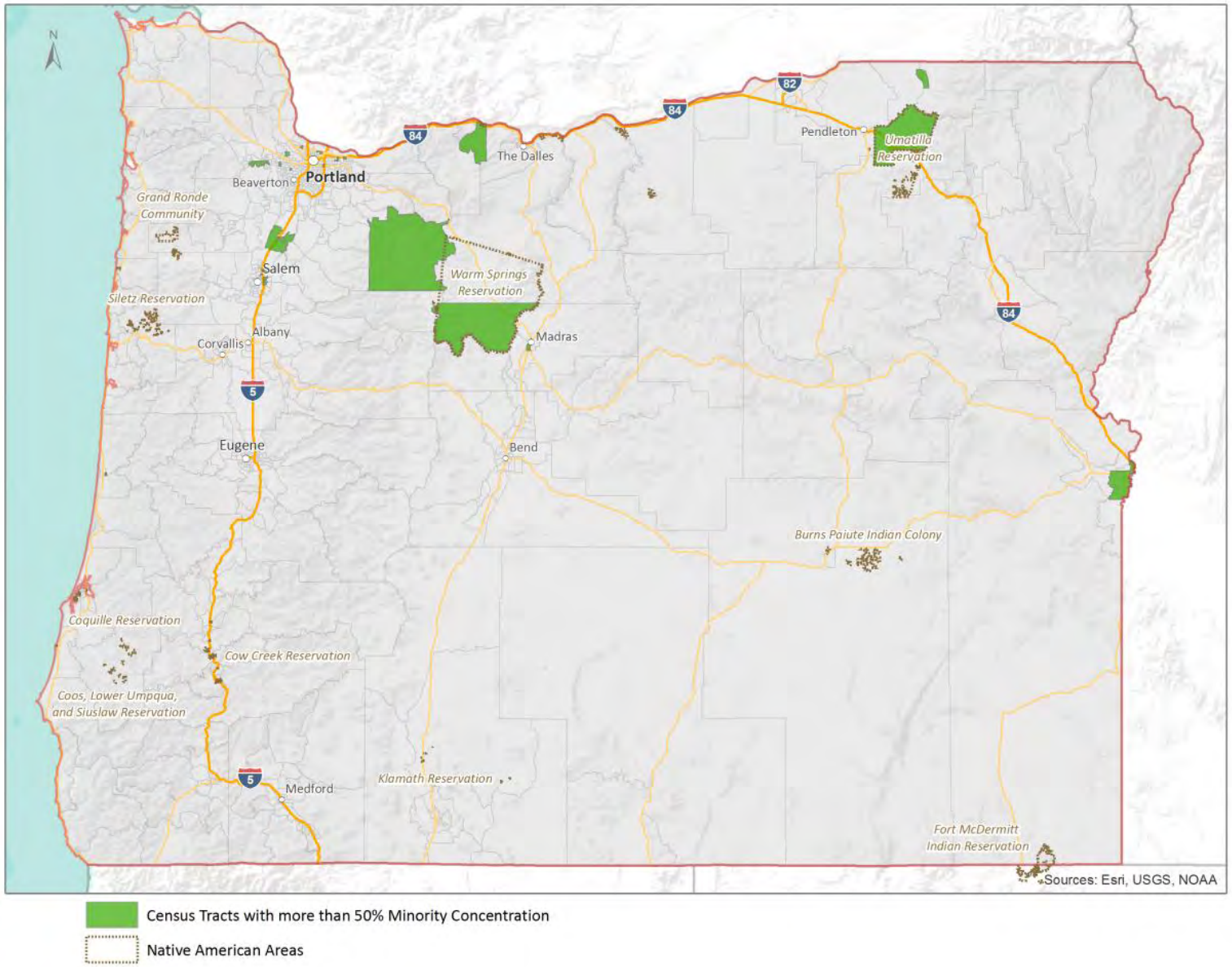
Majority-minority areas. Figure I-17 presents the location of the 31 majority-minority (more than 50% minority) Census tracts throughout the state. While there is some overlap between racial and ethnic concentrations and majority-minority Census tracts, it is possible for a census tract to meet the criteria of one without being the other. A large number of majority-minority Census tracts exist in the greater Portland area, Hillsboro and in the Salem area.[6] Other majority-minority Census tracts are found near The Dalles, around Warm Springs Reservation, Umatilla Reservation and Ontario. Despite the large Hispanic population in Oregon, only nine of the 31 majority-minority Census tracts have Hispanic populations over 50 percent, meaning the remaining majority-minority Census tracts are a combination of racial and ethnic minorities,[7] with the exception of one census tract that has a Native American population over 50 percent.

[6] While the four majority-minority Census tracts located in the Woodburn area (north of Salem along I-5) are all Hispanic concentrated areas, Woodburn also contains a significant Russian Orthodox population. Russian Orthodox residents, however, would not contribute to the minority count if they self-identify as "white" in U.S. Census Bureau surveys.

[7] Other races and multiple races are included in the minority resident calculation.

Figure I-17. Majority-Minority Areas, State of Oregon, 2013

Source:
2009-2013 ACS; BBC Research & Consulting.



Racially and ethnically concentrated areas of poverty. A new component of fair housing studies is an analysis of "racially or ethnically concentrated areas of poverty," also called RCAPs and ECAPs. A Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty is a neighborhood with significant concentrations of high poverty and is majority-minority.

HUD's definition of a Racially/Ethnically Concentrated Area of Poverty is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

Figure I-19 and Figure I-20 present the locations of Oregon's five Racially/Ethnically Concentrated Areas of Poverty. Two are in the greater Portland Area (Hillsboro and east Portland), one is in northeast Salem, one lies in a relatively remote area of eastern Clackamas County and the last is in Ontario. Figure I-18 presents associated characteristics for each Racially/Ethnically Concentrated Area of Poverty census tract. The individual poverty rate ranges from 39 percent to 53 percent. The highest percentage of families with children is 55 percent, while the lowest is 17 percent (excluding the Clackamas County census tract). All Census tracts contain limited English proficiency persons greatly above the state average of three percent, with the census tract with the highest percentage of Hispanics (72%) containing the second highest percentage within the state at 42 percent.

Households within Racially/Ethnically Concentrated Area of Poverty Census tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of Racially/Ethnically Concentrated Area of Poverty households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where Racially/Ethnically Concentrated Area of Poverty households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (i.e. limited non-English information and materials); Racially/Ethnically Concentrated Area of Poverty households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

Figure I-18.
Racially/Ethnically Concentrated Areas of Poverty Census Tract Characteristics

Census Tract	County	% Minority	% Hispanic	% Individual Poverty Rate	% Family Households w/ Children	% Single Mother Households	% LEP
41005980000*	Clackamas	52.2%	39.3%	39.3%	0.0%	0.0%	37.8%
41045970400	Malheur	56.9%	53.6%	52.7%	35.0%	16.6%	20.4%
41047000502	Marion	61.5%	45.9%	52.6%	47.4%	18.2%	20.5%
41051009606	Multnomah	54.1%	35.9%	42.3%	39.8%	12.6%	34.5%
41067032409	Washington	75.2%	72.2%	44.7%	55.0%	24.2%	41.5%

Note: *This census tract has a population of only 201 residents, and given that the statistics are based on sampling data, the reported 0% for percentage of family households with children and percentage of single mother households may be underestimated. However, the census tract is in a remote location of Clackamas County and family households is likely to be small.

Source: 2009-2013 ACS; BBC Research & Consulting.

Figure I-19. Racially or Ethnically Concentrated Areas of Poverty, State of Oregon, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.

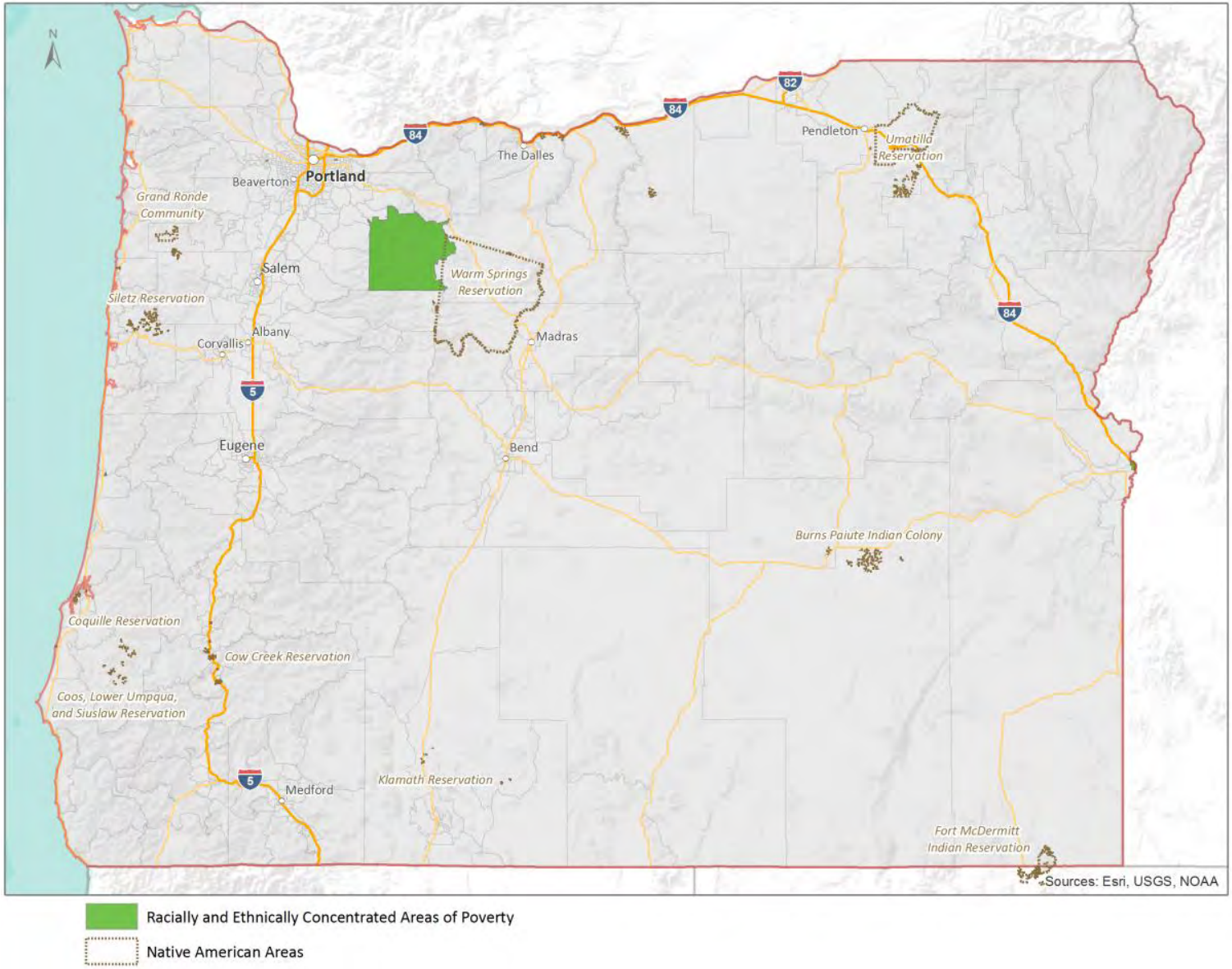
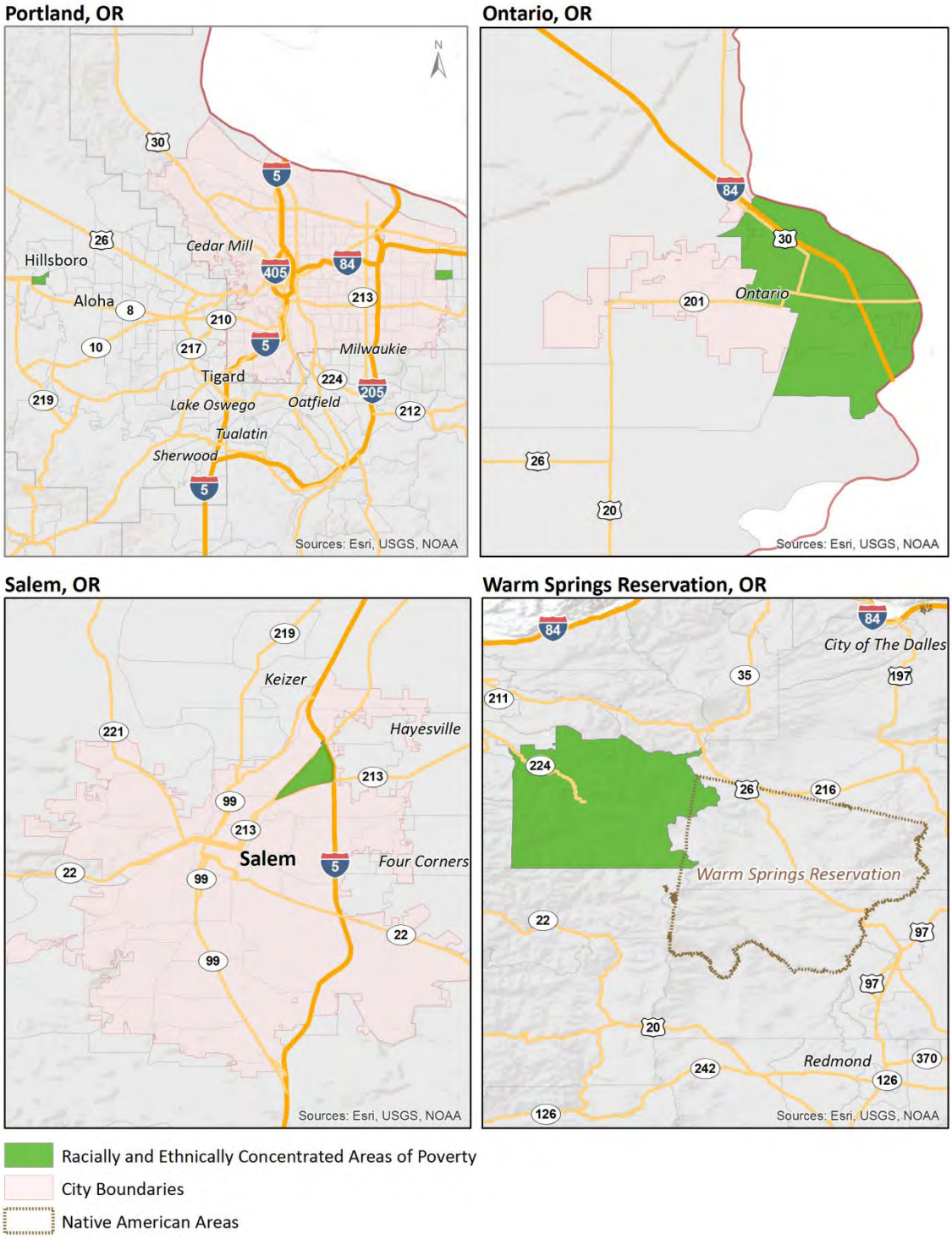


Figure I-20.
Racially or Ethnically Concentrated Areas of Poverty



Source: 2009-2013 ACS; BBC Research & Consulting.

Disability Analysis

This section examines (a) the extent to which certain geographical areas have a concentration of persons with disabilities; and (b) the extent to which persons with disabilities are housed in the most integrated setting appropriate for their needs.

As specified in federal regulations: "The most integrated setting is one that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible, consistent with the requirements of the Americans with Disabilities Act, 42 USC. 12101, et seq., and Section 504 of the Rehabilitation Act of 1973, 29 USC 794. See 28 CFR. part. 35, App. A (2010) (addressing 25 CFR 35.130)." Under this principle, derived from the Supreme Court's decision in Olmstead vs. L.C., institutionalized settings are to be avoided to the maximum possible extent in favor of settings in which persons with disabilities are integrated with nondisabled persons.

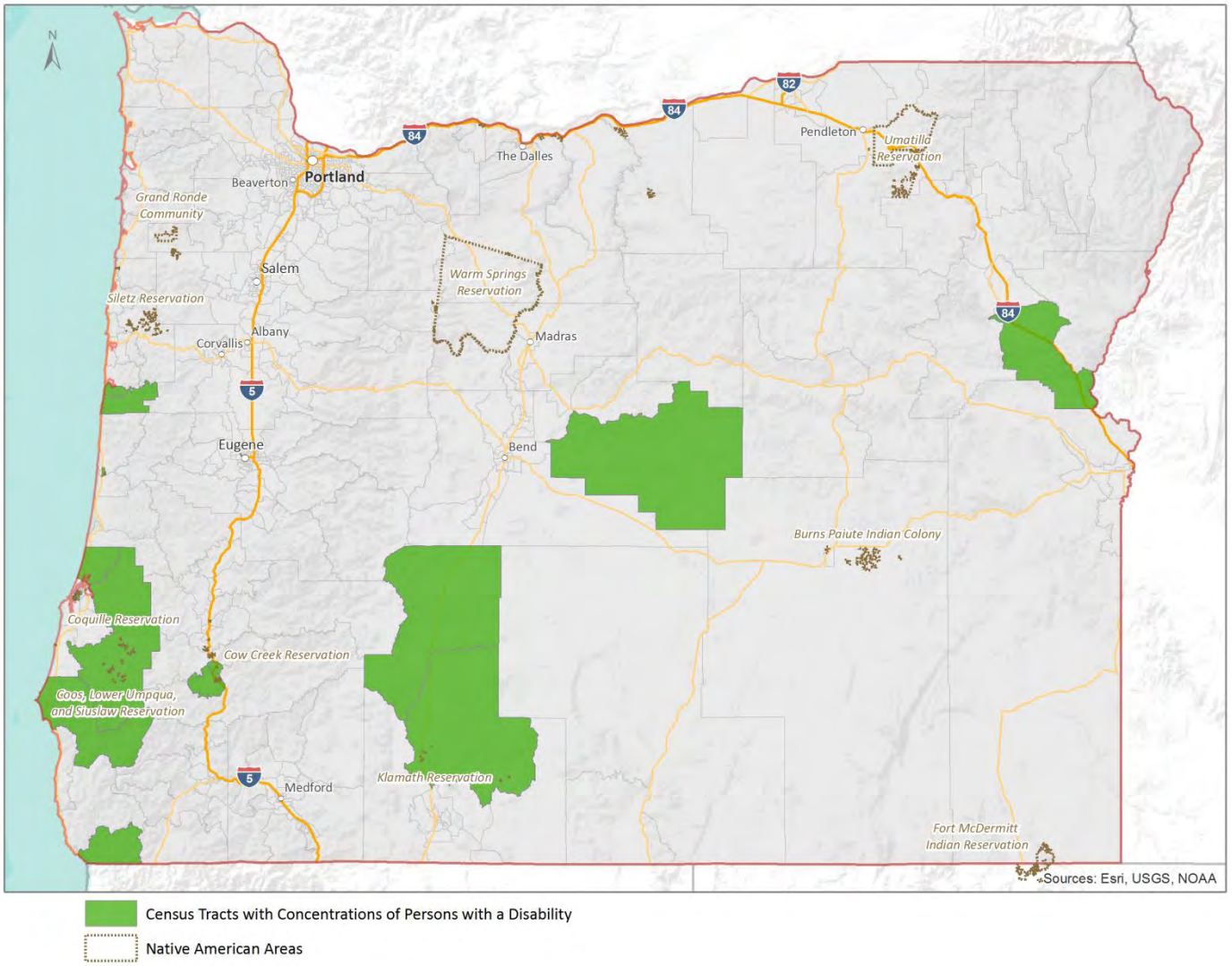
Different types of accommodations and/or services may be needed to allow individuals with disabilities to live in integrated settings. For example, persons with physical disabilities may need units with universal design or accessibility features, both within the public and assisted housing stock, specific to their needs. Persons with other types of disabilities may require access to services and support—e.g., transportation assistance, specific health services—they need to live independently. Many persons with disabilities need housing that is affordable, as well as accessible.

Persons with disabilities concentration analysis. Figure I-21 displays concentrated areas of persons living with disabilities, defined in this analysis as more than 25 percent of individuals in a census tract living with a disability. There are 31 Census tracts in Oregon where at least a quarter of the residents are persons living with disabilities. Statewide, 14 percent of all residents live with a disability, but among seniors (age 65 and over) this increases to 38 percent. The map indicates many of the concentrated areas correlate highly with an aged population—southwest Oregon and areas along the coast are popular locations for retirees. The senior/retiree cohort is more likely to live with a disability, and in particular a physical disability, thus leading to census tract concentrations. As the Baby Boomer generation continues to age and life expectancy continues to increase, the number of Oregon residents living with a disability is likely to substantially increase in the coming years.

Figure I-21. Persons with Disabilities, State of Oregon, 2013

Source:

2009-2013 ACS; BBC Research & Consulting.



Persons with HIV/AIDS. Residents living with HIV/AIDS fall under the disability classification of protected class, but their housing accommodation needs may differ significantly from residents with other physical disabilities. For example, while a high proportion of people living with HIV live with co-occurring physical, mental, and/or substance use disorders, many do not need units with universal design or accessibility features. Still, unpredictable changes in health status may jeopardize the housing stability of people living with HIV, and, similar to many protected classes, limited housing choice vouchers can be a major challenge in achieving stable housing. Data show that stable housing is an important part of medical management of HIV: people experiencing unstable housing situations or homelessness were more likely to have poor treatment outcomes for HIV.

The 2013 Oregon Health Authority Epidemiologic Profile of HIV/AIDS reports that there are 5,581 people living with HIV/AIDS in Oregon. Fifty-five percent diagnosed lived in Multnomah County. Diagnosis rates are 3.8 times higher among African American residents and 1.6 times higher among Hispanic or Latino residents compared to white residents. The diagnosis rate is seven times higher among men compared to women. The state has noted a significant increase in the diagnosis rate among 20 to 24 year old men since 2006.

Assisted Housing Disproportionality Analysis

This section uses HUD data on assisted housing beneficiaries in Oregon to determine: "Are minorities participating at the same rate as the income eligible population?" This exercise is meant to reveal market areas where protected classes have limited options in the private market and/or opportunities for the state to improve provision of programs to protected classes.

The analysis includes the following rental subsidy programs: public housing, Section 8 Housing Choice Vouchers (HCV), Section 236, Low Income Housing Tax Credit, and any other multifamily assisted projects with FHA insurance or HUD subsidy, including rehabilitation and new construction. For the comparative analysis, the proportion of households earning 60 percent or less of AMI is used as a proxy for income eligible households. County-level data for counties with fewer than 25 program participants was excluded to avoid misleading conclusions.

Figure I-22 on the following page compares the race and ethnicity of program participants to income eligible households. The "Difference" columns reflect the difference between the proportion of beneficiaries and the proportion of eligible participants—negative numbers indicate lower participation in HUD programs than might be expected (i.e. underrepresented) and positive numbers indicate higher participation than might be expected (i.e. overrepresented). Differences of 10 percentage points or more are considered "disproportionate." In the figure, disproportionate differences are shaded blue for underrepresentation in HUD programs and green for overrepresentation.

Statewide, 10 percent of subsidized housing beneficiaries are African American compared to 3 percent of households earning less than 60 percent AMI. The difference of 7 percentage points suggests that African Americans are more likely to participate in HUD programs than might be expected given their income profile. Nine percent of beneficiaries are Hispanic, compared with 10 percent of households earning less than 60 percent of AMI. Therefore, participation for Hispanic residents is about what would be expected given their eligibility.

In Jefferson County and Morrow County, minorities have disproportionately low participation rates in housing subsidy programs—a difference of 17 percentage points in Jefferson and 27 percentage points in Morrow.

Conversely, minorities have disproportionately high participation rates in Malheur County (12 percentage point difference) and Multnomah County (15 percentage point difference).

Figure I-22.
Assisted Housing Beneficiaries, 2013

	Subsidized Housing Beneficiaries				Households Earning Less than 60% AMI				*Difference*		
	Percent Minority	Percent Hispanic	Percent African Am.	Subsidized Units	Percent Minority	Percent Hispanic	Percent African Am.	Total HH <60% AMI	*Minority*	*Hispanic*	*African Am.*
State of Oregon	**24%**	**9%**	**10%**	**50,844**	19%	10%	3%	**552,303**	*5%*	*-1%*	*7%*
Baker County	9%	4%	2%	331	7%	3%	0%	2,945	*2%*	*1%*	*2%*
Benton County	13%	6%	2%	828	16%	6%	1%	16,667	*-3%*	*0%*	*1%*
Clackamas County	13%	5%	4%	2,793	13%	7%	1%	45,009	*0%*	*-2%*	*3%*
Clatsop County	6%	2%	1%	514	12%	7%	0%	5,633	*-6%*	*-5%*	*1%*
Columbia County	7%	3%	1%	613	8%	4%	0%	7,174	*-1%*	*-1%*	*1%*
Coos County	9%	3%	1%	1,041	10%	3%	1%	10,228	*-1%*	*0%*	*0%*
Crook County	4%	1%	0%	120	8%	5%	0%	3,897	*-4%*	*-4%*	*0%*
Curry County	8%	1%	2%	243	6%	3%	0%	4,282	*2%*	*-2%*	*2%*
Deschutes County	7%	4%	1%	1,160	10%	6%	0%	23,478	*-3%*	*-2%*	*1%*
Douglas County	5%	3%	0%	1,328	9%	4%	0%	14,361	*-4%*	*-1%*	*0%*
Grant County	7%	3%	1%	80	5%	1%	0%	1,303	*2%*	*2%*	*1%*
Harney County	6%	6%	0%	89	10%	2%	0%	1,255	*-4%*	*4%*	*0%*
Hood River County	23%	17%	1%	166	26%	23%	0%	2,433	*-3%*	*-6%*	*1%*
Jackson County	12%	7%	3%	2,681	14%	8%	1%	29,661	*-2%*	*-1%*	*2%*
Jefferson County	17%	11%	2%	87	34%	17%	0%	2,649	*-17%*	*-6%*	*2%*
Josephine County	8%	4%	1%	1,043	9%	5%	0%	14,393	*-1%*	*-1%*	*1%*
Klamath County	16%	5%	3%	944	18%	9%	2%	10,789	*-2%*	*-4%*	*1%*
Lake County	2%	0%	0%	56	10%	5%	1%	1,669	*-8%*	*-5%*	*-1%*
Lane County	12%	5%	3%	4,603	14%	6%	1%	57,429	*-2%*	*-1%*	*2%*
Lincoln County	9%	5%	1%	710	13%	4%	0%	8,436	*-4%*	*1%*	*1%*
Linn County	9%	5%	1%	2,135	13%	7%	1%	15,918	*-4%*	*-2%*	*0%*
Malheur County	41%	36%	2%	535	29%	27%	1%	4,316	*12%*	*9%*	*1%*
Marion County	26%	17%	4%	4,901	27%	19%	1%	38,244	*-1%*	*-2%*	*3%*
Morrow County	3%	0%	0%	33	30%	25%	0%	1,151	*-27%*	*-25%*	*0%*
Multnomah County	43%	7%	27%	14,473	28%	10%	8%	122,207	*15%*	*-3%*	*19%*
Polk County	17%	12%	1%	1,398	18%	9%	0%	8,793	*-1%*	*3%*	*1%*
Tillamook County	5%	1%	0%	157	11%	7%	0%	3,759	*-6%*	*-6%*	*0%*
Umatilla County	19%	16%	1%	750	23%	16%	1%	9,889	*-4%*	*0%*	*0%*
Union County	8%	4%	1%	616	9%	4%	0%	4,177	*-1%*	*0%*	*1%*
Wallowa County	7%	4%	2%	109	5%	2%	1%	1,125	*2%*	*2%*	*1%*
Wasco County	15%	10%	0%	523	13%	9%	0%	3,307	*2%*	*1%*	*0%*
Washington County	33%	16%	9%	3,816	27%	15%	2%	62,759	*6%*	*1%*	*7%*
Yamhill County	17%	13%	1%	1,647	16%	12%	1%	12,966	*1%*	*1%*	*0%*

Note: Gilliam, Sherman and Wheeler counties were excluded because they had fewer than 25 total beneficiaries.

Source: HUD's 2013 Picture of Subsidized Households data, 2009-2013 ACS, State of Oregon County Statistics Comparison Table and BBC Research & Consulting.

In 2012, the Oregonian published a story that examined the location of publicly subsidized relative to high poverty and minority-concentrated Census tracts. The story reported that more than two-thirds of African American and Latino renters living in affordable rental developments created through the federal Low Income Housing Tax Credit (LIHTC) program lived in "poverty Census tracts," compared with just over half of whites.

For this Analysis of Impediments, all affordable rental housing developments in a state database maintained by OHCS were compared with concentrated areas of poverty and minority concentrations (defined earlier in this document). This comparison found that 6 percent of all affordable units (3% of all affordable properties) were located in high poverty areas, and 1 percent of all affordable units (1% of all affordable properties) were located in Racially/Ethnically Concentrated Areas of Poverty. Subsidized units for farmworkers were somewhat more likely than other subsidized units to be located in Racially/Ethnically Concentrated Areas of Poverty while subsidized units for the elderly were somewhat less likely than other subsidized units to be located in Racially/Ethnically Concentrated Areas of Poverty.

SECTION II.
Fair Housing Environment

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, familial status and disability. The Fair Housing Act—Amended (FHAA) covers most types of housing including rental housing, home sales, mortgage and home improvement lending and land use and zoning. Excluded from the FHAA are owner-occupied buildings with no more than four units, single family housing units sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.[1]

States or local governments may enact fair housing laws that extend protection to other groups. The State of Oregon extends protections for marital status, sexual orientation including gender identity, honorably discharged veterans/military status, domestic violence victims and source of income. Source of income is intended to protect benefit income, such as social security income or disability income. Originally, the legislation exempted Section 8 vouchers from this protected class. As of July 1, 2014, Section 8 vouchers and other forms of rental subsidy may not be discriminated against in Oregon.

Fair Housing Complaints

This section reviews fair housing complaints filed by Oregon residents.

Process for filing complaints. The Civil Rights Division of the Bureau of Labor and Industries (BOLI) has primary responsibility for enforcing fair housing laws in Oregon. BOLI also enforces laws related to discrimination and furthers equal opportunity in the areas of employment, public accommodations and career schools.

For Oregon residents who have experienced discrimination, several options are available. Residents can contact the Fair Housing Council of Oregon (FHCO) for guidance on filing a complaint or for a referral to an attorney. Residents can also contact an attorney directly to pursue a civil complaint, or, if a resident meets income qualifications, he or she could seek representation by Legal Aid Services of Oregon (LASO). Finally, residents can file a complaint directly with HUD or BOLI. Because Oregon's fair housing law is designated as "substantially equivalent" by HUD (this designation was granted in 2008), BOLI enforces complaints on behalf of HUD.

To file a complaint with BOLI, the intake process begins by completing a questionnaire available on BOLI's website or by phone. The intake officer then drafts a formal complaint document that

[1] "How Much Do We Know? Public Awareness of the Nation's Fair Housing Laws", The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

must be signed by the complainant and returned to BOLI. If the basis for the complaint is covered by both state and federal law, the complaint is automatically co-filed with HUD.

If BOLI determines there is prima facie case, a BOLI investigator notifies the complainant and respondent and conducts interviews within 40 days of receiving the case. During the investigation, the case conciliator attempts to find a way to settle the case. The complainant may be required to attend a fact-finding conference, which aims to identify points of agreement and disagreement and, if possible, settle the complaint. If a settlement is achieved at this stage, a conciliation agreement—a voluntary no-fault settlement of a complaint—is created and the case is closed.

If conciliation is not reached, BOLI continues to investigate. This can include interviewing the complainant, witnesses and gathering evidence of damages. If the Fair Housing Council of Oregon is conducting testing, testers will be interviewed. When the investigation is complete, the investigator makes a recommendation whether to find cause or dismiss the case.

If BOLI finds substantial evidence of discrimination BOLI issues such a determination and sends the case to its Administrative Prosecution Unit. BOLI will make one last attempt to conciliate the case before the Administrative Hearings Unit issues a charge. The Hearings Unit represents the complainant at the administrative hearing.

If the outcome is in the complainant's favor, BOLI's Commissioner issues a final order and a remedy from the respondent, which may include rental, lease or sale of real property, expenses lost due to the discriminatory action or compensation for emotional distress and attorney fees.

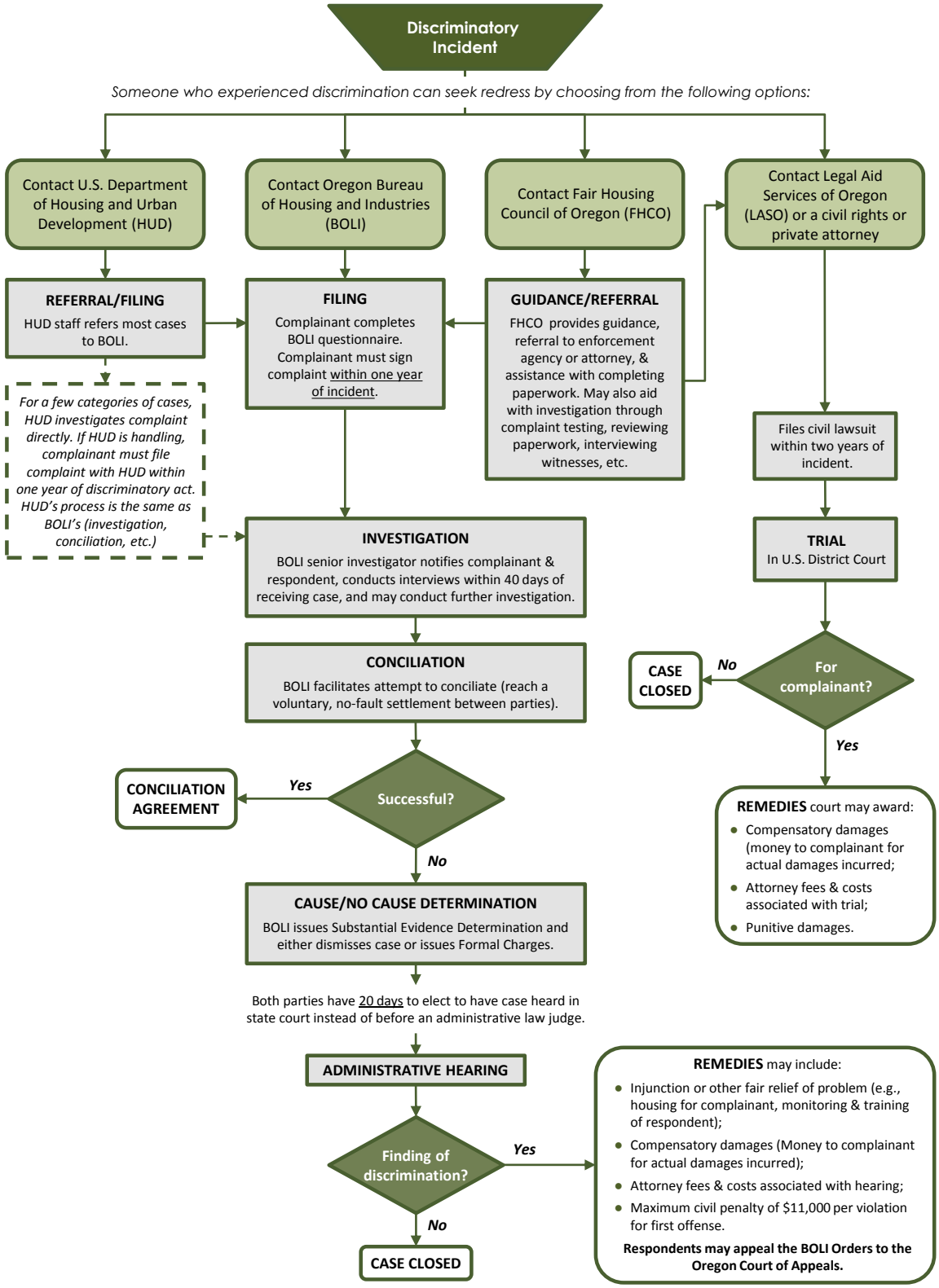
Once the Hearings office issues a charge on an administrative complaint, the complainant or the respondent can to elect to move the case into the court. If there is an election then the DOJ steps in to represent BOLI and the complainant's interests. According to BOLI, in the majority of its fair housing cases someone elects and the case moves to the court.

DOJ requires reimbursement of attorney's fees from BOLI, which can substantially exceed the reimbursement HUD grants to BOLI for handling federal fair housing cases. This is a recent requirement of DOJ and has created a very large outstanding receivable from BOLI to DOJ (estimated at $200,000). This situation—insufficient per-case reimbursements by HUD coupled with the frequency with which cases are moved from BOLI to DOJ and the cost of the DOJ investigation—could compromise the future ability of BOLI and DOJ to continue to process fair housing cases.

Oregon Senate Bill 380, introduced in January 2015, may serve to improve this situation. The Bill would provide BOLI's Commissioner with discretion to choose which cases to pursue and how far to pursue them. Specifically, it would allow BOLI to consider the merits of a case and decide whether to take it through the judicial process or excuse themselves from it, as which point, the respondent or complainant would be responsible for attorney costs if they wish to pursue the case in court.

Figure II-1 provides an overview of the primary steps involved in pursuing a fair housing complaint in Oregon.

Figure II-1.
Fair Housing Complaint Flowchart for Oregon



Note: This diagram is a simplified summary of common pathways for seeking protection of remedies under the Fair Housing Act. It includes principal, but not all, steps and options.

Source: Washington County Fair Housing Plan 2012.

Oregon complaint intake trends. The first step for residents who feel they have been discriminated against is often an inquiry to a fair housing organization. The FHCO conducts intakes for residents statewide in addition to Clark County in Washington.[2]

BBC obtained intake call data from the FHCO from July 1, 2010 to June 30, 2013. The FHCO reported 590 intake calls during this period.

Basis of intake call. Statewide, intake calls based on disability represented 54 percent of all calls. Familial status and national origin represented the second and third largest shares (14% and 13% respectively). Figure II-2 displays the number and percent by basis of intake call from July 1, 2010 to June 30, 2013.

Figure II-2.
Basis of Intake Call

Note:
One primary basis was reported for each intake call.

Source:
Fair Housing Council of Oregon.

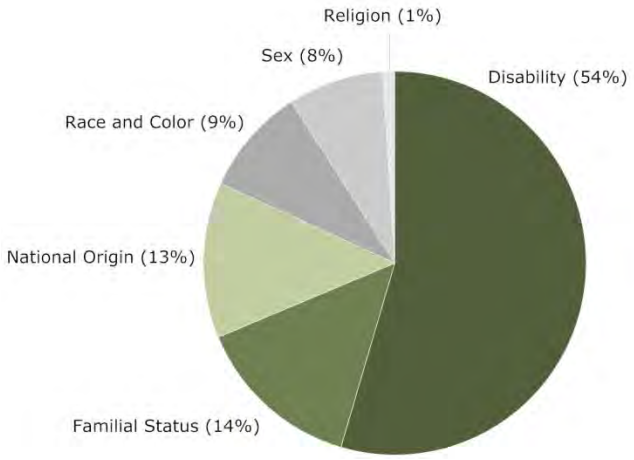
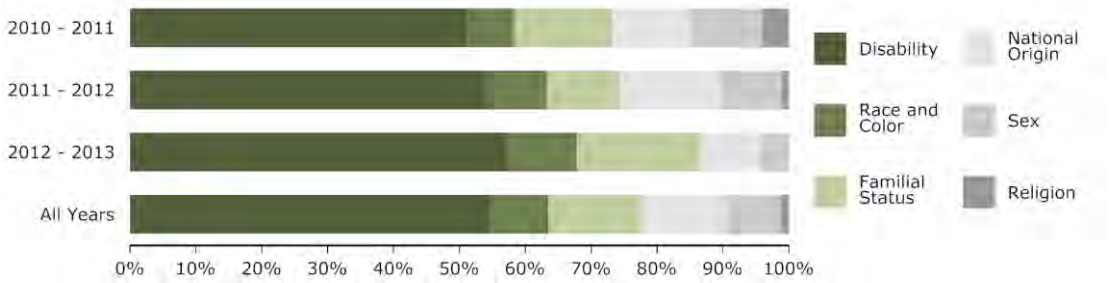


Figure II-3 shows the basis of intake calls by year. Intake calls based on disability accounted for slightly over half of each year's total intakes, ranging from 51 percent in 2010-11 to 57 percent in 2012-13. The share for the other intake bases varied slightly year by year, however in almost all cases, the balance of intake bases in each year represented less than one-third of all intakes.

[2] The complaint data are for the State of Oregon only (Clark County excluded).

Figure II-3.
Basis of Intake Calls by Year, State of Oregon

Intake Type	2010-11	2011-12	2012-13	All Years
Disability	51%	54%	57%	54%
Race and Color	7%	9%	11%	9%
Familial Status	15%	11%	19%	14%
National Origin	12%	15%	9%	13%
Sex	11%	9%	4%	8%
Religion	4%	1%	0%	1%



Note: One primary basis was reported for each intake call.
HUD uses "sex" to refer to gender discrimination.

Source: Fair Housing Council of Oregon.

Geographic distribution. Between July 1, 2010 and June 30, 2013, intake calls came from 31 counties in Oregon. There were no intake calls from Gilliam, Harney, Morrow, Sherman, Wallowa and Wheeler counties. Not surprisingly, the two most populous counties in Oregon, Multnomah and Washington, account for 47 percent of all intake calls between July 1, 2010 and June 30, 2013.

BBC analyzed the distribution of complaints by county compared to the distribution of the state's population by county. For the majority of counties, their proportion of total intakes is similar or smaller than their proportion of the state's population. Multnomah County's proportion of intake calls far exceeds its proportion of the population (35% to 19%) and Polk County's proportion of intake calls is 2 percentage points higher than its proportion of the population.

To adjust for population size, intakes were also analyzed as a ratio (intakes per 10,000 people; see Figure II-7). This ratio is highest for Polk County (3.3), Curry County (3.1), Multnomah County (2.8), and Union County (2.3). Polk County received 21 intake calls in 2012-13, significantly higher than the one call the county received in 2010 and 3 calls in 2011. The elevated 2012-13 number may partially account for Polk County's high ratio.

Curry and Union counties have similarly high complaints per 10,000 people and their higher ratios may be related to the higher proportion of residents in these counties with disabilities (25% and 16% respectively) compared to the 13 percent statewide. Multnomah County's intake ratio is comparable to its complaint ratio of 2.5.

Oregon complaint trends. As part of the State of Oregon AI, complaint data were obtained from BOLI. The information contained all fair housing complaints filed or closed with BOLI between

January 1, 2010 and December 31, 2014. BOLI reported 545 complaint records during this period.

Basis of complaints. Statewide during time period, complaints based on disability represented 52 percent of all complaints filed. Race represented the second largest share at 16 percent, followed by familial status and national origin at 11 percent and 8 percent respectively. Figure II-4 displays the number and percent by basis of complaint from January 1, 2010 to December 31, 2014.

Figure II-4.
Basis of Complaints, State of Oregon, January 1, 2010 to December 31, 2014

Note:
One primary basis was reported for each complaint.

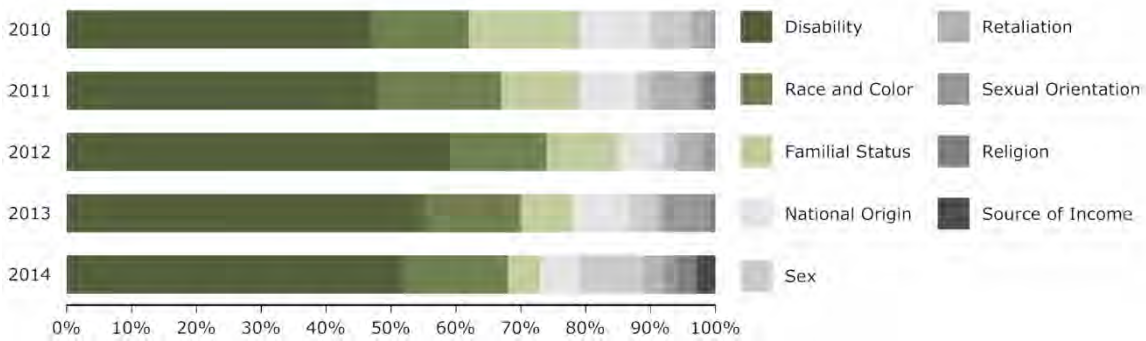
Source:
Bureau of Labor and Industries.

Basis	Number	Percent
Disability	284	52%
Race and Color	87	16%
Familial Status	58	11%
National Origin	45	8%
Sex	26	5%
Retaliation	20	4%
Sexual Orientation	12	2%
Religion	8	1%
Source of Income	5	1%
Total	**545**	**100%**

Figure II-5 shows the basis of complaint by year. Complaints based on disability accounted for the greatest share of complaints each year, ranging from 47 percent in 2010 to 59 percent in 2012. Complaints based on race accounted for the second largest share of complaints in all years, except for 2010 when complaints based on familial status accounted for a slightly higher share than complaints based on race. The share for the other basis of complaint categories varied year by year, although in most years, the balance of complaint bases represented less than one-third of all complaints.

Figure II-5.
Basis of Complaints Share by Year, State of Oregon, January 1, 2010 to December 31, 2014

Basis	2010	2011	2012	2013	2014	All Years
Disability	47%	48%	59%	55%	52%	**52%**
Race and Color	15%	19%	15%	15%	16%	**16%**
Familial Status	17%	12%	11%	8%	5%	**11%**
National Origin	11%	9%	7%	9%	6%	**8%**
Sex	6%	2%	2%	4%	10%	**5%**
Retaliation	3%	7%	4%	1%	3%	**4%**
Sexual Orientation	1%	1%	3%	7%	2%	**2%**
Religion	1%	2%	0%	1%	3%	**1%**
Source of Income	0%	1%	0%	0%	3%	**1%**



Note: One primary basis was reported for each complaint.

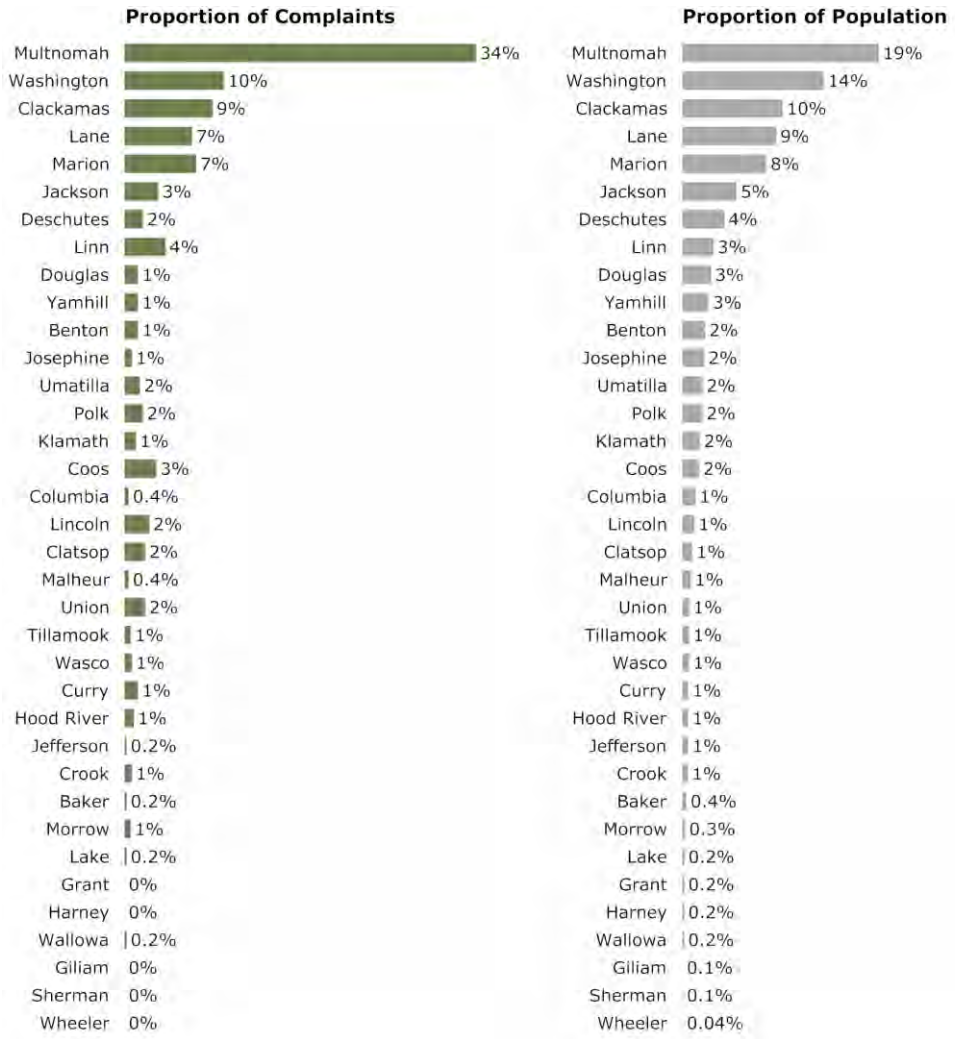
Source: Bureau of Labor and Industries.

Geographic distribution. Figure II-6 shows the distribution of complaints by county compared to the distribution of the state's population by county.

As with intake call trends, counties with the largest proportion of complaints are found in the most populous counties in the state, specifically Multnomah County, which includes the City of Portland and the City of Gresham, and Washington and Clackamas counties, the second and third most populous counties respectively.

In most cases, the proportion of complaints is similar to each county's share of the state's population. Nine counties have a higher proportion of complaints than their proportion of the population, with Multnomah County's proportion of complaints far exceeding its proportion of the population (34% v. 19%).

Figure II-6.
Proportion of Complaints and Population by County, State of Oregon, January 1, 2010 to December 31, 2014.



Note: No complaints were filed for Gilliam, Grant, Harney, Sherman and Wheeler counties between January 1, 2010 and December 31, 2014.

Source: Bureau of Labor and Industries, 2010 Census.

Figure II-7 displays the top 10 counties by number of complaints and complaints per 10,000 residents.[3] Multnomah, Washington and Clackamas—the state's most populous counties—had the highest number of complaints.

Complaints were also analyzed as a ratio (complaints per 10,000 people) to control for population size. This ratio is highest for Union, Curry and Clatsop counties. The higher prevalence of complaints in these counties may be related to the higher proportion of residents with disabilities (16% in Union County, 25% in Curry County and 17% in Clatsop County) compared to the 13 percent statewide. Union County and Curry County also have a high dissimilarity index between African American and non-Hispanic whites, which may increase the

[3] A full list of complaints by number and per 10,000 residents is located in Figure II-22.

likelihood of complaints based on race. Complaints per 10,000 residents for the State of Oregon overall was 1.4.

Figure II-7.
Total Complaints, Top 10 Counties, State of Oregon, January 1, 2010 to December 31, 2014

	Top 10 Counties	Number of Complaints
1	Multnomah	187
2	Washington	53
3	Clackamas	47
4	Marion	38
5	Lane	36
6	Linn	22
7	Jackson	18
8	Coos	17
9	Lincoln	13
10	Clatsop	11
	State of Oregon	**545**

	Top 10 Counties	Complaints per 10,000 people
1	Union	4.3
2	Curry	3.1
3	Clatsop	3.0
4	Lincoln	2.8
5	Coos	2.7
6	Morrow	2.7
7	Multnomah	2.5
8	Hood River	2.2
9	Crook	1.9
10	Linn	1.9
	State of Oregon	**1.4**

Note: One primary basis was reported for each complaint.

Source: Bureau of Labor and Industries, 2010 Census.

Figure II-8 shows the counties with the highest percentage of complaints based on disability. One hundred percent of Coos County and Union County complaints were based on disability, compared to 52 percent of complaints for the state overall. Clatsop, Lincoln, Marion, Linn and Lane counties also had a high share of disability based complaints among nonentitlement jurisdictions. All of these counties have a higher proportion of residents with disabilities than the statewide proportion; this may be influencing the high share of disability related complaints in these counties.

Figure II-8.
Top Disability Based Complaint Counties, State of Oregon, January 1, 2010 to December 31, 2014

County	Disability Based Complaints	Total Complaints	Percent
Coos	17	17	100%
Union	11	11	100%
Clatsop	7	11	64%
Lincoln	8	13	62%
Marion	22	38	58%
Linn	12	22	55%
Washington	28	53	53%
Lane	18	36	50%
Clackamas	23	47	49%
Multnomah	88	187	47%
State of Oregon	**284**	**545**	**52%**

Note:
One primary basis was reported for each complaint.

Source:
Bureau of Labor and Industries.

Figure II-9 of shows the counties with the highest percentage of complaints based on race and color. Umatilla County and Klamath County have the highest percentages, partially due to the low number of total complaints.

Figure II-9.
Top Race and Color Based Complaint Counties, State of Oregon, January 1, 2010 to December 31, 2014

Note:
One primary basis was reported for each complaint.

Source:
Bureau of Labor and Industries.

County	Race/Color Based Complaints	Total Complaints	Percent
Umatilla	3	8	38%
Klamath	2	6	33%
Multnomah	51	187	27%
Lincoln	3	13	23%
Polk	2	10	20%
Clatsop	2	11	18%
Washington	9	53	17%
Lane	6	36	17%
Clackamas	5	47	11%
Marion	3	38	8%
Jackson	1	18	6%
State of Oregon	**85**	**545**	**16%**

Resolution of complaints. Figure II-10 shows the resolution of closed complaints between January 1, 2010 and December 31, 2014. Of the 545 complaints filed with BOLI during this time, 13 percent remain open and 87 percent have been closed.

Among closed complaints, 59 percent were closed due to no substantial evidence, which occurs when BOLI investigators determine a lack of substantial evidence of a fair housing violation. Twenty-five percent were conciliated and closed; this occurs when the complainant and defendant agree on how to address the cause of the complaint. The remaining complaints were closed for a range of reasons, each accounting for a small share all closed complaints.

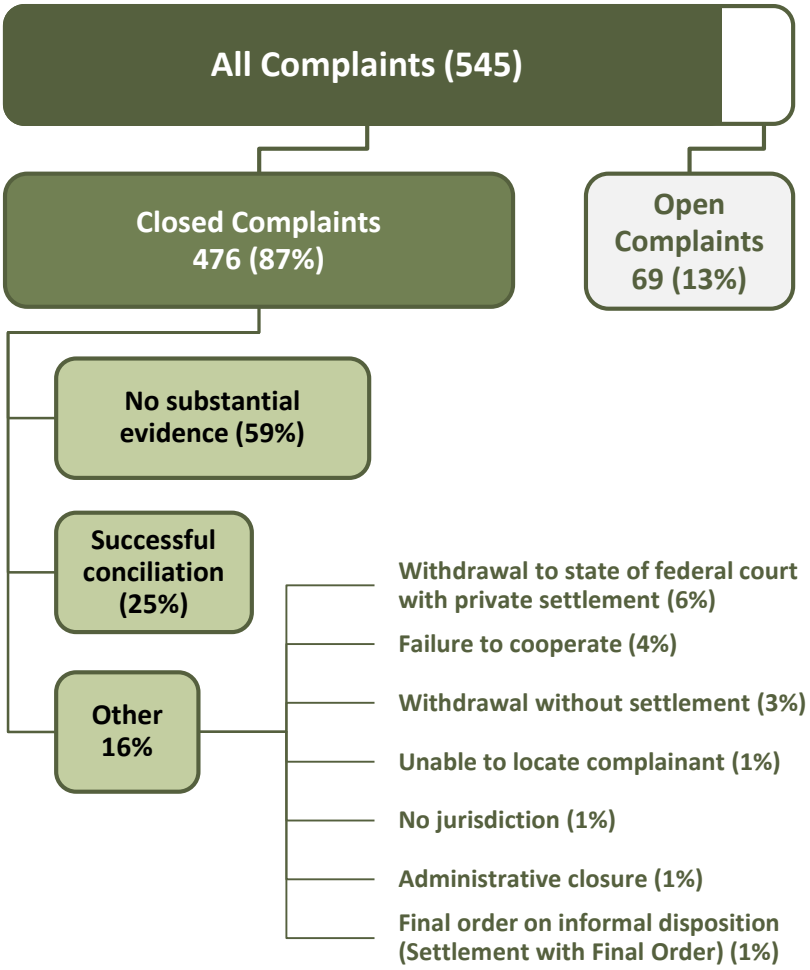
Figure II-10. Resolution of Closed Complaints, January 1, 2010 to December 31, 2014

Note:

Successful conciliation is a combination of: negotiated conciliation before determination of cause, successful conciliation agreement after cause finding, conciliation prior to cause finding, and successful mediation during or after investigation.

Source:

Bureau of Labor and Industries.



Fair Housing Legal Case Review

This section describes fair housing legal actions that were brought and/or resolved during the past ten years, to assess trends in Oregon legal challenges and outcomes. The sources for the cases below are from the National Fair Housing Advocate Online Case Database and the United States Department of Justice Housing and Civil Enforcement Cases Database.

The purpose of the legal summaries below is to highlight, in a non-technical way, recent legal findings that concern fair housing laws. The summaries are provided in order for local government leaders and staff, stakeholders, and the public to better understand some of the more complex aspects of fair housing laws and be aware of the potential for violations.

The cases are grouped by the primary fair housing violation that was challenged in the case. The cases review begins with cases that involve fair housing accessibility challenges and/or disability discrimination, which represent most of the cases found in the legal review.

Bureau of Labor and Industries of the State of Oregon v. Prometheus Real Estate Group Inc., et al. (2014). This case involves a complaint filed with the Bureau of Labor and Industries (BOLI) against Prometheus Real Estate Group for failure to make reasonable accommodation.

In October 2011, the complainant requested a disabled parking spot closer to his unit because his disability limited his ability to walk. The apartment complex in which the complainant lived failed to comply with the request. On January 29, 2012, the complainant fell and was injured in the parking lot of the housing complex. One week after the fall, the housing complex installed the requested signage. The complainant died the following day. A complaint was filed with BOLI, which found substantial evidence of unlawful discrimination on the part of the Prometheus Real Estate Group, including a failure to make reasonable accommodation.

On January 28, 2015, the Prometheus Real Estate Group agreed to pay $475,000 to settle allegations that it failed to provide a reasonable accommodation. The agreement included a number of stipulations, including that Prometheus provide BOLI with a list of all owned or managed properties, conduct annual fair housing training for employees, maintain a reasonable accommodation log that documents these requests for BOLI semi-annually, and notify all tenants of their rights to reasonable accommodation.

Fishing Rock Owners' Association, Inc. v. David Roberts and Sharon Roberts (2014). This case is related to a proposed drug rehabilitation facility in the Fishing Rock subdivision. In February 2009, the defendants, who owned three adjacent lots in the Fishing Rock subdivision, informed the Fishing Rock Owners' Association of their intention to operate an outpatient drug rehabilitation program out of their home. The Association filed a complaint that this action violated the subdivision's prohibition of commercial activity and requested a judgment to stop the defendants from operating a business on their property. The defendants then filed counterclaims alleging disability discrimination in violation of the FFHA.

The court ruled that the defendants failed to present any evidence to support a reasonable accommodation claim or to support the defendants' claim that the Association interfered with their attempts to establish a rehabilitation facility by creating restrictive parking rules. The court dismissed the defendants' counterclaims.

Book v. Hunter (2013). This case involves a refusal to make reasonable accommodation. The complainant, a resident with a disability living with an emotional assistance service dog, sought to rent an apartment from the defendants. After the complainant's rental application was preliminarily approved, she provided the defendants with a physician's note identifying her need for a companion animal. The rental application was subsequently denied due to, "inaccurate or false information supplied by applicant", and "undisclosed or unpermitted pet".

The court held that the defendants violated the FFHA by failing to reasonably accommodate the complainant's disability. The court ruled in favor of the complainant and awarded $12,000 in damages and recovery of attorney's fees and costs.

McVick LLC and JDV Corporation v. United States Department of Housing and Urban Development (2012). This case involves noncompliance with accessibility requirements in the FFHA for persons with disabilities. On September 21, 2009, the Fair Housing Council of Oregon (FHCO) filed a complaint with HUD alleging that McVick LLC discriminated on the basis of disability by building a property that did not comply with the FFHA's accessibility requirements. Over many months McVick LLC repeatedly refused to allow HUD to inspect the interior of the units. They also filed counterclaims that HUD's inspection should be banned

because the complainant, the FHCO, lacked standing and was not an "aggrieved person" under the FFHA.

The court ruled in favor of HUD, concluding that McVick LLC knew of the defendant's desire to inspect the property and that they failed to provide evidence of irreparable harm cause by allowing interior inspections.

Steven Kulin v. Deschutes County (2010). This case involves alleged violation of FFHA and ADA based on disability status. The complainant was a disabled business owner who operated his business from his home. He received notices from Deschutes County that he violated the county code associated with his property and that a variance from the code was required. The complainant claimed that the county deprived him of his property and enjoyment of his home due to their refusal to accommodate the disabled in the application of the county code and by requiring the disabled to apply for a variance in order to receive accommodation. The court did not find sufficient evidence to support the allegation that the defendants were liable for the violation and dismissed the complainant's claims.

Garcia v. Washington County Dept. of House. Services (2006). This case involves an alleged refusal to make reasonable accommodation. The complainant has a schizoaffective disorder and other related disabilities. He began receiving Section 8 voucher rental assistance in 1994 and continued using the voucher when he moved into a home owned by his brother in 1997. The assistance ended in December 2005 at HUD's direction due to a rule that prohibits using a voucher at a dwelling owned by a person related by blood or marriage where the relative also resides. The complainant submitted a request to HUD to continue to live with his brother and receive assistance. The defendant then sent two letters to HUD recommending the request be denied. HUD subsequently denied the request. The complainant claimed the defendant intentionally failed to help him find alternative means to accommodate his disability.

Despite the prohibition on receiving Section 8 voucher assistance if living in a home and related by blood or marriage to the owner, the court noted that not making reasonable accommodation to ensure a disabled person has an equal opportunity to use and enjoy a dwelling is unlawful discrimination under the FFHA. Furthermore, the court found no evidence to support the defendant's argument that the complainant's claim should be dismissed because the FFHA exempts public housing agencies from suits related to discriminatory housing practices.

Woodworth v. Bank of America (2011). This case involves alleged discrimination in lending by a financial institution. The complainants are permanently disabled and rely on Social Security Disability for their income. In 2005, they contacted Bank of America to obtain financing for needed repairs to their home. Instead of providing a home equity line of credit, the bank refinanced their home loan in 2005, 2006, 2007 and 2008. The complainants were unable to make the payments on the 2008 loan refinance and defaulted. A foreclosure sale of the complainants' home was scheduled for April 5, 2010.

The complainants claimed that their housing was made unavailable through unaffordable mortgage loans that the bank knew or should have known the complainants could not afford. They also claimed that the bank discriminated against them by issuing successive refinance

mortgage loans instead of a conventional home equity line of credit that may be offered to applicants without disabilities.

The court ruled in favor of the defendants, who argued the FFHA only applies to purchase transactions, not refinance loans at issue in this case. The court also held that the complainants failed to provide substantial evidence showing directly or raising the inference that discriminatory intent motivated the defendants' conduct.

Pacific Community Resource Center et al., v. City of Glendale Oregon (2014). This case involves alleged discriminatory enforcement of the City of Glendale's ordinance on occupancy requirements. In October 2009, the complainants established a motel in Glendale's commercial zone. They requested City Council permission for residential tenants to rent rooms. Shortly after, Glendale City Council removed multi-family housing from the permitted uses in the commercial zone and the complainants subsequently received notice from the city of a potential zoning ordinance violation. The complainants were later convicted by a circuit court judge of operating without obtaining an R-2 Certificate of Occupancy or a Conditional Use Permit. The complainants continued to operate the motel for residential uses while they unsuccessfully sought a Certificate of Occupancy and incurred civil penalties totaling $65,000 by September 16, 2013.

The court found the complainants' evidence provided only an inference of discriminatory impact, not a direct discriminatory impact. The complainants' claim of disparate impact on the American Indian community of Glendale was considered insufficient by the court because two of the three Native American tenants were able to relocate during litigation. The court denied the complainants' motion for relief.

United States of America and Fair Housing Council of Oregon v. Hadlock (2010). This case involves a violation of the FFHA based on familiar status. The Fair Housing Council of Oregon (FHCO) filed a complaint on behalf of the complainant against the defendant for discriminating on the basis of familial status. In June 2007 the complainant contacted the defendant to inquire about an advertised rental property. The defendant asked the complainant if she had any children because she did not intend to rent the property to anyone with children. Testing phone calls submitted in the case revealed the defendant repeatedly asked callers about family composition and size and noted to one caller that she did not want to rent to families.

The court found substantial evidence that the defendant made discriminatory statements that discouraged families from renting. The complainants successfully demonstrated the differential treatment resulting from the defendant's statements. The court ruled in favor of the complainant and required the defendant retain a professional management company if she continues to rent her property, to obtain fair housing training and to pay damages and attorney's fees to FHCO.

United States v. Ballis (2007). This case involves a refusal to rent based on race and sex. In February 2006, a complaint was filed that alleged that the owners of an apartment building in Portland refused to rent to a couple on the basis of one individual's race and sex; the individual was an African American male. The complaint also alleged that the defendants discriminated against the FHCO by engaging in disparate treatment against an African American male tester.

The court ruled in favor of the complainant and required the defendants to pay damages and to attend fair housing training.

Dean v. Jones (2010). This case involves alleged violation of due process rights and retaliation under the FFHA. The complainant represented himself and the other residents of the Alder House, a low income housing facility that receives federal housing credits. The complainant alleged that the defendants discriminated against the Alder House tenants by posting unlawful violation notices and fines against the complainants.

The court held that the complainant cannot claim discrimination under the FFHA because he did not allege that he is a member of any of the classes protected by the Act or that the defendants' adverse actions were based on his status as a protected class member. The court ruled in favor of the defendant and dismissed the complainant's claims. The court also recommended the complainant re-file a complaint that establishes that he is a member of a protected class or that he suffered adverse consequences because he complained about discrimination against tenants of protected classes.

Fair Lending Review

Homeownership is valuable for many reasons, including the primary role it plays in building equity, strengthening credit and providing long-term residential and economic stability. Gaps in homeownership rates among some minority groups compared to whites are common. These gaps may relate to factors such as historic housing discrimination leading to segregation of minorities in neighborhoods with low home values and disproportionately lower incomes and employment stability among some minority groups.

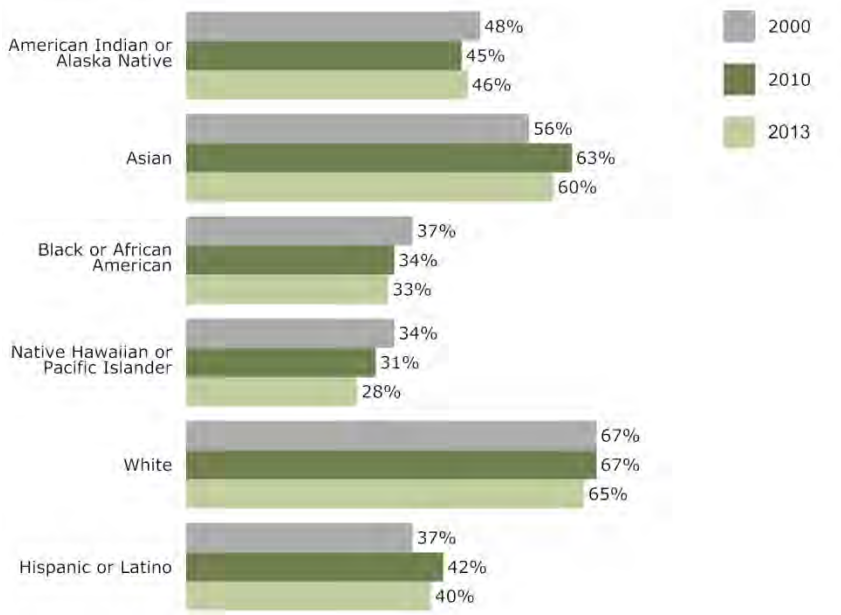
Figure II-11 compares homeownership rates among minority and White residents in 2000, 2010 and 2013. White households consistently have the highest rates of homeownership, between 65 and 67 percent. Asians have the second-highest rate. These compare to much lower rates of ownership for other minority groups: In 2013, 46 percent of American Indian or Alaska Natives, 40 percent of Hispanic s, 33 percent of African Americans and 28 percent of Native Hawaiian/Pacific Islanders were homeowners.

In 2013, the African American/White homeownership gap was greater in Oregon than the gap nationwide: African Americans in Oregon had a homeownership rate 32 percentage points lower than whites, compared to 29 percentage points lower nationwide. The Native Hawaiian or Pacific Islanders/White gap was also greater in Oregon compared to the gap nationwide. Hispanic/White and American Indian/White gaps in Oregon were similar to national trends and the Asian/White gap was considerably lower in Oregon than nationwide.

Except for Asian and Hispanic households, the past decade was a period of declining homeownership. Hispanics in Oregon experienced an increase in homeownership, from 37 percent in 2000 to 42 percent in 2010 and 40 percent in 2013. In contrast, the rate for African Americans declined from 37 percent in 2000 to 33 percent in 2013; the rate for American Indian or Alaska Natives declined from 48 percent in 2000 to 45 percent in 2010; and the rate for Native Hawaiian or Pacific Islanders declined from 34 percent in 2000 to 28 percent in 2013.

Figure II-11. Homeownership Rates by Race and Ethnicity, State of Oregon, 2000, 2010 and 2013

Source:
US Census 2000, 2010, 2013.



The following section discusses how disparities in access to capital explain some of the gaps in homeownership.

Mortgage loan data analysis. Home Mortgage Disclosure Act, or HMDA, data are widely used to detect evidence of discrimination in mortgage lending. In fact, concern about discriminatory lending practices in the 1970s led to the requirement for financial institutions to collect and report HMDA data. The variables contained in the HMDA dataset have expanded over time, allowing for more comprehensive analyses and better results. However, despite expansions in the data reported, HMDA analyses remain limited because of the information that is *not* reported.

As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities, genders, and location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Yet HMDA data do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to an applicant. Basically, the data provide *a lot* of information about the lending decision—but *not all* of the information.

Beginning in 2004, HMDA data contained the interest rates on higher-priced mortgage loans. This allows examinations of disparities in high-cost, including subprime, loans among different racial and ethnic groups. It is important to remember that subprime loans are not always predatory or suggest fair lending issues, and that the numerous factors that can make a loan "predatory" are not adequately represented in available data. Therefore, actual predatory practices cannot be identified through HMDA data analysis. However, the data analysis can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted.

The Federal Reserve is the primary regulator of compliance with fair lending regulations. The Federal Financial Institutions Examination Council (FFIEC) is responsible for collecting and providing public access to HMDA data.

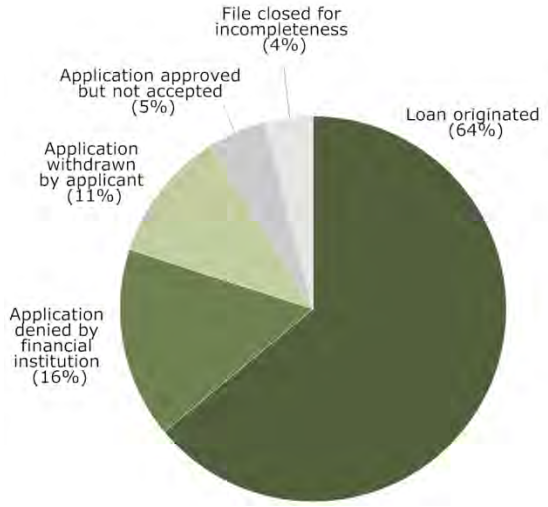
When federal regulators examine financial institutions, they use HMDA data to determine if applicants of a certain sex, race or ethnicity are rejected at statistically significant higher rates than applicants with other characteristics are. The Federal Reserve uses a combination of sophisticated statistical modeling and loan file sampling and review to detect lending discrimination.

This section uses the analysis of HMDA data to examine disparities in lending and loan denials across different racial and ethnic groups and income categories, to determine if loans are being apportioned more favorably to some racial and ethnic groups as opposed to others.

Loan applications in Oregon. During 2013, the latest year for which HMDA data are publicly available, there were 170,751 loan applications made in Oregon secured by residential properties that intended to be occupied by owners. Sixty-five percent of the loan applications were for refinancing, 31 percent were for home purchase and the remaining four percent were for home improvement. Seventy-eight percent of the loans were conventional loans, 12 percent were Federal Housing Administration-insured, 7 percent were Veterans Administration-guaranteed and 2 percent were Farm Service Agency or Rural Housing Service loans.

Almost two-thirds (64%) of all loan applications were approved and originated. Sixteen percent of all loan applications in Oregon were denied and 11 percent were withdrawn by the applicant. Figure II-12 displays the actions taken on Oregon loan applications in 2013.

Figure II-12.
Loan Applications and Action Taken,
State of Oregon, 2013



Note:
Does not include loans for multifamily properties or non-owner occupants.

Source:
FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

Outcome of loan applications. Figure II-13 presents more detail on the outcomes of loan applications, focusing on differences in race and ethnicity and income.

Loan origination rates were lowest for Hispanic applicants (55%) and American Indian or Alaska Native applicants (56%). These groups had their loans denied 23 and 24 percent of the time, respectively. Asian and White applicants had the highest origination rates—and the lowest denial rates—with around two-thirds of loans originated and 15 percent of loans denied.

Originations of loans are dependent upon the loan application being submitted in a complete form to the lending officer. Loans that are withdrawn, incomplete or not accepted by the borrower affect borrower origination rates. Figure II-13 also includes these outcomes for borrowers by race and ethnicity. In all three categories, racial and ethnic minority applicants had either the same share or a slightly higher share than White applicants—as such, the effect of withdrawals, incomplete loan applications and non-approvals on the origination rates is minimal.

The last three rows in the figure compare the application outcomes of potential minority borrowers with potential White borrowers. The largest difference in originations is for Hispanics/non-Hispanics: Hispanics received loans 10 percentage points less frequently than non-Hispanics. Similar differences exist for African Americans and American Indians or Alaska Natives (8 and 9 percentage point disparities).

The largest difference in the denial rate is for American Indian or Alaska Natives/whites and Hispanic/non-Hispanics. American Indian or Alaska Natives received a denial 8 percentage points more frequently than whites. Similarly, Hispanics received a denial 8 percentage points more frequently than non-Hispanics.

Figure II-13.
Outcome of Mortgage Loan Applications by Race/Ethnicity, State of Oregon, 2013

Race/Ethnicity	Percent Originated	Percent Approved but Not Accepted by Applicant	Percent Denied	Percent Withdrawn	Percent Incomplete
Race					
American Indian or Alaska Native	56%	7%	24%	10%	3%
Asian	66%	6%	15%	10%	3%
Black or African American	57%	6%	20%	12%	4%
Native Hawaiian or Pacific Islander	60%	6%	18%	11%	5%
White	65%	5%	16%	10%	3%
Ethnicity					
Hispanic or Latino	55%	6%	23%	11%	4%
Non-Hispanic or Latino	65%	5%	15%	10%	3%
American Indian / White Difference	**-9%**	**1%**	**8%**	**0%**	**0%**
African American / White Difference	**-8%**	**1%**	**5%**	**2%**	**0%**
Hispanic / Non-Hispanic Difference	**-10%**	**1%**	**8%**	**1%**	**1%**

Note: There is a statistically significant difference between White and African American denial rates, White and American Indian denial rates and non-Hispanic and Hispanic denial rates at 95% confidence.

Does not include loans for multifamily properties or non-owner occupants.

Differences between racial and ethnic groups may be impacted by rounding.

Source: FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

As displayed in Figure II-14, these disparities in denial rates persist even at high income levels. Among applicants earning $75,000 or above, the denial rate among American Indian or Alaska Natives was 7 percentage points higher than whites and the denial rate for African American applicants was 4 percentage points higher than whites.

Similarly, among Hispanics earning $75,000 or above, the denial rate was 6 percentage points higher than that of non-Hispanic applicants. African American applicants earning less than $24,999 experienced the highest denial rate (48%).

Figure II-14.
Mortgage Loan Application Denials by Race/Ethnicity and Income, State of Oregon, 2013

Race/Ethnicity	Overall Percent Denials	Percent of Denials by Income			
		$0 - $24,999	$25,000 - $49,999	$50,000 - $74,999	$75,000 and Over
Overall	**16%**	**36%**	**21%**	**16%**	**13%**
Race					
American Indian or Alaska Native	24%	41%	29%	20%	20%
Asian	15%	42%	22%	15%	11%
Black or African American	20%	48%	28%	19%	16%
Native Hawaiian or Pacific Islander	18%	44%	25%	18%	12%
White	16%	35%	20%	15%	12%
Ethnicity					
Hispanic or Latino	23%	41%	27%	21%	18%
Non-Hispanic or Latino	15%	35%	19%	15%	12%
American Indian / White Difference	**8%**	**6%**	**10%**	**5%**	**7%**
African American / White Difference	**5%**	**13%**	**9%**	**4%**	**4%**
Hispanic / Non-Hispanic Difference	**8%**	**7%**	**8%**	**6%**	**6%**

Note: Does not include loans for multifamily properties or non-owner occupants.
Differences between racial and ethnic groups may be impacted by rounding.

Source: FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

The denial rate displayed in Figure II-13 and Figure-14 above is calculated by dividing the number of denials by the total number of loan applications. The denial rate could also be calculated by dividing the number of denials by the number of denials+originations (excluding applications that are withdrawn, not accepted, closed). Calculating the denial rate this way results in a higher denial rate because the other outcomes—withdrawal by applicant, approved but not accepted by applicant and closed for incompleteness—are not considered.

This calculation was used to compare the denial rate in 2013 with the 2008 denial rate in the 2011 Oregon AI, which used the denials/loans denied+originated approach. This comparison is shown in Figure II-15. The loan denial rate decreased for all groups between 2008 and 2013 except for American Indian or Alaska Natives. The denial rate declined by 8 percentage points for Hispanics and 7 percentage points for African Americans.

This trend may be partially related to the passing of the Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act) in 2008. The Act, which was designed to improve the mortgage loan market and enhance consumer protections, mandated that states license mortgage loan originators and set the minimum licensing requirements that states must comply with in their licensing programs.

Figure II-15.
Mortgage Loan Application Denials by Race/Ethnicity Based on Loans Originated, State of Oregon, 2008 and 2013.

Note:

Native Hawaiian or Pacific Islander not included in 2011 AI.

Does not include loans for multifamily properties or non-owner occupants.

Source:

FFIEC HMDA Raw Data, 2013, Western Economics 2011 Oregon AI and BBC Research & Consulting.

Race/Ethnicity	2008	2013	Percent Change
American Indian or Alaska Native	26%	30%	4%
Asian	25%	19%	-6%
Black or African American	33%	26%	-7%
White	24%	19%	-5%
Hispanic or Latino	38%	30%	-8%

Figure II-16 displays the denial rate by race and ethnicity by loan purpose. Denial rates were lowest for home purchase loans and highest for home improvement loans for all racial and ethnic groups. Among refinancing loans, which accounted for 65 percent of all loans, the denial rate was highest for Hispanic applicants and American Indian or Alaska Native applicants at 26 percent. White applicants and Asian applicants had the lowest denial rate at 17 percent and 18 percent respectively. A similar trend was found for denial rates for home purchase loans.

Home improvement had the highest denial rates across racial and ethnic groups. Consistent lack of home improvement capital for certain racial/ethnic groups and/or neighborhoods can lead to disproportionate impact in housing quality and neighborhood conditions.

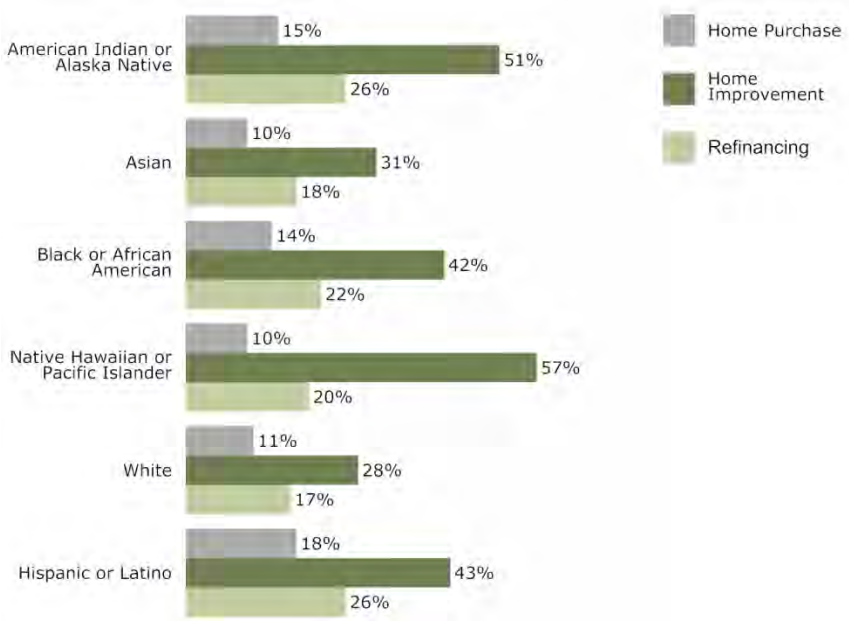
Figure II-16.
Denial by Race/Ethnicity and Loan Purpose, State of Oregon, 2013

Note:

Does not include loans for multifamily properties or non-owner occupants.

Source:

FFIEC HMDA Raw Data, 2013, BBC Research & Consulting.



HMDA data contain some information on why loans were denied, which can help to explain differences in denials among racial and ethnic groups. Figure II-17 shows the reasons for denials in Oregon. As the table demonstrates, racial and ethnic minorities, with the exception of Asian applicants, are more likely to be denied a loan based on credit history than White and non-Hispanic applicants.

Figure II-17.
Reasons for Denials of Loan Applications by Race/Ethnicity of Applicant, State of Oregon, 2013

Race/Ethnicity	Debt-to-Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other
Race									
American Indian or Alaska Native	15%	2%	29%	21%	4%	5%	10%	1%	13%
Asian	30%	4%	17%	14%	2%	6%	10%	0%	16%
Black or African American	21%	0%	27%	13%	4%	5%	12%	0%	18%
Native Hawaiian or Pacific Islander	20%	2%	31%	9%	2%	7%	12%	0%	17%
White	21%	2%	21%	21%	3%	5%	11%	0%	16%
Ethnicity									
Hispanic or Latino	22%	2%	29%	14%	4%	5%	8%	0%	15%
Non-Hispanic or Latino	21%	2%	20%	21%	3%	5%	11%	0%	16%

Note: Does not include loans for multifamily properties or non-owner occupants.

Source: FFIEC HMDA Raw Data, 2013, BBC Research & Consulting.

Stakeholder perspectives on denials. The Stakeholder Advisory Committee (SAC), an advisory group assembled for the AI made up of lenders, real estate industry experts, and advocates, offered their perspective on the results mortgage lending analysis.

- Cosigning on loans for family members and sometimes friends is a common practice among certain cultural groups, particularly when capital is difficult to obtain. This will raise debt-to-income ratios and sometimes damage credit, making it harder to be approved for traditional loans.
- Minority groups tend to have lower FICO scores and higher debt-to-ratio income ratios, which may cause higher rates of loan denials.
- Some minority groups have higher percentages of undocumented income, which may be a factor that influences loan denials.
- High loan denials in rural areas are a factor of market conditions and depressed economies.
- Some first time homebuyer programs don't require a large down payment, so an individual may start with only three percent equity. Given this, even a small change in value can put homeowners underwater. This is especially impactful in rural areas which had lower home values to begin with.
- "Character lending" remains a common practice in small towns. Applicants who do not fit the traditional borrower mold may be at a disadvantage.

Lack of access to capital and "unbanked" residents. When residents are reluctant to seek capital or bank accounts with traditional financial institutions and need banking services they patronize other, non-traditional sources. The Federal Deposit Insurance Corporation (FDIC) has consistently surveyed such residents, whom they term "unbanked and underbanked" households. Unbanked households are those that lack any kind of deposit account at an insured depository institution. Underbanked households hold a bank account, but also rely on alternative financial providers such as payday lenders or pawn shops.

The latest survey (2012) found that in the United States, 28 percent of households are unbanked or underbanked (8.2% unbanked and 20.1% underbanked). In Oregon, 4.3 percent of households are unbanked and 14.4 percent are underbanked—nearly 10 percentage points lower than the U.S. proportion. Oregon had one of the lowest proportions of unbanked or underbanked households in the nation, behind New Hampshire, Minnesota and Wisconsin.

Oregon's Hispanic households are disproportionately likely to be unbanked: in 2009, 17 percent were unbanked compared to 3 percent for whites. An additional 24 percent of Hispanics were underbanked (v. 14% for whites); the banking status of 13 percent was unknown.[4] In sum, 46 percent of Hispanics in Oregon are "banked" compared to 75 percent of whites.

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[4] Data on other races were not available in the 2009 survey The 2012 report did not include demographic details on the unbanked.

Household types that are least likely to be banked include: single female households (15%), households earning less than $15,000/year (22%), households with low educational attainment (17% of households without high school degrees are unbanked), renters (15%) and younger and middle age households (7% between 15 and 34 are unbanked and 9% between 35 and 44 are unbanked).

Geographic variation in denials. Figure II-18 displays the 10 counties in Oregon with the highest percent of loan applications that were denied in 2013.[5] The denial rate for the top 10 counties ranged from 56 percent to 24 percent, compared to 16 percent for the state overall. It is important to note that Wheeler County—with a very high denial rate of 56 percent—had only 27 loan applications in 2014.

Figure II-18.
Mortgage Loan Denials in the Top 10 Counties, State of Oregon, 2013

Note:

Does not include loans for multifamily properties or non-owner occupants.

Source:

FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

Top 10 Counties	Percent Denied For All Races and Ethnicities	Total Number of Loan Applications
1 Wheeler	56%	27
2 Lake	34%	248
3 Grant	31%	202
4 Malheur	28%	654
5 Sherman	27%	41
6 Curry	26%	860
7 Harney	26%	176
8 Wallowa	25%	295
9 Morrow	24%	321
10 Jefferson	24%	666
State of Oregon	**16%**	**170,751**

Overall, denial rates are higher in rural counties and in non-Metropolitan Statistical Areas (MSAs) than in urban counties/areas for all races and ethnicities (including whites) except for African Americans.

The map in Figure II-19 displays the percent of loan applications that were denied in 2013 by county. The counties with the highest denial rates are mostly in Eastern Oregon. Counties with the lowest denial rates were part of or adjacent to the state's largest cities.

[5] Figure II-23 shows denial rates by race and ethnicity for all counties.

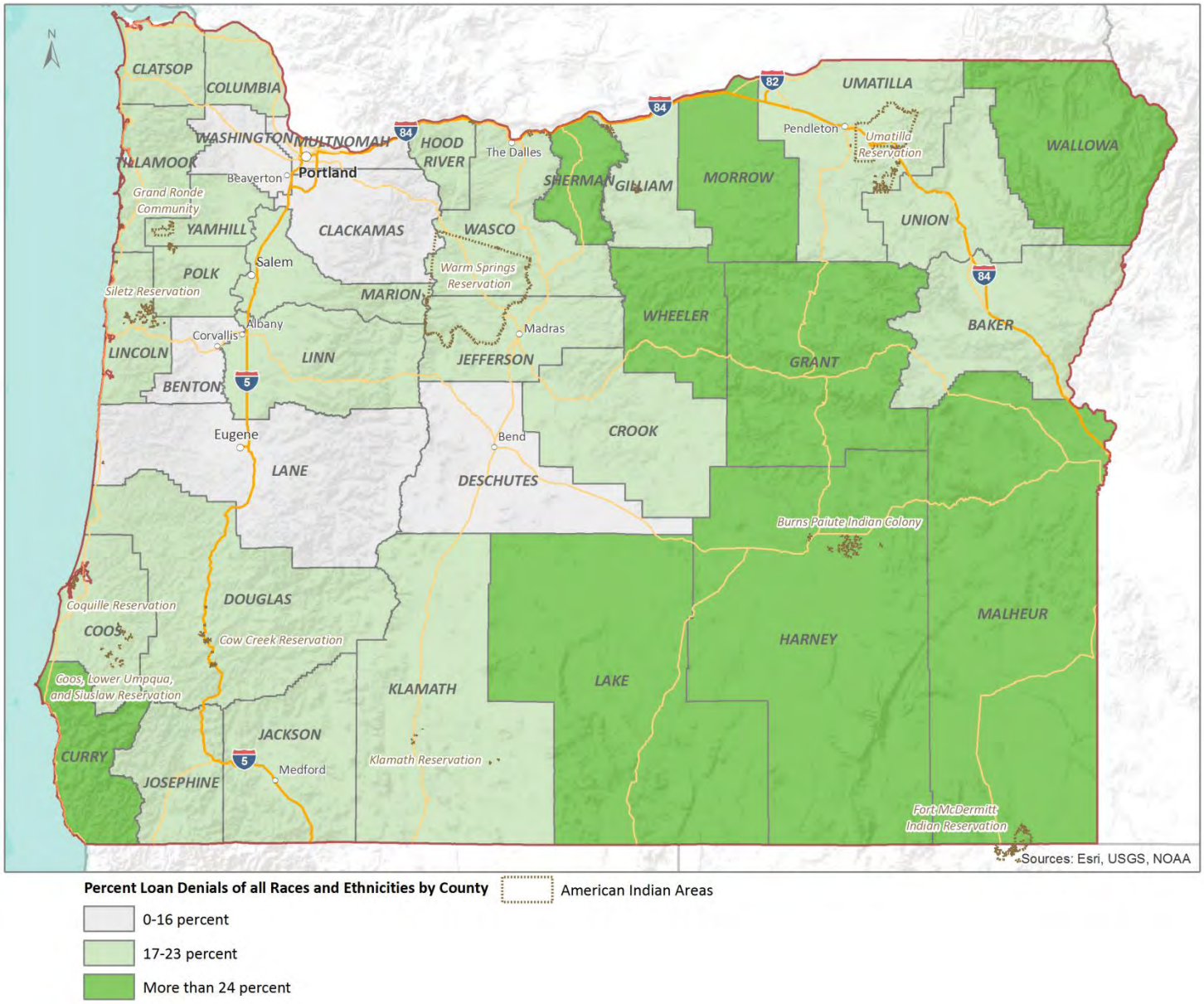
Figure II-19. Mortgage Loan Denials all Races and Ethnicities by County, State of Oregon, 2013

Note:

Does not include loans for multifamily properties or non-owner occupants.

Source:

FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.



Subprime analysis. This section examines how often racial and ethnic minority loan applicants in Oregon received subprime loans compared to White applicants. For the purposes of this section, we define "subprime" as a loan with an APR of more than three percentage points above comparable Treasuries. This is consistent with the intent of the Federal Reserve in defining "subprime" in the HMDA data.

There was not a large difference in the percent of subprime loans between racial groups in 2013. At the highest income level, Asian applicants and White applicants had slightly lower rates of subprime loans compared to other racial groups. A three or four-percentage point difference was found between Hispanic applicants and non-Hispanic applicants in income categories from $74,999 and under. Figure II-20 displays subprime loans by race, ethnicity and income in 2013.

Figure II-20.
Subprime Loans by Race/Ethnicity and Income, State of Oregon, 2013

Race/Ethnicity	Overall Percent Subprime	Percent Subprime Loans by Income			
		$0 - $24,999	$25,000 - $49,999	$50,000 - $74,999	$75,000 and Over
Race					
American Indian or Alaska Native	4%	4%	3%	5%	4%
Asian	1%	1%	2%	2%	1%
Black or African American	3%	2%	4%	3%	3%
Native Hawaiian or Pacific Islander	4%	4%	11%	3%	3%
White	3%	4%	4%	3%	2%
Ethnicity					
Hispanic or Latino	5%	7%	8%	7%	3%
Non-Hispanic or Latino	3%	3%	4%	3%	2%
American Indian/White Difference	***1%***	***0%***	***-1%***	***2%***	***2%***
African American/ White Difference	***0%***	***-2%***	***0%***	***0%***	***1%***
Hispanic/ Non-Hispanic Difference	***3%***	***3%***	***4%***	***3%***	***1%***

Note: Does not include loans for multifamily properties or non-owner occupants.
Differences between racial and ethnic groups may be impacted by rounding.
Source: FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

Figure II-21 displays the 10 counties in Oregon with the highest percent of originated loans that were subprime in 2013.[6] The percent of originated loans that were subprime ranged from 11 percent to 5 percent, compared to 3 percent for the state overall.

[6] A full list of subprime rates by race and ethnicity and county is in Figure II-24.

Figure II-21.
Subprime Loans in the Top 10 Counties, State of Oregon, 2013

Note:

Does not include loans for multifamily properties or non-owner occupants.

Source:

FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

County	Percent Subprime Loans for All Races and Ethnicities	Total Number of Originated Loans
Sherman	11%	19
Morrow	10%	179
Lake	8%	105
Jefferson	7%	362
Harney	7%	87
Malheur	7%	346
Clatsop	5%	845
Tillamook	5%	554
Curry	5%	402
Columbia	5%	1508
State of Oregon	**3%**	**108,497**

Full county lists. The following figures include all counties in Oregon (prior figures contained only the 10 counties with the highest rates). Figure II-22 provides complaints by number and per 10,000 residents by county, Figure II-23 shows denial rates by race and ethnicity and county, and Figure II-24 provides subprime rates by race and ethnicity and county.

Figure II-22. Complaints by County, State of Oregon, January 1, 2010 to December 31, 2014

Note:

No complaints were filed for Gilliam, Grant, Harney, Sherman and Wheeler counties between January 1, 2010 and December 31, 2014.

Source:

Bureau of Labor and Industries, 2010 Census.

County	Number of Complaints
Multnomah	187
Washington	53
Clackamas	47
Marion	38
Lane	36
Linn	22
Jackson	18
Coos	17
Lincoln	13
Clatsop	11
Union	11
Deschutes	10
Polk	10
Umatilla	8
Benton	7
Curry	7
Yamhill	7
Douglas	6
Klamath	6
Hood River	5
Crook	4
Josephine	4
Wasco	4
Morrow	3
Tillamook	3
Columbia	2
Malheur	2
Baker	1
Jefferson	1
Lake	1
Wallowa	1
State of Oregon	**545**

County	Complaints per 10,000 people
Union	4.3
Curry	3.1
Clatsop	3.0
Lincoln	2.8
Coos	2.7
Morrow	2.7
Multnomah	2.5
Hood River	2.2
Crook	1.9
Linn	1.9
Wasco	1.6
Wallowa	1.4
Polk	1.3
Lake	1.3
Clackamas	1.3
Marion	1.2
Tillamook	1.2
Umatilla	1.1
Lane	1.0
Washington	1.0
Klamath	0.9
Jackson	0.9
Benton	0.8
Yamhill	0.7
Malheur	0.6
Deschutes	0.6
Baker	0.6
Douglas	0.6
Josephine	0.5
Jefferson	0.5
Columbia	0.4
State of Oregon	**1.4**

Figure II-23.
Mortgage Loan Denials by Race and Ethnicity and County, State of Oregon, 2013

County	Percent Denied All Race and Ethnicity	Percent Denied by Race					Percent Denied by Ethnicity		American Indian/White Difference	African American/ White Difference	Hispanic/Non-Hispanic Difference
		American Indian	Asian	Black or African American	Native Hawaiian or Pacific Islander	White	Hispanic or Latino	Non-Hispanic or Latino			
Baker	23%	50%	0%	-	0%	23%	33%	23%	27%	-	10%
Benton	14%	22%	11%	20%	23%	13%	22%	13%	9%	7%	9%
Clackamas	15%	21%	15%	25%	19%	14%	21%	14%	7%	11%	7%
Clatsop	21%	18%	25%	17%	0%	19%	27%	19%	-1%	-2%	8%
Columbia	21%	23%	25%	13%	13%	20%	15%	20%	3%	-7%	-5%
Coos	19%	23%	15%	17%	0%	19%	20%	19%	5%	-2%	1%
Crook	20%	20%	0%	0%	0%	19%	14%	19%	1%	-19%	-5%
Curry	26%	31%	50%	0%	-	26%	33%	27%	4%	-26%	6%
Deschutes	15%	12%	17%	11%	5%	15%	23%	14%	-3%	-3%	8%
Douglas	19%	22%	22%	11%	10%	18%	26%	18%	4%	-7%	8%
Gilliam	23%	-	-	-	-	25%	0%	26%	-	-	-26%
Grant	31%	20%	-	-	-	30%	0%	30%	-10%	-	-30%
Harney	26%	17%	-	-	-	27%	17%	27%	-10%	-	-10%
Hood River	22%	18%	18%	100%	25%	20%	34%	20%	-2%	80%	14%
Jackson	17%	32%	19%	15%	25%	16%	23%	16%	16%	-2%	7%
Jefferson	24%	50%	0%	-	0%	22%	26%	22%	28%	-	4%
Josephine	18%	12%	27%	17%	0%	17%	28%	17%	-5%	0%	12%
Klamath	21%	16%	20%	50%	17%	20%	23%	20%	-4%	30%	3%
Lake	34%	0%	100%	-	-	34%	0%	34%	-34%	-	-34%
Lane	17%	25%	17%	16%	22%	16%	25%	16%	9%	1%	9%
Lincoln	22%	27%	13%	33%	50%	21%	32%	21%	6%	13%	11%
Linn	20%	29%	16%	17%	18%	20%	23%	20%	9%	-3%	4%
Malheur	28%	60%	17%	-	0%	27%	36%	25%	33%	-	11%
Marion	19%	33%	18%	17%	25%	18%	24%	17%	15%	0%	7%
Morrow	24%	0%	-	-	100%	23%	25%	23%	-23%	-	2%
Multnomah	14%	19%	18%	21%	18%	13%	18%	13%	6%	9%	5%
Polk	18%	21%	22%	0%	14%	18%	28%	17%	3%	-18%	10%
Sherman	27%	-	-	-	-	28%	-	28%	-	-	-
Tillamook	24%	40%	0%	0%	33%	24%	40%	24%	16%	-24%	16%
Umatilla	22%	34%	39%	11%	25%	21%	34%	20%	13%	-10%	14%
Union	21%	0%	50%	0%	0%	22%	19%	22%	-22%	-22%	-3%
Wallowa	25%	0%	-	-	-	24%	33%	24%	-24%	-	10%
Wasco	23%	46%	0%	-	50%	22%	37%	22%	24%	-	15%
Washington	12%	19%	12%	20%	16%	12%	20%	12%	7%	8%	9%
Wheeler	56%	-	-	-	-	54%	100%	52%	-	-	48%
Yamhill	18%	31%	17%	15%	8%	18%	26%	17%	13%	-3%	9%
State of Oregon	**16%**	**24%**	**15%**	**20%**	**18%**	**16%**	**23%**	**15%**	**8%**	**5%**	**8%**

Note: Does not include loans for multifamily properties or non-owner occupants. Differences between racial and ethnic groups may be impacted by rounding. Dashes represent the absence of applicants.

Source: FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

Figure II-24.
Subprime Loans by Race and Ethnicity and County, State of Oregon, 2013

County	Percent Subprime All Race and Ethnicity	Percent Subprime by Race					Percent Subprime by Ethnicity		American Indian/White Difference	African American/ White Difference	Hispanic/ Non-Hispanic Difference
		American Indian	Asian	Black or African American	Native Hawaiian or Pacific Islander	White	Hispanic	Non-Hispanic			
Baker	3.8%	0.0%	0.0%	-	0.0%	4.4%	0.0%	4.0%	-4.4%	-	-4.0%
Benton	1.6%	0.0%	1.5%	0.0%	0.0%	1.6%	1.9%	1.6%	-1.6%	-1.6%	0.3%
Clackamas	2.4%	1.6%	1.6%	1.5%	6.3%	2.4%	4.8%	2.2%	-0.8%	-0.9%	2.6%
Clatsop	5.3%	0.0%	14.3%	0.0%	0.0%	5.6%	5.6%	5.6%	-5.6%	-5.6%	0.0%
Columbia	4.9%	20.0%	0.0%	0.0%	20.0%	5.4%	0.0%	5.5%	14.6%	-5.4%	-5.5%
Coos	2.8%	4.3%	0.0%	0.0%	0.0%	2.9%	4.0%	2.9%	1.5%	-2.9%	1.1%
Crook	3.8%	0.0%	0.0%	-	0.0%	4.1%	6.7%	3.9%	-4.1%	-	2.8%
Curry	5.2%	0.0%	0.0%	0.0%	-	5.5%	12.5%	5.4%	-5.5%	-5.5%	7.1%
Deschutes	3.2%	6.5%	3.9%	0.0%	15.4%	3.1%	1.8%	3.2%	3.3%	-3.1%	-1.4%
Douglas	3.3%	0.0%	0.0%	0.0%	0.0%	3.3%	0.0%	3.4%	-3.3%	-3.3%	-3.4%
Gilliam	0.0%	-	-	-	-	0.0%	-	0.0%	-	-	-
Grant	3.2%	0.0%	-	-	-	3.7%	0.0%	3.7%	-3.7%	-	-3.7%
Harney	6.9%	0.0%	-	-	-	7.5%	0.0%	7.5%	-7.5%	-	-7.5%
Hood River	1.3%	0.0%	0.0%	-	0.0%	1.5%	1.8%	1.4%	-1.5%	-	0.4%
Jackson	4.1%	5.9%	0.0%	5.3%	0.0%	4.2%	7.9%	4.1%	1.7%	1.1%	3.8%
Jefferson	6.9%	0.0%	0.0%	-	0.0%	6.8%	16.0%	6.0%	-6.8%	-	10.0%
Josephine	4.3%	14.3%	0.0%	0.0%	0.0%	4.2%	9.4%	4.1%	10.1%	-4.2%	5.4%
Klamath	3.7%	6.1%	9.1%	0.0%	0.0%	3.7%	4.1%	3.8%	2.3%	-3.7%	0.3%
Lake	7.6%	0.0%	-	-	-	4.8%	25.0%	3.7%	-4.8%	-	21.3%
Lane	2.7%	2.6%	0.6%	6.7%	3.3%	2.7%	2.5%	2.7%	-0.2%	3.9%	-0.2%
Lincoln	3.8%	5.3%	0.0%	0.0%	0.0%	3.6%	0.0%	3.3%	1.7%	-3.6%	-3.3%
Linn	3.9%	4.2%	0.0%	0.0%	0.0%	4.0%	3.9%	4.0%	0.1%	-4.0%	-0.1%
Malheur	6.6%	0.0%	0.0%	-	0.0%	6.8%	10.7%	5.3%	-6.8%	-	5.4%
Marion	3.4%	6.4%	5.3%	5.6%	5.7%	3.3%	6.3%	3.1%	3.0%	2.2%	3.2%
Morrow	10.1%	0.0%	-	-	-	11.2%	9.7%	11.5%	-11.2%	-	-1.8%
Multnomah	1.9%	3.4%	1.3%	3.4%	3.9%	2.0%	4.8%	1.8%	1.5%	1.4%	3.0%
Polk	3.2%	13.6%	3.2%	0.0%	0.0%	3.1%	4.3%	3.1%	10.5%	-3.1%	1.2%
Sherman	10.5%	-	-	-	-	11.1%	-	11.1%	-	-	-
Tillamook	5.2%	20.0%	0.0%	-	0.0%	5.1%	0.0%	5.2%	14.9%	-	-5.2%
Umatilla	4.3%	4.3%	0.0%	0.0%	20.0%	4.5%	12.1%	3.4%	-0.1%	-4.5%	8.7%
Union	3.9%	0.0%	0.0%	0.0%	0.0%	3.7%	0.0%	3.7%	-3.7%	-3.7%	-3.7%
Wallowa	1.9%	0.0%	-	-	-	2.1%	0.0%	2.1%	-2.1%	-	-2.1%
Wasco	3.1%	20.0%	0.0%	-	-	3.0%	0.0%	3.4%	17.0%	-	-3.4%
Washington	1.7%	2.9%	0.4%	3.0%	2.6%	1.8%	4.8%	1.6%	1.1%	1.2%	3.2%
Wheeler	0.0%	-	-	-	-	0.0%	-	0.0%	-	-	-
Yamhill	4.0%	0.0%	0.0%	0.0%	0.0%	4.2%	3.6%	3.8%	-4.2%	-4.2%	-0.2%
State of Oregon	**2.7%**	**4.2%**	**1.1%**	**3.2%**	**3.9%**	**2.8%**	**5.2%**	**2.6%**	**1.4%**	**0.4%**	**2.6%**

Note: Does not include loans for multifamily properties or non-owner occupants. Differences between racial and ethnic groups may be impacted by rounding. Dashes represent the absence of borrowers.

Source: FFIEC HMDA Raw Data, 2013 and BBC Research & Consulting.

SECTION III.
Public Policies and Regulations

This section of the AI contains an analysis of state regulations, policies and programs that could potentially affect housing choice of protected classes.

It begins with a review of relevant Oregon Revised Statutes (ORS). HUD's Fair Housing Planning Guide was used in determining which regulations to examine. HUD prescribes that state regulations related to the following are reviewed:

- Building, occupancy, health and safety codes,
- Construction of assisted and private housing,
- Site and neighborhood standards for new construction,
- Accessibility standards for new construction and/or laws that restrict housing choices of persons with disabilities,
- Demolition of housing and displacement of low income residents,
- Multifamily rehabilitation, and
- Tax and finance policies that affect fair distribution of services to protected classes.

This section also discusses state programs and policies associated with the distribution of assisted housing, in addition to those which may affect housing choice but are not directly related to the provision of affordable housing. It concludes with a discussion of housing barriers from the perspective of public housing authorities (PHAs), important providers of subsidized housing to low income households.

HUD also requires an examination of steering (real estate agents directing potential homebuyers to certain areas based on their race or ethnicity), deed restrictions, and discriminatory brokerage services. These potentially discriminatory actions were examined through stakeholder surveys and interviews and are addressed in the sections that report survey results. Fair lending is discussed in the Fair Housing Environment section of the AI, which discusses mortgage lending activities.

State Regulations (ORS) that Affect Provision of Housing

The detailed review of ORS is found in Appendix A. The review examined state-level statutes, regulations and programs related to fair housing, needed housing, and housing in general.

Overall, the review found that Oregon statutes include a fairly detailed system to evaluate demands for various types of housing (mostly based on income levels), to prepare plans based on those evaluations of need, and to adopt local land use regulations to implement the adopted

plans. Perhaps most notably, the state has put in place numerous statutes that reflect the language of the FHAA, the ADA, and the Rehabilitation Act of 1973.

Summary of ORS review. The review found Oregon's laws to be favorable to fair housing. More specifically, Oregon statutes**:**

- Require that local governments provide for "needed housing" through both single-family and multi-family housing for both owner and renter occupancy, government assisted housing, mobile or manufactured home parks, manufactured homes on individual lots, and housing for farmworkers. Manufactured homes and farmworker housing must be treated as substantially the equivalent of other single-family and multi-family housing. These statutes are facially neutral with respect to FHAA-protected citizens.
- Prohibit local governments from barring government assisted housing that is similar to unassisted housing.
- Grant cities and counties relatively standard zoning and subdivision powers, with the important qualification that their need be consistent with adopted comprehensive plans created through the statewide land use planning system, through statutes that are facially neutral with respect to FHAA-protected citizens.
- Create some exceptions to its strict limits on residential development on forest, agriculture, and other resource lands in order to promote economically viable rural land uses or to reduce burdens on rural property owners in ways that would not have major impacts on the overall statewide planning system. The state could have made additional exceptions to allow the construction of housing needed for FHAA-protected citizens (such as assisted living facilities) in rural areas—yet it has no legal duty to do so, and failure to do so does not constitute a barrier to fair housing choice.
- Allow rehabilitation of farmworker housing stock in areas outside cities to standards that do not meet the statewide building code. While this may have an effect on the resulting quality of farmworker housing, it appears to have been adopted in order to expand the supply that type of housing.
- Require that residential homes (for up to 5 residents, including but not limited to FHAA-protected citizens, plus caregivers) be permitted in each residential and commercial district that permits single-family homes, and that the standards for approval for a residential home be no stricter than those applied to a single family dwelling. In addition, the statutes allow residential homes to occupy existing dwelling structures in farm use zones without the imposition of requirements different than occupancy of the structure by a single-family home. These provisions are more favorable to the accommodation of assisted housing than those of many other states.
- Require that residential facilities (for 6 to 15 residents, including but not limited to FHAA-protected citizens, plus caregivers,) be permitted wherever multifamily residential uses are a permitted use and a conditional use in any zone where multifamily residential uses are a conditional use. These strong provisions could be further strengthened by imposing a standard similar to that for residential homes prohibiting the adoption for residential facilities that are stricter than those for multifamily housing.

- Require local governments to provide reasonable modifications to housing (particularly for the disabled), as well as reasonable accommodation in housing rules and policies.
- Include key language related to housing accessibility from the Americans with Disabilities Act, the FHAA, and the Rehabilitation Act of 1973, including the FHAA's broad definition of "disability," the ADA's definition of places of "public accommodation," and requirements that renovations of "affected buildings" include improvements to accessibility.
- Prohibit discrimination on the basis of disability in the selling, renting, or making available of housing units.
- Establish building features to promote accessibility that must be included in housing development projects that include state or federal subsidies.
- Include standards to allow reasonable landlord limits on building occupancy based on health and safety concerns, and taking into account the size of the rooms and the nature of the dwelling unit, provided those standards are applied equitably.

In general, Oregon's standards are stronger, and remove barriers to fair housing choice more effectively, than those in the statutes of several other states. The exception is Oregon's limit on municipalities' ability to enact inclusionary zoning programs, which is discussed in further detail below.

Oregon could further strengthen its regulations by:

- Making additional exceptions to allow the construction of housing needed for FHAA-protected citizens (such as assisted living facilities) in rural areas.
- Imposing a standard similar to that for residential homes prohibiting the adoption for residential facilities that are stricter than those for multifamily housing.
- We understand that not all Oregon local governments have standards that comply with the "clear and objective" requirement regulating the development of needed housing on buildable land. Improving enforcement of compliance with this requirement could have the effect of further increasing housing supply.
- While ORS 443.400 requires that all residential facilities providing care for six or more residents be licensed by the state, ORS 197.660 and 197.665 only require that residential facilities with between six and 15 residents are required to be licensed by the state—but are not required to be permitted in multifamily and commercial zone districts. If Oregon wanted to strengthen its fair housing protections, it could extend coverage of ORS 197.665 to require that the state's local governments treat residential facilities licensed by the state the same way it treats multifamily apartment buildings or condominiums of the same size. The result would be that Oregon cities and counties would need to permit a licensed residential facility of 25 or 30 residents in the same zone districts where it would allow an unlicensed multifamily dwelling structure of the same size.

Inclusionary zoning. Inclusionary zoning is a program commonly used in high cost areas to produce affordable housing. In general, inclusionary zoning programs require that residential developments of a certain size incorporate a proportion of units that meet affordable price points. Inclusionary zoning can be applied to rental or homeownership housing or both.

A handful of states, including Oregon, have state regulations that directly or indirectly prohibit local governments from using inclusionary zoning. In Oregon, the ability of municipalities to enact inclusionary zoning programs is limited by two state statutes:

- ORS 197.309 affects the sale of housing:

  (1) Except as provided in subsection (2) of this section, a city, county or metropolitan service district may not adopt a land use regulation or functional plan provision, or impose as a condition for approving a permit under ORS 215.427 or 227.178, a requirement that has the effect of establishing the sales price for a housing unit or residential building lot or parcel, or that requires a housing unit or residential building lot or parcel to be designated for sale to any particular class or group or purchasers.

  (2) Nothing in this section is intended to limit the authority of a city, county or metropolitan service district to adopt or enforce a land use regulation, functional plan provision or condition or approval creating or implementing an incentive, contract commitment, density bonus or other voluntary regulation, provision or condition designed to increase the supply of moderate or lower cost housing units.

- ORS 91.255(2) concerns rental of housing: *a city or county shall not enact any ordinance or resolution which controls the rent that may be charged for the rental of any dwelling unit.* Exceptions include natural or man-made disasters and in the case of state run housing programs.

The connection of inclusionary zoning and fair housing. Disallowing inclusionary zoning as part of a community's affordable housing toolkit limits the provision of affordable housing in general. In addition, limits on the use of inclusionary zoning may disproportionately affect members of protected classes to the extent that they have a greater need for affordable housing. This situation is called discriminatory effect or disparate impact.

HUD has consistently concluded that policies which may be neutral to protected classes can be found to have a discriminatory effect on the basis of a protected class regardless of intent. For example, HUD has described occupancy requirements that limit the number of persons per dwelling unit as having a discriminatory effect on families.

HUD recently addressed questions about how disparate impact should be considered in fair housing in its "Implementation of the Fair Housing Act's Discriminatory Effects Standard" Rule.[1] The purpose of the rule is to "formally establish a three-part burden shifting test…thereby providing greater clarity and predictability for all parties engaged in housing transactions as to how the discriminatory effect standard applies."

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[1] http://portal.hud.gov/hudportal/documents/huddoc?id=discriminatoryeffectrule.pdf.

The three-part test works in the following way:

- The plaintiff (party who brings the complaint) must initially prove that a practice results in, or would predictably result in, a discriminatory effect on the basis of a protected characteristic.
- If the charging party or plaintiff proves such a case, the burden of proof shifts to the respondent or defendant to prove that the challenged practice is necessary to achieve one or more of its substantial, legitimate, nondiscriminatory interests.
- If the defendant is successful, then the charging party or plaintiff may still establish liability by proving that the substantial, legitimate, nondiscriminatory interest could be served by a practice that has a less discriminatory effect.

Discriminatory effect is not addressed directly in the Federal Fair Housing Act. As such, the question of whether disparate impact is part of the Act has been considered in many lawsuits. At the time this AI was prepared, disparate impact was under consideration by the U.S. Supreme Court in a case brought by the State of Texas against the nonprofit Inclusive Communities Project (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project).*

Effect of Oregon's law. At the very least, Oregon's state laws prohibiting inclusionary zoning limit the ability of cities and counties in the state to employ a program that has created a significant inventory of affordable units in many other cities. Depending on the pending Supreme Court decision, prohibitions on, or the lack of polices allowing inclusionary zoning could be challenged under the theory of disparate impact. Researcher Rolf Pendall has documented a statistically significant correlation between the absence of multifamily housing opportunities and African American residents.[2]

A bill proposed in the state legislature would address the prohibition on inclusionary zoning by amending ORS 197.309 to allow municipalities to establish affordable-housing requirements of developers, with up to 30 percent of units in a development to be sold at below market prices. The programs would need to provide some type of development incentives such as fast-track approvals, fee waivers/reductions, density bonuses and/or floor/area adjustments.[3]

Because this bill only addresses the for sale provisions of price controls in the ORS, inclusionary zoning would still not apply to rental developments until ORS 91.255(2) is repealed or changed.

Another bill that was proposed, but not carried forward would have addressed rental increases but only for residents of mobile home parks. Senate Bill 452 would have formed a Task Force on Affordable Manufactured Home Park Living to develop recommendations to protect manufactured home owners from predatory and inappropriate rent increases.[4]

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[2] Pendall, Rolf, "Local Land Use Regulation and the Chain of Exclusion," Journal of the American Planning Association. 2000;66:125–142.

[3] https://olis.leg.state.or.us/liz/2015R1/Downloads/MeasureDocument/HB2564/House%20Amendments

[4] https://olis.leg.state.or.us/liz/2015R1/Downloads/ProposedAmendment/6149

Regulations and policies related to demolition and displacement. In rural areas, displacement of low income households is often related to closure and/or redevelopment of manufactured home parks (v. demolition of affordable apartment complexes that characterize urban area displacement). From 2001 through 2007, at the apex of the housing boom, approximately 2,800 Oregon households were displaced when the owners of 69 manufactured home parks closed these communities. Most of the estimated 6,000 displaced residents had low incomes, most were homeowners and many were seniors. According to Oregon Department of Revenue sources, most were not able to find new manufactured housing communities to which they could move their home, and abandonment of the home resulted.

Research has found that the closure of manufactured housing communities can have profound, adverse impacts on displaced individuals. These effects range are both financial (loss of affordable housing and increase in monthly housing costs; loss of the household's primary asset) and social (loss of community and friends, convenience of location, loss of independence for seniors) in nature.

In response to community closures, several jurisdictions adopted local ordinances to soften the impacts. On a state level, the 2007 Oregon Legislature adopted provisions that amended existing state landlord tenant law to provide more advance notice to residents about community closures, financial payments and refundable tax credits to those displaced, and the opportunity to establish nonprofit resident owned communities through park purchases from willing sellers. These changes were proposed by the Manufactured Housing Landlord Tenant Coalition and adjusted during the legislative process.

The principal provisions adopted are as follows:

- Owner must provide 365 day notice to residents of proposed manufactured housing community closure.
- Park owners must make payments to displaced homeowners of $5,000 for a singlewide, $7,000 for a doublewide or $9,000 for a triple-wide or larger home.
- If residents are not able to move the home, the park owner must pay for disposal costs.
- The State of Oregon authorized a $5,000 refundable tax credit for each displaced manufactured housing homeowner (one per home).
- The legislature authorized a new type of legal entity, a manufactured dwelling park nonprofit co-operative, to foster the development of resident-owned communities through purchases from willing park sellers.

In addition, ORS 197.480 requires that Oregon cities and provide, in accordance with urban growth management agreements, for mobile home or manufactured dwelling parks as an allowed use. The statute also requires that cities and counties establish the need for areas to be planned and zoned to accommodate the potential displacement of mobile home or manufactured housing parks.

These regulations help address many of the market challenges that manufactured home owners face, with the exception of rising rents. In many rural areas, manufactured or mobile homes provide the most affordable housing, particularly for households who need larger units. Yet the affordability of manufactured homes is often eroded by the cost of land leases charged by park owners. Because manufactured homes are costly to move and the supply of parks is limited, manufactured home households are more likely to accept lease increases and/or tolerate actions by park owners that may be in violation of fair housing laws. Remedying this condition would require changes to the state's prohibition on rent control law, as discussed on page 5.

Land planning efforts related to housing provision. Oregon has a long history of state-involvement in land use planning. Indeed, some of the state's regulations intended to minimize urban sprawl and preserve environmental and agricultural interests have existed for more than 30 years. For example, the state requires that municipalities plan for a wide variety of residential uses including "a determination of expected housing demand at varying rent ranges and cost levels… [and]…allowance for a variety of densities and types of residences in each community."

This section reviews two state efforts related to land planning that affect housing provision: the Urban Growth Boundary and Model Development Code.

Urban Growth Boundary. In 1973, the State of Oregon adopted the nation's first set of statewide land use planning laws under Senate Bill 100. The bill created the state Department of Land Conservation and Development (DLCD) and within it, the Land Conservation and Development Commission (LCDC). It requires every city or metropolitan area to submit their proposed urban growth boundary to the LCDC and justify it according to the state's planning goals, which include the preservation of agricultural land, forests and open spaces and the development of high-quality, livable cities and towns by increasing density, improving public transit, and encouraging affordable housing close to jobs. The law also requires jurisdictions to assess the capacity of their urban growth boundary every five years and determine whether it contains sufficient land supply to support 20 years of population and employment growth. There are currently 240 urban growth boundary jurisdictions in the state.

The impact of the urban growth boundary system on housing affordability has been raised in the past, largely in relation to urban areas. In 2005, the Oregon Task Force on Land Use Planning was created to conduct a review of the system. This review resulted in Senate Bill 1011 in 2007, which allowed Metro and Portland-area counties to identify urban and rural reserves outside the urban growth boundary in order to define where future growth would be directed over the next forty to fifty years, providing a longer-term vision than the five-year planning cycles.

Stakeholders who participated in the AI survey were asked if *state* land use laws and growth limitations create barriers to housing choice. This was rated as a medium barrier, with an average rating of 4.9 out of 9. A second question asked about overly restrictive *local* land use and zoning regulations; this received an average rating of 4.8 out of 9.

Just handful of stakeholders offered comments about why they felt land use laws created housing choice barriers. Stakeholders differed somewhat in their opinions: Most were concerned that land use limitations lead to increased housing prices; others felt state laws and local actions

needed to be revisited to determine if they are addressing housing needs at all affordability levels.

TGM Model development code. In response to numerous requests for planning assistance from communities throughout Oregon, the state's Transportation and Growth Management (TGM) Program developed the Model Development Code and User's Guide for Small Cities (TGM Model Code). This was originally published in 1999 with the third edition issued in October 2012. The TGM Program reports that the Model Code has been used widely around Oregon, particularly in small cities that often lack the necessary planning resources to perform such a large-scale effort on their own. In this way, the Model Code provides these cities with consistent guidance and technical expertise in zoning, development standards, review procedures, and implementation of state and planning rules and statutes. The Model Code is intended to help these cities integrate land use and transportation planning, meet new legal requirements and provide a user-friendly, flexible model code.

The Model Code can be found at: http://www.oregon.gov/LCD/TGM/pages/modelcode.aspx

Development codes are adopted by ordinance to implement a city or county comprehensive plan and in Oregon, municipalities are required to ensure the development (or zoning) code comply with the adopted comprehensive plan. Specific elements of a comprehensive plan outline policies on needed housing and housing choice and form the basis by which zoning and development standards are applied. To allow for flexibility between municipalities, many relevant fair housing provisions of the Model Code are placeholders, dependent on the findings and policies adopted in each comprehensive plan.

The analysis of the Model Code for this AI identified some issues that could be considered potential barriers to affirmatively furthering fair housing. It also found opportunities to better align the Model Code with the suggested requirements and best practices found in the Inclusive Communities Toolkit's Land Use and Fair Housing Evaluation Tool.[5]

Opportunities to refine the TGM Model Code include the following:

- To avoid disparate treatment of development types that could be occupied by persons with disabilities, add guidance in the Model Code as to when boarding housing may be different than other types of residential structures, for the purposes of applying development standards.

- The Land Use and Fair Housing Evaluation Tool in the Model Code does a nice job of providing examples of land use options to increase housing choice that may be new to rural communities. To avoid restricting these options to a few (which may not work in every rural community), the examples could be expanded upon to include a wider variety of creative housing options

[5] http://www.fhco.org/pdfs/Guide-for-Neighbors-Web.pdf and http://www.fhco.org/pdfs/Guide-for-Elected-Officials-Web.pdf

- The Model Code discusses several design concepts but, without explicit definitions, these terms could be misinterpreted and inadvertently create pathways for neighbors to legally appeal development of needed housing or housing to be occupied by people in protected classes. Community character or context language should be further clarified.

- Expand the guidance in the Model Code related to parking minimums for residential uses and potential impacts those minimums have on affordability and housing choice.

- Use the Model Code and its user's guide to inform and educate planners on where issues in development processes arise related to Conditional Use permitting and how cities can address uses with potential impacts to neighboring properties and still affirmatively further fair housing.

- Review and revise Model Code definitions for: Dwelling (including all applicable subsections), and Group Living. Unbundle development regulations from the various arrangements people choose to live. Ideally, these definitions would separate the concepts of occupancy (number and relations of people who do or will reside within a unit) from concepts of physical development (number of rooms/kitchens/bathrooms, size of structure, relationship of units to lots, etc.).

Tax Policies Related to Housing Provision[6]

All real property within the State of Oregon is subject to assessment and taxation unless exempted as provided by Oregon law. There are two primary kinds of tax exemptions affecting housing:

1) Exemptions available automatically to any qualifying property owner who applies for an exemption, and

2) Exemptions that must first be adopted by local governments and/or taxing jurisdictions before they go into effect and qualifying property owners may apply.

These are discussed in turn below.

Property tax exemptions applicable statewide. The principal property tax exemptions which do not require local adoption and are applicable to housing throughout the state include:

- **ORS 307.092 Property of housing authority**. Property owned or under lease by a housing authority is considered to be public property exempt from all taxes and special assessments of a city, county, state or any of their political subdivisions. This exemption also includes properties leased to low income households by a partnership, nonprofit corporation or limited liability company for which the housing authority is a general partner, limited partner, director, member, manager or general manager. Thus, this exemption provides a

[6] Information for this section comes from *Oregon Revised Statutes, 2013 Edition* and the *Washington County Fair Housing Plan 2012*. Kim Armstrong, Washington County Department of Housing Services, wrote the tax exemption summary that appears in that plan.

means through which LIHTC projects and other affordable housing projects can obtain long-term tax exempt status without a locally-adopted exemption, provided that the local housing authority is willing to be party to the limited partnership or other ownership entity. The housing authority is permitted to make a Payment in Lieu of Taxes, although such payments are not required. The law excludes commercial property leased to a for-profit entity from this exemption. There is no legislative sunset for this exemption, and the exemption applies as long as the property qualifies.

- **ORS 307.130-162 Property of art museums, volunteer fire departments or literary, benevolent, charitable and scientific institutions.** This section of the law grants an exemption to property (or a portion thereof) owned or being purchased by benevolent, charitable or religious nonprofit institutions, as long as the property is being used solely for the religious or charitable work of the organization. The law has numerous provisions and exceptions. The organization must apply to the tax assessor for this exemption, but once it is in hand, the owner is not required to submit renewals unless the ownership or use changes. Some jurisdictions have provided tax exemptions under this section of the code for projects providing housing in conjunction with treatment programs or supportive services. There is no legislative sunset date for this exemption, and it may apply as long as the property qualifies.

- **ORS 307.181 Land acquired or owned by Indian tribe.** Tribal-owned property that is used exclusively for housing for low income households may qualify for a tax exemption if it is located in a county in which more than 10 percent of the enrolled members of the eligible tribe reside. This exemption also applies to property held under lease or a lease purchase agreement by an eligible tribe and property belonging to a partnership, nonprofit corporation or limited liability company of which an eligible Indian tribe is a general partner, limited partner, director, member, manager or general manager. This exemption applies exclusively to Oregon's ten recognized tribes.

- **ORS 307.241-245 Property of nonprofit corporation providing housing to elderly persons.** Housing for older adults owned by nonprofit corporations, funded by specific funding sources (e.g., Section 202 grant), constructed after January 1, 1977 and placed in service by January 1, 1990 is eligible to apply for a tax exemption. The Oregon Department of Revenue reimburses the county for the lost tax revenue annually. There is no legislative sunset for this exemption, and the exemption may be received as long as the property qualifies.

- **ORS 307.471 Student housing exempt from school district taxes.** Housing owned by a nonprofit corporation and used exclusively for student housing may qualify for an exemption from school district taxes. Housing must be provided on a non-discriminatory basis. A fraternity or sorority house may qualify if it is owned by a nonprofit and if housing is offered to non-members. Owners must apply to the county assessor for the exemption, but once it is granted, it remains in effect until the property no longer qualifies for the exemption. There is no legislative sunset date for this exemption.

- **ORS 307.480-490 Farm labor camp and child care facility property.** Eligible nonprofits that own or operate a farm labor camp providing housing to current and prospective agricultural workers or a childcare facility for agricultural workers' families may apply

annually for an exemption from property taxes. However, the nonprofit must make a Payment in Lieu of Taxes equal to 10 percent of rental receipts. The property must meet health and fire safety regulations and pass inspection. There is no legislative sunset date for this exemption, and it may apply as long as the property qualifies.

Property Tax Exemptions Requiring Local Adoption. Oregon law also authorizes additional categories of property tax exemptions that require local governments and other taxing entities to take some action in order to enable the exemption. For some taxing entities (such as school districts, parks districts and water districts), the governing body may simply need to agree to allow the exemption on qualifying properties. For jurisdictional governments, such as cities and counties, the governing body may need to adopt the exemption, hold public hearings, designate areas in which the exemption will be granted, develop rules and guidelines, accept applications for exemptions, and administer the exemption program. The specific local action required to enable the exemption varies for each ORS-authorized tax exemption.[7]

Tax exemptions requiring local adoption include:

- **ORS 307.515-527 Low Income Rental Housing.** This law allows for-profit and nonprofit owners of rental housing for households earning no more than 60 percent of median family income to apply for a 20-year property tax exemption. The property must be offered for rent or held for developing low-income housing. The value of the exemption must be reflected in reduced rents. The exemption may not be applied retroactively to for-profit corporations. These provisions require local governments to develop and adopt policy standards and guidelines to be used to assess applications, determine eligibility, and approve exemptions. The governing body may charge a fee for accepting and processing applications, and it may require property owners to submit renewal applications over the life of the exemption, if so specified in the local policies. This enabling legislation has been extended multiple times and will now sunset in 2020 unless extended further.

- **ORS 307.540-548 Nonprofit Corporation for Low-Income Housing.** This law allows nonprofit owners of rental housing for households earning no more than 60 percent median family income to apply for property tax exemption. The property must be offered for rent or held for developing low-income housing. The value of the exemption must be reflected by tenant benefits (including, but not limited to, rent reductions). If the nonprofit is a general partner and is responsible for day-to-day operations, the property may be eligible. A nonprofit with leasehold interest may be considered the property purchaser if the full value of the exemption is reflected in reduced rents. The property owner must apply for the exemption and submit an annual application for renewal for every year the exemption is sought. The governing body may charge a fee for accepting and processing

[7] Each taxing district is only authorized to exempt a property from its own share of property taxes. However, if the sum of the rate of taxation of all the taxing districts that agree to the exemption equals 51 percent or more of the total combined rate of taxation for the property, then 100 percent of the taxes may be exempt, if the taxing district that initially adopted the exemption so requests. Typically, gaining a full exemption requires cooperation among two or more taxing districts.

applications. The exemption may be received as long as the property qualifies, or until the legislative sunset date, whichever comes first.

- **ORS 307.600-637 Multiple-Unit Housing.** This law allows owners of multiple-unit housing to apply for a 10-year property tax exemption if they are located in locally-designated district, such as core urban areas or transit districts. If the exemption is established to provide exemptions for affordable housing, the designated area may be an entire city or county. However, to qualify for an affordable housing exemption, the property must be subject to a low income housing assistance contract with a government entity. Local governments must designate an area for exemptions, develop and adopt policy standards and guidelines to be used to assess applications, determine eligibility, and approve exemptions. The governing body may charge a fee for accepting and processing applications, and it may require property owners to submit renewal applications over the life of the exemption, if so specified in the local policies. The sunset for these provisions was extended to 2022, at which point exemptions will end, unless the sunset is extended further.

Two categories of tax exemptions that require local adoption but may be less relevant to small cities and rural areas are as follows:

- **ORS 307.651-687 Single-Unit Housing in Distressed Urban Areas (cities only).** This law allows owners of new construction with one or more qualified single-family dwelling units with a market value no more than 120 percent of median sales price for the area to apply for a 10- year property tax exemption, if the property is located within a distressed urban area. The sunset for this exemption occurs in 2025, unless further extended.

- **ORS 307.841-867 Vertical Housing in Development Zones**. This law allows cities or counties to designate an area in a city or unincorporated urban area as a vertical housing development zone to encourage the development of new multi-story projects in a core urban area or a transit oriented area. Residential properties within that zone may apply for a partial property tax exemption.

How tax policies and regulations affect housing choice. As evidenced above, Oregon allows tax exemptions to support affordable housing development—but these exemptions may be difficult to obtain for certain types of housing developments. The projects that typically can obtain exemptions include projects that are clearly owned by nonprofit entities such as Single Asset Entities for a HUD 202 project (ORS 307.130-162), farmworker housing projects (ORS 307.480-490 Farm labor camp and child care facility property), tribal housing (ORS 307.181), and Housing Authority projects (ORS 307.092). Other types of housing developments may have trouble obtaining exemptions or may be prohibited from doing so. Specifically,

- The LIHTC program is one of the most significant resources for affordable rental housing. LIHTC projects typically are not granted an exemption under existing statewide exemptions because the ownership entity, the limited partnership, is a for-profit corporation. However, if a Housing Authority is a "general partner, limited partner, director, member, manager or general manager" in a LIHTC project, the property is exempt from property tax under ORS 307.092.

- Local jurisdictions can grant exemptions to LIHTC projects by adopting adopts ORS 307.515-527 or ORS 307.540-548, However, the appetite for local tax exemptions is likely to be influenced by the existing level of revenue generation with in a city or county. Through two voter-approved ballot measures (5 and 50, passed in 1990 and 1997, respectively), Oregon limited the amount of property taxes that can be generated locally. Jurisdictions which have little private property (e.g., because much of their land is federally-owned) may be poorly positioned to approve tax exemptions. Two nonentitlement jurisdictions currently provide locally-adopted tax exemptions under ORS 307.515-527 Low Income Rental Housing, La Pine and Prineville.

- Oregon's existing tax exemptions do not incentivize the development of mixed-income communities. Instead, they limit exemptions to properties owned by specific entities (e.g., tribes and housing authorities) or to households earning 60 percent of median family income or less.

The challenges presented by the state's tax policies were identified by stakeholders surveyed for the AI, who ranked "State tax policy that promotes local government reliance on property taxes" as the 6th highest-rated barrier to housing choice among 51 potential barriers. The reliance on local property taxes, combined with a lack of effective statewide exemptions, increases the cost of operating subsidized housing. The complexity of obtaining an exemption was raised by stakeholders interviewed for the AI who noted that the process may discourage developers from outside of the state from developing in Oregon, therefore limiting the overall capital available for affordable housing development.

Three bills in the state legislature could provide some smaller adjustments that help remedy aspects of these challenges:

- HB 3082 would allow local jurisdictions to adopt a provision allowing properties where existing residents' incomes rise to as high as 80 percent median family income to remain tax exempt;

- HB 2690 would exempt from property taxation land acquired and held by nonprofits for building residences to be sold to individuals whose income is not greater than 80 percent of area median income; and

- HB2610 would add farmworker housing to the types of property receiving agricultural property tax exemptions.

Oregon may want to look to the State of Colorado, which has exemption provisions that apply statewide and do not require local hearings, rules or guidelines (C.R.S. 39-3-112 (2014)). Colorado's exemptions explicitly benefit housing for seniors, persons with disabilities, single-parent households, transitional housing providers and providers of housing to extremely low income households.

Other Regulations that Affect Housing Provision

Barriers to housing choice created by state laws can extend beyond regulations that are directly related to housing production. This section reviews regulations that are not directly related to the construction of housing yet may affect the provision of housing in other ways. These topics were raised by stakeholders in the interviews and surveys conducted for the AI and include:

- Fair housing protection of housing choice vouchers holders/Section 8 and recipients of other local, state or federal rent assistance under and the Housing Choice Landlord Guarantee Program;
- Laws related to past evictions, criminal background checks and affecting re-entry housing options;
- The state's Qualified Allocation Plan (QAP) for Low Income Housing Tax Credit (LIHTC) properties;
- Notice period for evictions; and
- Restraining orders.

Housing Choice Voucher holder protections and Landlord Guarantee Program.

Oregon state fair housing laws have historically contained protection from "source of income"—but this definition excluded income related to federal rental subsidies. This was perceived as a barrier to housing choice in the past and, because voucher holders are more likely to be racial and ethnic minorities and/or have a disability, the law could have a disparate impact on the protected classes.

This potential barrier is included here because of a recent change in state law which mitigated the fair housing concern. As of July 1, 2014, the State of Oregon expanded its source of income protections in state fair housing law to include income from Housing Choice Vouchers (HCV) or Section 8, or other local, state or federal programsWith this expansion, the state created the Housing Choice Landlord Guarantee Program to mitigate losses that landlords might experience from unpaid rent or damages caused by tenants as a result of their occupancy under the HCV program. Through the program landlords are entitled to up to $5,000 in reimbursement of damages after a court order for the damages claimed. As of March 31, 2015, seven claims have been paid totally approximately $31,000.

The state has partnered with a number of organizations to ensure that residents and landlords are aware of the new protection. These include the foundation Meyer Memorial Trust; organizations which advocate on behalf of tenants including Community Alliance of Tenants, Oregon Law Center, and Lane County Legal Aid; organizations which represent landlords including Multifamily Northwest, Oregon Rental Housing Association, and the Rental Housing Alliance Oregon; and Public Housing Authorities and their representative, Oregon Housing Authorities; as well as other organizations and agencies such as the Bureau of Labor and Industries (BOLI) and the Fair Housing Council of Oregon (FHCO). Training consists of educating landlords and tenants, including public housing authorities; housing unit pre-inspection programs; tenant navigation services; and deposit assistance.

Criminal histories, evictions and credit blemishes. A consistent theme among stakeholders surveyed and interviewed for this AI was the lack of housing options for persons with past criminal histories. Onerous look back periods for criminal charges of rental applicants was the second-highest housing practice barrier identified by stakeholders surveyed in this AI. A secondary concern was lack of housing for residents with more minor infractions—e.g., credit blemishes or prior evictions.

Consideration of certain criminal charges or convictions may impede housing opportunities for post-incarcerated members of protected classes commonly overrepresented in prison populations, such as persons with mental illness and African American males. According to a 2014 State of Oregon Legislative report, approximately 50 percent of Oregon's prison population in 2012 needed mental health treatment (48% of male inmates and 80% of female inmates). Fifteen percent of all male inmates and 44 percent of all female inmates were diagnosed with severe mental illness.

ORS Chapter 144 provides the procedures and conditions for parole and post-prison supervision. Section 144.102 requires that for a minimum of six months after release, a person must reside in the county they were last supervised or, if the person was not supervised at the time of the offense, in the county the person lived at the time the offense. The statute states:

- When a person is released from imprisonment on post-prison supervision, the board shall order as a condition of post-prison supervision that the person reside for the first six months after release in the county that last supervised the person, if the person was on active supervision as an adult for a felony at the time of the offense that resulted in the imprisonment. (ORS 144.102.7a)
- If the person was not on active supervision as an adult for a felony at the time of the offense that resulted in the imprisonment, the board shall order as a condition of post-prison supervision that the person reside for the first six months after release in the county where the person resided at the time of the offense that resulted in the imprisonment. (ORS 144.102.7b)

The residency condition requirement can complicate the process of finding housing upon re-entry in housing markets where housing supply is limited and/or costly. To the extent that certain residents are disproportionately likely to be incarcerated, the residency requirement may disproportionately impact housing choice.

The statute allows for a waiver of this residency condition if the person being released meets at least one of the following conditions. Per the Department of Corrections Administrative Rule 291-019-0100, offenders must receive permission from supervising officers before moving between counties. Conditions for moving include:

- Proof of employment with no set ending date in a different county;
- The person is found to pose a significant danger to the victim residing in the county, or a victim or victim's family is found to pose a significant danger to the person;

- The person has a family member residing in a different county who can help with rehabilitation and post-prison supervision;
- The person is required to participate in a treatment program that is not available in the county;
- The person requests release to another state; or,
- The board finds other good cause for the waiver.

The last condition could encompass lack of housing options; however, a waiver that specifically addresses limited housing choice may be a more effective way in preventing disproportionate impact on certain protected classes.

It is common for criminal histories to affect the housing options of residents long after they have fulfilled their sentence. Beginning in January 2014, ORS 90.300 changed how landlords may treat past evictions and criminal histories of rental applicants. Landlords may not consider a previous eviction filing if the action was dismissed or won by the applicant. This does not apply if the eviction filing is still pending at the time the applicant submitted the application. Specifically,

- Landlords may not consider a previous eviction filing that resulted in an eviction against the applicant that occurred five years or more before the time the applicant submitted the application.
- Landlords may not consider a previous arrest that did not result in a conviction. This does not apply if the arrest resulted in charges for criminal behavior that have not been dismissed at the time the application is submitted.
- Landlords may consider an applicant's criminal convictions and charging history if the conviction or pending charge is for conduct that is a:
    - Drug-related crime;
    - Person crime;
    - Sex offense;
    - Crime involving financial fraud, including identity theft or forgery; or,
    - Any other crime that could adversely affect the landlord's property, or the safety and wellbeing of other residents.

Additionally, Oregon law allows people charged or convicted of certain minor offenses to apply to set aside, or expunge, their conviction. Convictions for serious crimes cannot be set aside.

It is important to note that although the law limits the "look back" period for evictions to five years, it does not provide a time limit for criminal charges.

Qualified Allocation Plan (QAP). In the stakeholder survey conducted for the AI, stakeholders were asked about the extent to which state scoring preferences (Qualified Allocation Plan or QAP) for the Low Income Housing Tax Credit (LIHTC) program created barriers to housing choice. Stakeholders rated this barrier as moderate, rating it 4.1 out of 9,

with 9 representing the most significant barrier. Thirty-seven percent of stakeholders said the QAP created strong or significant barriers to housing choice. Many of these respondents offered open-ended comments about why the QAP was a challenge. The comments fell into two primary categories:

- Challenges in development and management of subsidized affordable housing in rural areas. Although the division of competitive funds into separate pools (i.e., urban and rural projects do not compete against one another) assures that small cities and rural areas do not compete against applications from areas with more resources and greater development capacity, some stakeholders recommend that the state take an additional step and consider developing a few alternate program guidelines that apply exclusively to Balance of State projects. The alternate guidelines might affect both how applications are scored within the pool and also how projects are underwritten once they have been selected.

- Concern was expressed about the geographic scale of how the level of saturation of LIHTC/affordable housing is calculated. If there's a subsidized housing project in a town 30 miles away, the area can be considered "saturated," even though residents don't benefit from the housing 30 miles away.

These concerns were shared with the state administrators of the LIHTC program. State administrators discussed recent changes in the QAP that had the intent of equalizing the playing fields for urban and rural projects. For example, metropolitan and rural areas do not compete against one another for funding and there is no minimum unit requirement that prevents small scale projects from receiving funding (the state has funded projects of between 6 and 8 units). Balance of state awards have recently made up more than one-third of all projects receiving funding. Finally, state scoring does not require applicants to maintain their developments with contractors (which may be hard to find in rural areas); the state simply evaluates capacity as part of the award consideration.

Eviction notices. Oregon's eviction requirements are fairly typical: Landlords must give tenants who have resided in a property for less than one year a 30 day notice of eviction; the requirement is 60 days for longer-term tenants. Longer leases (1 year+) are reportedly becoming less common in the state due to rising rental prices. Lower income households are more likely to be adversely affected by shorter-term leases and practices of no-cause lease terminations because landlords have a greater incentive to raise prices on low rent properties (the market is generally tighter for more affordable units). This could disproportionately affect protected classes who are more likely to be low income—racial and ethnic minorities, persons with disabilities and female-headed households with children.

Restraining orders. Restraining orders against persons who are harassing and/or threatening non-related parties are reportedly difficult to obtain. The state allows two types of restraining orders: 1) Stalking, which sometimes can be challenging to obtain due to First Amendment (free speech) protections; and 2) Protections for elderly persons and persons with disabilities.

Some stakeholders have recommended modifications of the current law to allow for restraining orders against residents who are harassed because of their race or ethnicity (and potentially other protected classes).

Public Housing Authority Housing Provision

As part of the AI, public housing authorities (PHAs) in nonentitlement areas were asked to complete a survey on barriers to housing choice and their practices promoting equitable and fair housing choice. Fourteen PHAs responded to the survey and represented an equal mix of rural and semi-urban areas in Oregon.

Housing supply and landlord practices. Overall, PHAs reported that it is difficult (69%) or very difficult (31%) for a voucher holder to find a unit that accepts Section 8. PHAs identified that the following four groups face greater challenges than others in finding rental units that accept vouchers:

1) Residents with criminal backgrounds (69%);

2) Large families (46%);

3) Persons with disabilities (31%); and

4) Single person households (31%).

Despite concerns about housing condition in the non-PHA stakeholder survey, (see Section V), Housing Quality Standards were not identified by PHAs as a barrier in finding landlords to participate in the Section 8 voucher program (94% of PHAs said the standards were not a problem).

PHAs identified the following practices of landlords as being the top barriers to housing choice:

- Onerous "look back periods" for criminal charges of rental applicants;
- Refusal to provide lease agreements or information on rentals in accessible formats for persons with disabilities; and
- Refusal to allow assistance/emotional support animals.

PHAs were asked if public support or opposition affected the siting and supply of public and other affordable rental housing in their community. Some PHAs described environments welcoming of affordable housing: "There is generally decent public support depending on the locality with which we work. We have experienced lots of support for siting affordable housing developments."

Some linked affordable housing opposition to Housing Choice Voucher holder protected status: "Landlords have responded to protected status by increasing screening criteria, requiring three times income and charging water and sewer. Landlords know these 'screening techniques' will effectively rule out renting to Section 8 participants."

When asked directly about the new source of income regulation, 42 percent of PHAs said that this change has led to *more landlords* accepting vouchers, while 58 percent said there has been *little or no change* in the number of landlords accepting vouchers.

Concentration of units and tenants. The majority of PHAs (83%) said that certain racial or ethnic groups are not more likely to reside in certain developments. One reason that a PHA gave for why certain racial or ethnic groups are more likely to reside in certain developments was "People are most comfortable surrounded by people like themselves." Another was related to the types of programs used to obtain housing: "Certain developments that are restricted to a particular workforce (i.e., Rural Development 514) more often attract certain racial groups and cultural preferences."

PHAs were asked about the primary reasons their developments are located where they are. Sixty-nine percent of PHAs identified two main factors: historical patterns and developments were built where land was available. Other factors identified included: land cost (31%), proximity to services (23%), proximity to transit (15%), and unit were created through redevelopment (15%).

Sixty percent of PHAs said there is little or no difference between the neighborhoods in which their tenants live compared with the composition of the community overall. Among PHAs that identified differences, 40 percent said that tenants were more likely to live in mixed income neighborhoods and 40 percent said tenants were more likely to live in neighborhoods with older housing. Other differences included that tenants were more likely to live in neighborhoods that are: low income; racially mixed; or racially segregated.

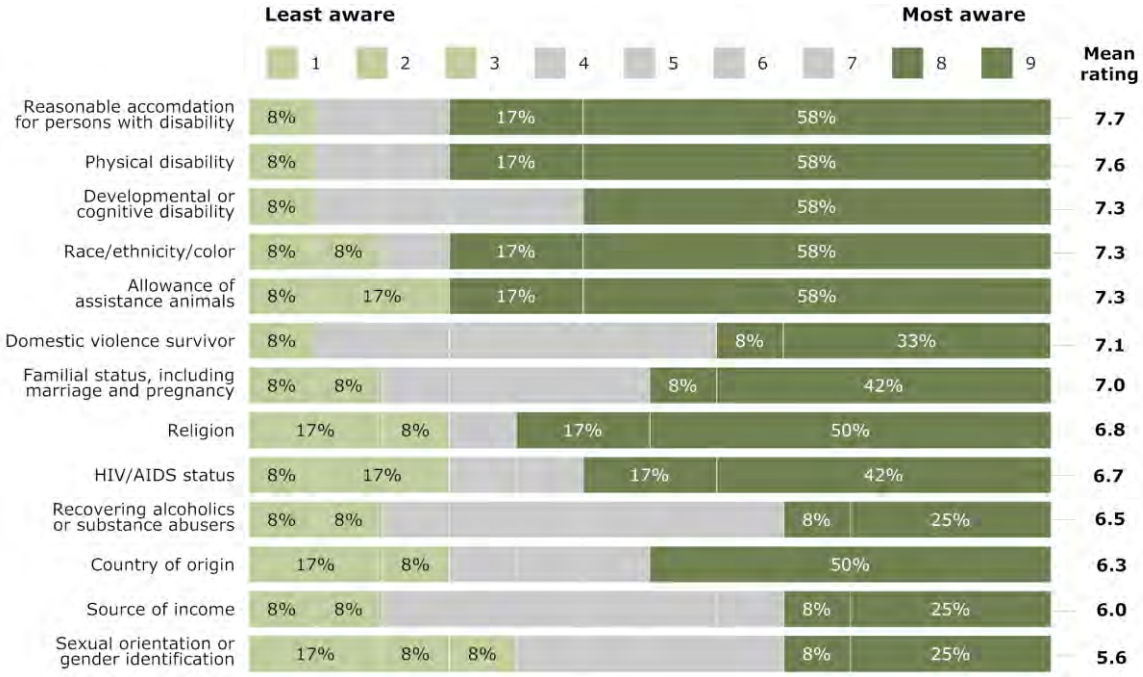
The majority of PHAs (62%) said that voucher holders were more likely to live in low income neighborhoods than compared with the composition of the community overall. Voucher holders were also more likely to live in mixed income neighborhoods (38%). Thirty-one percent of PHAs said that there is little of no difference between the neighborhoods in which voucher holders live compared with the composition of the community overall.

Only one PHA said that LIHTC properties in their community are located in racially or ethnically segregated neighborhoods. The PHA identified the reasons why this is case: historical patterns, land costs are too high in other areas of the community, proximity to transit, proximity to services, developments were built where land was available, and redevelopment of existing complex.

Barriers to housing choice. When asked about federal, state and locally created contributors to fair housing choice, most PHAs identified none. Land costs and community opposition were the most common barriers described: "Many affordable housing developments end up being developed in area of poverty concentration, possibly due to the low cost of land and reduced neighborhood opposition."

PHAs were asked which housing protections their clients are most and least aware of. Overall, PHAs reported that their clients were well aware of most housing protections. The protections that their clients were least aware of are: national origin(average 6.3), source of income (average 6.0), and sexual orientation or gender identification (average 5.6).

Figure III-1.
Client awareness of fair housing protections



Source: BBC Research & Consulting 2015 Oregon PHA Survey.

PHAs were asked to give examples of implicit discrimination occurring in their service area and/or against their clients. Examples included:

- Source of income discrimination for families with vouchers;
- Income three times the rent used as screening criteria;
- Resident not wanting low income renters in their neighborhood;
- Complaints to law enforcement or other government agencies by neighbors; and
- Private landlords seem to have implicit discrimination against clients with mental illness.

The majority of PHAs (77%) reported that there is adequate information, resources and training on fair housing available in their community. PHAs that reported inadequate available information said the following resources would be helpful: more frequent landlord training, training for onsite private property managers, and general training resources free of charge for landlords.

When asked what fair housing activities PHAs use to inform their communities about fair housing laws, the most common were: 1) listing fair housing information on websites and 2) providing voucher or rental unit applicants with fair housing information.

A fewer number of PHAs participate in the following activities: sponsor fair housing education and outreach events of residents (2 PHAs), hold or sponsor fair housing training (3), and support fair housing month activities (1).

Policies, practices and fair housing activities. All but one PHA reported giving preferences to certain resident groups. Preferences were wide ranging and included: homeless, elderly/disabled on a fixed/no income, victims of domestic violence, terminal illness, families working on training or education programs, applicants that live in the PHAs jurisdiction, transitional housing graduates, families, local county preference, public housing reasonable accommodations, rent burden, involuntary displacement, public housing residents who need to move due to medical or family change, and residents selected to participate in transitional housing sites where the PHA has reviewed and approved the supportive services being provided.

Adaptive modifications for voucher holders and mobility counseling—to programs that can be important in improving housing opportunities—were less common than preferences:

- The majority of PHAs (92%) do not provide funds for adaptive modification of Section 8 funded units.
- The majority of PHAs (67%) do not have a mobility counseling programs for voucher holders. Of the four PHAs that do provide mobility counseling, two said their program is very effective, one said their program is moderately effective, and one declined to say.

What would you change?

When asked what they would change to increase access to housing for all types of residents in Oregon, PHAs said:

- "Create policies that encourage landlords to limit rent increases and maintain rents at affordable levels;"
- "Create a fund for move in costs such as deposits;" and
- "Have a hotline number for folks to call to discuss situations when they think they are being discriminated against where they can be either educated about what are protected classes versus being discriminated based upon other issues, or they could be assisted with completing an appropriate discrimination complaint right away. Some folks do not complete the complaint because they cannot get immediate answers."

SECTION IV.
Stakeholder Consultation

This section presents the findings from the stakeholder consultation elements of the Analysis of Impediments. Unless otherwise noted, the findings reflect the opinions and experiences of stakeholders whose agencies or organizations operate or provide services in Oregon's nonentitlement communities.

Participation Opportunities

All interested stakeholders had the opportunity to respond to a comprehensive online survey designed to identify public and private practices and policies that may constitute or contribute to impediments to fair housing choice in Oregon's nonentitlement areas. As needed, the study team interviewed subject matter experts to validate data findings and explore issues in more depth. To lend local expertise and perspective to the data and policy analyses, the team convened a Stakeholder Advisory Committee, drawn from agencies and organizations in the public, private and nonprofit sectors.

Stakeholder survey. The stakeholder survey was available online from January 15 to February 28, 2015. The stakeholder survey included the following topics:

- Current housing market and needs;
- The degree of seriousness of 51 potential barriers to fair housing in the local areas served;
- Availability and need for fair housing training, resources and assistance at the local level;
- Housing opportunities for persons with disabilities; and
- Opportunities for the State of Oregon to affirmatively further fair housing.

A total of 485 individuals from across the state participated. Overall, 280 of the respondents operate or provide services either statewide or in nonentitlement areas and 205 provide services solely in one of Oregon's entitlement communities. Only data from stakeholders serving nonentitlement communities are included in this analysis.

Key person interviews and focus groups. To supplement the stakeholder survey, the study team conducted 15 in-depth interviews with subject matter experts on topics related to affordable housing; housing needs and preferences of persons with disabilities; housing needs of post-incarceration individuals, farmworkers, and tribes; and rural housing markets and housing development. Stakeholders in Ontario, Coos Bay and Klamath Falls participated in focus groups.

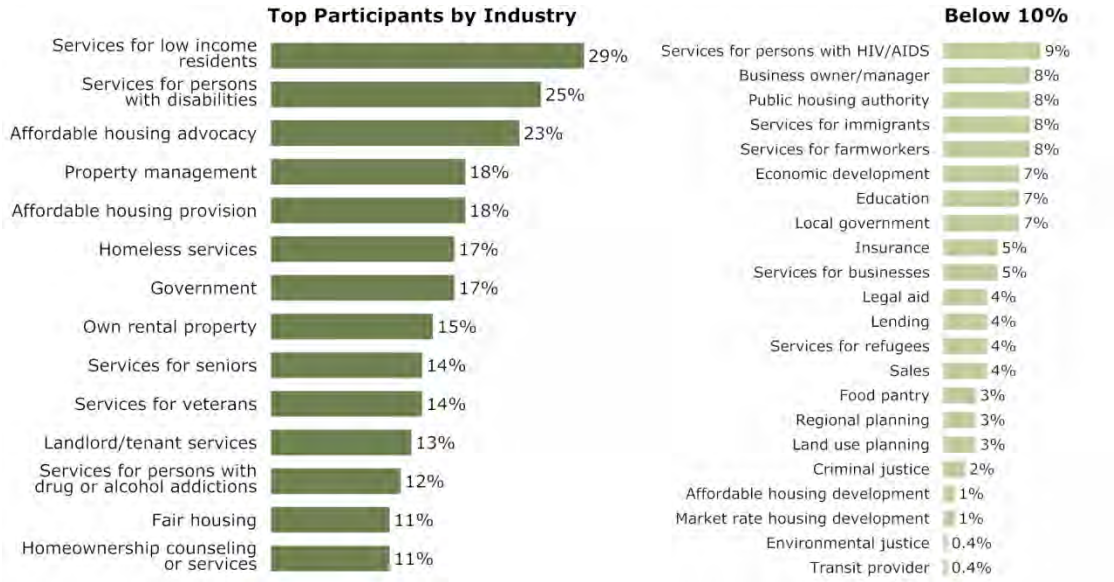
Stakeholder Advisory Committee. Over the course of the study period, 20 Oregon experts in fields related to housing, human services and advocacy participated in a Stakeholder Advisory

Committee. Members engaged in thoughtful dialogue on key policy issues in a series of conference calls. Members reviewed and discussed interim findings related to concentration of members of protected classes; lending data; State policies and practices associated with development or preservation of affordable housing and housing that meets the needs and preferences of persons with disabilities; community and housing re-entry; and potential impediments to fair housing. Each conversation focused on the state's nonentitlement areas.

Industry and Organization Type

Stakeholder participants serving Oregon's nonentitlement communities represent a diverse range of organizations, as shown in Figure IV-1. These include housing development and property management, economic development, criminal justice, planning, advocacy and services for special needs populations. One in four respondents work in an agency that provides services for persons with disabilities.

Figure IV-1.
Type of Industry, Organization



Note: n=280 stakeholders serving nonentitlement communities. Numbers add to greater than 100 percent due to multiple responses.

Source: BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Recent Changes in Local Housing Markets

To provide context for stakeholders' assessments of fair housing locally, survey respondents shared their perceptions of the most significant changes in the housing market in the area(s) they serve in the past five years and the population segments most impacted by these changes. Most stakeholders described changes in housing markets driven by increased demand for rental housing.

- **Increased demand for affordable rental housing.** By far, the majority of stakeholders' characterizations of the most significant changes in local housing markets related to an increased demand for rental housing, and affordable rental housing in particular. Stakeholders associated the increased demand with several factors, including

foreclosures shifting households into the rental market; lack of product for first-time homebuyers; stricter lending requirements for homeownership overall (e.g., size of down payment, credit scores); flat or falling household income; and population growth.

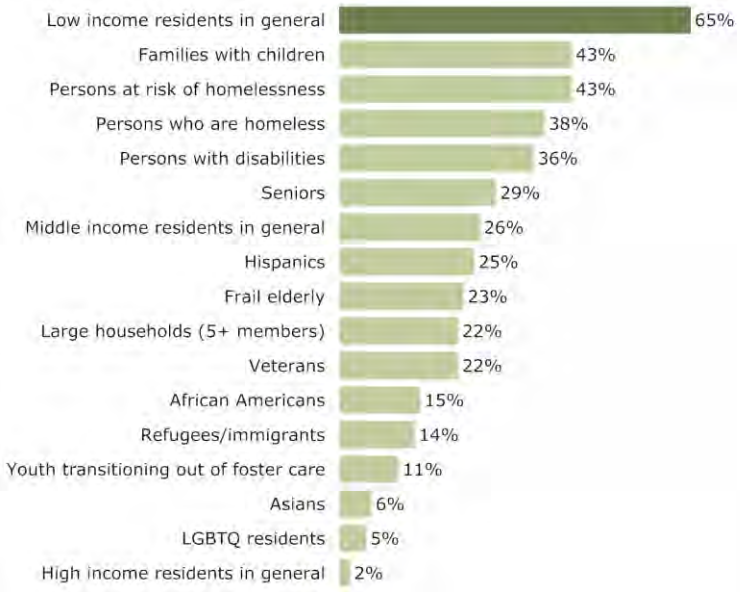
Rising cost of rental housing and low vacancy rates. The increased demand for rental housing has resulted in very low vacancy rates in some areas, increasing rents and increases in the number of applicants for a given unit. In many places, HUD's Fair Market Rents have not kept pace with the rental market. Prospective tenants with criminal histories, imperfect rental or credit histories or with incomes less than three times the monthly rent face increased difficulty in securing a unit, as other candidates may be less "risky" on paper to a landlord. A few stakeholders attributed rising rent to passage of Oregon's Housing Choice Act of 2013.

Policy issues. Stakeholders raised several policy issues in their descriptions of significant changes in local housing markets. These include:

- Housing Choice Act of 2013 ("Section 8 Bill");
- Increased number of tenant requests for companion animals/assistance animals;
- Increased oversight by the (federal) Consumer Finance Protection Bureau and other consumer lending policies; and
- Changes in federal funding priorities (e.g., decreased HOME funds, increased allocation of funds to homeless veterans).

Population segments most impacted. As shown in Figure IV-2, nearly two-thirds of stakeholders report that low income residents in general are most impacted by the changes in the housing market, followed by families with children (43%); persons at risk of homelessness (43%); persons who are homeless (38%) and persons with disabilities (36%).

Figure IV-2.
Resident Groups Most Affected by Housing Market Changes



Note:

n=280. Numbers add to greater than 100 percent due to multiple responses.

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Potential Barriers to Fair Housing Choice

Stakeholders evaluated the degree of seriousness in the communities they serve of 51 potential barriers to fair housing choice. Respondents were asked to rate only those potential barriers of which they considered themselves reasonably knowledgeable. This comprehensive set of potential barriers addressed several aspects related to fair housing choice:

- Location of affordable housing;
- Availability of affordable housing;
- Private and public housing practices;
- Local, state and federal policies and practices; and
- Knowledge of fair housing.

Summary of most serious barriers. Figure IV-3 presents the potential barriers to fair housing stakeholders rated a 5.5 or higher on a scale of 0-9 (where a rating of 0 is "not a barrier" in the community and a rating of 9 is a "very serious barrier" in the community).

Nearly 60 percent of stakeholders consider limited resources to help persons with disabilities transition out of institutional settings to be a serious barrier. This lack of resources is compounded by a lack of housing available for persons with disabilities who wish to leave nursing homes or other institutional settings (the second most serious barrier rated). That a majority of stakeholders viewed these issues as significant barriers means that concern about this issue extends beyond the 25 percent of respondents who serve people with disabilities. Other potential barriers receiving high average ratings by stakeholders include poor condition of some affordable housing; lack of knowledge of some landlords of the Fair Housing Act and new state laws pertaining to Section 8/Housing Choice Vouchers; lack of larger housing units for families; NIMBYism; and onerous "look back" periods for criminal charges.

Figure IV-3.
Summary of Barriers Rated Most Serious by Stakeholders

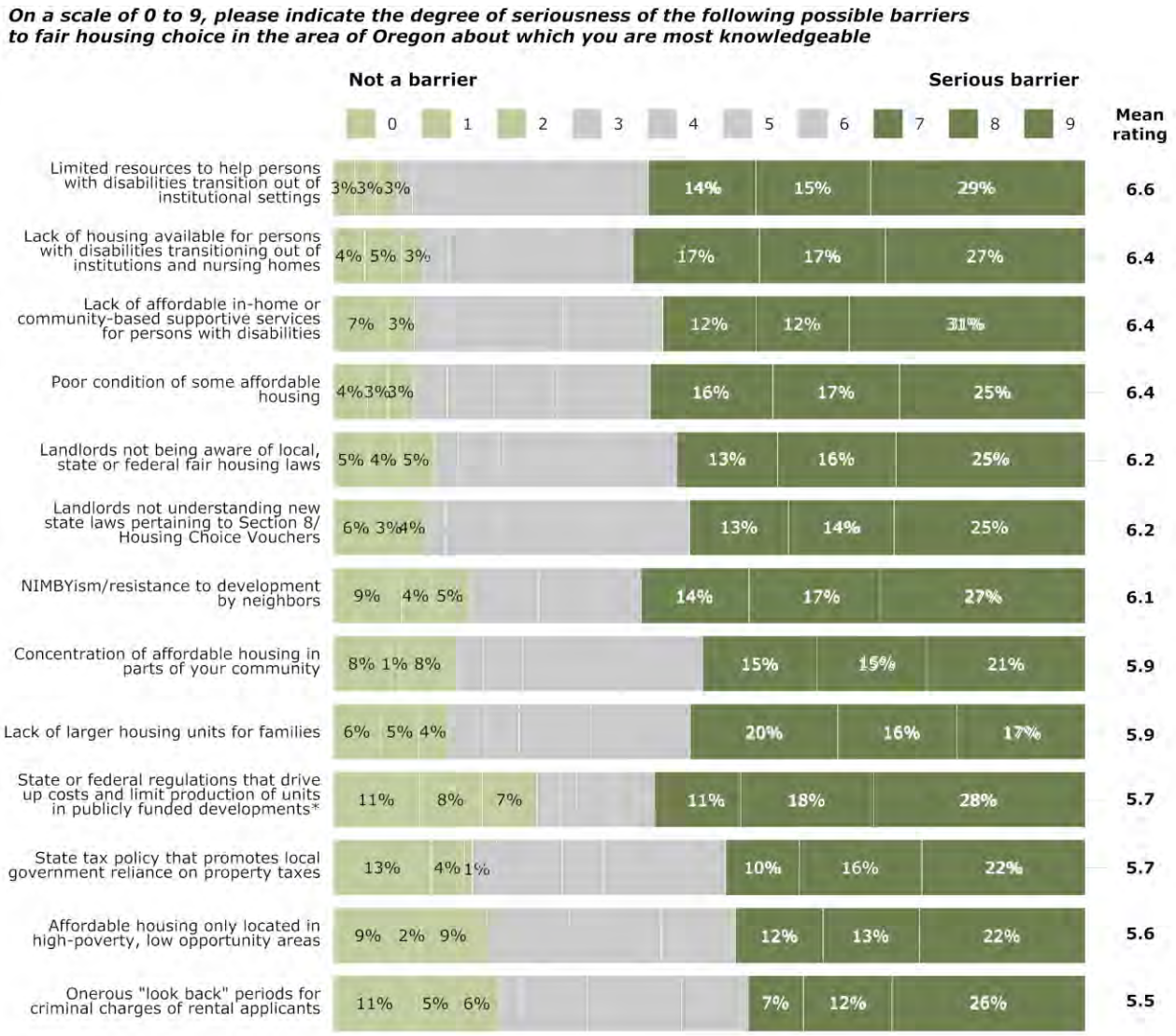
Note:

Barriers shown had average ratings of 5.5 or higher on a 0-9 scale. n ranges from 150 to 202.

Full question text: *State or federal laws, regulations or policies which hold publicly funded/subsidized housing developments to design and constructions standards that exceed those of market rate housing, thus driving up costs and limiting production of units.

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

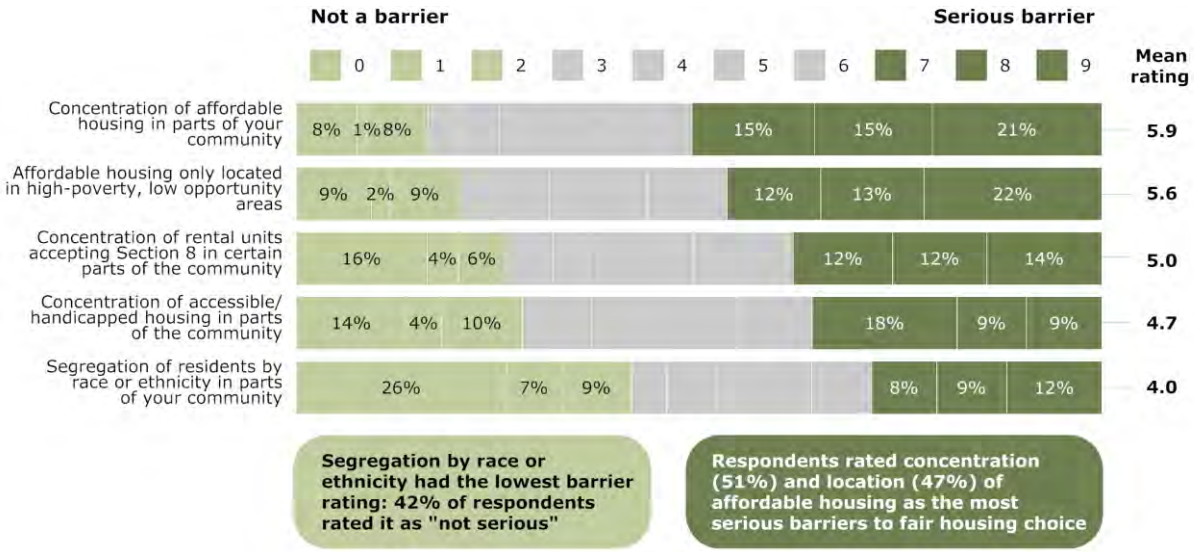


Housing location. Stakeholders rated the degree of seriousness of five potential barriers to fair housing associated with housing location (Figure IV-4). Among them, a concentration of affordable housing in certain parts of the community was the most serious barrier. Segregation by race or ethnicity was considered the least serious barrier in this group. Overall, 29 percent of stakeholders considered racial/ethnic segregation to be a serious barrier in their community (ratings of 7, 8, 9) while serious barrier, versus 42 percent who did not consider segregation to be a barrier (ratings of 0, 1, 2).

For persons with disabilities, particularly mobility impairments, another dimension of housing location is the need for housing located in areas with accessible sidewalks, and, ideally, access to public transportation. In interviews, stakeholders emphasized the linkage between housing and transportation in general, but for persons with disabilities in particular. Some suggested the need for increased coordination between state and local government and the Oregon Department of Transportation (ODOT).

One interview participant described the transportation challenges of those who are not able to get a driver's license because of a lack of documentation. In searching for housing in areas with poor transit, they are limited by a lack of a vehicle. They are faced with limiting their housing search to places where they can reach employment and daily destinations without a vehicle, obtaining rides from friends or family or driving illegally.

Figure IV-4.
Housing Factors that Create Barriers to Fair Housing Choice



Note:

n ranges from 139 to 172.

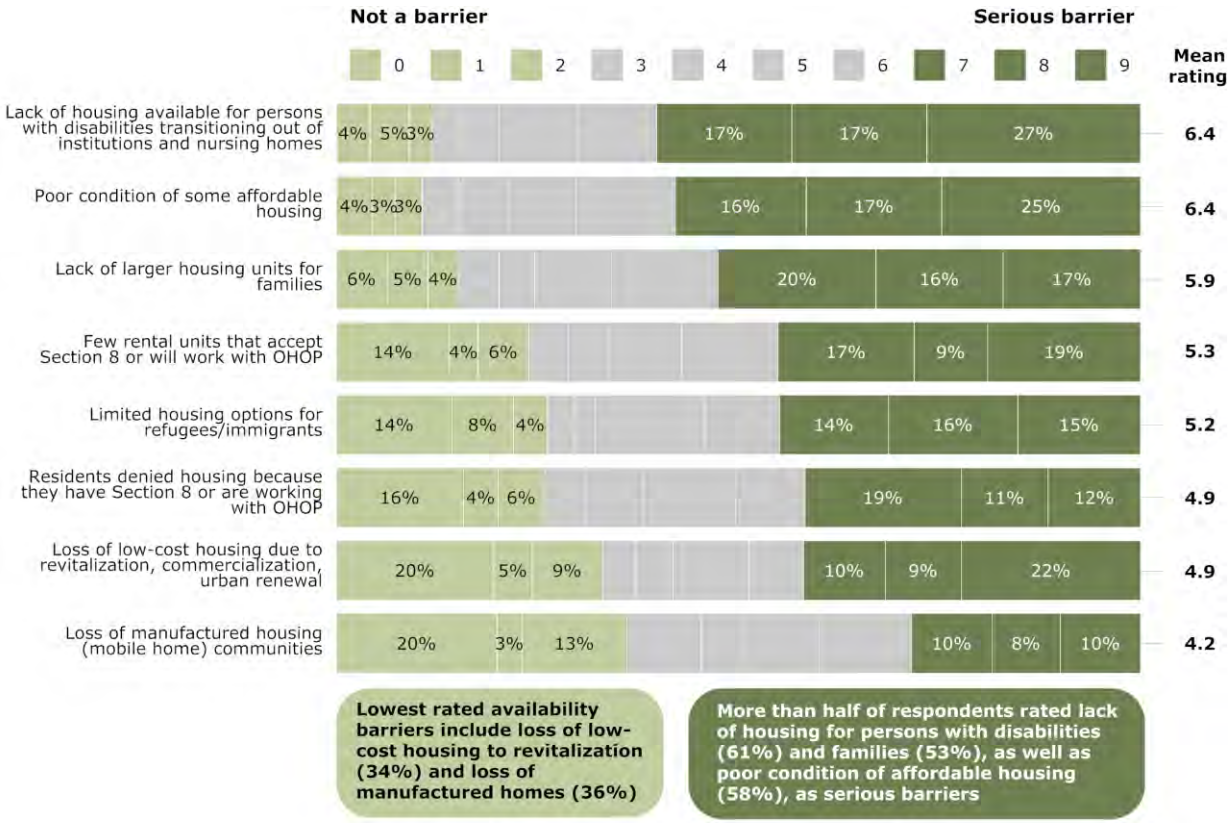
Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Housing availability. Figure IV-5 presents stakeholder ratings of seven potential barriers to fair housing measuring housing availability overall and for particular protected classes. As shown, three out of five stakeholders (61%) consider a lack of housing available for persons transitioning out of institutions and nursing homes to be a serious barrier to fair housing. Nearly the same proportion rate poor condition of some affordable housing to be a serious barrier. Slightly more than half of stakeholders find a lack of larger housing units for families to be a barrier.

Among the housing availability factors rated, most stakeholders did not cite displacement as serious barriers. It may be that policies addressing resident displacement due to revitalization or other municipal projects and loss of manufactured housing communities have been largely effective. Stakeholders evaluated two factors related to Section 8 vouchers: 1) the number of units that accept Section 8 or OHOP vouchers and, 2) denials due to having Section 8 or OHOP assistance. All things being equal, we would anticipate that the relative seriousness of both these measures as barriers to fair housing will fall over time as landlords' knowledge of the Housing Choice Act of 2013 increases. Market forces will continue to impact the availability of units for voucher holders, especially if Fair Market Rents do not keep pace with local conditions.

Figure IV-5.
Barriers to Housing Availability



Note:

n ranges from 118 to 178.

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Housing practices, including steering and blockbusting. With respect to public and private housing practices, nearly three in five stakeholders considered NIMBYism/resistance to development to be a serious barrier to fair housing. Slightly less than half of stakeholders rated onerous "look back" periods for criminal charges for rental applicants to be a serious barrier. As discussed in Section IV, changes to state law governing how landlords may treat an applicant's criminal history became effective January 1, 2014. In discussing the degree to which criminal history may be an impediment to fair housing, some stakeholders shared that the full impact of the changes in law have yet to be fully realized and that more outreach needs to be done.

In interviews, stakeholders discussed difficulties farmworkers and immigrants face when searching for housing. These include language barriers, especially for those who speak indigenous Central American languages or who do not have green cards or social security numbers. Many do not understand American rental practices such as security deposits, and leases or manufactured home park rules are rarely offered in languages other than English. These challenges increase their vulnerability to discriminatory practices.

Some housing providers make assumptions about Hispanic renters (e.g., that they are low income; do not have documents; or have large families and will bring more family members from Mexico), which further limits access to housing. One interviewee described segregation of Hispanic farmworkers taking the form of labor camps on the outskirts of Woodburn. Another interviewee described segregation by building within a development; one building comprised of white tenants next door to a building comprised of Hispanic tenants.

In interviews, some stakeholders discussed patterns of discriminatory practices against American Indians, including landlord refusals to accept housing vouchers issued by tribal housing authorities.

In focus groups and interviews, several participants raised particular challenges faced by prospective tenants who are domestic violence survivors. In some cases, the prospective tenant may be a former homeowner, so no prior rental history is available. Others, particularly in very small communities, are "known" survivors, and some landlords refuse to rent to these applicants because they "know" that the abuser will return and damage the unit or that the tenant will disrupt other residents due to their domestic situation. From these discussions, it was clear that neither local landlords nor survivors are aware of the state's applicable fair housing protections.

From the perspective of some interviewees, NIMBYism related to low income or farmworker housing is driven by fear and rumor. One gave the example of a project proposed in Independence that neighbors feared would yield crowded schools and gang activity. Neither steering nor blockbusting was raised by stakeholders as significant barriers. In interviews, stakeholders surmised that affordability was the primary driver behind neighborhoods shown to potential homeowners rather than steering.

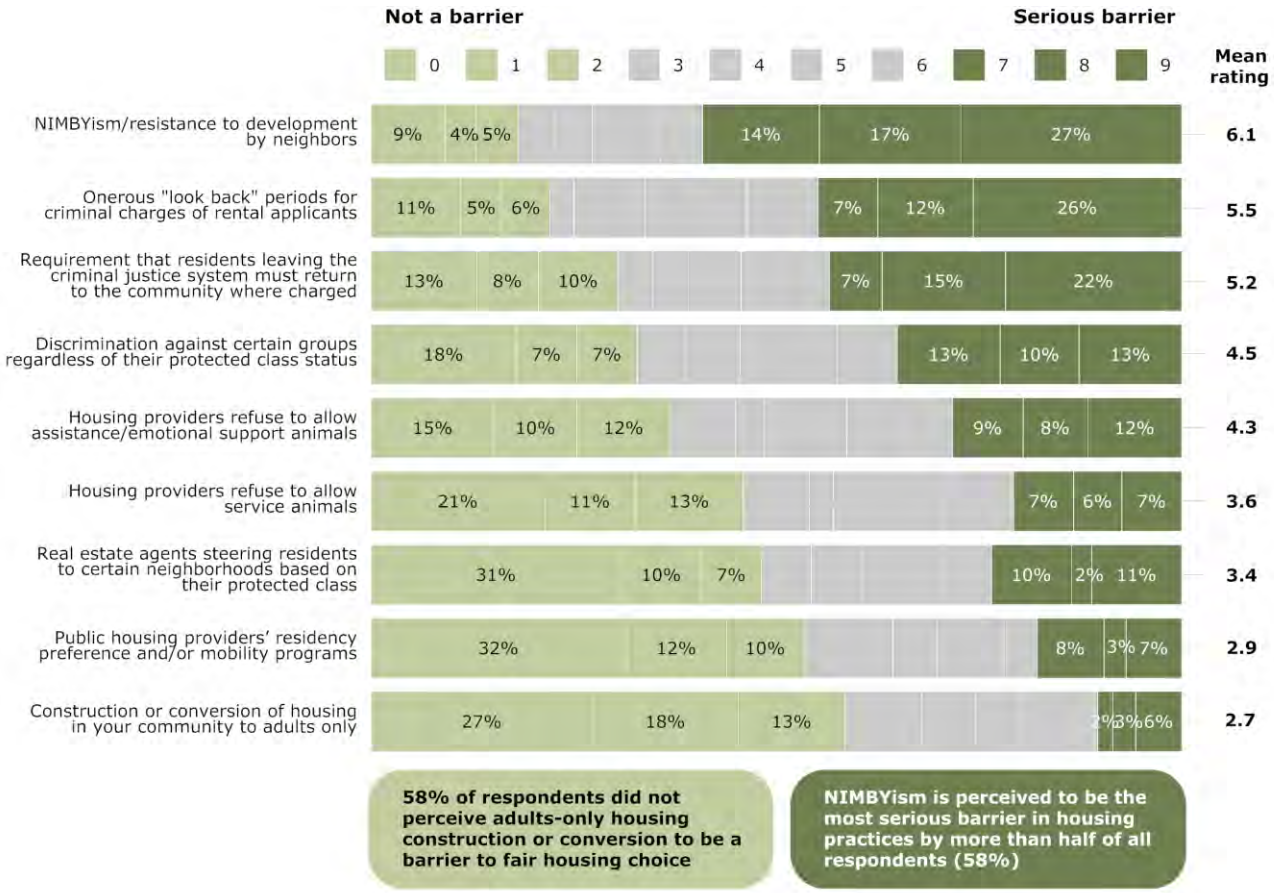
Figure IV-6.
Housing Practices that Create Barriers to Fair Housing Choice

Note:

n ranges from 73 to 138.

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.



State and federal policies. Stakeholders evaluated the degree to which 10 state or federal policies create barriers to fair housing choice in Oregon's nonentitlement areas. The top four policy barriers considered most serious all influence housing affordability, either by raising development costs or limiting options for local communities to pursue a broad range of policies to develop or preserve affordable housing.

As shown in Figure IV-7, nearly 60 percent of stakeholders perceive "State or federal laws, regulations or policies which hold publicly funded/subsidized housing developments to design and constructions standards that exceed those of market rate housing, thus driving up costs and limiting production of units" to be a very serious barrier to fair housing choice in the state's nonentitlement areas. Nearly half of stakeholders (48%) consider the state's tax policy that promotes local government reliance on property tax to be a very serious barrier. Both of these policies increase the cost of developing and providing housing, perhaps exacerbating the economic impacts of hot rental markets or decreasing the potential for less dense, rural affordable housing developments to pencil out.

The state's prohibition of inclusionary zoning and limitations on General Obligation bond use constrain policy choices of local governments. While these policies may not be appropriate for every housing market, the state's limitations deny local governments the option of pursuing these policies to address particular local market failures.

Where state agencies have been successful, in the experience of stakeholders, is minimizing loss of low-cost housing through direct agency actions. Nearly half of stakeholders do not think loss of such housing due to state action is a barrier.

In focus groups and interviews, stakeholders underscored the importance of developing state policies with an eye to capacity differences between rural counties and agencies and those located in more populous or affluent areas. For example, a Department of Environmental Quality program funds housing rehabilitation in certain situations, but participation requires a full time staff member to manage the program; few rural counties can afford such a staffing commitment and are therefore unable to participate. Other issues related to a lack of local capacity included requirements related to program reporting and outreach requirements, many of which are not relevant or are inefficient for small communities.

In interviews and SAC meetings, stakeholders discussed conflicts between community need for housing for persons with disabilities and limitations placed on the percentage of units that can be allocated—20 percent—as part of the state's policies to comply with the Supreme Court's *Olmstead v. L.C.* decision. Participants thought that the 20 percent threshold could be relaxed in rural communities and still achieve the goal of providing integrated housing opportunities.

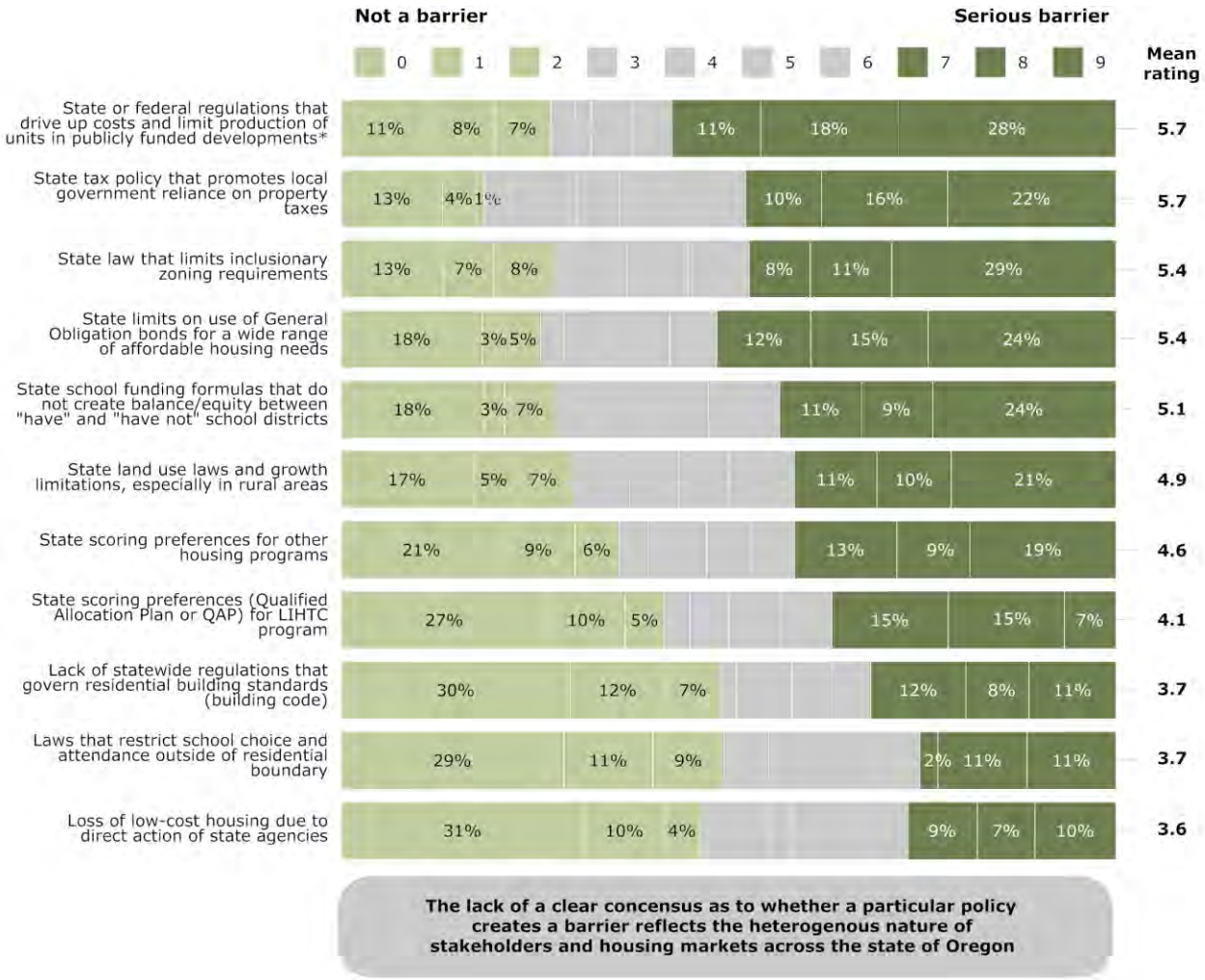
Figure IV-7.
State and Federal Policies that Create Barriers to Fair Housing Choice

Note:

Full question text: *State or federal laws, regulations or policies which hold publicly funded/subsidized housing developments to design and constructions standards that exceed those of market rate housing, thus driving up costs and limiting production of units.

Source:

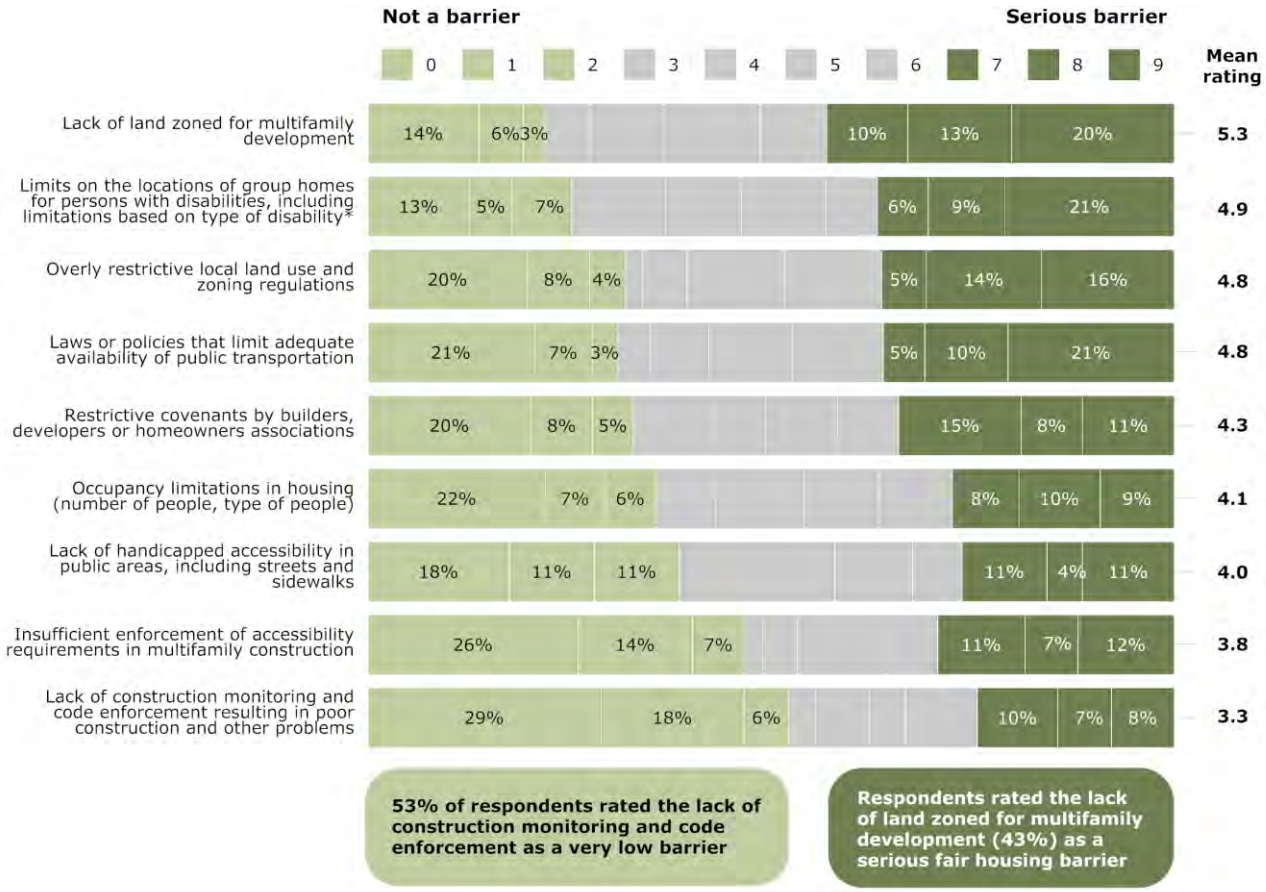
BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.



Local policies, including deed restrictions. Figure IV-8 presents stakeholder ratings of nine local policies that may create barriers to fair housing choice. Among these local policies, about two in five stakeholders consider a lack of land zoned for multifamily development to be a serious barrier, compared to about one in five stakeholders who do not consider this to be a barrier. Stakeholders are split in their perception of the degree to which restrictive covenants (i.e. deed restrictions) by builders, developers or homeowners associations create barriers to fair housing choice—one-third consider restrictive covenants to be a very serious barrier while one-third do not consider such covenants to be a barrier.

Limitations on the location of group homes for persons with disabilities, including limitations based on type of disability, are considered a serious barrier to fair housing by two in five stakeholders. Slightly more than one in three stakeholders (36%) rate overly restrictive local land use and zoning regulations a serious barrier. Among the local policies considered, stakeholders were least likely to cite a lack of construction monitoring and code enforcement to be a serious barrier. However, in interviews and focus groups, participants frequently described poor conditions often found in market rate affordable housing.

Figure IV-8.
Local and Jurisdictional Policies that Create Barriers to Fair Housing Choice



Note: * Limits on the locations of group homes for persons with disabilities, including limitations based on type of disability (e.g., physical, developmental, intellectual, mental, addiction recovery, HIV status).

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Capacity and knowledge. Stakeholders evaluated nine potential barriers to fair housing related to knowledge and capacity. Among these, nearly 60 percent rate limited resources to help persons with disabilities transition out of institutional living situations a very serious barrier. A similar proportion considers a lack of affordable in-home or community-based supportive services for persons with disabilities a very serious barrier to fair housing choice. Other barriers perceived to be serious relate to landlords' lack of knowledge of state and federal fair housing protections in general, and more specifically a lack of understanding related to Section 8/Housing Choice Vouchers.

Some SAC members suggest that landlords are deliberately choosing to deny housing to voucher holders, while other SAC members believe that some landlords are still unaware of the change in law. The degree to which all stakeholders serving nonentitlement areas believe landlords' lack of knowledge of fair housing creates impediments suggests the need for continued outreach and education.

In interviews, some stakeholders described clients who encountered landlords who flatly refused to allow service animals. Others allowed the animal, but had numerous and overly-restrictive rules that made it impossible for the tenant to comply, leading to moves or threats of eviction.

About two in five stakeholders believe that the complexity of filing fair housing complaints itself is a serious barrier to fair housing choice, while one-third does not agree. In interviews, stakeholders expressed concern about the lack of prompt remedies to discriminatory situations.

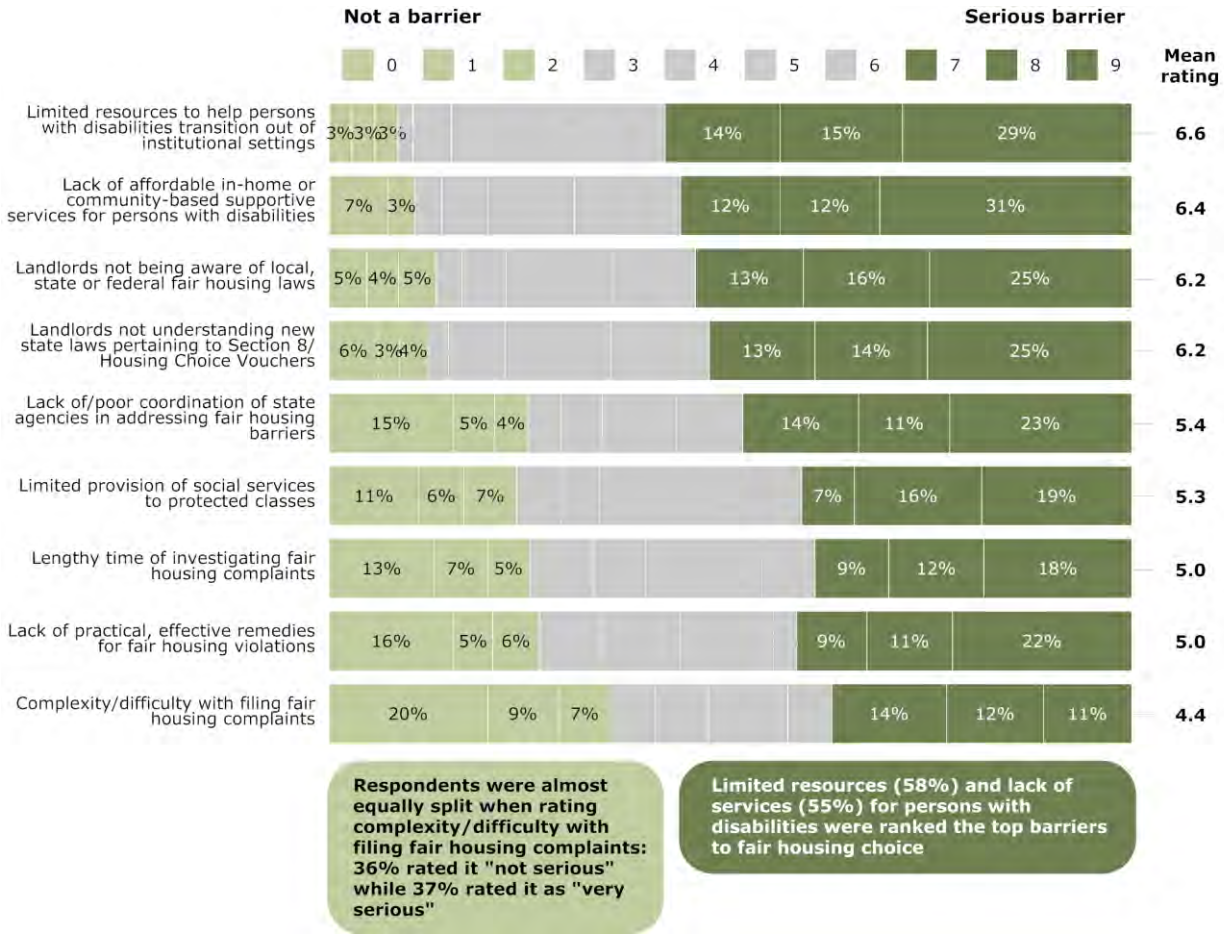
In interviews and focus groups, stakeholders described a need in western and southern Oregon for increased local capacity to address housing discrimination and near-criminal practices that take advantage of poor residents. Examples include requiring a tenant to pay large security deposits and then evicting the tenant for a "safety" violation, such as removing batteries from smoke detectors. Others believe a "good old boys" network manipulates the Eviction Court and eviction proceedings to the benefit of a small group of landlords.

With respect to affordable housing development in nonentitlement areas, SAC members and stakeholder survey respondents suggest that an additional barrier is a lack of local lending capacity to develop complex financial deals required for LIHTC or other opportunities. This results in developers having to try to persuade urban or nonlocal lenders that the project will succeed.

Figure IV-9.
Housing Capacity and Knowledge that Create Barriers to Fair Housing Choice

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.



Housing for Persons with Disabilities

Among protected classes, data describing the housing needs and access to opportunity of persons with disabilities are particularly scarce. To supplement the publicly available data, stakeholders responded to a series of questions related to the housing needs and access to opportunity of persons with disabilities. In forming their responses, stakeholders were asked to consider all types of disabilities, including, but not limited to physical, developmental, intellectual, mental, addiction recovery, and HIV status.

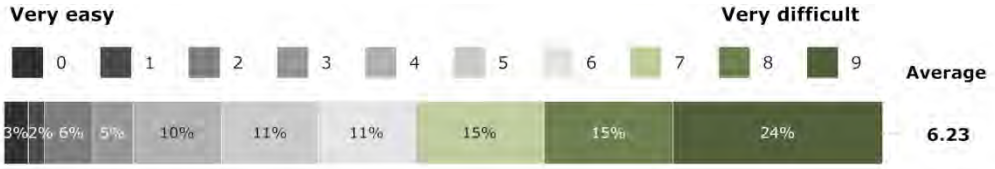
Accessible housing availability. As shown in Figure IV-10, most stakeholders believe the communities in which they work have an insufficient number of units accessible to persons with disabilities. Slightly more than one in 10 stakeholders believes sufficient accessible units exist in their local market to accommodate the needs to persons with disabilities.

Figure IV-10.
How would you characterize the availability of housing stock in the area you serve that is accessible to persons with disabilities?

Note:
n=143.
Source:
BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Knowledge of funding sources for modifications. With respect to learning about opportunities to fund accessibility improvements or modifications, about half of stakeholders think it is very difficult to find information about these programs.

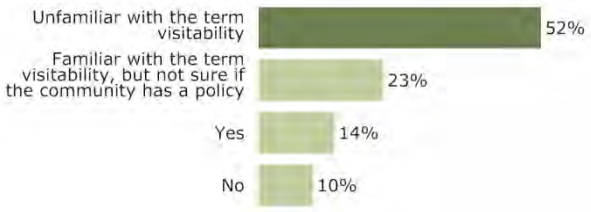
Figure IV-11.
In your opinion, how easy is it for persons with disabilities to find information about grant and loan programs to make needed accessibility improvements/modifications to their homes?



Note: n=109.
Source: BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Local visitability policies. More than half of stakeholders are unfamiliar with the term "visitability, " and another quarter are familiar with the term but uncertain whether or not the areas they serve have formal policies.

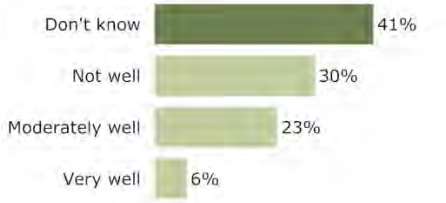
Figure IV-12.
Does the community in which you work have a visitability policy or incentives to encourage visitability in new housing construction?



Note:
n=134.
Source:
BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Policies to encourage integrated community settings. The greatest proportion of stakeholders, 41 percent, does not know how well state or local policies or practices encourage placement of persons with disabilities in integrated settings.

Figure IV-13.
How well do state and local policies and practices encourage the placement of persons with disabilities in apartments, single family homes and other integrated community settings?



Note:
n=142.
Source:
BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Principal housing challenges. Most stakeholder depictions of the principal housing challenges of persons with disabilities focus on affordability, accessibility, supportive services and transportation. Many underscored that, in addition to challenges related to household income, this population also experienced challenges specific to the type of disability that one had, such as stigma association with mental illness or addiction recovery or physical barriers experienced by people with limited mobility. Some individuals need access to supportive services such as case management or in-home health care in order to live independently. Without supportive services, some individuals must live in group or congregate homes when they would prefer a more independent situation. Access to transportation is also a challenge, amplified by the Analysis of Impediments focus on Oregon's nonentitlement areas, where public transportation in general is rare.

Examples of stakeholder descriptions of the principal housing challenges of residents with disabilities include:

- *"It depends. Physical accessibility, obviously. For those with mental illness or addiction recovery, prejudice. For those with developmental intellectual, supportive services." (Stakeholder survey respondent)*

Affordable and accessible housing.

- *"Availability of housing resources that are affordable for persons with a disability. In addition, units available may not be affordable within the budget of the persons seeking housing resources." (Stakeholder survey respondent)*

- *"Lack of housing options that fall within the 20 percent disability allowance, cost of housing for someone on disability or homeless with NO INCOME." (Stakeholder survey respondent)*

- *"Beyond the obvious that there are limited homes with adequate modifications to assist wheelchairs, costs to modify individual homes is so out of reach to most persons who live on a fixed or disability income. Or, contractors just do not understand the unique needs for handicapped individuals." (Stakeholder survey respondent)*

- *"Acquiring accessible housing and remaining connected to necessities. There are few sidewalks, limited public transportation and few available residences without stairs." (Stakeholder survey respondent)*

- *"Another problem our clients have is securing housing after a hospitalization. It is tough to get a place of their own and tough to get back to their community." (Stakeholder interview)*

Supportive services.

- *"Access to consistent supportive service in order to live independently. Inadequate resources to appropriate service providers." (Stakeholder survey respondent)*

- *"Also, lack of support once housing is located for tenants who are mentally disabled makes maintaining the housing challenging and can lead to chronic homelessness." (Stakeholder survey respondent)*

- *"It is primarily persons with mental disabilities who do not have enough support to make it in their own apartment." (Stakeholder survey respondent)*

- *"Stigma. Lack of prior rental history, possible criminal and credit issues. Limited assistance helping them navigate through the initial process of obtaining housing, then help staying successful." (Stakeholder survey respondent)*

- *"There are not enough supportive services for those trying to transition into housing. Individuals may not have the skills to pay rent and bills and have a fear of failure. Often the housing has tight and restrictive rules; both the rules of OHOP and the rules of the housing complex, including clean and sober living; this can be intimidating." (Stakeholder interview)*

Transportation.

- *"I think transportation is difficult for most residents in our community and therefore even more problematic for persons with disabilities." (Stakeholder survey respondent)*

- *"Lack of public transportation." (Stakeholder survey respondent)*

- *"Availability of housing in general. Lack of transportation options. Sufficient resources to assist with housing-first options."*

Other challenges: prejudice and stereotypes.

- *"Local residents' lack of awareness of 'invisible disabilities' and fear of certain types of disabilities, i.e. emotional or mental or addicts." (Stakeholder survey respondent)*

- *"Landlords and managers giving them a chance. I tend to find that managers will have a predisposition with individuals with disabilities and will automatically believe that they will fail. It's very frustrating." (Stakeholder survey respondent)*

- *"Things are slowly changing, but a major problem is still low expectations for individuals with intellectual development disorders (IDD). They can't be served in general classrooms, so they are separated from their peers at a young age. There is discrimination in the community; individuals are ostracized. There is a lot of fear because people do not understand individuals with IDD." (Stakeholder interview)*

- *"The biggest tension point is associated with the line between a mental disability that involves behavior that is just different and one that harms community habitability/peace." (Stakeholder survey respondent)*

- *"Landlords are reluctant to work with our clients. The population we serve usually has an additional stigma to deal with beyond HIV, such as being gay or a drug history." (Stakeholder interview)*

Fair Housing Knowledge and Capacity

Stakeholders responded to a series of questions related to fair housing knowledge and capacity to identify education and outreach needs.

Knowledge of where to file a complaint. Slightly more than half of stakeholders would refer a client to a state fair housing organization, such as FHCO, if they wanted to help a client file a fair housing complaint. Slightly less than one in 10 would not know where to direct a client, and a similar proportion would need to search for a resource.

Figure IV-14.
If you wanted to help a client file a fair housing complaint, to whom or where would you refer them?

Note:
n=157. Numbers add to greater than 100 percent due to multiple responses.

Source:
BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Part participation in fair housing training. Most stakeholders have received fair housing training in the past; most of these had received training from a fair housing organization. Three in 10 had received training in-house through their employer.

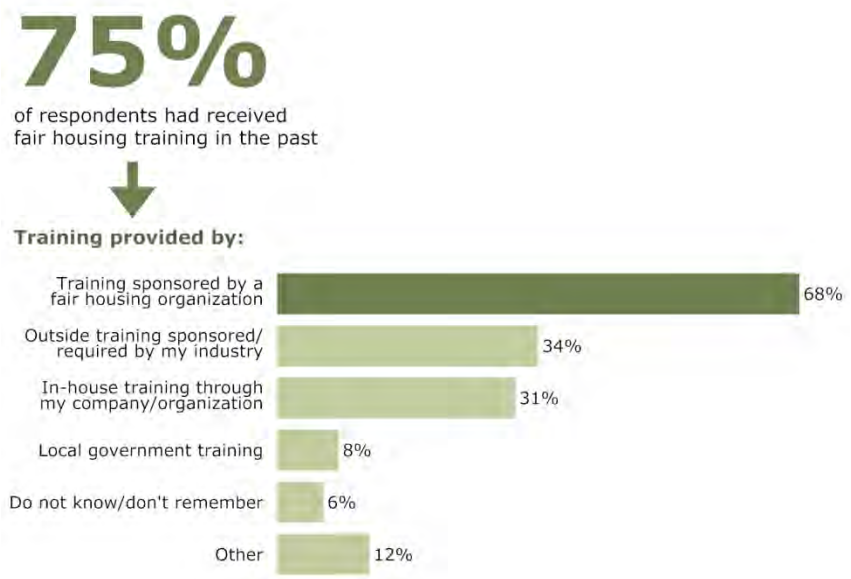
Figure IV-15.
Have you received fair housing training in the past?

Note:

n=157 and n=118.

Source:

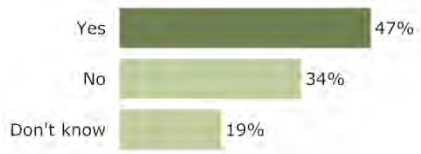
BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.



Need for local fair housing resources. Stakeholders provided their assessment of the adequacy of local fair housing resources and the types of fair housing activities needed in the community.

Adequacy of resources, training and information available locally. About one in three stakeholders believe local fair housing information, resources and training is inadequate.

Figure IV-16.
Do you feel there is adequate information, resources and training on fair housing laws in the area you serve?



Note:

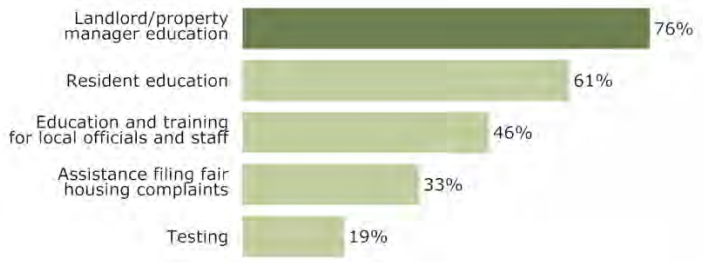
n=156.

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Types of fair housing activities needed locally. With respect to the types of fair housing activities needed locally, most stakeholders emphasized education and training. By far, the greatest proportion of respondents (76%) point to a need for local landlord/property manager fair housing education and training, followed by resident education (61%).

Figure IV-17.
What types of fair housing activities are most needed in the area you serve?



Note:

n=156. Numbers add to greater than 100 percent due to multiple responses.

Source:

BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Affirmatively Furthering Fair Housing: The Role of the State of Oregon

Stakeholders shared their perspectives regarding how the state could most effectively work to mitigate fair housing barriers in the nonentitlement communities and contribute to local efforts to affirmatively further fair housing choice.

Stakeholders offered a number of suggestions to mitigate barriers and affirmatively further fair housing. The most common suggestions include:

- Fair housing education for landlords. Some suggested regulating landlords to ensure they are informed of their fair housing obligations. Other emphasized the importance of a training and education approach rather than enforcement and fines;
- Fair housing education for renters;
- Fair housing and policy education and training for housing authorities and local governments;
- Increase funding for supportive services to help persons with disabilities remain housed;
- Restore funds to the Fairview Trust, which was intended to support persons with IDD; funds could be used to transition individuals from group homes to the community;
- Change the policy that allows the state to take an individual's SSDI if the individual lives in a group home, allowing for the individual to have more flexibility for those funds.
- Prioritizing housing and supportive services for persons with disabilities, promoting independent, integrated housing and increased production of visitable and accessible housing;
- Tax credit or other builder/landlord incentives to develop or preserve affordable housing or to offer below market rents to low income households;
- Work with HUD to ensure Fair Market Rents reflect current market conditions;
- Allow local jurisdictions to adopt inclusionary zoning policies;
- Move toward state-level guidelines for housing and services program implementation, not current county-level systems;

- Property tax relief for nonprofit-owned affordable housing;
- Revisit policies that increase the cost of affordable housing development; and
- Improved coordination among state agencies that provide funding and services.

Summary of Top Issues

The stakeholder consultation process yielded numerous insights on the housing choices of Oregon residents living in nonentitlement communities; effects of local, state and federal policies on housing opportunities and issues specific to individual protected classes. The analysis suggests the following:

- A lack of affordable, accessible housing and resources for supportive services greatly limits fair housing choice of persons with disabilities.
- Landlords, particularly "mom and pop" operations, lack knowledge of their fair housing obligations, and may not be aware of recent changes in state law that impact their tenant selection process.
- Residents, especially renters, lack knowledge of their fair housing protections. Residents who do not speak English or have mental or intellectual disabilities are particularly vulnerable to discriminatory practices, but stakeholders also provided examples of discrimination based on familial status, race or ethnicity, sexual orientation and disability.
- State policies crafted to suit the scale of metropolitan areas are difficult to implement in rural communities due to a lack of population density, population diversity or staff capacity.
- State policies that increase the costs of developing or managing affordable housing pose additional challenges in rural communities.
- Local lenders do not have the staff capacity or experience needed to finance multifamily deals, much less navigate the complexity of affordable housing finance. This results in providers or developers seeking loans from out-of-market financial institutions who may not understand the local market.
- In some more isolated areas of the state, outright discriminatory practices continue, particularly toward Hispanic and Native American renters.
- The transition from an institutionalized setting, regardless of whether it is a hospital or a jail, represents a vulnerable time for members of protected classes. Both a lack of housing options and a lack of transition services are seen as problems.
- State policies which limit the array of tools that jurisdictions may use to support affordable housing are seen as an issue.
- Poor housing conditions represent a significant problem in more economically depressed areas of the state.

SECTION V.
Public Input

This section summarizes findings from the public input elements of the State of Oregon 2015 Analysis of Impediments. Unless otherwise noted, all participants live in nonentitlement communities.

Participation Opportunities

Resident participation opportunities for the 2015 Analysis of Impediments included a survey and focus groups.

Resident survey. BBC designed a resident survey to capture the experiences, attitudes and preferences of Oregon's nonentitlement residents with respect to housing choice, community norms and perceptions and housing discrimination.

Statistically-valid, representative resident telephone survey. The resident survey results are representative of households in Oregon's nonentitlement areas at the 95 percent confidence level. The general population surveys (*general market sample*) are supplemented by oversamples of nonwhite residents (*nonwhite subsample)* and households which include a member with a disability (*disability subsample)*. A detailed methodology for the resident telephone survey is provided in Appendix C.

Self-selected resident survey. The resident survey was available online, on paper with postage-paid mailing or by phone (respondents could call BBC's 800 number and take the survey by phone in English or Spanish with BBC staff). Overall, 369 residents completed the online survey. Of these, 91 lived in nonentitlement areas. Approximately 20 residents participated in the survey by phone (all English speakers) and 18 returned paper surveys by mail. Where appropriate, findings from the self-selected survey are used to supplement the representative survey.

Focus groups. BBC and Commonworks Consulting partnered with local organizations in Coos Bay, Dallas, the Dalles, Hood River, Klamath Falls and Ontario to host and recruit focus groups with local residents. Partner organizations included Head Start agencies, Community Action Agencies, a county developmental disability services department, a housing authority and a nonprofit housing provider. BBC prepared promotional flyers in English and Spanish for distribution. Each local partner conducted outreach to residents, clients and other partners. A total of 27 residents participated in the focus groups. One focus group was conducted in Spanish. In Klamath Falls and Coos Bay, focus groups were comprised of local stakeholders (10 participants).

Participant Profile Summary

Appendix C presents a full demographic and socioeconomic profile of respondents to the statistically valid, representative resident telephone survey. Respondent characteristics include:

- **Race and ethnicity—**Among general market sample participants, 86 percent identify as white, followed by 5 percent Hispanic, 3 percent Native American and 2 percent multi-racial. In the nonwhite sample, 52 percent of respondents identify as Hispanic; 21 percent Native American; 10 percent multi-racial; 5 percent African American and 5 percent Asian. Three in four members of the disability sample are white; 10 percent Native American and 6 percent Hispanic.

- **Age—**Respondents in the general market sample ranged in age from 18 to 88, with a median age of 48. The nonwhite sample respondents have a median age of 47 and an average age of 46, ranging overall from 18 to 74. The disability sample skews older and ranges from 20 to 87, with an average age of 55 and median of 58.

- **Household size and composition—**The median household size in each sample is three members. Large households (five or more members) comprise 17 percent of the general market sample, 28 percent of the nonwhite sample and 15 percent of the disability sample. The greatest proportion of households in each sample consists of the respondent, a spouse/partner and children (40% general market, 37% nonwhite, and 33% disability). Nearly one in five general market households (15%), 21 percent of nonwhite sample households and 20 percent of disability sample households include adult family members other than the respondent's spouse or partner.

- **Household income—**The median household income in the general market and disability samples is $35,000 up to $50,000 and $25,000 up to $35,000 for the nonwhite sample. Households earning less than $25,000 are 15 percent of the general market sample, 31 percent of the nonwhite sample and 35 percent of the disability sample.

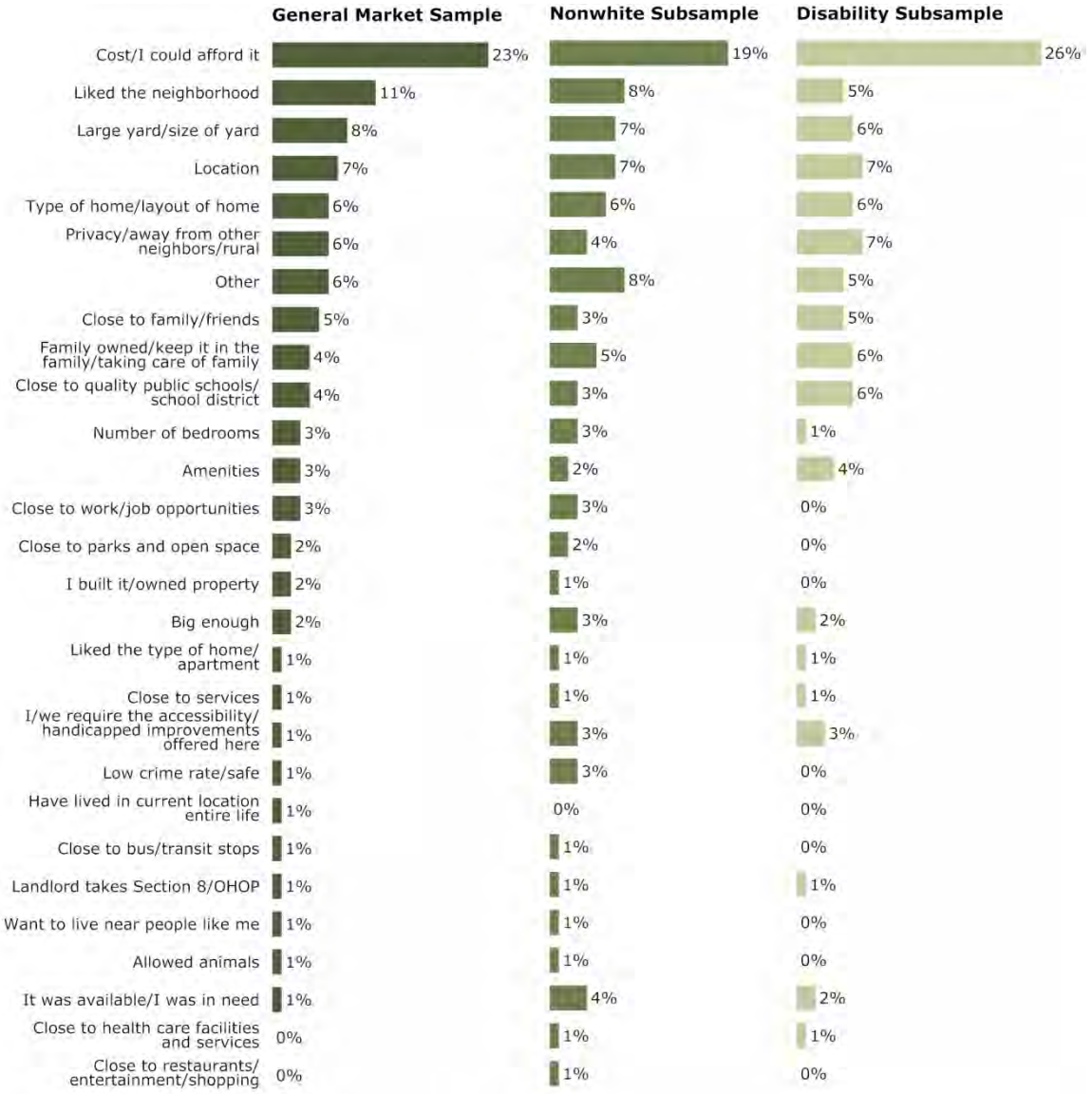
- **Disability—**By design, all of the respondents included in the disability sample have at least one household member with a disability of any type (e.g., physical, mental, intellectual, or developmental). Households with a member with a disability comprise 22 percent of the general market sample and 31 percent of the nonwhite sample.

Housing Choice and Preferences

This section explores residents of Oregon's nonentitlement areas' housing preferences, including the factors most important to them in choosing their current home and whether or not they would like to move to another housing unit or location.

Most important factor in choosing current home. Survey respondents identified the single most important factor that led to their choice of home. As shown in Figure V-1, cost was the most important factor for one in four respondents in both the general market and disability samples and one in five nonwhite respondents. Other important factors to each population include characteristics of the housing unit, neighborhood and location factors and proximity to family/friends and employment. In focus groups, participants described difficulty finding affordable housing, and this is compounded by long waitlists for vouchers or other subsidized housing.

Figure V-1.
What is the factor that was most important to you in choosing your current home or apartment?



Note: General market sample n=398, nonwhite sample n=156, disability sample n=217.

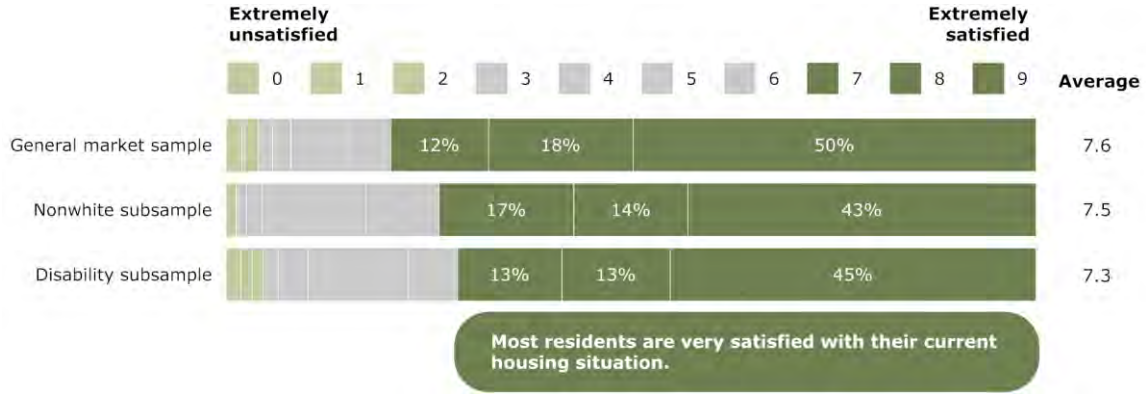
Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Satisfaction with current housing. Most residents are very satisfied with their current housing situation, and half of general market respondents are 'extremely satisfied' (Figure V-2). Only a small proportion of respondents—8 percent of general market, 5 percent of nonwhite, and 10 percent of disability sample—were somewhat or very unsatisfied (rating of 0-4) with their housing. Across all three groups, top reasons include:

- Landlord won't make repairs;
- Home/apartment needs repairs that I can't afford;
- Does not meet our handicapped accessible needs;
- Can't refinance/problems with lender; and

- Foreclosure concerns.

Figure V-2.
How satisfied are you with your housing situation?



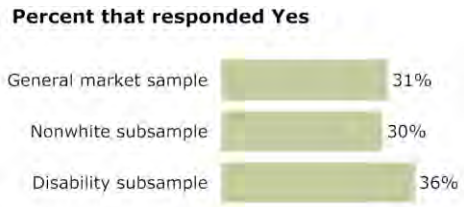
Note: General market sample n=400, nonwhite sample n=156, disability sample n=217.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

In focus groups, many participants living in more rural or economically depressed communities described poor housing conditions due to lack of maintenance and inexpensive housing construction. Other condition issues include the presence of black mold and poor ventilation. Others, particularly those living in nonprofit affordable housing or housing owned or inspected by housing authorities or voucher agencies, report satisfaction and good housing conditions. Those living in more suburban and economically stable communities experience higher housing costs and a more limited supply of affordable housing.

Desire to move. Regardless of their satisfaction with current housing, at least three in 10 respondents would like to move from their current home or apartment (Figure V-3). A greater proportion of respondents in the disability subsample (36%) are more likely to desire a move than the general population or nonwhite respondents.

Figure V-3.
If you had the opportunity, would you like to move from your current home or apartment?



Note:
General market sample n=398, nonwhite sample n=156, disability sample n=217.
Source:
BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Figure V-4 presents the top five reasons for wanting to move shared by respondents. In each sample, one in five respondents wants to move to a bigger housing unit or a unit with more bedrooms. Slightly more than one in 10 participants in the disability sample identified a need for housing that better meets their accessibility needs. A desire for "independence" ranked in the top five reasons for wanting to move. Examples of the how respondents define independence includes:

- "I'm getting older and I want my own home."
- "Make my own decision and do my own repairs."

- "To have more privacy."

Figure V-4.
Top 5 Reasons for Wanting to Move

General Market Sample	Nonwhite Subsample	Disability Subsample
1 Bigger house/apartment/ more bedrooms (18%)	1 Bigger house/apartment/ more bedrooms (18%)	1 Bigger house/apartment/ more bedrooms (18%)
2 Want to be in a rural environment (12%)	2 Smaller house/apartment/ downsize (11%)	2 Need more accessible unit or house (13%)
3 Want to buy a home (12%)	3 Want to be in a rural environment (9%)	3 Smaller house/apartment/ downsize (12%)
4 Smaller house/apartment/ downsize (8%)	4 Independence (6%)	4 Want to move to different neighborhood (9%)
5 Independence (8%)	5 Want to be in a city/ urban environment (6%)	5 Independence (8%)

Note: General market sample n=122, nonwhite sample n=47, disability sample n=78.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

By far, the cost of moving or the lack of other affordable options in the area is the reason the greatest proportion of those who would like to move has not. Market forces related to home sales or vacancy rates are barriers to moving for some respondents. In addition to the top five reasons shown in Figure V-5, leases/contracts; divorce proceedings; waiting for the housing market to improve are factors respondents shared.

Figure V-5.
What is the main reason why you haven't moved yet? Top 5 Reasons

General Market Sample	Nonwhite Subsample	Disability Subsample
1 Can't afford to move/Can't afford to live anywhere else (39%)	1 Can't afford to move/Can't afford to live anywhere else (45%)	1 Can't afford to move/Can't afford to live anywhere else (46%)
2 Family reasons (11%)	2 Family reasons (11%)	2 Family reasons (13%)
3 Can't sell house/fixing up house first (6%)	3 Rentals are all full; can't find a place to rent (6%)	3 Can't sell house/fixing up house first (8%)
4 Employment reasons (5%)	4 Can't sell house/fixing up house first (4%)	4 Need to finish school / Kids are in school (4%)
5 Can't find a better place to live (4%)	5 Employment reasons (4%)	5 Rentals are all full; can't find a place to rent (3%)

Note: General market sample n=122, nonwhite sample n=47, disability sample n=78.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Housing for People with Disabilities

All participants who affirmed that they or a member of their household has a disability of any type (e.g., physical, mental, intellectual, developmental) responded to a series of questions related to their housing accessibility needs and their experience requesting reasonable accommodations.

Accessibility and suitability of current home. One in five households with a member with a disability is living in home that does not meet their accessibility or accommodation needs. Of these households, the greatest proportion report needs for ramps or wheelchair access followed by bathroom accessibility features.

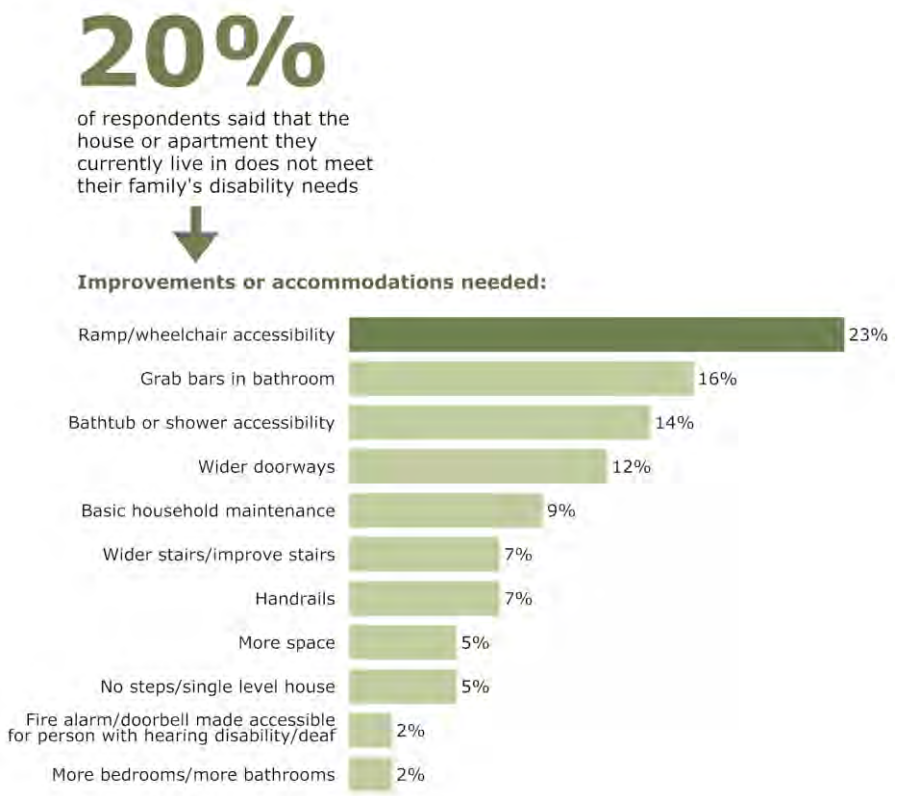
Figure V-6.
Suitability of Home and Needed Improvements

Note:

Disability sample n=208 and n=43.

Source:

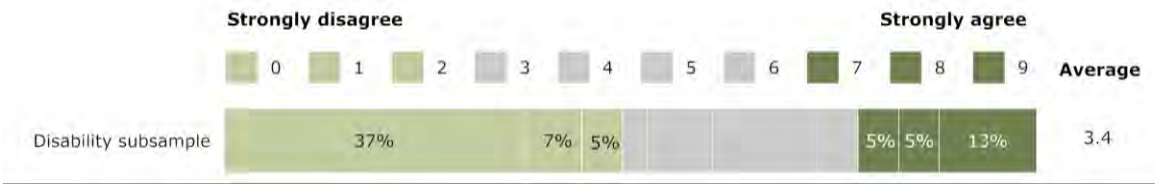
BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.



In focus groups, most participants did not report having particular difficulty finding accessible housing for themselves or household members with mobility impairments. More challenging is finding and maintaining suitable housing arrangements for persons with mental illness or emotional behavioral disorders.

Affordable accessible housing. On average, households that include a member with a disability report that they can afford the housing that has the accessibility features needed. However, one in four households cannot afford housing with the features they need.

Figure V-7.
I can't afford the housing that has accessibility/handicapped features we need.



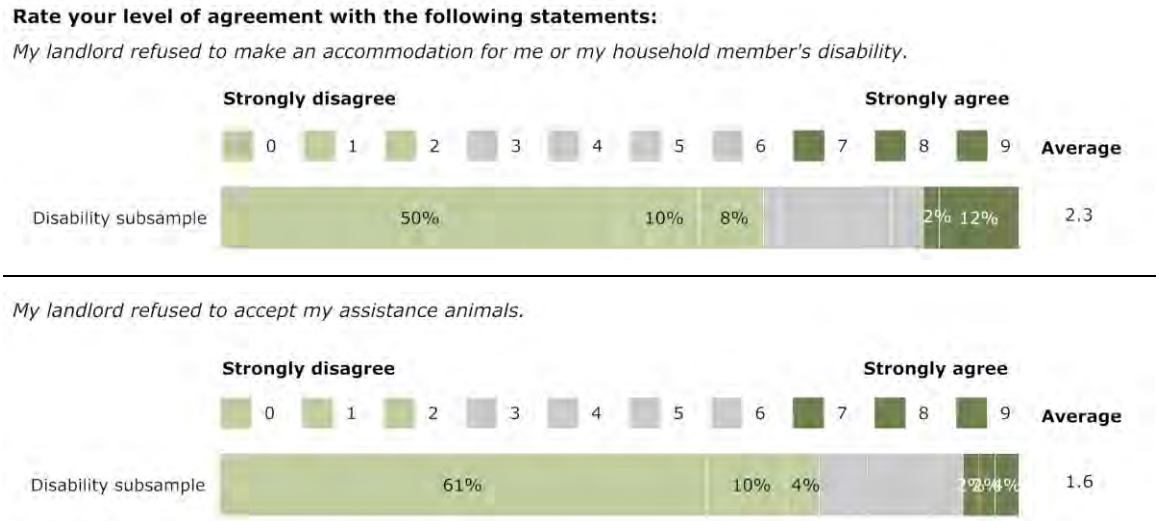
Note: Disability sample n=208.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Reasonable accommodations. Renters and homeowners were asked the degree to which requests for reasonable accommodations were granted by either landlords or, if applicable, homeowners associations (HOAs).

Landlords. The majority of renter households in the disability sample strongly disagreed with statements describing landlord refusal of reasonable accommodation requests or denial of assistance animals. This suggests that most landlords are accommodating the needs of tenants with disabilities. Slightly more than one in 10 strongly agreed that "my landlord refused to make an accommodation." With respect to assistance animals, most landlords are accepting; with only 8 percent of responding agreeing that a landlord refused the animal.

Figure V-8.
Reasonable Accommodations by Landlords



Note: Disability sample n=52.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

HOAs. Few homeowners in the disability sample indicated problems receiving reasonable accommodations from their homeowners association.

Figure V-9.
The HOA in my neighborhood wouldn't let me make changes to my house or property for my disability.

Note: Disability sample n=120.

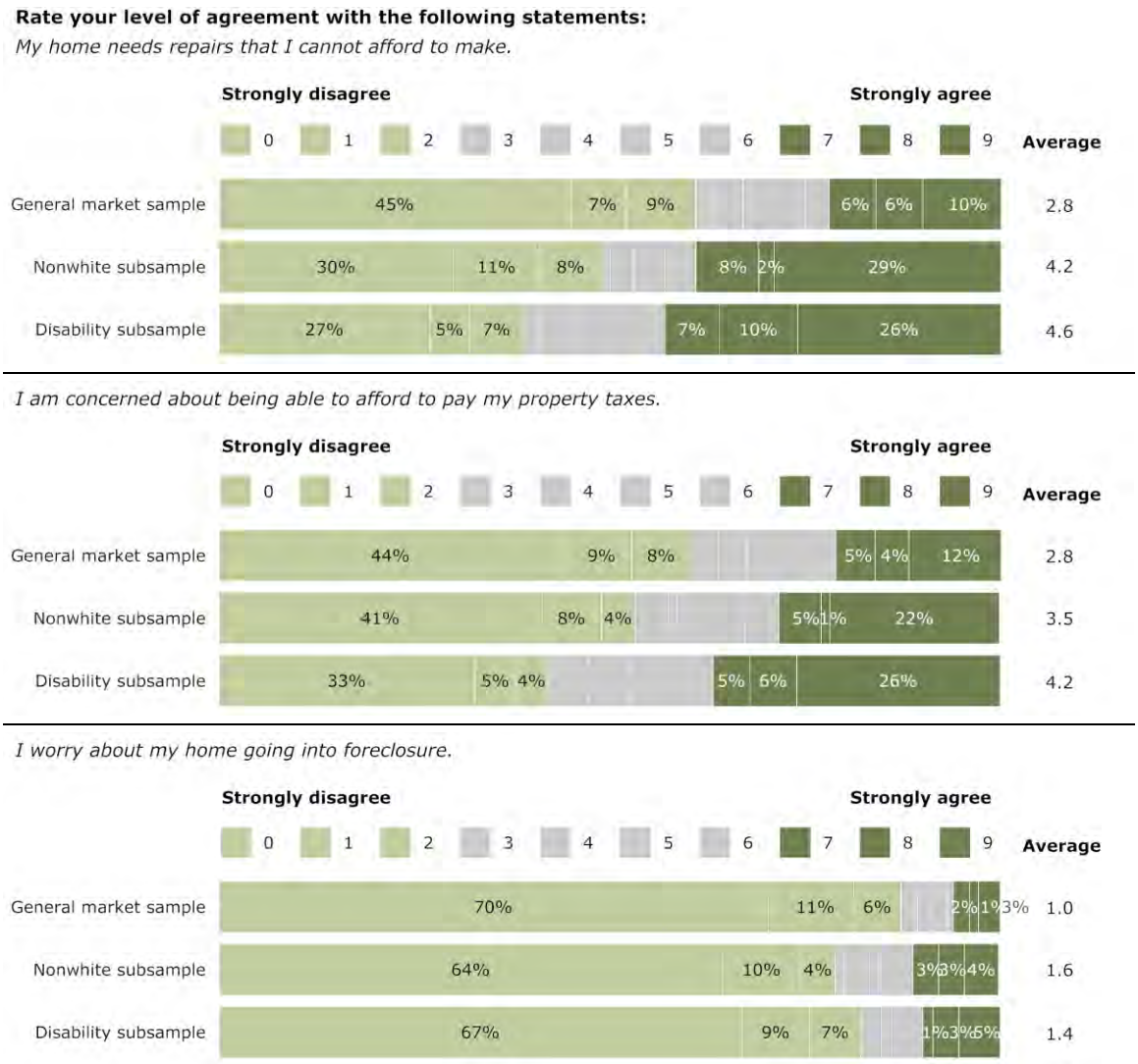
Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Housing Concerns and Challenges

To better understand the housing circumstances of Oregon residents living in nonentitlement areas, participants responded to a series of questions related to concerns they may have about their current housing situation as well as challenges they may encounter when trying to secure housing to rent or buy due to their personal circumstances.

Homeowner concerns and challenges. Figure V-10 presents homeowners' degree of concern with respect to home repairs they cannot afford to make; ability to pay property taxes; and foreclosure. While most homeowners do not report concerns about these issues, about one in four general market homeowners cannot afford to make needed repairs, and this proportion increases to nearly two in five nonwhite homeowners and slightly more than two in five disability subsample households. About one in three disability subsample homeowners worry about paying property taxes. On average, few homeowners worry about foreclosure.

Figure V-10.
Homeowner Concerns and Challenges



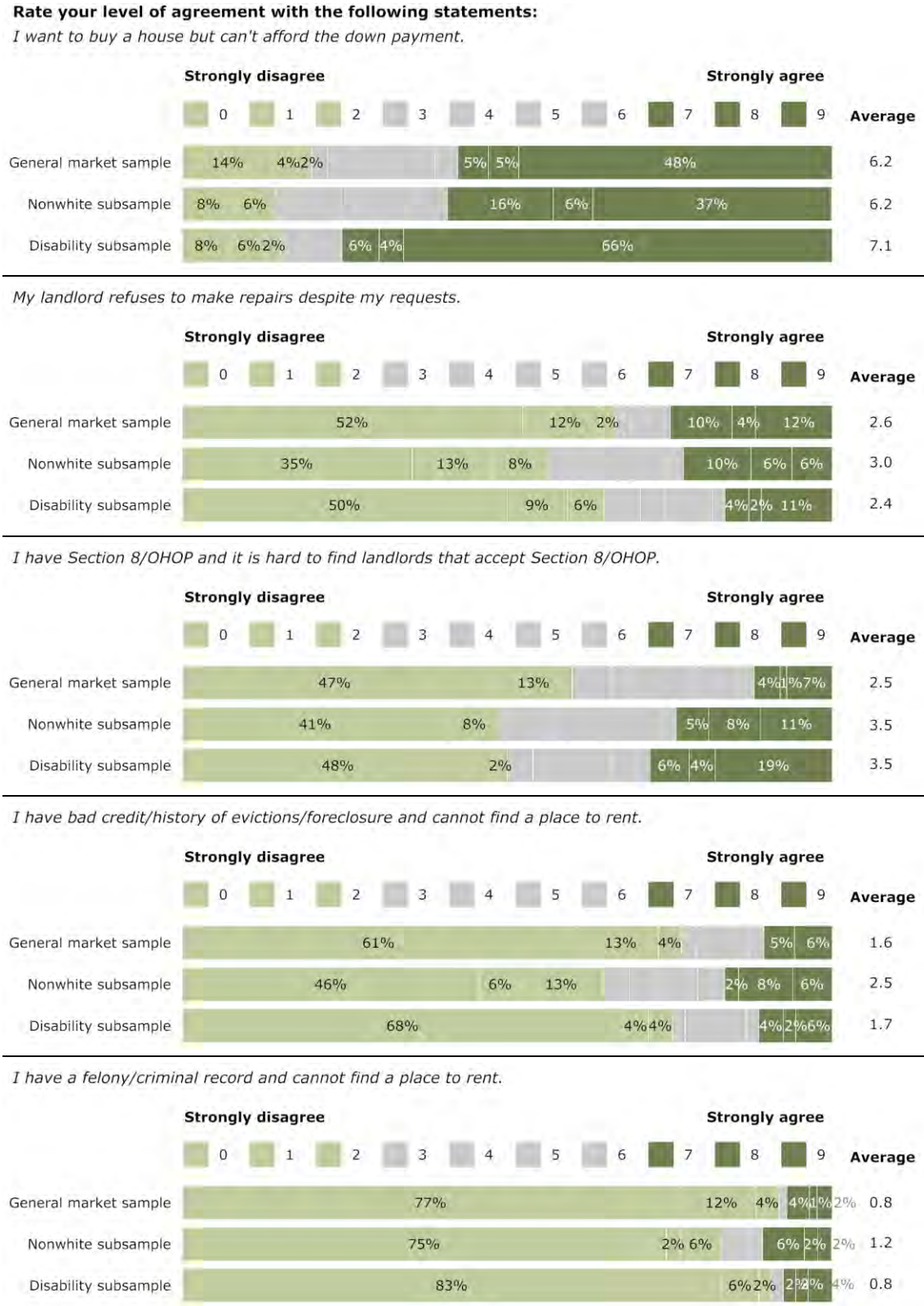
Note: General market sample n=282, 280 and 282; nonwhite sample n=91, 92 and 90, disability sample n=150, 150, and 151.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Renter concern and challenges. As shown in Figure V-11, about 60 percent of general market and nonwhite renters want to buy a home but cannot afford the down payment; this rate increases to 75 percent among disability subsample renters. Although not a concern to most renters, a sizeable minority (about one in four) experience landlords refusing to make repairs. A greater proportion of nonwhite and disability sample renters report difficulty finding landlords who accept Section 8 /Housing Choice Vouchers or OHOP programs than experiencing credit-related renting difficulties. The extension of source of income protections effective July 2104 is anticipated to ease this difficulty. While most renters do not have criminal records/felonies, about one in 10 general market and nonwhite renters agree that this history has impeded their ability to find a place to rent.

As previously discussed, several focus group participants shared examples of poor housing conditions, lack of repair and the presence of black mold. Several described instances where they had made repairs or improvements to a rental house only to have the landlord increase the rent beyond what the family could afford.

Figure V-11.
Renter Concerns and Challenges

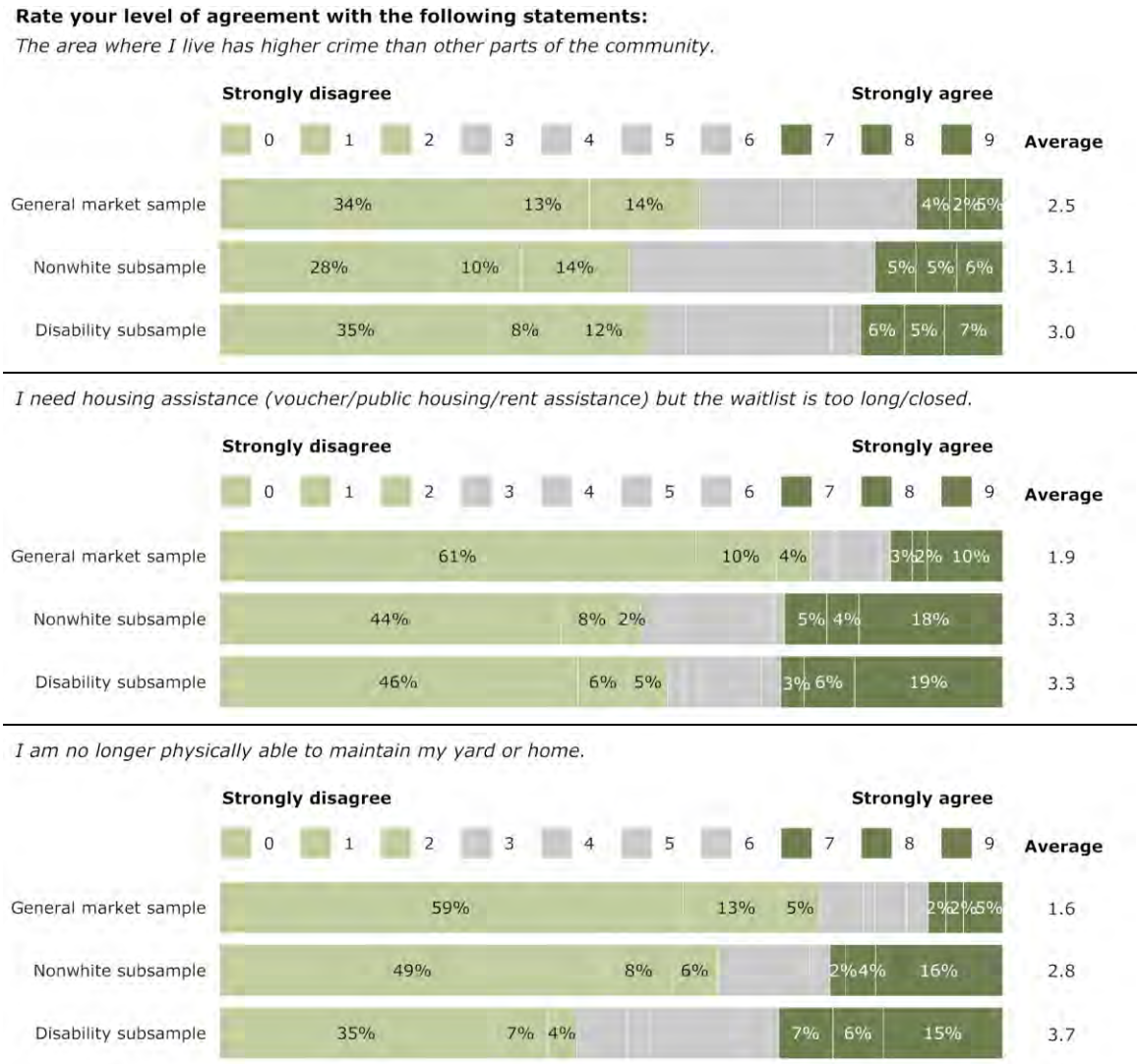


Note: General market sample n=84, 85, 70, 86 and 85; nonwhite sample n=48, 49, 37, 48 and 47; disability sample n=54, 53, 52, 53 and 53.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Other housing challenges and concerns. Homeowners and renters alike responded to questions about the relative level of crime in their neighborhood; their need for housing assistance; and their ability to maintain their home and landscape. While most do not agree that their neighborhood has higher crime, respondents in the nonwhite and disability subsamples are more likely than those in the general market to agree. Slightly more than one in four nonwhite respondents and disability sample households agree that they need housing assistance but waitlists are too long or closed. Nearly three in 10 respondents in the disability subsample and 27 percent of nonwhite respondents agree that they are no longer physically able to maintain their yard or home, compared to 15 percent of the general market.

Figure V-12.
Crime, Need for Assistance, and Home Maintenance Challenges



Note: General market sample n=398, 399 and 363; nonwhite sample n=153, 147 and 154, disability sample n=215, 201, and 217.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

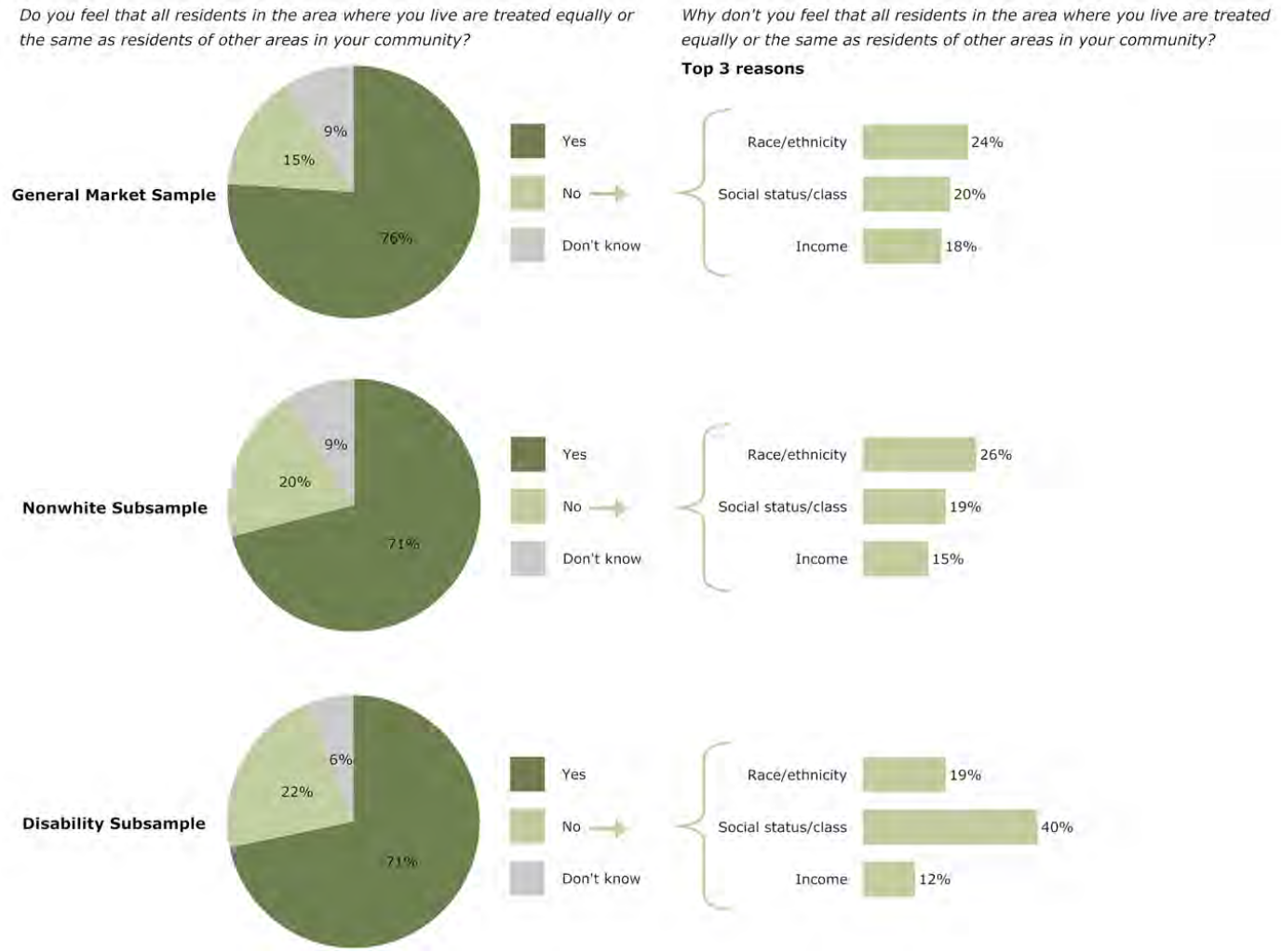
Community Norms and Preferences

The fair housing landscape in any community is influenced by direct and indirect actions. Similar households may naturally cluster together due to personal preferences unrelated to outside actions; in other cases, similar households may cluster together due to lingering impacts of historic segregation. Residents responded to a series of questions designed to measure community norms and preferences related to equitable treatment of all residents, regardless of individual characteristics and to gauge the relative tolerance of the community at large toward different types of households and housing options.

Equitable treatment. Figure V-13 presents responses to the question, "do you feel that all residents in the area where you live are treated equally or the same as residents of other areas in your community?" As shown, responses from the general market, nonwhite and disability samples are quite similar: 76 percent of general market participants and 71 percent of both the nonwhite and disability samples believe that residents are treated equally. The top three reasons offered by the greatest proportion of those who disagree suggest that not all residents are treated equally due to race or ethnicity; social status or class; and income. Other reasons for unequal treatment address age, disability, discrimination against renters, beliefs, and being a newcomer to a community (i.e., "not from here"). Examples include:

- *"There's a large population of people that live in poverty that live in southern Deschutes and I feel they are not treated equally." (Nonwhite subsample respondent)*
- *"I think they are still prejudiced against Mexicans in rentals." (Nonwhite subsample respondent)*
- *"The way some people feel about immigrants. Stereotypes. Assuming someone's legal status may be something when they don't know either way." (General market respondent)*
- *"I absolutely know there's an old boys club, and there is discrimination against Hispanics, and people assume they are illegal. They have experienced a lot of discrimination and they are discriminated against here." (Disability subsample respondent)*
- *"Can't get to the places you need to get to." (Disability subsample respondent)*
- *"Biggest problem is the way upper income folks treat the lower income people." (General market subsample)*
- *"Because we are in a rural area here, and the concerns of the rural people are not being addressed by the cities." (General market respondent)*

Figure V-13.
Equal Treatment of Residents

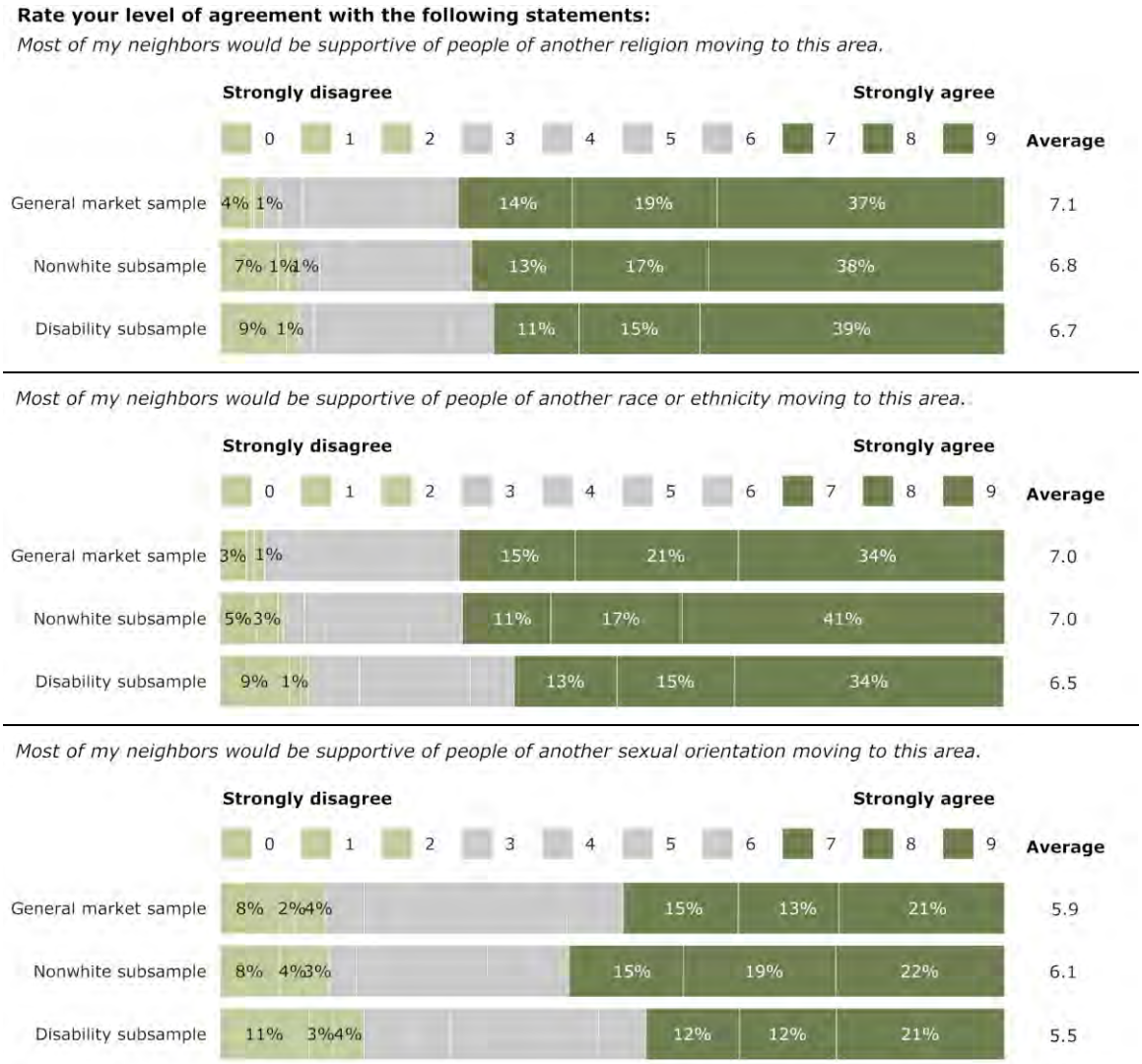


Note: General market sample n=400, nonwhite sample n=156, disability sample n=218.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Community norms—household diversity. Most respondents believe that their neighbors would be supportive of different types of households moving into the area, including people of other religions, races or ethnicities, and sexual orientation. Greater proportions of respondents in each sample believe their neighbors would be supportive of people of another religion or race/ethnicity than of people of another sexual orientation. None of the observed differences in proportion between the three respondent segments are statistically significant. With respect to sexual orientation, a greater share of respondents in each population rated their neighbors' degree of support in the neutral (gray) area—neither agreeing nor disagreeing.

Figure V-14.
Community Norms: Support of Different Types of Households Moving to the Area



Note: General market sample n=384, 379 and 360; nonwhite sample n=150, 149 and 144, disability sample n=213, 201, and 201.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Community norms—support of housing types. Respondents' assessments of support for five different housing types are presented in Figure V-15. As shown, support for different types of housing or housing situations varies significantly, from broad support of housing for people with disabilities and low income seniors to majority opposition to apartment buildings (the building form, not the occupants). The results demonstrate the fear or discomfort of many residents regarding people with substance abuse disorders and underscore the need for multifamily development to be of an appropriate scale and aesthetic to complement existing neighborhoods.

- **Perceptions of neighbor support for residential home for people with disabilities.** Regardless of sample, respondents are very consistent in their perceptions of neighbors' support of a residential home for people with disabilities locating in their area. About 60 percent of respondents, strongly believe their neighbors would be supportive and about 10 percent strongly disagree.

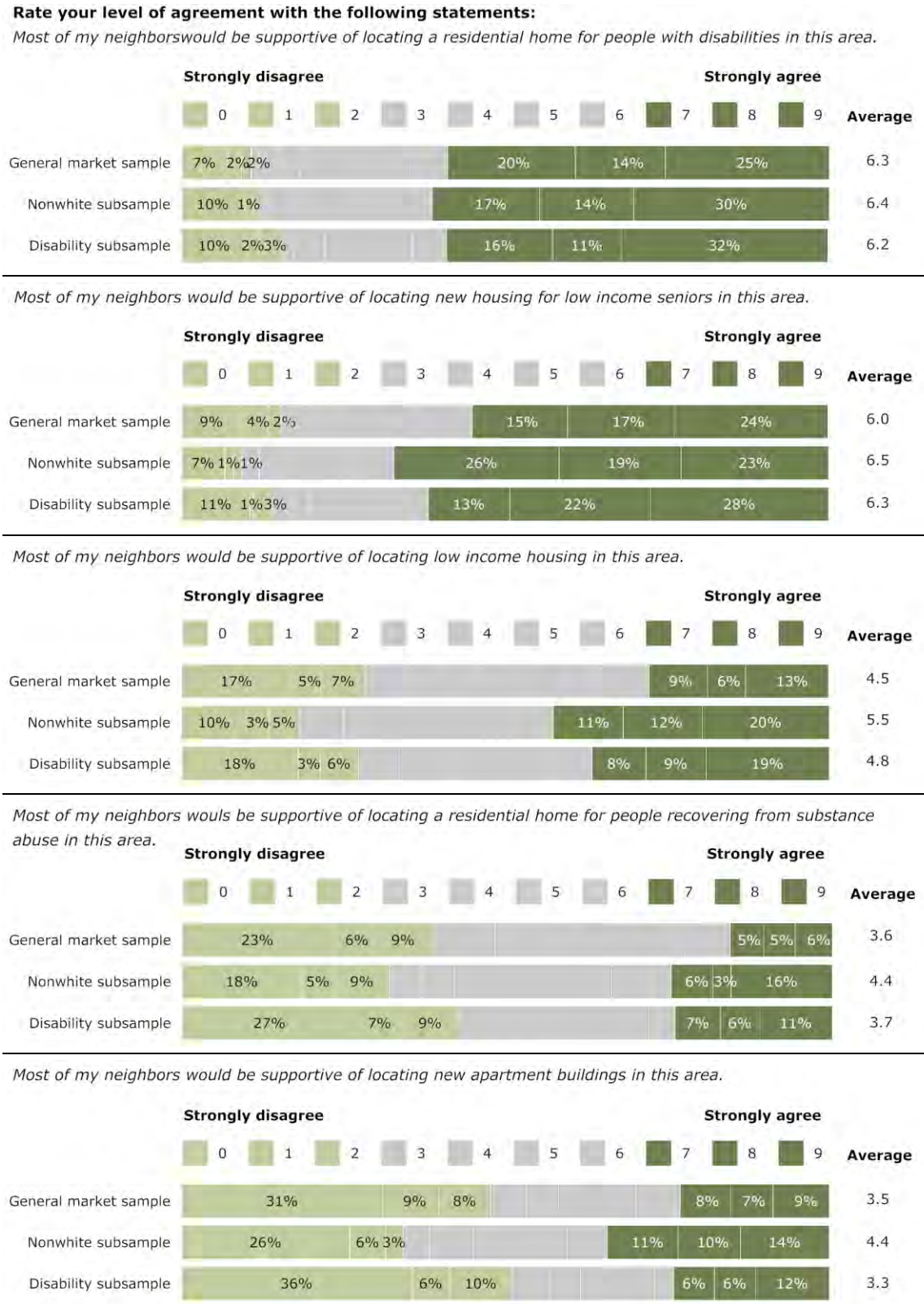
- **Perceptions of neighbor support for new housing for low income seniors.** A majority of residents strongly agree that most neighbors would support new housing for low income seniors. Perceptions of strong support are greatest among nonwhite respondents. About 15 percent of general market and disability sample respondents strongly disagree that most neighbors would be supportive.

- **Perceptions of neighbor support for locating low income housing in the area.** Respondents in the general market sample are equally split in strong agreement (28%) and strong disagreement (28%) in their perceptions of neighbor support for locating low income housing in the area. Compared to the general market, respondents in the nonwhite and disability subsamples are more likely to strongly agree that neighbors would support low income housing.

- **Perceptions of neighbor support for locating a residential home for people recovering from substance abuse in the area.** About one in four respondents in the nonwhite and disability samples strongly agree that most neighbors would support recovery housing, compared to 15 percent of the general market. Two in five disability subsample respondents and about one-third of nonwhite and general market respondents strongly disagree that most neighbors would be supportive.

- **Perceptions of neighbor support for locating new apartment buildings in the area.** Of all the measures considered, respondents were least likely to think most neighbors would be supportive of locating new apartment buildings in the area—48 percent of the general market, 51 percent of the disability subsample and 34 percent of the nonwhite subsample strongly disagreed. Among the samples, nonwhite respondents were more likely to strongly agree that most neighbors would support new apartment buildings—34 percent compared to 23 percent of the general market and 24 percent of the disability subsample.

Figure V-15.
Community Norms: Support of Different Housing Types



Note: General market sample n=380, 375, 376, 370 and 380; nonwhite sample n=145, 145, 148, 141 and 145; disability sample n=207, 207, 205, 201 and 207.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Experience with Housing Denial and Discrimination

Survey respondents and focus group participants shared their experience with housing denial and housing discrimination.

Housing denial. Within the past five years, about one-third of respondents in the general market and nonwhite subsample and two in five households in the disability subsample seriously looked for housing in Oregon (Figure V-16). Of these households who seriously looked for housing, about 14 to 28 percent were denied housing to either rent or purchase. The observed differences in denial rates are not statistically significant between the three samples. This means that, statistically, nonwhite households and households with a disabled member are no more or less likely to have been denied housing in the past five years than residents of the nonentitlement communities overall.

Those who experienced denial of housing described their perception of the reason(s). Among general market respondents, the top three reasons for denial were:

- Bad credit;
- Income too low; and
- Criminal background/felony/charges.

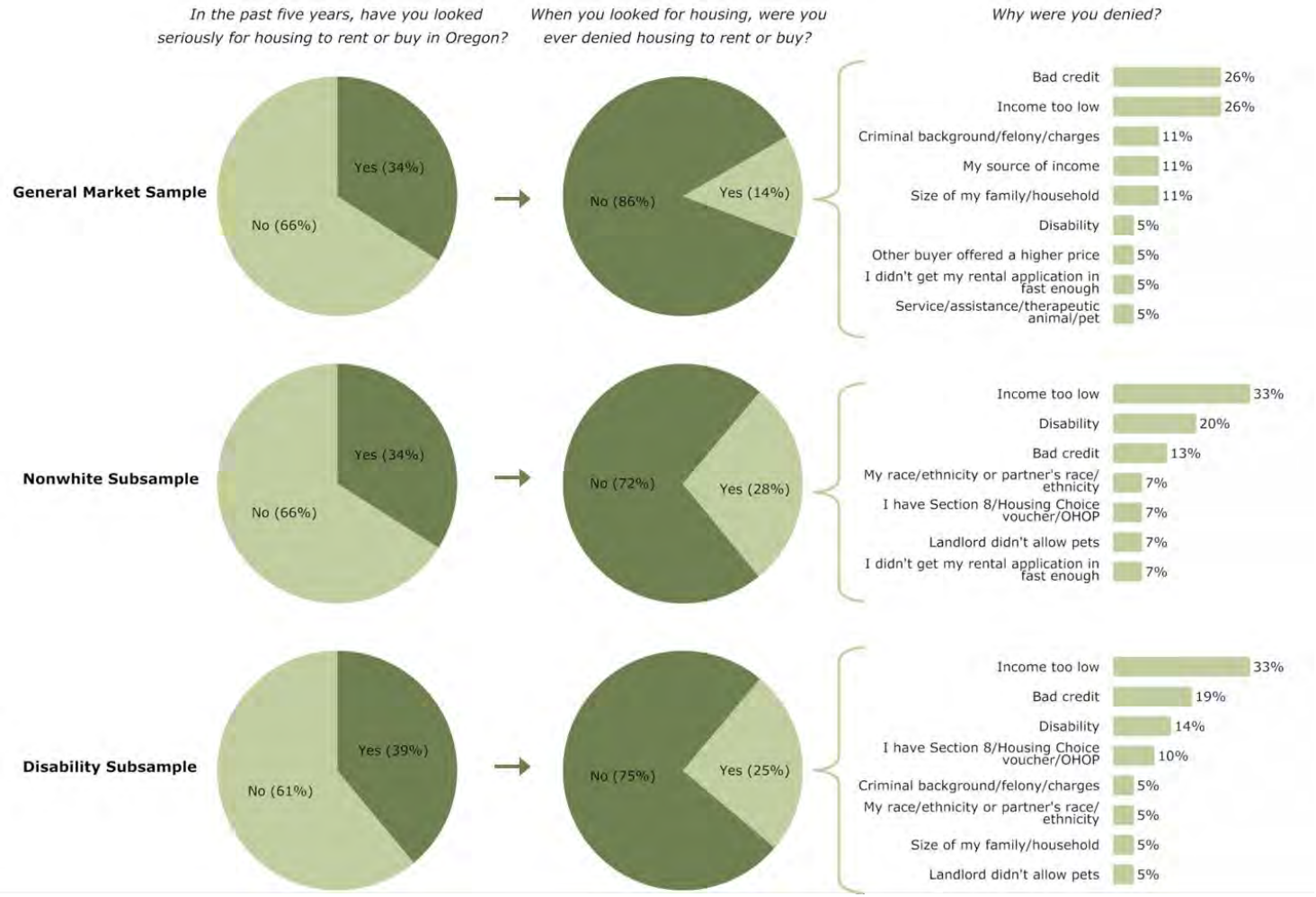
The top three reasons for denial among the nonwhite subsample and disability subsample respondents were the same:

- Income too low;
- Bad credit; and
- Disability.

Examples of other reasons for housing denial include:

- *"The landlord said I should not have to borrow money for the deposit. But I know it was because I am disabled, and he did not feel safe renting to me." (Disability subsample respondent)*
- *"Because I was a homeowner, I did not have any references as a renter." (General market respondent)*
- *"I have my own business and am self-employed. I was denied in getting a mortgage because of that at multiple financial institutions." (General market sample)*

Figure V-16.
Experience with Denial of Housing



Note: General market sample n=400, 136 and 19; nonwhite sample n=156, 53 and 15; disability sample n=218, 85 and 21. Showing all reasons for denial equal to or greater than 5 percent.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Experience of housing discrimination. Figure V-17 presents the proportion of survey respondents who believe they have experienced housing discrimination and the reasons for the discrimination. By design, no definition of housing discrimination under state or federal law was provided to respondents; these data reflect respondents' perception of discrimination based on their experience and knowledge. Similarly, the question asking the reason for the discrimination was open-ended, so as not to bias the results not to limit responses to only those circumstances defined by law.

Overall, one in 20 residents of Oregon's nonentitlement areas reports having experienced discrimination when looking to rent or buy housing in Oregon. This rate more than doubles for nonwhite respondents (12%) and disability subsample respondents (13%).

Among residents in the general market sample, the top three reasons for the housing discrimination experienced are:

- Race or ethnicity;
- Low income; and
- Large family/kids.

Nonwhite respondents attributed the housing discrimination experienced to:

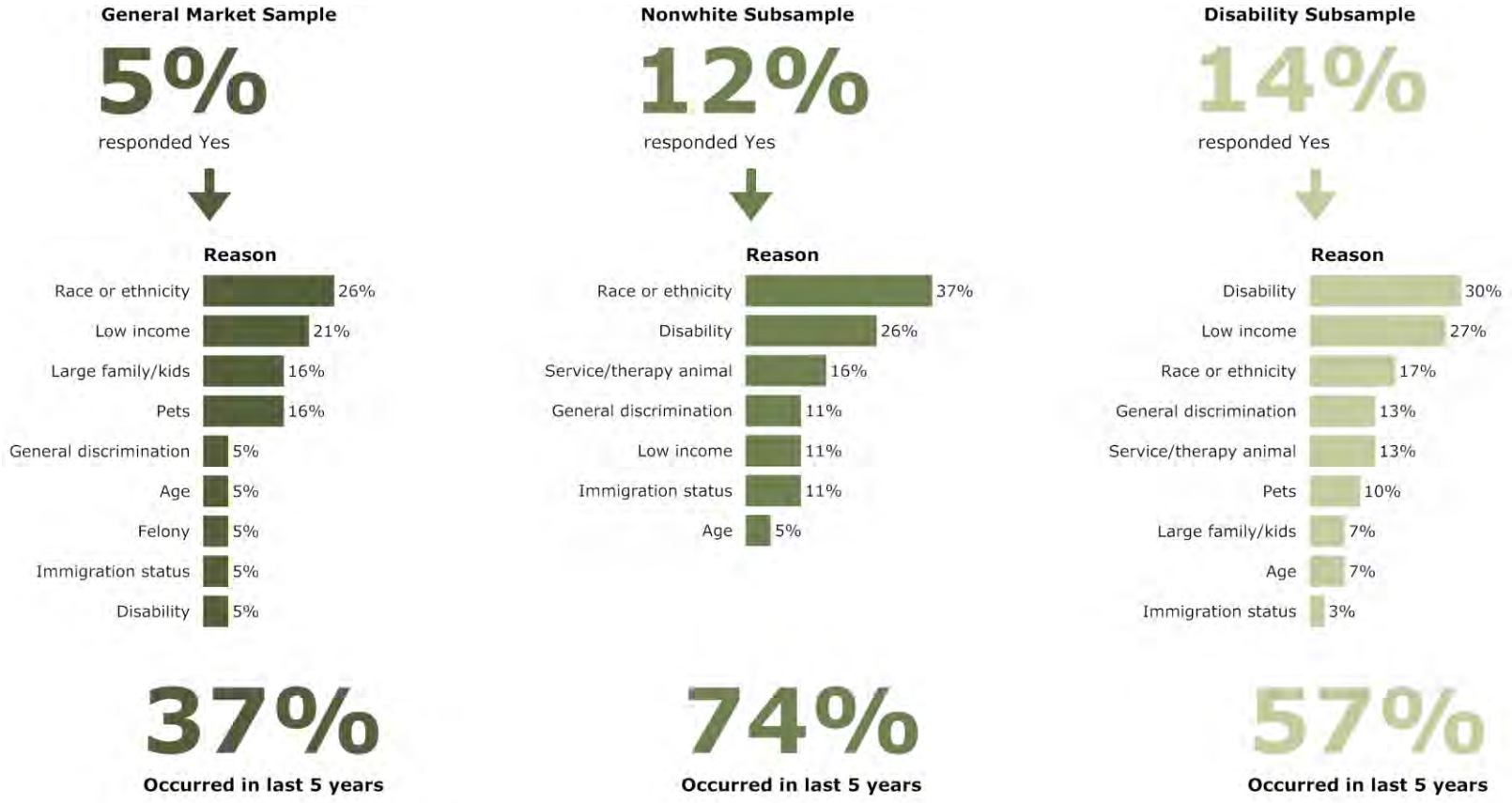
- Race or ethnicity;
- Disability; and
- Service animal/therapy animal.

Respondents in the disability sample attribute their housing discrimination experience to:

- Disability;
- Low income; and
- Race or ethnicity.

Although sample sizes are small, results indicate that a greater proportion of nonwhite (74%) and disability (57%) sample respondents experienced housing discrimination in the past five years than those from the general market (37%).

Figure V-17.
When you looked for housing in your community, did you ever feel discriminated against?



Note: General market sample n=379, 19 and 19; nonwhite sample n=156, 19 and 19; disability sample n=218, 30 and 30.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Reasons for discrimination. As shown in the previous figure, respondents who believe they experienced discrimination when looking for housing in their community shared the reason(s). Focus group participants shared their experience with housing discrimination. Examples in their own words include:

Disability.

- *"Because we spoke about wanting a wheelchair ramp." (Disability subsample respondent)*
- *"I believe it was because I am older and disabled. They said I could not come up with the deposit money fast enough, but I do not believe him. It was because I am disabled." (Disability subsample respondent)*
- *"The landlord was worried she was going to have to put in money to make changes for me. I was falling after having a reaction to my medication. She didn't want to do anything. She just wanted to collect a check." (Disability subsample respondent)*
- *"Because I am a paranoid schizophrenic." (Disability subsample respondent)*

Familial status.

- *"I was taking in four kids, and could not find place that would accept the kids." (General market respondent)*

Income.

- *"Because the Realtors and Banks didn't want to talk to me because of the size and price I could afford. I was renting the house I live in and I ended up buying it because everything else I saw was junk. I had to find alternate financing to buy the home." (Disability subsample respondent)*
- *"Because I was poor and I was on Section 8, and it didn't allow me enough money to live in a place I wanted to. I was stuck in an apartment for fifteen years that I didn't want to live in." (Disability subsample respondent)*

National origin.

- *"Everywhere we went, they asked us for our Social Security cards or a about what our legal status was and if you have neither of those, they do not rent to you." (Nonwhite subsample respondent)*

Race or ethnicity.

- *"I wasn't given the consideration another person was. It was puzzling to me but I spoke with a Caucasian friend who said, 'sometimes you forget your skin is brown.'" (Nonwhite subsample respondent)*
- *"People were looking at me and waving while calling me "nigger." I was on the PTA and doing everything I can to help but there is a lot of ignorant people. Moreover, they treat all Indian/Mexican/Latinos poorly." (Nonwhite subsample respondent)*

- *"The landlord that I spoke to refused to do anything because I was an American Indian." (Nonwhite subsample respondent)*

Other.

- *"Because I tried to get in one of the low income apartments. If you're not a migrant worker you can't get them." (General market respondent)*

- *"Just for the main reason, they wanted to know my account information and because they looked down on me having an older car—I ended up going elsewhere." (Nonwhite subsample respondent)*

- *"I had a dog." (General market respondent)*

In focus groups, a few participants described discriminatory or unfair treatment by landlords:

- A landlord taking longer to respond to maintenance requests of voucher holders than other tenants.

- A landlord harassing a Hispanic mother who does not speak English by going through her trash, installing motion-activated security cameras to film her back door, preventing her children from playing in common areas and refusing to let guests park in the resident's assigned parking space.

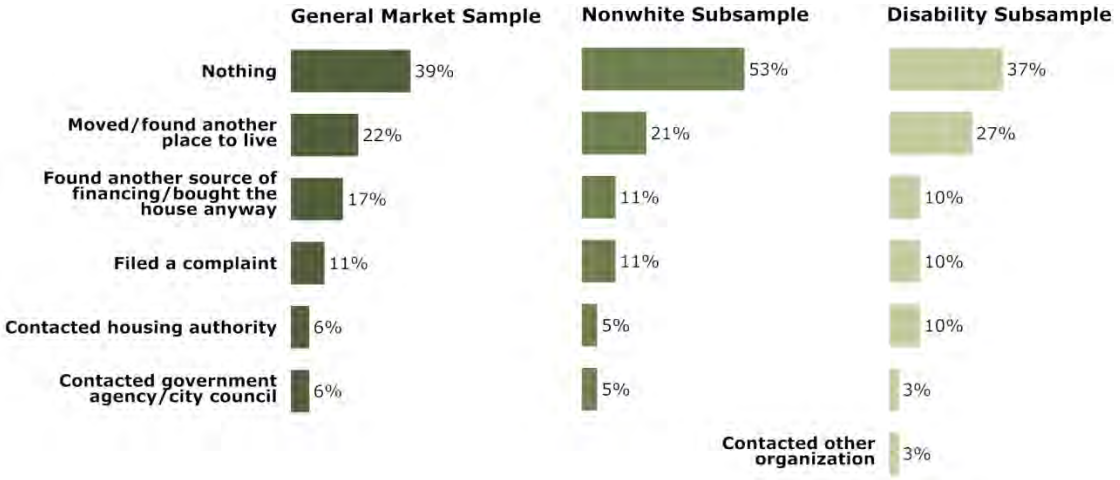
- One mother moved rather than face eviction due to noise complaints about her children filed by a downstairs neighbor.

- Reluctance or refusal to accept Section 8 vouchers.

- Refusal to rent to someone with a felony from 10 years ago.

Response to housing discrimination experience. The greatest proportion of respondents who experienced housing discrimination did "nothing" in response. The second greatest proportion moved or found someplace else to live. Although sample sizes are small, about one in 10 (two respondents) shared that they filed a complaint about the housing discrimination.

Figure V-18.
What did you do about the discrimination?



Note: General market sample n=18; nonwhite sample n= 19; disability sample n= 30.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

The two respondents who filed a complaint did so with HUD (one respondent) and the Oregon Attorney General's Office (one respondent). The complaint filed with the Oregon Attorney General's Office was resolved in three months to the resident's satisfaction. The respondent who filed with HUD stated that more than seven years have passed without a resolution—"It did not get resolved; I did not hear anything about it. It did not go anywhere."

Response to hypothetical housing discrimination. All survey respondents were asked how they would respond if they or someone they knew was discriminated against when looking for housing. About one in 10 general market and disability subsample respondents would do "nothing." Those who would do something think that they would contact: local government or local elected officials; a lawyer or the ACLU; or the housing authority. None would contact HUD and only respondents in the disability subsample suggested they would contact a fair housing organization (6%).

In focus groups, participants were generally unaware of their fair housing rights and did not know where to turn for help or information.[1]

[1] Commonworks Consulting provided resident focus group participants with informational brochures from the Fair Housing Council of Oregon.

Figure V-19.
If you felt you or someone you knew were discriminated against when looking for housing, what would you do? Top Five Responses

General Market Sample	Nonwhite Subsample	Disability Subsample
1 Contact city/county government/ elected officials (15%)	1 Contact a lawyer/ACLU (14%)	1 Contact city/county government/ elected officials (20%)
2 Contact housing authority (13%)	2 Go to different real estate agency/find a different place to live (13%)	2 Contact housing authority (18%)
3 Nothing (11%)	3 Contact city/county government/ elected officials (13%)	3 Contact a lawyer/ACLU (9%)
4 Contact a lawyer/ACLU (9%)	4 Contact housing authority (12%)	4 Nothing (8%)
5 Go to different real estate agency/find a different place to live (9%)	5 Find help somewhere/not sure who to contact/report it to somebody (8%)	5 Contact a Fair Housing Organization (6%)

Note: General market sample n=358; nonwhite sample n= 126; disability sample n= 218.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Summary of Top Issues

Key findings from the public input process include:

- Most residents are satisfied with their current housing situation; those that are not report issues with condition, size and suitability. Costs associated with moving or a lack of suitable affordable alternative housing options are the primary barriers to moving.
- One in five households that include a member with a disability live in housing that is not suitable for the person with a disability. Generally this is associated with a lack of needed accessibility features, particularly in bathrooms.
- Most residents perceive their neighbors to be tolerant of different types of households moving into the area.
- A majority of residents believe their neighbors would be supportive of housing for people with disabilities, low income seniors, and to a somewhat lesser extent housing for low income people in general. Participants believe their neighbors would be least supportive of new apartment buildings in the area.
- Anywhere from 14 to 28 percent of residents who looked for housing to rent or buy in Oregon in the last five years experienced denial. Of these, bad credit, income, disability and criminal history were the most common reasons for denial.
- One in 20 households in Oregon's nonentitlement areas believe they have experienced housing discrimination in the past, and this rate climbs to slightly more than one in 10 nonwhite households or households that include a member with a disability. Race or ethnicity, disability and low income are among the most common factors.
- Residents are generally unaware of who to contact to report housing discrimination.

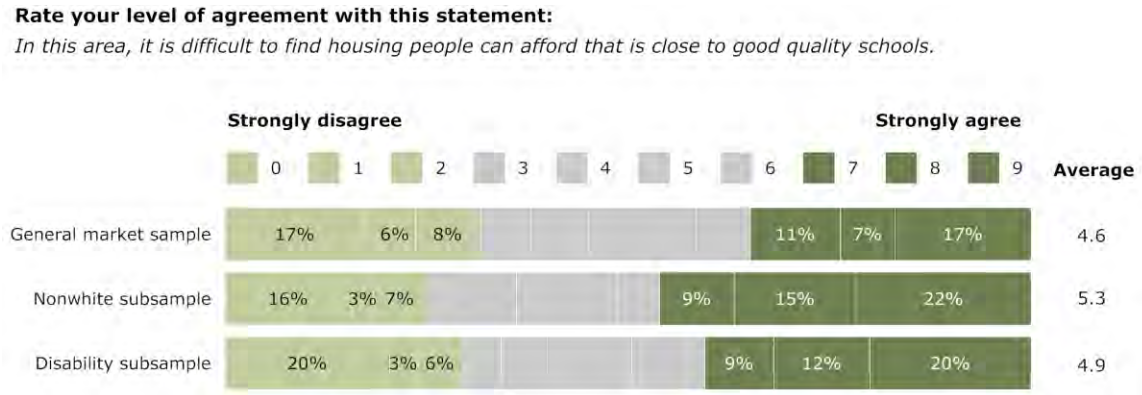
SECTION VI.
Access to Community Assets

This section explores the degree to which residents of Oregon's nonentitlement areas are able to access community assets, including such as quality public schools, employment opportunities and health care services. This section also explores community accessibility to persons with disabilities. The purpose is to examine the landscape for access to community assets for nonentitlement areas as a whole and to discern needs or challenges shared by residents.

Schools

School quality and the degree to which low income households are able to access good schools is one aspect of examining access to community assets. As shown in Figure VI-1, respondents are mixed in their opinion of ease of finding housing close to good schools. Overall, about two in five respondents agree that finding housing people can afford near good schools is difficult. Nearly half of nonwhite respondents (46%) agree that it is difficult to find affordable housing near quality schools, but 26 percent disagree.

Figure VI-1.
In this area, it is difficult to find housing people can afford that is close to good quality schools.



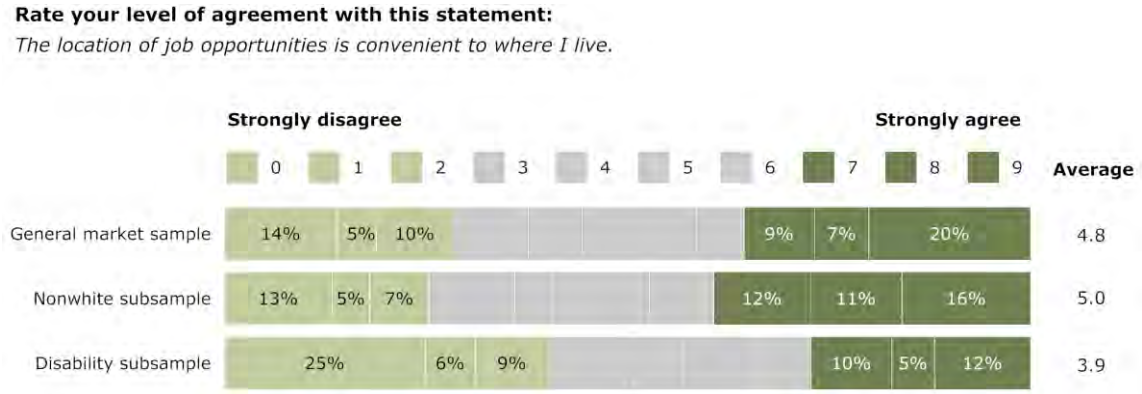
Note: General market sample n=385, nonwhite sample n=152, disability sample n=210.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Employment

Proximity of housing to employment opportunities is a measure of access to opportunity. Figure VI-2 presents respondents' assessment of the convenience of job opportunities to their home location. General market and nonwhite subsample respondents are more likely to agree that job opportunities are convenient; participants in the disability subsample are much more likely to disagree. Given the geographic diversity and dispersed population and employment centers throughout Oregon's nonentitlement areas, it is not surprising that the overall picture of access to job opportunities is mixed when examined as a whole.

Figure VI-2.
The location of job opportunities is convenient to where I live.



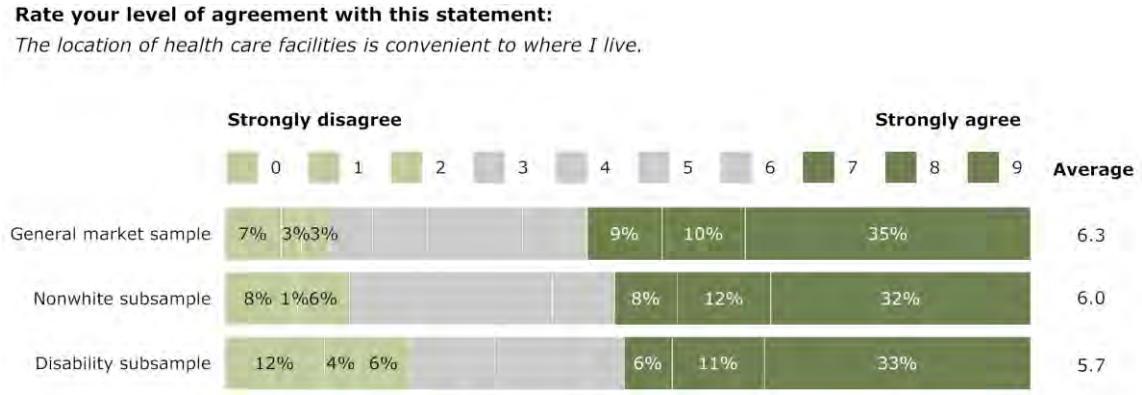
Note: General market sample n=388, nonwhite sample n=150, disability sample n=209.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Health Care

Residents of nonentitlement communities are more likely to agree than not that health care facilities are conveniently located. Individuals with disabilities are more likely than the general population or nonwhites to disagree about the convenience of health care facilities.

Figure VI-3.
The location of health care facilities is convenient to where I live.



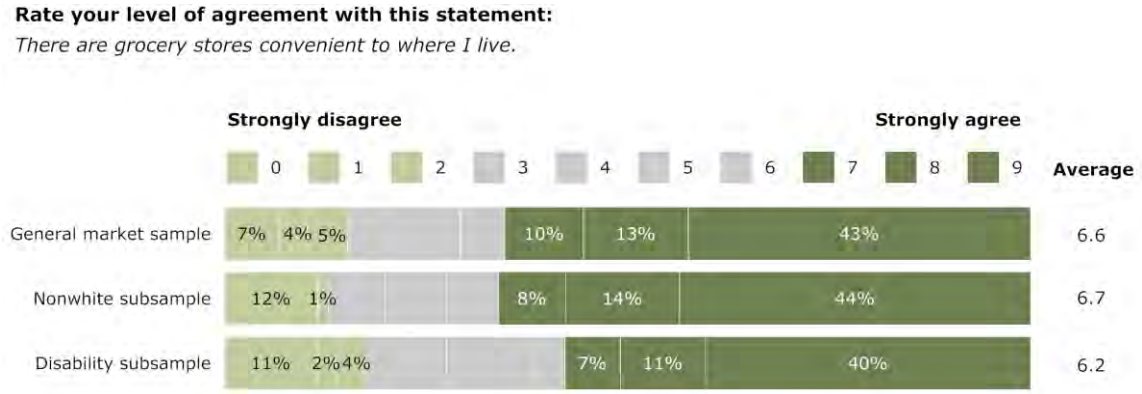
Note: General market sample n=388, nonwhite sample n=155, disability sample n=209.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Grocery

The majority of respondents reported that grocery stores are convenient to where they lived. Respondents in the disability subsample were slightly less likely than the general population and nonwhites to agree that stores are conveniently located.

Figure VI-4.
There are grocery stores convenient to where I live.



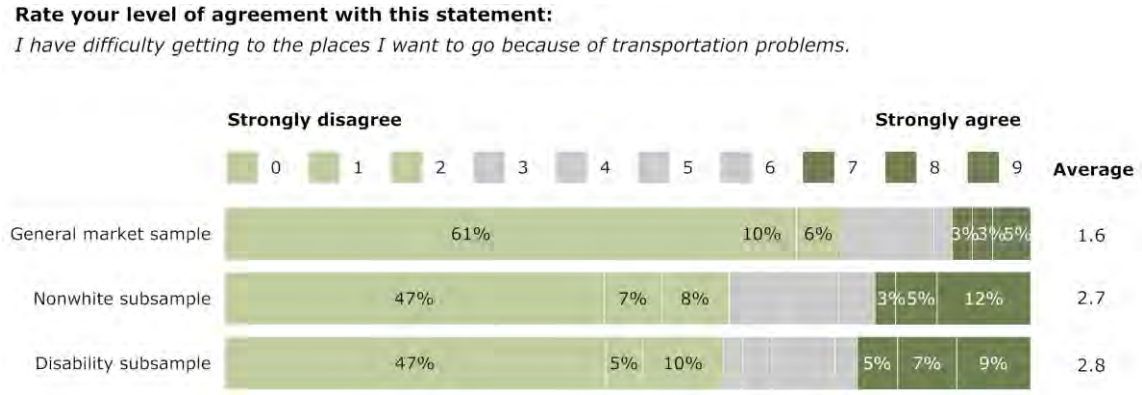
Note: General market sample n=400, nonwhite sample n=156, disability sample n=218.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Transportation

The majority of residents did not perceive transportation issues to be a problem. However, nonwhites and individuals with disabilities were more likely than the general population to respond that they have difficulties with transportation (20% and 21% respectively).

Figure VI-5.
I have difficulty getting to the places I want to go because of transportation problems.

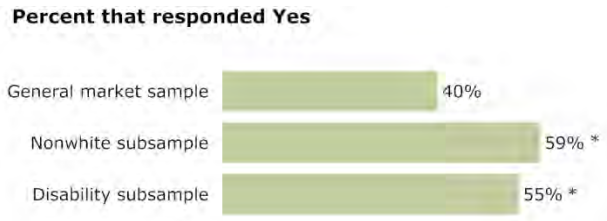


Note: General market sample n=399, nonwhite sample n=155, disability sample n=218.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Although most residents of nonentitlement communities do not report having difficulty getting to the places they want to go because of transportation problems, fairly large proportions would use public transit if it were available. A greater proportion of respondents in the nonwhite sample and disability samples would use public transit than respondents in the general market sample. This is a statistically significant difference.

Figure VI-6.
If public transit were available to you, would you use it?



Note:

*Statistically significant difference from the general market sample at the 95 percent confidence level.
General market sample n=362, nonwhite sample n=145, disability sample n=192.

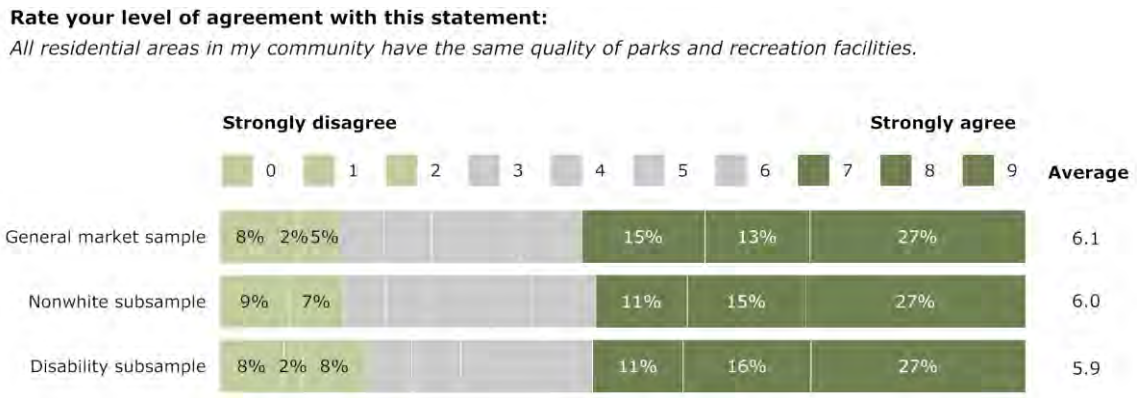
Source:

BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Parks and Recreation

In some communities, park and recreation facilities in older or lower income neighborhoods are considered to be lower quality or less well maintained than newer parks or those located in more affluent neighborhoods. This does not appear to be the case for Oregon's nonentitlement areas as a whole. Overall, most residents believe that all residential areas in their community have the same quality of parks and recreation facilities. As shown in Figure VI-7, responses were remarkably similar across each population segment. Overall, fifteen percent of the general population, 17 percent of the nonwhite sample and 18 percent of the disability sample disagreed that parks were the same quality in all areas.

Figure VI-7.
All residential areas in my community have the same quality of parks and recreation facilities.



Note: General market sample n=392, nonwhite sample n=150, disability sample n=214.

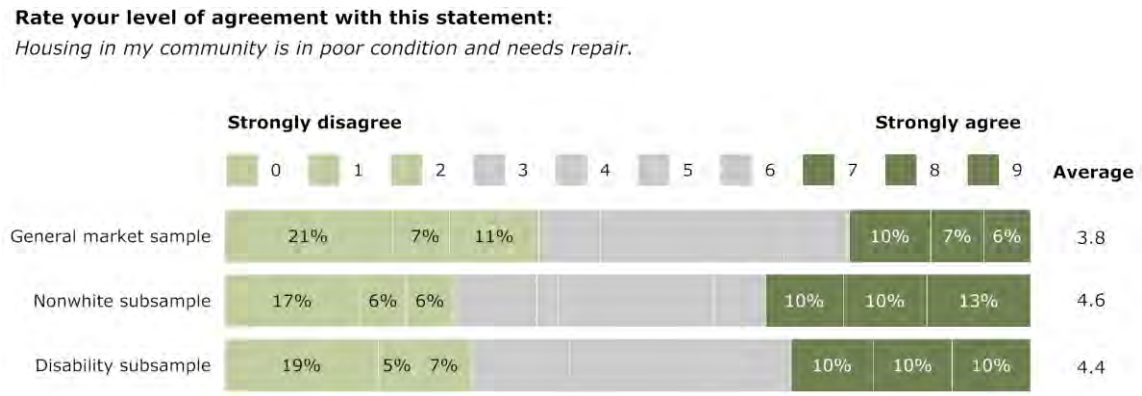
Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Housing Stock Condition

On average, residents' perception of the housing conditions in their community is mixed. Nonwhites and disability subsample respondents are more likely than the general market respondents to agree that housing in their community is in poor condition and needs repair. In interviews and focus groups, stakeholders shared stories of poor housing conditions common to market rate affordable housing in many rural areas. In some places, tenants are reluctant to request repairs or maintenance for fear of landlord retaliation. Others suggested that poor conditions are due to the landlord's inability to afford repairs. They suggested a need for more

resources for tenant education so that they better understand their rights and responsibilities. Others discussed the need for more intensive rental housing code enforcement.

Figure VI-8.
Housing in my community is in poor condition and needs repair.



Note: General market sample n=395, nonwhite sample n=155, disability sample n=215.

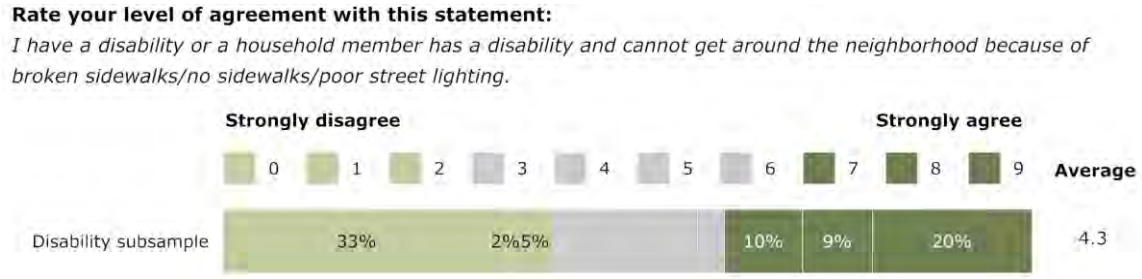
Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

Community Asset Accessibility

Participants in the disability subsample responded to a series of questions regarding the ability of the member of their household with a disability to get around their neighborhood and access community assets such as employment opportunities, health services and community amenities, facilities and services.

Accessible infrastructure. As shown in Figure VI-9, respondents are split as to whether it is challenging for individuals with disabilities to navigate their neighborhood. Almost 40 percent of respondents strongly agreed that it can be difficult for individuals with disabilities to get around their neighborhood, while the same proportion disagreed. This underscores the case by case nature of the need for community accessibility infrastructure.

Figure VI-9.
I have a disability or a household member has a disability and cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting.



Note: Disability sample n=218.

Source: BBC Research & Consulting from 2015 Oregon Resident Telephone Survey.

When asked to specify the types of improvements needed in their community, the most common resident responses related to poor (or nonexistent) sidewalk systems and lack of ramps to

access public buildings and local businesses. Residents and stakeholders described the challenges encountered or needed improvements:

- *"Actually I went to a town meeting for Veterans that were being discriminated against with bad bridges and sidewalks; they were not accommodating the disabled veterans and other disabled people by repairing the bad sidewalks or providing ramps for them." (Resident survey respondent)*
- *"I have noticed the old courthouse has many stairs and no elevator." (Resident survey respondent)*
- *"Some of the businesses could have handicapped ramps." (Resident survey respondent)*
- *"The curbs in the community need to be modified for electric wheelchairs. My husband and I need to walk in the street." (Resident survey respondent)*

Access to transportation. In describing how their community could become more accessible for the household member with a disability, more than 20 percent of responses referenced transportation needs, particularly accessible public transit. Stakeholders also weighed in on transit access for persons with disabilities. Nearly half report that access to transit for persons with disabilities is the same as that of the general population. (Same access does not necessarily imply actual access to public transit; it also includes communities where no public transit exists.) Nearly one in four stakeholders believe persons with disabilities have less access to transit.

Figure VI-10
How does access to public transit for people with disabilities compare to the rest of the community?

Note:
n=133.
Source:
BBC Research & Consulting from the 2015 Oregon Stakeholder Survey.

Access to health care services. Transportation was identified as the main barrier for individuals with disabilities accessing health services. Respondents also reported that location can be a barrier due to the distance they must travel to visit a health facility. Several participants also discussed the need for more doctors and specialists in their community. Other factors mentioned included affordability, accessibility, and lack of mental health services.

Access to employment opportunities. Respondents identified several necessary improvements to ensure that individuals with disabilities are able to access employment opportunities. Accessibility issues were mentioned by several respondents, namely the need for more sidewalks and wheelchair ramps. Respondents also identified transportation as a barrier to employment, specifically the need for more public transportation. Lastly, many participants reported the economy, and the general lack of jobs, especially in rural areas as issues that need improvement.

SECTION VII.
Impediments to Fair Housing Choice

Since the last AI was conducted in 2010, the State of Oregon has invested many resources toward addressing the identified impediments to fair housing choice. In sum, the state has:

- Funded a wide range of fair housing outreach and education and capacity-building activities;
- Funded audit testing to identify where issues of concern or discriminatory activities may exist;
- Examined and enhanced resources available to non-English speaking residents;
- Expanded the state's source of income protections to include income from the Housing Choice Voucher, or Section 8, program or other local, state or federal rent assistance;
- Changed how landlords may treat past evictions and criminal histories of rental applicants;[1]
- Continued programs to ensure that subsidized housing is available in a wide variety of neighborhoods.

However, affirmatively furthering fair housing choice (AFFH) is a complicated effort, as housing choices are affected by a variety of market conditions and actions by both residents and industry—not all of which are within the state's control. This AI found barriers to housing choice that had not been identified previously, as well as barriers that continue to exist. Those barriers are discussed below. Actions to address these barriers are described in the Fair Housing Action Plan section, Section VIII.

2015 Impediments to Fair Housing Choice

The remainder of this section is divided into two parts:

> 1) Impediments to housing choice. These are barriers that affect protected classes covered under state and federal fair housing laws; and
>
> 2) Barriers to housing choice. These barriers may not affect one or more protected classes directly; instead they limit housing opportunities for households in general. In certain circumstances, when disparately impacting a certain resident group protected by fair housing laws, they may become impediments.

[1] Residents with criminal histories are not a protected class; however, there can be overlap with protected class categories, most commonly disability and race/ethnicity.

Impediments to Fair Housing Choice

According to HUD's proposed rule on fair housing, impediments to fair housing choice can take a variety of forms and include: building and zoning codes, processes for site selection for low income housing, lack of public services in low income areas, less favorable mortgage lending for minority borrowers and lack of public awareness of rights and responsibilities associated with fair housing.[2]

Key to the definition of "impediment" is the effect on protected classes. An action may be an impediment, for example if it prevents people from moving out of racially concentrated areas of poverty and/or neighborhoods that perpetuate disparities in access to community assets.

The following impediments are organized around the primary research findings from the 2015-2019 AI.

Research Finding #1: Persons with disabilities face widespread barriers to housing choice. Discrimination against persons with disabilities in accessing housing was evidenced through fair housing complaint data (consistently more than half of complaints and intake calls) and respondents to the resident survey. The top two barriers to housing choice identified by stakeholders surveyed for this AI were related to housing persons with disabilities.

Impediments that have contributed to this finding include:

- ***Impediment 1-1.*** There is a lack of affordable, accessible housing, including housing available for persons with disabilities who wish to leave nursing homes or other institutional settings. Twenty percent of disability respondents to the AI resident survey said their homes do not meet their family's disability needs. Forty-six percent want to move and said they can't afford to move or live anywhere else in their community. Units that are developed for persons with disabilities (ADA-compliant) are often filled with people without disabilities because there is no functional referral system and no requirements that landlords match units with residents who need accommodations.

- ***Impediment 1-2.*** Some landlords refuse to make reasonable accommodations for persons with disabilities. This is the most common reason for complaints statewide and in many entitlement areas. It is important to note that, according to residents surveyed for this AI, most landlords *do* comply with reasonable accommodations requests, yet some are still unaware or refuse to comply with fair housing laws.

- ***Impediment 1-3.*** There are limited resources to help persons with disabilities transition out of institutional settings.

- ***Impediment 1-4.*** Infrastructure in rural areas is generally inaccessible due to lack of sidewalks and paved roads. Public transit is very limited and is often difficult to access.

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[2] http://www.gpo.gov/fdsys/pkg/FR-2013-07-19/pdf/2013-16751.pdf

- ***Impediment 1-5.*** Some aspects of state statutes could be improved to clarify how group homes should be treated in local land use regulations and zoning codes. Although state law provides very prescriptive regulations in some areas, some loopholes exist that may cause differential treatment of group home facilities.

Research Finding #2: Discrimination against protected classes persists statewide. According to the statistically significant resident survey conducted for this AI, 5 percent of residents in Oregon's nonentitlement areas believe they have experienced some form of housing discrimination. This rate more than doubles for nonwhite respondents (12%) and disability subsample respondents (13%). The survey results indicate that a greater proportion of nonwhite residents and residents with a disability experience housing discrimination than residents overall.

The top three reasons for the housing discrimination are generally consistent across resident types and include:

- Race and ethnicity (all respondents),
- Disability (disability and nonwhite respondents),
- Low income (disability and nonwhite respondents),
- Large families/children (all respondents).

Discriminatory behavior can result in and be the reason for segregation. Although Oregon has few areas of segregation, those that do exist in rural areas are generally high poverty and have high proportions of non-English speakers—characteristics which can limit residents' access to opportunity.

Results from fair housing audit testing—which was conducted independent of this AI—support the resident survey findings on discrimination. Discrimination based on race or ethnicity was found in 25 percent of nonentitlement tests. More frequent audits have been completed in entitlement areas, where discrimination in rental transactions based on race and ethnicity was found in about two-thirds of cases. Although these test samples are relatively small, they corroborate stakeholder and resident observations and reported experiences.

In many cases, housing discrimination is subtle and can be difficult to detect, especially for residents who are unaware of their fair housing rights. The AI relied on interviews with stakeholders who work closely with protected classes and residents' self-reported experiences to uncover some of the more subtle discriminatory activities. These included:

- A landlord refusing to rent to a person with a disability because they had to borrow money for the security deposit;
- Landlords requesting Social Security cards and asking about legal status;
- Landlords imposing unreasonable conditions or refusing to work with organizations who provide services to persons with disabilities because they are nervous they will "fail."

- Harassment by neighbors (repeated complaints about noise made by children, pointing firearms at residents).

Impediments that contribute to discrimination include:

- ***Impediment 2-1.*** Lack of enforcement of fair housing violations in rural areas.

- ***Impediment 2-2.*** Limited housing options for persons most vulnerable to housing discrimination: non-English speakers, persons of Hispanic descent, Native Americans, African Americans, large families and, as discussed above, persons with disabilities.

Research Finding #3. Residents lack knowledge of their fair housing rights, are not empowered to take action and have very limited fair housing resources locally. According to the resident survey conducted for the AI, 39 percent of residents of nonentitlement areas would take no action if they felt they had been discriminated against. This is much higher for nonwhites: 53 percent would take no action, suggesting lack of knowledge of what to do and/or lack of faith that taking action would result in a positive outcome.

The resident survey also revealed low awareness of fair housing rights. Most residents do not know where to turn for help if they've experienced discrimination.

According to stakeholders, immigrants and non-English speakers are very vulnerable to discrimination because of their lack of fair housing knowledge: New immigrants, farmworkers and non-English speakers who are "told no at the front door" do not file complaints because they are completely unaware of their fair housing rights; "they don't realize they aren't second class citizens."

Those residents who said they would take action are mostly likely to contact a city/county/government website or a housing authority. Yet a review of how nonprofit housing providers, including public housing authorities (PHAs), communicate fair housing information on websites found that fair housing information was limited.

In general, the housing provider websites do a very good job of detailing affordable housing developments in a community and the process for applying for subsidized housing. Nearly all of the websites could be improved, however, by adding:

- Fair housing information that is upfront and easy to find (i.e., on the front page),

- A description of how to file a complaint and links to the FHCO and HUD websites, and

- Information in languages other than English.

Impediments related to this finding include:

- ***Impediment 3-1.*** Local fair housing resources are limited statewide, particularly in rural communities.

Research Finding #4. In many rural areas, credit is limited for residents who want to buy homes and developers who want to build multifamily housing. Homeownership not only provides residents residential stability, homeownership is the surest way to build wealth in America. The implications of lack of access to credit affect more than the borrower: Lack of capital for home improvements affects neighborhood quality which, in turn, affects home values and residents' ability to access credit.

A review of mortgage lending data for this AI found that African American, Hispanic, and Native American residents face challenges in accessing home mortgage credit. According to the analysis of Home Mortgage Disclosure Act (HMDA) data, African American, Hispanic and Native American loan applicants face higher loan denial rates than non-Hispanic white applicants (differences of 8 to 10 percentage points). These disparities in denial rates persist even at high income levels (<$75,000/year). Denial rates are particularly high for home improvement loans: 51 percent of Native American, 43 percent of Hispanic and 42 percent of African American applicants were denied home improvement loans in 2013.

The top counties for lending disparities were all rural. Overall, denial rates are higher in non-Metropolitan Statistical Areas (MSAs) than in MSAs for all races and ethnicities (including whites) except for African Americans.

A combination of factors captured in the HMDA data explains the disparities including poor/lacking credit histories, high debt-to-income ratios and lack of collateral. In some cases, applicants have weakened their credit profile by cosigning loans for family and friends in an effort to help them access credit. The FDIC estimates that 40 percent of Hispanic residents in Oregon do not use traditional banks.

In addition to the HMDA review, stakeholders expressed concern about the lack of available credit for development of multifamily units in rural areas. Capital is reportedly very difficult to obtain due to market conditions in rural areas and bank mergers reducing the number of local financial institutions in rural areas. Although this is more of a barrier than an impediment, it is included here because it involves capital constraints.

Impediments and barriers related to this finding include:

- ***Impediment 4-1.*** Limited credit alternatives for households in rural areas who seek homeownership, and
- ***Barrier 4-2***. Lack of capital to develop multifamily housing in rural areas.

Barriers to Fair Housing Choice

The following barriers affect housing opportunities for households in general in Oregon, particularly low income households. They may also disproportionately affect protected classes—but that nexus depends on each particular case.

Research Finding #5. Condition of affordable housing is generally poor in rural areas. Housing condition in rural areas was frequently raised as a barrier to housing choice by stakeholders.

Poor condition of affordable housing was the fourth highest rated barrier by stakeholders in the AI survey. In focus groups, many participants living in more rural or economically depressed communities described poor housing conditions due to lack of maintenance and inexpensive housing construction, most commonly associated with privately-provided housing.

Although poor housing condition generally affects households similarly regardless of protected class, it can be a particular problem for certain protected classes when:

- Fear of landlord retaliation if condition issues are reported and the experience of discrimination limits other housing choices of certain protected classes;
- Landlords maintain properties differently depending on the occupants; and
- Lack of code enforcement is selectively applied to certain types of properties (e.g., manufactured home parks mostly occupied by Hispanic residents or large families).

Research Finding #6. Oregon's state laws may limit the ability of cities and counties to employ programs that are known to create a significant amount of affordable units in many other jurisdictions. Oregon's state laws prohibiting inclusionary zoning (ORS 197.309 and ORS 91.255(2)) may limit the ability of cities and counties in the state to employ a program that has created a significant inventory of affordable units in many other jurisdictions.

Depending on the U.S. Supreme Court's disparate impact ruling (expected in June 2015), Oregon's state laws prohibiting IZ could also be challenged for disparate impact on protected classes if the housing produced with IZ would result in expanded housing choices for certain resident groups. This is particularly true for residents of manufactured home parks whose affordability of housing is often eroded by the cost of land leases charged by park owners. Because manufactured homes are costly to move and the supply of parks is limited, manufactured home households are more likely to accept lease increases and/or tolerate actions by park owners that may be in violation of fair housing laws. Remedying this condition would require changes to the state's prohibition on inclusionary zoning.

Research Finding #7. State laws and local practices, coupled with lack of housing in rural areas, create impediments to housing choice for persons with criminal backgrounds. A consistent theme among stakeholders surveyed and interviewed for this AI was the lack of housing options for persons with past criminal histories. Onerous look back periods for criminal charges of rental applicants was the second-highest housing practice barrier identified by stakeholders surveyed in this AI. A secondary concern was lack of housing for residents with more minor infractions—e.g., credit blemishes or prior evictions.

Consideration of certain criminal charges or convictions may impede housing opportunities for post-incarcerated members of protected classes commonly overrepresented in prison populations, such as persons with mental illness and African American males. According to a 2014 State of Oregon Legislative report, approximately 50 percent of Oregon's prison population in 2012 needed mental health treatment (48% of male inmates and 80% of female inmates). Fifteen percent of all male inmates and 44 percent of all female inmates were diagnosed with severe mental illness.

ORS 144.102 requires that for a minimum of six months after release, a person must reside in the county they were last supervised or, if the person was not supervised at the time of the offense, in the county the person lived at the time the offense. The residency condition requirement can complicate the process of finding housing upon re-entry in housing markets where housing supply is limited and/or costly. To the extent that certain residents are disproportionately likely to be incarcerated, the residency requirement may disproportionately impact housing choice.

SECTION VIII.
Fair Housing Action Plan

This section contains the recommended Fair Housing Action Plan ("Action Plan") for 2016-2020 to address identified impediments and barriers to housing choice. The Action Plan follows the order of the impediments and barriers discussed in Section VII.

The fair housing barriers identified in the AI research are discussed below. As specified in HUD's AFH tool, the action items to address the barriers are assigned a priority ranking. The prioritization was based on:

- The significance of the barrier in contributing to segregation,
- The significance of the barrier in limiting housing choice, and
- Ease of implementation—i.e., the ability of the city and its partners to address the barrier.

Recommended 2016-2020 Fair Housing Action Plan

Research Finding #1: Persons with disabilities face widespread barriers to housing choice statewide.

Impediments found to contribute to barriers to housing choice for persons with disabilities include:

- ***Impediment 1-1.*** Lack of affordable, accessible housing, including housing available for persons with disabilities who wish to leave nursing homes or other institutional settings.
- ***Impediment 1-2.*** Refusal of some landlords to make reasonable accommodations for persons with disabilities.
- ***Impediment 1-3.*** Persons with disabilities who desire to transition out of institutional settings are limited by the lack of affordable, accessible and supportive services housing, in addition to financial and emotional support to assist them in their transitions.
- ***Impediment 1-4.*** Housing choices for persons with disabilities are severely limited by lack of sidewalks, paved roads and reliable and sufficient public transportation.
- ***Impediment 1-5.*** Local zoning and land use regulations and/or inexact application of state laws may impede the siting and approval of group homes.

Recommended **Action Items** to address impediments:

- ***Action items 1-1.***

    a. Determine the specific housing needs for persons with disabilities and develop proactive strategies to address the need. *High priority, Long term effort (3-4 years)*

    b. Determine how to better match persons with disabilities with accessible units, including if persons with disabilities have access to units as they become available. *High priority, Moderate term effort (2-3 years)*

    c. Examine how the state can increase the number of accessible units in publicly funded multifamily developments while complying with all relevant regulations and constraints. *High priority, Moderate term effort*

    d. Support the efforts of Public Housing Authorities to implement adaptive modification programs. *Low priority, Moderate term effort*

    e. Promote polices that support aging in place and funding for retrofitting of senior housing. Support the continued dissemination of information on how communities can provide opportunities for residents to age in place and how to improve community access for persons with disabilities living in independent settings. *High priority, Moderate term effort*

- ***Action item 1-2.*** Identify resources and provide opportunities for education and training on the requirements to provide reasonable accommodations. *Moderate priority, Short term effort*

- ***Action item 1-3.*** Convene service providers and persons with disabilities to prioritize the needs to transition persons with disabilities into the community from medical or other systems of care. *High priority, Moderate term effort*

- ***Action item 1-4.*** Prioritize accessibility improvements in publicly funded community development projects, to promote housing choice for persons with disabilities. *Moderate priority, Long term effort*

- ***Action item 1-5.*** Review and support best practices to further housing choice for persons with disabilities, including potential modifications to state statutes to further fair housing protections for persons with disabilities residing in group home settings. *Moderate priority, Long term effort*

Research Finding #2: Discrimination against protected classes persists statewide.

Impediments found to contribute to housing discrimination include:

- ***Impediment 2-1.*** Lack of enforcement of fair housing violations persists statewide.

- ***Impediment 2-2.*** Limited housing options for persons most vulnerable to housing discrimination: non-English speakers, persons of Hispanic descent, Native Americans, African Americans, large families and, as discussed above, persons with disabilities.

Recommended **Action Items** to address impediments:

- ***Action items 2-1.***

    a. Continue to fund efforts of Fair Housing Council of Oregon (FHCO) to provide fair housing education and training services. Continue to fund the fair housing complaint line and provide broader assistance with landlord/tenant disputes. Promote increasing the language accessibility of these services. *High priority, Long term effort*

    b. Strengthen the certification that all publicly funded grantees comply with all federal, state and local nondiscrimination laws. Provide educational materials to ensure grantees understand fair housing obligations. *Moderate priority, Short term effort (1-2 years)*

- ***Action item 2-2.***

    a. Continue to fund and expand fair housing audit testing to inform educational, outreach and enforcement efforts. Incorporate retesting and verification in efforts. *High priority, Long term effort*

    b. Promote housing alternatives for persons reentering community from incarceration and persons surviving domestic violence. *High priority, Long term effort*

    c. Provide stakeholder education and training on fair housing laws and requirements. *Moderate priority, Long term effort*

    d. Fund complaint intake process at FHCO as well as technical assistance for federal funding recipients. *High priority, Long term effort*

    e. Fund pilot program to review Post Acknowledgement Plan Amendments submitted to DLCD to identify land use proposals with a potentially discriminatory impact. *Moderate priority, Short term effort*

    f. Continue to staff the Housing Choice Advisory Committee and monitor implementation of HB 2639 (2013). *Moderate priority, Long term effort*

    g. Continue efforts to expand housing choices in rural areas. *High priority, Long term effort*

    h. Promote access to mediation services for neighbor on neighbor harassment in manufactured home parks. These services are also available for landlord tenant disputes. *High priority, Long term effort*

    i. Promote tools and education for housing providers to understand fair housing requirements—e.g., working with apartment associations to distribute model

lease agreements in English and Spanish and reasonable accommodations policies. *Moderate priority, Long term effort*

j. Continue to fund advocacy services to persons living with HIV/AIDS through locally based housing case managers. *High priority, Long term effort*

k. Promote housing alternatives for persons surviving domestic violence. *High priority, Moderate term effort*

Research Finding #3. Residents lack knowledge of their fair housing rights, are not empowered to take action and have very limited fair housing resources locally.

- ***Impediment 3-1.*** Local fair housing resources statewide are limited. This is particularly true in rural communities.

Recommended Action Items to address impediment:

- ***Action items 3-1.***

a. Ensure that fair housing resources are provided statewide. Ensure that rural communities are able to effectively access services and resources. To the extent possible, prioritize long-term support for fair housing activities. *High priority, Long term effort*

b. Provide culturally specific fair housing education and outreach for tribal communities, Spanish speaking communities, new immigrants and persons with limited English proficiency. *High priority, Long term effort*

c. Ensure persons living with HIV/AIDS have access to Fair Housing information and resources. *High priority, Long term effort*

Research Finding #4. In many rural areas, credit is limited for residents who want to buy homes and developers who want to build multifamily housing.

Impediments and barriers related to this finding include:

- ***Impediment 4-1.*** Limited credit alternatives for households in rural areas who seek homeownership.

- ***Impediment 4-1.*** Discriminatory lending practices persist for person of color.

- ***Barrier 4-2***. Lack of capital to develop multifamily housing in rural areas.

Recommended **Action Items** to address impediments and barriers:

- ***Action items 4-1.***

a. Explore enhancements to the single family bond program. *Moderate priority, Long term effort*

b. Continue to provide down payment assistance for low income homebuyers; provide focus on home buyers of color. *High priority, Long term effort*

c. Continue to support funding homebuyer education and counseling, and financial education and counseling for low income homebuyers. *High priority, Long term effort*

d. Partner with banking and mortgage industry and existing community development financial institutions to increase lending opportunities in rural communities. *High priority, Moderate term effort*

e. Continue the Oregon Individual Development Account (IDA) Initiative to increase opportunities for low income Oregonians to access home ownership. *High priority, Short term effort*

f. Convene lenders to better understand the challenges—and solutions—to addressing limited capital in rural areas. *Moderate priority, Moderate term effort*

- ***Action items 4-2.***

a. Continue discussions with the Oregon Affordable Housing Tax Credit workgroup and partners regarding the Tax Credit, and how this program can be used to provide additional opportunities in rural communities. *High priority, Short term effort*

b. Partner with banking and mortgage industry and existing community development financial institutions to increase lending opportunities in rural communities. *Moderate priority, Long term effort*

Research Finding #5. Condition of affordable housing is generally poor in rural areas.

In addition to the actions outlined in 2.1 the state should consider the following:

Action items 5.

a. Consider ways to partner with local jurisdictions to improve housing code enforcement. *Moderate priority, Long term effort*

b. Require that all grantees/developers of funded rental housing projects that have high risk of compliance violations, or are poor performing, will annually inspect the condition and habitability of the units funded. *High priority, Short term effort*

Research Finding #6. Oregon's state laws <u>may</u> limit the ability of cities and counties to employ programs that are known to create a significant amount of affordable units in many other jurisdictions.

- ***Barrier 6-1.*** The state's ban on the use of inclusionary zoning limits municipalities' ability to employ flexible tools and incentives to increase the number of affordable units built.

- ***Impediment 6-2.*** The lack of affordable units significantly limits housing choice for persons of color and low income persons.

Action items 6.

a. Work with Department of Land Conservation and Development to examine Oregon's land use laws and planning and zoning systems and seek ways to help local jurisdictions meet their statutory housing obligations. *Low priority, Long term effort*

b. Conduct deeper research into how Oregon's current land use system could accommodate creation of integrated neighborhoods and increased inventory of affordable units. *Moderate priority, Long term effort*

c. Strengthen technical planning assistance for cities around creating housing choice. *Low priority, Long term effort*

d. Encourage use of local incentives to encourage affordable housing development. *Low priority, Long term effort*

Research Finding #7. State laws and local practices, coupled with lack of housing in rural areas, create impediments to housing choice for persons with criminal backgrounds.

- ***Impediment 7.1.*** To the extent that certain residents are disproportionately likely to be incarcerated, the residency requirement may disproportionately impact housing choice for protected classes. Persons with criminal backgrounds have few, if any housing options.

Action items 7.

a. Reduce barriers for persons under post-prison supervision and probation to find and maintain affordable housing. *Moderate priority, Long term effort*

b. Consider funding second chance tenant training programs and landlord guarantee programs (e.g., similar to the Housing Choice Landlord Guarantee program). *Moderate priority, Short term effort*

c. Examine the effectiveness of reentry programs in housing environment and support best practices. *Moderate priority, Moderate term effort*

d. Provide funding opportunities for programs focused on reentry and supportive housing. *Moderate priority, Short term effort*

FAIR HOUSING ACTION PLAN (FHAP) - STATE OF OREGON

For purposes of this plan, the distinction between an impediment and a barrier, is that a barrier appears to affect all protected classes equally

FAIR HOUSING BARRIER	PRIORITIZATION	ACTION ITEMS TO ADDRESS IMPEDIMENTS	FAIR HOUSING PARTNERS	TIMELINE *Short Term 1-2 Years; Moderate Term 2-3 Years; Long Term 3-4 Years*	PROGRESS, DELIVERABLES AND OUTCOMES
Impediment 1-1. Lack of affordable, accessible housing, including housing available for persons with disabilities who wish to leave nursing homes or other institutional settings.	High	**Action Item 1-1a.** Determine the specific housing needs for persons with disabilities and develop proactive strategies to address the need.	OHCS/OHA	Long Term	
	High	**Action Item 1-1b.** Determine how to better match persons with disabilities with accessible units, including if persons with disabilities have access to units as they become available	OHCS/FHCO	Moderate Term	
	High	**Action Item 1-1c.** Examine how the state can increase the number of accessible units in publicly funded multifamily developments while complying with all relevant regulations and constraints.	OHCS/OHA	Moderate Term	
	Low	**Action Item 1-1d.** Support the efforts of Public Housing Authorities to implement adaptive modification programs.	Public Housing Authorities	Moderate Term	
	High	**Action Item 1-1e.** Promote polices that support aging in place and funding for retrofitting of senior housing. Support the continued dissemination of information on how communities can provide opportunities for residents to age in place and how to improve community access for persons with disabilities living in independent settings.	OHCS	Moderate Term	
Impediment 1-2. Refusal of some landlords to make reasonable accommodations for persons with disabilities.	Moderate	**Action Item 1-2.** Identify resources and provide opportunities for education and training on the requirements to provide reasonable accommodations.	OHCS/FHCO	Short Term	
Impediment 1-3. Persons with disabilities who desire to transition out of institutional settings are limited by the lack of affordable, accessible and supportive services housing, in addition to financial and emotional support to assist them in their transitions.	High	**Action Item 1-3.** Convene service providers and persons with disabilities to prioritize the needs to transition persons with disabilities into the community from medical or other systems of care.	OHCS/FHCO/OHA/DHS	Moderate Term	
Impediment 1-4. Housing choices for persons with disabilities are severely limited by lack of sidewalks, paved roads and reliable and sufficient public transportation.	Moderate	**Action Item 1-4.** Prioritize accessibility improvements in publicly funded community development projects, to promote housing choice for persons with disabilities.	OHCS/OBDD-IFA/OHA/DHS	Long Term	
Impediment 1-5. Local zoning and land use regulations and/or inexact application of state law may impede the siting and approval of group homes.	Moderate	**Action Item 1-5.** Review and support best practices to further housing choice for persons with disabilities, including potential modifications to state statutes to further fair housing protections for persons with disabilities residing in group home settings.	OHCS/FHCO/OHA/DHS	Long Term	
Impediment 2-1. Lack of enforcement of fair housing violations persists statewide.	High	**Action Item 2-1a.** Continue to fund efforts of Fair Housing Council of Oregon (FHCO) to provide fair housing education and training services. Continue to fund the fair housing complaint line and provide broader assistance with landlord/tenant disputes. Promote increasing the language accessibility of these services.	OHCS/OBDD-IFA	Long Term	

For purposes of this plan, the distinction between an impediment and a barrier, is that a barrier appears to affect all protected classes equally

FAIR HOUSING BARRIER	PRIORITIZATION	ACTION ITEMS TO ADDRESS IMPEDIMENTS	FAIR HOUSING PARTNERS	TIMELINE *Short Term 1-2 Years; Moderate Term 2-3 Years; Long Term 3-4 Years*	PROGRESS, DELIVERABLES AND OUTCOMES
	Moderate	**Action Item 2-1b.** Strengthen the certification that all publicly funded grantees comply with all federal, state and local nondiscrimination laws. Provide educational materials to ensure grantees understand fair housing obligations.	OHCS/FHCO	Short Term	
Impediment 2-2. Limited housing options for persons most vulnerable to housing discrimination: non-English speakers, persons of Hispanic descent, Native Americans, African Americans, large families and, as discussed above, persons with disabilities.	High	**Action Item 2-2a.** Continue to fund and expand fair housing audit testing to inform educational, outreach and enforcement efforts. Incorporate retesting and verification in efforts.	OHCS/FHCO	Long Term	
	High	**Action Item 2-2b.** Promote housing alternatives for persons reentering community from incarceration and persons surviving domestic violence.	OHCS/Re entry Council/Gov Task Force on DV	Long Term	
	Moderate	**Action Item 2-2c.** Provide stakeholder education and training on fair housing laws and requirements.	OHCS/OBDD-IFA	Long Term	
	High	**Action Item 2-2d.** Fund complaint intake process at FHCO as well as technical assistance for federal funding recipients.	OHCS/OBDD-IFA	Long Term	
	Moderate	**Action Item 2-2e.** Fund pilot program to review Post Acknowledgement Plan Amendments submitted to DLCD to identify land use proposals with a potentially discriminatory impact.	OHCS/OBDD-IFA	Short Term	
	Moderate	**Action Item 2-2f.** Continue to staff the Housing Choice Advisory Committee and monitor implementation of HB 2639 (2013).	OHCS	Long Term	
	High	**Action Item 2-2g.** Continue efforts to expand housing choices in rural areas.	OHCS	Long Term	
	High	**Action Item 2-2h.** Promote access to mediation services for neighbor on neighbor harassment in manufactured home parks. These services are also available for landlord tenant disputes.	OHCS	Long Term	
	Moderate	**Action Item 2-2i.** Promote tools and education for housing providers to understand fair housing requirements—e.g., working with apartment associations to distribute model lease agreements in English and Spanish and reasonable accommodations policies.	OHCS/FHCO	Long Term	
	High	**Action Item 2-2j.** Continue to fund advocacy services to persons living with HIV/AIDS through locally based housing case managers.	OHA	Long Term	
	High	**Action Item 2-2k.** Promote housing alternatives for persons surviving domestic violence.	OHCS/ DHS	Moderate Term	
Impediment 3-1. Local fair housing resources statewide are limited. This is particularly true in rural communities.	High	**Action Item 3-1a.** Ensure that fair housing resources are provided statewide. Ensure that rural communities are able to effectively access services and resources. To the extent possible, prioritize long-term support for fair housing activities.	OHCS/OBDD-IFA/FHCO	Long Term	

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FAIR HOUSING BARRIER	PRIORITIZATION	ACTION ITEMS TO ADDRESS IMPEDIMENTS	FAIR HOUSING PARTNERS	TIMELINE *Short Term 1-2 Years; Moderate Term 2-3 Years; Long Term 3-4 Years*	PROGRESS, DELIVERABLES AND OUTCOMES
	High	**Action Item 3-1b.** Provide culturally specific fair housing education and outreach for tribal communities, Spanish speaking communities, new immigrants and persons with limited English proficiency.	OHCS/FHCO	Long Term	
	High	**Action Item 3-1c.** Ensure persons living with HIV/AIDS have access to Fair Housing information and resources.	OHCS/OHA/FHCO	Long Term	
Impediment 4-1. Limited credit alternatives for households in rural areas who seek homeownership.	Moderate	**Action Items 4-1a.** Explore enhancements to the single family bond program.	OHCS	Long Term	
Impediment 4-1. Discriminatory lending practices persist for persons of color.	High	**Action Items 4-1b.** Continue to provide down payment assistance for low income homebuyers; provide focus on home buyers of color.	OHCS	Long Term	
	High	**Action Items 4-1c.** Continue to support funding homebuyer education and counseling, and financial education and counseling for low income homebuyers.	OHCS	Long Term	
	High	**Action Items 4-1d.** Partner with banking and mortgage industry and existing community development financial institutions to increase lending opportunities in rural communities.	OHCS	Moderate Term	
	High	**Action Items 4-1e.** Continue the Oregon Individual Development Account (IDA) Initiative to increase opportunities for low income Oregonians to access home ownership.	OHCS	Short Term	
	Moderate	**Action Items 4-1f.** Convene lenders to better understand the challenges—and solutions—to addressing limited capital in rural areas.	OHCS	Moderate Term	
Barrier 4-2. Lack of capital to develop multifamily housing in rural areas.	High	**Action Item 4-2a.** Continue discussions with the Oregon Affordable Housing Tax Credit workgroup and partners regarding the Tax Credit, and how this program can be used to provide additional opportunities in rural communities.	OHCS	Short Term	
	Moderate	**Action Item 4-2b.** Partner with banking and mortgage industry and existing community development financial institutions to increase lending opportunities in rural communities.	OHCS	Long Term	
Research Finding #5. Condition of affordable housing is generally poor in rural areas.	Moderate	**Action Item 5a.** Consider ways to partner with local jurisdictions to improve housing code enforcement.	OHCS/FHCO	Long Term	
	High	**Action Item 5b.** b. Require that all grantees/developers of funded rental housing projects that have high risk of compliance violations, or are poor performing, will annually inspect the condition and habitability of the units funded.	OHCS	Short Term	
Barrier 6-1. The state's ban on the use of inclusionary zoning limits municipalities' ability to employ flexible tools and incentives to increase the number of affordable units built.	Low	**Action Item 6a.** Work with Department of Land Conservation and Development to examine Oregon's land use laws and planning and zoning systems and seek ways to help local jurisdictions meet their statutory housing obligations.	OHCS/DLCD	Long Term	

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FAIR HOUSING BARRIER	PRIORITIZATION	ACTION ITEMS TO ADDRESS IMPEDIMENTS	FAIR HOUSING PARTNERS	TIMELINE *Short Term 1-2 Years; Moderate Term 2-3 Years; Long Term 3-4 Years*	PROGRESS, DELIVERABLES AND OUTCOMES
Impediment 6-2. The lack of affordable units significantly limits housing choice for persons of color and low income persons.	Moderate	**Action Item 6b.** Conduct deeper research into how Oregon's current land use system could accommodate creation of integrated neighborhoods and increased inventory of affordable units.	OHCS/DLCD	Long Term	
	Low	**Action Item 6c.** Strengthen technical planning assistance for cities around creating housing choice.	OHCS/DLCD	Long Term	
	Low	**Action Item 6d.** Encourage use of local incentives to encourage affordable housing development.	OHCS/DLCD	Long Term	
Impediment 7-1. Persons with criminal backgrounds have few, if any housing options.	Moderate	**Action Item 7a.** Reduce barriers for persons under post-prison supervision and probation to find and maintain affordable housing.	OHCS/ DOC/Re entry Council	Long Term	
	Moderate	**Action Item 7b.** Consider funding second chance tenant training programs and landlord guarantee programs (e.g., similar to the Housing Choice Landlord Guarantee program).	OHCS/DOC	Short Term	
	Moderate	**Action Item 7c.** Examine the effectiveness of reentry programs in housing environment and support best practices.	OHCS/DOC	Moderate Term	
	Moderate	**Action Item 7d.** Provide funding opportunities for programs focused on reentry and supportive housing.	OHCS/DOC	Short Term	

APPENDIX A.
Review of State Level Public Sector Barriers to Fair Housing in Oregon

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1. Introduction

This section reviews whether Oregon state-level laws have the effect of making housing unavailable for groups of citizens protected by the Fair Housing Act Amendments of 1988 (the "FHAA" as later amended and interpreted by the courts). This regulatory review was guided by HUD's Fair Housing Planning Guide, Volume 1, and subsequent HUD rule-making activity.

The FHAA create obligations that private individuals and entities and all levels of government not "make unavailable" housing to serve certain protected groups of U.S. citizens. When governments "make unavailable" housing for these citizens it is usually through errors of omission, either by not extending fair housing protections to the full range of citizens protected by federal law, or by failing to consider how facially neutral and well-intentioned requirements could have unintentional discriminatory impacts.

It is important on the outset to define exactly what this review covers — and what it did not cover.

- **State Level.** Most importantly, our review focused at the state level and not at the local level. Oregon, like most states in the western and southern U.S., delegates a great deal of land use and housing authority to its cities and counties. Unlike many states, however, Oregon's unique statewide planning system imposes several constraints on how local governments use their powers. The primary question addressed in this review is whether Oregon's land use and subdivision enabling authorities, taken in conjunction with the statewide planning system that constrains the use of those authorities, creates barriers to the provision of fair housing. The fact that a city or county could decide to use state-granted, facially-neutral land use authority that complies with the statewide planning systems in ways that would violate the FHAA is not considered a *state-created* barrier to fair housing.

- **Fair Housing — not Affordable Housing.** The FHAA prohibits housing discrimination based on race, color, religion, sex, national origin, age, familial status (which includes pregnant women) or disability (which includes the frail, persons with AIDS, physically and developmentally disabled, mentally ill, and recovering alcoholics and drug addicts, but not current abusers who are not "recovering"). We refer to those groups as the "FHAA-protected citizens." That list does not include low income persons, and we did not specifically review impacts of state regulations on housing affordability. However, where there is a probable overlap between the FHAA protected classes (such as persons with disabilities) and lower income populations, this review sometimes mentions potential impacts of decreased affordability on the supply of housing for FHAA-protected citizens. Following HUD's convention in many recent AIs, these are noted as "observations", but not "impediments," as facially neutral and otherwise legal impacts on housing affordability do not constitute barriers to fair housing under the FHAA.

This review covered relevant sections of the following Oregon Statutes and Regulations:

- OAR 660-015 (Statewide Planning Goals)
- Chapter 90 (Residential Landlord and Tenant)
- Chapter 91 (Tenancy)
- Chapter 197 (Comprehensive Land Use Planning)
- Chapter 215 (County Planning and Zoning; Housing Codes)

- Chapter 227 (City Planning and Zoning)
- Chapter 427 (Persons with Intellectual or Developmental Disabilities)
- Chapter 443 (Residential Care; Adult Foster Homes; Hospice)
- Chapter 446 (Manufactured Dwellings and Structures)
- Chapter 447 (Plumbing; Architectural Barriers)
- Chapter 456 (Housing)
- Chapter 659A (Unlawful Discrimination in Employment, Public Accommodations, and Real Estate Transactions)

This review is organized into the following topics:

- Land Use Planning
- Zoning and Subdivision Platting
- Farmworker Housing
- Accessibility to Housing Units
- Regulation of Housing Prices
- Urban Growth Boundaries / Needed Housing
- Manufactured Homes
- Assisted Living Facilities
- Building Occupancy
- Inclusionary Zoning

Consistent with recent revisions to CFR Part 24.100 et. seq., we did not limit the review to regulations that appear to be based on discriminatory intent, but also included those that could have discriminatory impacts on FHAA protected groups or households. Although some Oregon cities and counties use the terms "ordinance" and "regulation" differently, we use the term "regulations" to refer to zoning, subdivision, land use, and other development controls adopted by both cities and counties.

2. Background

The ability of private real estate markets to meet the housing needs of any community is strongly affected by zoning, subdivision, and land development regulations adopted by local governments. Those local actions are, in turn, affected by the powers granted by state governments that allow local land use regulations. Unfortunately many FHAA-protected citizens are disproportionately represented in lower income groups. For that reason, facially neutral local regulations that have the effect of increasing housing prices may reduce both affordability in general and the supply of housing available to FHAA-protected citizens. In many cases, local regulations that are intentionally or unintentionally exclusionary of different types of housing can offset the impact of affordable housing subsidies or increase the amount of subsidies necessary for the market to meet housing needs. This indirect connection between the affordability of housing and its impact on fair housing is discussed in the paragraphs below – but not in the regulation-by-regulation review that follows, because facially neutral authority to regulate – as well as facially neutral local exercises of that authority – whose only impact is on the affordability of housing to the general population have not been held to be violations of the FHAA. Nevertheless, both state and local governments should be aware that regulations that tend to increase housing prices may have a disproportionate impact on FHAA-protected citizens.

There are many ways in which local land use regulations may raise the price of housing, and where state grants of authority to local governments could be tailored to reduce those impacts. In Zoned Out, analyst Jonathan Levine recently documented the impact of zoning regulations on the supply of affordable housing, and his findings confirm the conclusions of several earlier studies.[1] For example, a 1998 study of regulatory barriers to affordable housing in Colorado identified five separate types of barriers, including zoning and subdivision controls.[2] The other areas were development processing and permitting, infrastructure financing mechanisms, building codes, and environmental and cultural resource protection tools. In the area of zoning and subdivision, the Colorado study identified four specific types of barriers:

- Minimum house size, lot size, or yard size requirements;
- Prohibitions on accessory dwelling units;
- Limited land zoned and available for multifamily and manufactured housing; and
- Excessive subdivision improvement standards.

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[1] Levine, Jonathan, Zoned Out (RFF Press, Washington, D.C., 2006).

[2] Colorado Deportment of Local Affairs, *Reducing Housing Costs through Regulatory Reform* (Denver: Colorado Department of Local Affairs, 1998).

Similarly, in 2007, a nationwide study prepared by the National Association of Home Builders for the U.S. Department of Housing and Urban Development documented which types of subdivision regulations have the greatest impacts on housing costs.[3] After establishing benchmark standards representing their estimates of the minimums necessary to protect public health and safety, the study compared the cost of building single family housing under those benchmark standards with actual costs of home construction. The study concluded that:

- 65 percent of the added costs were caused by minimum lot size requirements; and
- 9 percent of the added costs were caused by lot width requirements.

A third contributor was minimum house size requirements. Although only eight percent of local governments impose those controls, they were responsible for 17 percent of the added costs in those cities and counties that use them. Using 2004 data, the study concluded that subdivision regulations exceeding baselines for public health and safety added an average of $11,910 (4.8%) to the price of a new home.

In addition, in U.S. ex. rel. Anti-discrimination Center v. Westchester County[4], a U.S. District Court confirmed that local government eligibility for federal Community Development Block Grant Funds requires certification that the city or county is in compliance with the federal Fair Housing Act Amendments of 1988. That, in turn, requires that the local government (a) conduct an analysis of impediments to fair housing, (b) take actions to address the effects of those impediments, and (c) maintain records of the analysis and the steps taken. The fundamental lesson from the Westchester County case is that local efforts to address issues of housing affordability cannot – in the process – create barriers to fair housing choice. Affordable housing programs cannot have the effect of creating or perpetuating segregation based on race, disability, or other categories of FHAA-protected citizens.

For all of these reasons, it is important that state governments review their zoning, subdivision and land development authorizing legislation to ensure that they do not create unnecessary barriers to private production of affordable housing. It is also important that states take reasonable steps to ensure that state grants of power to regulate housing or to address affordable housing needs do not unintentionally create barriers to fair housing choice.

Because the character, development patterns, and future plans of each city and county are different, their zoning, subdivision, and development controls will also differ. No two community land use codes read alike. However, there are several land use practices that can help reduce barriers to housing choice, and states should review their authorizing legislation to ensure that those authorities allow and encourage local governments to minimize and remove barriers to housing choice. More specifically, state level grants of power to regulate land use should enable local governments to include as many of the following tools as possible.

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[3] Study of Subdivision Requirements as a Regulatory Barrier. EcoNorthwest, for National Association of Homebuilders Research Center, 2007.

[4] 495 F.Supp.2nd 375 (S.D.N.Y. 2007).

- **Small Lots.** Local land use regulations should be encouraged or required to include at least one zone district (or overlay district, or permit system) that allows small lots for single family detached housing in some locations. While the appropriate minimum lot size will vary with the character of the county, a zone allowing minimum lot sizes in the 3,000-4,000 square foot range often have a significant impact on housing affordability. In addition, lot width requirements should be reasonable and consistent with minimum lot sizes; while some codes require minimum lot widths of 70 feet or more, small homes can be constructed on lots as narrow as 25 feet (or even less). Minimum lot size requirements are the type of regulation most responsible for increasing housing costs.

- **Multi-family Parcels.** Local land use regulations should include at least one zone district that allows the construction of multi-family housing, and should map enough land into this district(s) to allow a reasonable chance that some multi-family housing will be developed. Maximum heights should be reasonable and consistent with the maximum density permitted; avoid mapping areas for multi-family densities and then imposing height restrictions that prohibit efficient development at those densities. Failure to provide opportunities for multi-family development has been identified as one of the four leading regulatory causes of increased housing costs.

- **Manufactured Homes.** Manufactured housing meeting HUD safety standards should be allowed in at least one zoning district where single-family "stick-built" housing is permitted. While restricting these homes to manufactured home parks is common, the better practice is to allow them in at least one residential zone where the size and configuration matches the scale and character of the area. ORS 197.307 has already addressed this issue for areas within urban growth boundaries.

- **Minimum House Sizes.** The zoning and subdivision regulations should not establish minimum house or dwelling unit sizes (beyond those in the building code). Minimum house size requirements have also been identified as a significant cause of increased housing price in those communities where they are in place.

- **Group Housing.** The local land use regulations should clarify that housing for groups protected by the Fair Housing Act Amendments of 1988 are treated as residential uses, and should generally allow those group housing uses in at least one residential district (preferably all districts) where equivalently sized single-family homes are permitted. Special permit requirements should be avoided, and spacing requirements between group housing is discouraged, since there is very little medical evidence to support the need for distance between these facilities as long as a large number are not located in a small area. Failure to provide for these uses in the code could subject the county to a developer's request for "reasonable accommodation" under the Act, and failure to provide "reasonable accommodation" could be a violation of federal law. In light of the aging of the American population, and the fact that age is a category of FHAA-protected citizens, the regulations should also provide areas where congregate care, nursing home, and assisted living facilities may be constructed.

- **Accessory Dwelling Units.** Local land use regulations should allow accessory dwelling units in at least one zone district – either as an additional unit within an existing home

structure or in an accessory building on the same lot. While some communities require a special permit for these uses, others find that they can be allowed by right provided that they comply with standards limiting scale, character, and parking.

- **Cottage-style Infill Development.** Unused infill lots, which are often irregularly shaped or have constrained geography (e.g. hillsides, ditches) are increasingly seen as opportunities to promote creative forms of development that can accommodate smaller housing units on smaller private streets. An increasing number of cities are including provisions allowing small parcels of land to be developed with small cottage-type housing (often limited to less than 1,000 sq. ft. of gross floor area) on unplatted lots, or as "site condominiums", or to otherwise ignore the minimum lot size and width requirements of the zone district where they are located. The added flexibility makes a previously unusable lot usable, and allows the creation of smaller, more innovative housing units on scattered sites that do not undermine the overall character of the area.

- **Co-housing Developments.** Co-housing developments involve smaller residential units with small or partial kitchens but also include a larger community kitchen and activity facility. Residents of the smaller housing units are members of the co-housing association and agree to share some of their meals and other community duties. Generally, the individual residential units are not platted and the ground beneath them cannot be sold, so the development is operated as a condominium or cooperative. Local land use regulations should include this option, which may be particularly useful for groups of FHAA-protected citizens who can live independently for many purposes but who require assistance or communal services in specific areas.

- **Mixed Use.** In order to promote affordability, housing should be allowed near businesses that employ workers, particularly moderate and lower income employees. To do that the land use regulations should permit residential units in at least one commercial zone district or should map some lands for multi-family development in close proximity to commercial districts.

- **Lower Parking Standards.** Although the traditional standard of two parking spaces per dwelling unit may be reasonable in some areas, many communities find that lower requirements (or no requirements in urbanized areas) can be used generally should be used for affordable housing, multi-family housing, group housing, and special needs housing. Excessive parking requirements can lead to the platting of larger lots, or can limit the size of multi-family projects to accommodate both housing and parking, both of which drive up housing costs.

- **Flexibility on Nonconforming Structures.** Although zoning codes generally require that nonconforming structures damaged or destroyed through fire or natural causes can only be rebuilt in compliance with the current zoning regulations, an increasing number of codes are exempting affordable housing (and in some cases all housing) from this requirement. Often the most affordable housing in a community is located on lots that are too small or narrow for the district where they are located, or in converted single-family structures or multi-family buildings that sometimes have too many units for the district where they are located. If forced to replat with larger lots or to reduce density

following a disaster, those affordable units may be lost, and allowing rebuilding with the same number of units as before may be the most efficient way to preserve these units in the housing stock.

- **Incentives.** In order to encourage the development of affordable housing, land use regulations should recognize the difficult economics involved and should offer incentives. Common incentives include smaller lots, increased density or building height in multi-family areas, reduced parking requirements, or waivers or reductions of application fees or development impact fees. Some communities provide additional incentives for housing that is restricted for occupancy at lower percentages of the Area Median Income (AMI). For example, developments restricted for households earning less than 50% of AMI could receive more generous incentives than those for households earning less than 80% of AMI. While zoning and subdivision incentives alone are often not enough to make development for lower levels of AMI economically feasible, they can be part of a broader package of incentives (for example, including financial incentives or land contributions) that make those project feasible. Any incentives offered should be updated as new housing studies are completed and new information about specific affordable housing needs is obtained.

- **Building Permit Rationing Exemptions.** Most communities that operate a growth management system based on annual or periodic rationing of building permits exempt affordable housing or allow it to compete for a separate pool of development rights in order to encourage this type of housing.

3. Review of Oregon's State Level Land Use Statutes and Regulations

A. Land Use Planning

Oregon's state and local level land use authorities and regulations are grounded in the Statewide Planning Goals and Guidelines set forth in ORS Chapter 197 and OAR 660. In fact, the state's zoning and subdivision local government enabling are unusually short (and have more limited coverage than other states) because so much of the content as to what must or may or cannot be done through local zoning and subdivision is contained in the statewide planning system. Goals 2 (Land Use Planning) and 10 (Housing) are particularly relevant to our review, and are set forth in the gray box below.[5]

GOAL 2: LAND USE PLANNING. OAR 660-015-0000(2)

PART I—PLANNING

To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.

City, county, state and federal agency and special district plans and actions related to land use shall be consistent with the comprehensive plans of cities and counties and regional plans adopted under ORS Chapter 268.

All land use plans shall include identification of issues and problems, inventories and other factual information for each applicable statewide planning goal, evaluation of alternative courses of action and ultimate policy choices, taking into consideration social, economic, energy and environmental needs. The required information shall be contained in the plan document or in supporting documents. The plans, supporting documents and implementation ordinances shall be filed in a public office or other place easily accessible to the public. The plans shall be the basis for specific implementation measures. These measures shall be consistent with and adequate to carry out the plans. Each plan and related implementation measure shall be coordinated with the plans of affected governmental units.

All land-use plans and implementation ordinances shall be adopted by the governing body after public hearing and shall be reviewed and, as needed, revised on a periodic cycle to take into account changing public policies and circumstances, in accord with a schedule set forth in the plan. Opportunities shall be provided for review and comment by citizens and affected governmental units during preparation, review and revision of plans and implementation ordinances.

Affected Governmental Units – are those local governments, state and federal agencies and special districts which have programs, land ownerships, or responsibilities within the area included in the plan.

Comprehensive Plan – as defined in ORS 197.015(5).

Coordinated – as defined in ORS 197.015(5). Note: It is included in the definition of comprehensive plan.

Implementation Measures – are the means used to carry out the plan. These are of two general types: (1) management implementation measures such as ordinances, regulations or project plans, and (2) site or area specific implementation measures such as permits and grants for construction, construction of public facilities or provision of services.

Plans – as used here encompass all plans which guide land-use decisions, including both comprehensive and single-purpose plans of cities, counties, state and federal agencies and special districts.

PART II—EXCEPTIONS

A local government may adopt an exception to a goal when:

- **a.** The land subject to the exception is physically developed to the extent that it is no longer available for uses allowed by the applicable goal;
- **b.** The land subject to the exception is irrevocably committed to uses not allowed by the applicable goal because existing adjacent uses and other relevant factors make uses allowed by the applicable goal impracticable; or
- **c.** The following standards are met:
  - **1.** Reasons justify why the state policy embodied in the applicable goals should not apply;
  - **2.** Areas which do not require a new exception cannot reasonably accommodate the use;
  - **3.** The long-term environmental, economic, social and energy consequences resulting from the use of the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed site; and
  - **4.** The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts

Compatible, as used in subparagraph (4) is not intended as an absolute term meaning no interference or adverse impacts of any type with adjacent uses. A local government approving or denying a proposed exception shall set forth findings of fact and a statement of reasons which demonstrate that the standards for an exception have or have not been met. Each notice of a public hearing on a proposed exception shall specifically note that a goal exception is proposed and shall summarize the issues in an understandable manner. Upon review of a decision approving or denying an exception:

- **a.** The commission shall be bound by any finding of fact for which there is substantial evidence in the record of the local government proceedings resulting in approval or denial of the exception;
- **b.** The commission shall determine whether the local government's findings and reasons demonstrate that the standards for an exception have or have not been met; and
- **c.** The commission shall adopt a clear statement of reasons which sets forth the basis for the determination that the standards for an exception have or have not been met.

Exception means a comprehensive plan provision, including an amendment to an acknowledged comprehensive plan, that;

- **a.** Is applicable to specific properties or situations and does not establish a planning or zoning policy of general applicability;
- **b.** Does not comply with some or all goal requirements applicable to the subject properties or situations; and
- **c.** Complies with standards for an exception.

PART III—USE OF GUIDELINES

Governmental units shall review the guidelines set forth for the goals and either utilize the guidelines or develop alternative means that will achieve the 3 goals. All land-use plans shall state how the guidelines or alternative means utilized achieve the goals.

Guidelines – are suggested directions that would aid local governments in activating the mandated goals. They are intended to be instructive, directional and positive, not limiting local government to a single course of action when some other course would achieve the same result. Above all, guidelines are not intended to be a grant of power to the state to carry out zoning from the state level under the guise of guidelines. (Guidelines or the alternative means selected by governmental bodies will be part of the Land Conservation and Development Commission's process of evaluating plans for compliance with goals.)

GUIDELINES

A. PREPARATION OF PLANS AND IMPLEMENTATION MEASURES

Preparation of plans and implementation measures should be based on a series of broad phases, proceeding from the very general identification of problems and issues to the specific provisions for dealing with these issues and for interrelating the various elements of the plan. During each phase opportunities should be provided for review and comment by citizens and affected governmental units. The various implementation measures which will be used to carry out the plan should be considered during each of the planning phases. The number of phases needed will vary with the complexity and size of the area, number of people involved, other governmental units to be consulted, and availability of the necessary information. Sufficient time should be allotted for:

1. collection of the necessary factual information
2. gradual refinement of the problems and issues and the alternative solutions and strategies for development
3. incorporation of citizen needs and desires and development of broad citizen support
4. identification and resolution of possible conflicts with plans of affected governmental units

B. REGIONAL, STATE AND FEDERAL PLAN CONFORMANCE

It is expected that regional, state and federal agency plans will conform to the comprehensive plans of cities and counties. Cities and counties are expected to take into account the regional, state and national needs. Regional, state and federal agencies are expected to make their needs known during the preparation and revision of city and county comprehensive plans. During the preparation of their plans, federal, state and regional agencies are expected to create opportunities for review and comment by cities

and counties. In the event existing plans are in conflict or an agreement cannot be reached during the plan preparation process, then the Land Conservation and Development Commission expects the affected government units to take steps to resolve the issues. If an agreement cannot be reached, the appeals procedures in ORS Chapter 197 may be used.

C. PLAN CONTENT

1. Factual Basis for the Plan

Inventories and other forms of data are needed as the basis for the policies and other decisions set forth in the plan. This factual base should include data on the following as they relate to the goals and other provisions of the plan:

a. Natural resources, their capabilities and limitations

b. Man-made structures and utilities, their location and condition

c. Population and economic characteristics of the area

d. Roles and responsibilities of governmental units.

2. Elements of the Plan

The following elements should be included in the plan:

a. Applicable statewide planning goals

b. Any critical geographic area designated by the Legislature

c. Elements that address any special needs or desires of the people in the area

d. Time periods of the plan, reflecting the anticipated situation at appropriate future intervals.

All of the elements should fit together and relate to one another to form a consistent whole at all times.

D. FILING OF PLANS (not repeated here)

E. MAJOR REVISIONS AND MINOR CHANGES IN THE PLAN AND IMPLEMENTATION MEAURES (not repeated here)

F. IMPLEMENTATION MEASURES

The following types of measure should be considered for carrying out plans:

1. Management Implementation Measures

a. Ordinances controlling the use and construction on the land, such as building codes, sign ordinances, subdivision and zoning ordinances. ORS Chapter 197 requires that the provisions of the zoning and subdivision ordinances conform to the comprehensive plan.

b. Plans for public facilities that are more specific than those included in the comprehensive plan. They show the size, location, and capacity serving each property but are not as detailed as construction drawings.

c. Capital improvement budgets which set out the projects to be constructed during the budget period.

d. State and federal regulations affecting land use.

e. Annexations, consolidations, mergers and other reorganization measures.

2. Site and Area Specific Implementation Measures

a. Building permits, septic tank permits, driveway permits, etc.; the review of subdivisions and land partitioning applications; the changing of zones and granting of conditional uses, etc.

b. The construction of public facilities (schools, roads, water lines, etc.).

c. The provision of land-related public services such as fire and police.

d. The awarding of state and federal grants to local governments to provide these facilities and services.

e. Leasing of public lands.

G. USE OF GUIDELINES FOR THE STATEWIDE PLANNING GOALS

Guidelines for most statewide planning goals are found in two sections-planning and implementation. Planning guidelines relate primarily to the process of developing plans that incorporate the provisions of the goals. Implementation guidelines should relate primarily to the process of carrying out the goals once they have been incorporated into the plans. Techniques to carry out the goals and plans should be considered during the preparation of the plan.

GOAL 10: HOUSING. OAR 660-015-0000(10)

To provide for the housing needs of citizens of the state.

Buildable lands for residential use shall be inventoried and plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.

Buildable Lands – refers to lands in urban and urbanizable areas that are suitable, available and necessary for residential use.

Government-Assisted Housing – means housing that is financed in whole or part by either a federal or state housing agency or a local housing authority as defined in ORS 456.005 to 456.720, or housing that is occupied by a tenant or tenants who benefit from rent supplements or housing vouchers provided by either a federal or state housing agency or a local housing authority.

Household – refers to one or more persons occupying a single housing unit.

Manufactured Homes – means structures with a Department of Housing and Urban Development (HUD) label certifying that the structure is constructed in accordance with the National Manufactured Housing Construction and Safety Standards Act of 1974 (42 USC 5401 et seq.), as amended on August 22, 1981.

Needed Housing Units – means housing types determined to meet the need shown for housing within an urban growth boundary at particular price ranges and rent levels. On and after the beginning of the first periodic review of a local government's acknowledged comprehensive plan, "needed housing units" also includes government-assisted housing. For cities having populations larger than 2,500 people and counties having populations larger than 15,000 people,

"needed housing units" also includes (but is not limited to) attached and detached single-family housing, multiple-family housing, and manufactured homes, whether occupied by owners or renters.

GUIDELINES

A. PLANNING

1. In addition to inventories of buildable lands, housing elements of a comprehensive plan should, at a minimum, include: (1) a comparison of the distribution of the existing population by income with the distribution of available housing units by cost; (2) a determination of vacancy rates, both overall and at varying rent ranges and cost levels; (3) a determination of expected housing demand at varying rent ranges and cost levels; (4) allowance for a variety of densities and types of residences in each community; and (5) an inventory of sound housing in urban areas including units capable of being rehabilitated.
2. Plans should be developed in a manner that insures the provision of appropriate types and amounts of land within urban growth boundaries. Such land should be necessary and suitable for housing that meets the housing needs of households of all income levels.
3. Plans should provide for the appropriate type, location and phasing of public facilities and services sufficient to support housing development in areas presently developed or undergoing development or redevelopment.
4. Plans providing for housing needs should consider as a major determinant the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources.

B. IMPLEMENTATION

1. Plans should provide for a continuing review of housing need projections and should establish a process for accommodating needed revisions.
2. Plans should take into account the effects of utilizing financial incentives and resources to (a) stimulate the rehabilitation of substandard housing without regard to the financial capacity of the owner so long as benefits accrue to the occupants; and (b) bring into compliance with codes adopted to assure safe and sanitary housing the dwellings of individuals who cannot on their own afford to meet such codes.
3. Decisions on housing development proposals should be expedited when such proposals are in accordance with zoning ordinances and with provisions of comprehensive plans.
4. Ordinances and incentives should be used to increase population densities in urban areas taking into consideration (1) key facilities, (2) the economic, environmental, social and energy consequences of the proposed densities and (3) the optimal use of existing urban land particularly in sections containing significant amounts of unsound substandard structures.
5. Additional methods and devices for achieving this goal should, after consideration of the impact on lower income households, include, but not be limited to: (1) tax incentives and disincentives; (2) building and construction code revision; (3) zoning and land use

controls; (4) subsidies and loans; (5) fee and less-than-fee acquisition techniques; (6) enforcement of local health and safety codes; and (7) coordination of the development of urban facilities and services to disperse low income housing throughout the planning area.

6. Plans should provide for a detailed management program to assign respective implementation roles and responsibilities to those governmental bodies operating in the planning area and having interests in carrying out the goal.

The text from Goals 2 and 10 above creates a sound state-level basis for requiring local governments to plan for housing to meet the expected needs of the population, and then to implement those plans through zoning, subdivision, and other powers. The housing goal explicitly recognizes the need to plan for housing affordable to the local community, which may have an indirect benefit to FHAA-protected citizens. While statewide planning goal 10 does not explicitly mention fair housing or FHAA-protected citizens, it is not required to do so, and its facial neutrality on these issues does not create a barrier to fair housing.

In addition, Oregon's statutes set forth fairly objective criteria for local governments to obtain an "exception" to a statewide planning goal. While it is technically possible that the exception process could be used to undermine affordability or to use local land use powers to avoid building needed housing for FHAA-protected citizens, the exception process itself is facially neutral with respect to both affordable housing and fair housing, and does not create a barrier to fair housing.

B. Urban Growth Boundaries and Needed Housing

In addition to its statewide planning system, Oregon has established a system of mandatory urban growth boundaries and has established, and repeatedly amended, provisions requiring that "needed housing" be accommodated within those boundaries. These provisions appear in ORS Sections 295-314, and relevant text appears in the gray box below.

ORS 197.295 Definitions As used in ORS 197.295 to 197.314 and 197.475 to 197.490:

(1) "Buildable lands" means lands in urban and urbanizable areas that are suitable, available and necessary for residential uses. "Buildable lands" includes both vacant land and developed land likely to be redeveloped.

(2) "Manufactured dwelling park" has the meaning given that term in ORS 446.003.

(3) "Government assisted housing" means housing that is financed in whole or part by either a federal or state housing agency or a housing authority as defined in ORS 456.005, or housing that is occupied by a tenant or tenants who benefit from rent supplements or housing vouchers provided by either a federal or state housing agency or a local housing authority.

(4) "Manufactured homes" has the meaning given that term in ORS 446.003.

(5) "Mobile home park" has the meaning given that term in ORS 446.003.

(6) "Periodic review" means the process and procedures as set forth in ORS 197.628 to 197.651.

(7) "Urban growth boundary" means an urban growth boundary included or referenced in a comprehensive plan.

ORS 197.296 Factors to establish sufficiency of buildable lands within urban growth boundary; analysis and determination of residential housing patterns

(1)(a) The provisions of this section apply to metropolitan service district regional framework plans and local government comprehensive plans for lands within the urban growth boundary of a city that is located outside of a metropolitan service district and has a population of 25,000 or more.

(b) The Land Conservation and Development Commission may establish a set of factors under which additional cities are subject to the provisions of this section. In establishing the set of factors required under this paragraph, the commission shall consider the size of the city, the rate of population growth of the city or the proximity of the city to another city with a population of 25,000 or more or to a metropolitan service district.

(2) At periodic review pursuant to ORS 197.628 to 197.651 or at any other legislative review of the comprehensive plan or regional plan that concerns the urban growth boundary and requires the application of a statewide planning goal relating to buildable lands for residential use, a local government shall demonstrate that its comprehensive plan or regional plan provides sufficient buildable lands within the urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for 20 years. The 20-year period shall commence on the date initially scheduled for completion of the periodic or legislative review.

(3) In performing the duties under subsection (2) of this section, a local government shall:

(a) Inventory the supply of buildable lands within the urban growth boundary and determine the housing capacity of the buildable lands; and

(b) Conduct an analysis of housing need by type and density range, in accordance with ORS 197.303 and statewide planning goals and rules relating to housing, to determine the number of units and amount of land needed for each needed housing type for the next 20 years.

(4)(a) For the purpose of the inventory described in subsection (3)(a) of this section, "buildable lands" includes:

(A) Vacant lands planned or zoned for residential use;

(B) Partially vacant lands planned or zoned for residential use;

(C) Lands that may be used for a mix of residential and employment uses under the existing planning or zoning; and

(D) Lands that may be used for residential infill or redevelopment.

(b) For the purpose of the inventory and determination of housing capacity described in subsection (3)(a) of this section, the local government must demonstrate consideration of:

(A) The extent that residential development is prohibited or restricted by local regulation and ordinance, state law and rule or federal statute and regulation;

(B) A written long term contract or easement for radio, telecommunications or electrical facilities, if the written contract or easement is provided to the local government; and

(C) The presence of a single family dwelling or other structure on a lot or parcel.

(c) Except for land that may be used for residential infill or redevelopment, a local government shall create a map or document that may be used to verify and identify specific lots or parcels that have been determined to be buildable lands.

(5)(a) Except as provided in paragraphs (b) and (c) of this subsection, the determination of housing capacity and need pursuant to subsection (3) of this section must be based on data relating to land within the urban growth boundary that has been collected since the last periodic review or five years, whichever is greater. The data shall include:

(A) The number, density and average mix of housing types of urban residential development that have actually occurred;

(B) Trends in density and average mix of housing types of urban residential development;

(C) Demographic and population trends;

(D) Economic trends and cycles; and

(E) The number, density and average mix of housing types that have occurred on the buildable lands described in subsection (4)(a) of this section.

(b) A local government shall make the determination described in paragraph (a) of this subsection using a shorter time period than the time period described in paragraph (a) of this subsection if the local government finds that the shorter time period will provide more accurate and reliable data related to housing capacity and need. The shorter time period may not be less than three years.

(c) A local government shall use data from a wider geographic area or use a time period for economic cycles and trends longer than the time period described in paragraph (a) of this subsection if the analysis of a wider geographic area or the use of a longer time period will provide more accurate, complete and reliable data relating to trends affecting housing need than an analysis performed pursuant to paragraph (a) of this subsection. The local government must clearly describe the geographic area, time frame and source of data used in a determination performed under this paragraph.

(6) If the housing need determined pursuant to subsection (3)(b) of this section is greater than the housing capacity determined pursuant to subsection (3)(a) of this section, the local government shall take one or more of the following actions to accommodate the additional housing need:

(a) Amend its urban growth boundary to include sufficient buildable lands to accommodate housing needs for the next 20 years. As part of this process, the local government shall consider the effects of measures taken pursuant to paragraph (b) of this subsection. The amendment shall include sufficient land reasonably necessary to accommodate the siting of new public school facilities. The need and inclusion of lands for new public school facilities shall be a coordinated process between the affected public school districts and the local government that has the authority to approve the urban growth boundary;

(b) Amend its comprehensive plan, regional plan, functional plan or land use regulations to include new measures that demonstrably increase the likelihood that residential development will occur at densities sufficient to accommodate housing needs for the next 20 years without expansion of the urban growth boundary. A local government or metropolitan service district

that takes this action shall monitor and record the level of development activity and development density by housing type following the date of the adoption of the new measures; or

(c) Adopt a combination of the actions described in paragraphs (a) and (b) of this subsection.

(7) Using the analysis conducted under subsection (3)(b) of this section, the local government shall determine the overall average density and overall mix of housing types at which residential development of needed housing types must occur in order to meet housing needs over the next 20 years. If that density is greater than the actual density of development determined under subsection (5)(a)(A) of this section, or if that mix is different from the actual mix of housing types determined under subsection (5)(a)(A) of this section, the local government, as part of its periodic review, shall adopt measures that demonstrably increase the likelihood that residential development will occur at the housing types and density and at the mix of housing types required to meet housing needs over the next 20 years.

(8)(a) A local government outside a metropolitan service district that takes any actions under subsection (6) or (7) of this section shall demonstrate that the comprehensive plan and land use regulations comply with goals and rules adopted by the commission and implement ORS 197.295 to 197.314.

(b) The local government shall determine the density and mix of housing types anticipated as a result of actions taken under subsections (6) and (7) of this section and monitor and record the actual density and mix of housing types achieved. The local government shall compare actual and anticipated density and mix. The local government shall submit its comparison to the commission at the next periodic review or at the next legislative review of its urban growth boundary, whichever comes first.

(9) In establishing that actions and measures adopted under subsections (6) or (7) of this section demonstrably increase the likelihood of higher density residential development, the local government shall at a minimum ensure that land zoned for needed housing is in locations appropriate for the housing types identified under subsection (3) of this section and is zoned at density ranges that are likely to be achieved by the housing market using the analysis in subsection (3) of this section. Actions or measures, or both, may include but are not limited to:

(a) Increases in the permitted density on existing residential land;

(b) Financial incentives for higher density housing;

(c) Provisions permitting additional density beyond that generally allowed in the zoning district in exchange for amenities and features provided by the developer;

(d) Removal or easing of approval standards or procedures;

(e) Minimum density ranges;

(f) Redevelopment and infill strategies;

(g) Authorization of housing types not previously allowed by the plan or regulations;

(h) Adoption of an average residential density standard; and

(i) Rezoning or redesignation of nonresidential land.

ORS 197-298 through 197-302 contain specific provisions for estimating housing needs for the Metro area (not included here).

ORS 197.303 "Needed housing" defined

(1) As used in ORS 197.307, "needed housing" means housing types determined to meet the need shown for housing within an urban growth boundary at particular price ranges and rent levels, including at least the following housing types:

(a) Attached and detached single-family housing and multiple family housing for both owner and renter occupancy;

(b) Government assisted housing;

(c) Mobile home or manufactured dwelling parks as provided in ORS 197.475 to 197.490;

(d) Manufactured homes on individual lots planned and zoned for single-family residential use that are in addition to lots within designated manufactured dwelling subdivisions; and

(e) Housing for farmworkers.

(2) Subsection (1)(a) and (d) of this section shall not apply to:

(a) A city with a population of less than 2,500.

(b) A county with a population of less than 15,000.

(3) A local government may take an exception under ORS 197.732 to the definition of "needed housing" in subsection (1) of this section in the same manner that an exception may be taken under the goals.

ORS 197.304 contains specific provisions for Lane County (not included here).

ORS 197.307 Effect of need for certain housing in urban growth areas; approval standards for certain residential development; placement standards for approval of manufactured dwellings

1. The availability of affordable, decent, safe and sanitary housing opportunities for persons of lower, middle and fixed income, including housing for farmworkers, is a matter of statewide concern.
2. Many persons of lower, middle and fixed income depend on government assisted housing as a source of affordable, decent, safe and sanitary housing.
3. When a need has been shown for housing within an urban growth boundary at particular price ranges and rent levels, needed housing shall be permitted in one or more zoning districts or in zones described by some comprehensive plans as overlay zones with sufficient buildable land to satisfy that need.
4. Except as provided in subsection (6) of this section, a local government may adopt and apply only clear and objective standards, conditions and procedures regulating the development of needed housing on buildable land described in subsection (3) of this section. The standards, conditions and procedures may not have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay.
5. The provisions of subsection (4) of this section do not apply to:

a. An application or permit for residential development in an area identified in a formally adopted central city plan, or a regional center as defined by Metro, in a city with a population of 500,000 or more.

b. An application or permit for residential development in historic areas designated for protection under a land use planning goal protecting historic areas.

6. In addition to an approval process for needed housing based on clear and objective standards, conditions and procedures as provided in subsection (4) of this section, a local government may adopt and apply an alternative approval process for applications and permits for residential development based on approval criteria regulating, in whole or in part, appearance or aesthetics that are not clear and objective if:

a. The applicant retains the option of proceeding under the approval process that meets the requirements of subsection (4) of this section;

b. The approval criteria for the alternative approval process comply with applicable statewide land use planning goals and rules; and

c. The approval criteria for the alternative approval process authorize a density at or above the density level authorized in the zone under the approval process provided in subsection (4) of this section.

7. Subject to subsection (4) of this section, this section does not infringe on a local governments prerogative to:

a. Set approval standards under which a particular housing type is permitted outright;

b. Impose special conditions upon approval of a specific development proposal; or

c. Establish approval procedures.

ORS 197.307(8) addresses manufactured housing, and is discussed later in this review.

Taken together, Subsections 4 through 7 contain what is known as the "clear and objective standards" requirement, which are intended to prevent local governments from enacting standards and procedures that tend to delay or make the development of housing more uncertain. By attempting to reduce the barriers to housing production in general, the clear and objective standards requirement probably helps increase the affordability of the overall housing stock, which in turn may increase the supply of housing for FHAA-protected citizens. However, the clear and objective standards requirement itself is content neutral, it does not aim at removing barriers to housing for any particular group of citizens.

To the extent that not all Oregon local governments have standards that comply with the "clear and objective" requirement, improved enforcement of compliance with this requirement could have the effect of increasing housing supply.

ORS 197.309 includes a prohibition regulating residential sales prices, and is discussed separately below.

ORS 197.312 Limitation on city and county authority to prohibit certain kinds of housing; zoning requirements for farmworker housing; real estate sales office.

(1) A city or county may not by charter prohibit from all residential zones attached or detached single-family housing, multifamily housing for both owner and renter occupancy or manufactured homes. A city or county may not by charter prohibit government assisted housing or impose additional approval standards on government assisted housing that are not applied to similar but unassisted housing.

ORS 197.312(2) and (3) address farmworker housing, and are discussed below.

ORS 197.313 Interpretation of ORS 197.312. Nothing in ORS 197.312 or in the amendments to ORS 197.295, 197.303, 197.307 by sections 1, 2 and 3, chapter 795, Oregon Laws 1983, shall be construed to require a city or county to contribute to the financing, administration or sponsorship of government assisted housing.

Consistent with statewide planning Goal 10 (Housing), these "needed housing" provisions requiring the creation of "clear and objective" standards for such housing focus on housing affordability and not on housing for FHAA-protected citizens. They are facially neutral with respect to the age, sex, race, nationality, familial status, or disability of residents to be benefitted by the application of clear and objective standards to help produce "needed housing".

ORS 197.309 prohibits local governments from adopting "a requirement that has the effect of establishing the sales price for a housing unit or residential building lot or parcel, or that requires a housing unit or residential building lot or parcel to be designated for sale to any particular class or group of purchasers." However, ORS 197.309 does allow negotiations, agreements, and incentives to produce housing that will be income restricted or available only to certain groups. Although ORS 197.309 does not permit local governments to require housing set-asides for FHAA-protected citizens, it does not create a barrier to fair housing availability or "make unavailable" housing for these groups, and FHAA does not require preferential treatment for FHAA-protected citizens within statewide regulatory schemes.

As a practical matter, ORS 197.309 probably has the effect of reducing the supply of housing for both low income groups and FHAA-protected citizens. However, the FHAA does not require preferential treatment for FHAA-protected citizens within statewide regulatory schemes, merely that they not "make unavailable" housing for these groups. Although the provisions of ORS 197.309 do not create a barrier to fair housing availability in Oregon, their repeal or modification would allow housing set-asides for FHAA-protected citizens.

In contrast, ORS 197.312(1) is an important regulation that promotes a diverse supply of housing and prevents discrimination based on source of income, and probably has the effect of increasing the supply of housing for low-income groups (and to the degree they are correlated, also to FHAA-protected citizens). ORS 197.313 clarifies that the intended effect of ORS 197.312 is not to require local government expenditures to build or subsidize housing, but to prevent the exclusion of certain types of housing that would otherwise be built by private or public builders to meet housing needs. This is consistent with the intent of the FHAA, which is to prohibit discrimination in housing provided by the public or private markets rather than to require public expenditures to build needed housing.

C. Zoning and Subdivision Platting

Zoning and subdivision platting are two of the most powerful tools that cities and counties can use to regulate the type, character, and location of housing development with their boundaries; however, almost all of those regulations are adopted at the local level. State level zoning and land use regulations can create barriers to fair housing choice if they require local governments to use zoning or subdivision standards or definitions that reduce the supply or availability of housing for FHAA-protected citizens but the mere fact that they do not prevent local governments from taking those actions does not constitute a state-level barrier to fair housing .

Cities

The State of Oregon—like every other state in the United States—grants municipalities zoning authority to divide land into districts and regulate things like building height, lot coverage, setbacks, and density.[6] Key provisions of ORS granting addressing these powers are set forth in the gray box below.

ORS 227.090 Powers and Duties of Commission

1. Except as otherwise provided by the city council, a city planning commission may:

a. Recommend and make suggestions to the council and to other public authorities concerning:

A. The laying out, widening, extending and locating of public thoroughfares, parking of vehicles, relief of traffic congestion;

B. Betterment of housing and sanitation conditions;

C. Establishment of districts for limiting the use, height, area, bulk and other characteristics of buildings and structures related to land development;

D. Protection and assurance of access to incident solar radiation; and

E. Protection and assurance of access to wind for potential future electrical generation or mechanical application.

b. Recommend to the council and other public authorities plans for regulating the future growth, development and beautification of the city in respect to its public and private buildings and works, streets, parks, grounds and vacant lots, and plans consistent with future growth and development of the city in order to secure to the city and its inhabitants sanitation, proper service of public utilities and telecommunications utilities, including appropriate public incentives for overall energy conservation and harbor, shipping and transportation facilities.

c. Recommend to the council and other public authorities plans for promotion, development and regulation of industrial and economic needs of the community in respect to industrial pursuits.

d. Advertise the industrial advantages and opportunities of the city and availability of real estate within the city for industrial settlement.

e. Encourage industrial settlement within the city.

f. Make economic surveys of present and potential industrial needs of the city.

g. Study needs of local industries with a view to strengthening and developing them and stabilizing employment conditions.

h. Do and perform all other acts and things necessary or proper to carry out the provisions of ORS 227.010 to 227.170, 227. and 227.180.

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[6] Levine, Jonathan, Zoned Out, (Washington, RFF Press), 2006.

i. Study and propose such measures as are advisable for promotion of the public interest, health, morals, safety, comfort, convenience and welfare of the city and of the area within six miles thereof.

ORS 227.100 Submission of plats for subdivisions and plans for street alterations and public buildings to commission; report. All subdivision plats located within the city limits, and all plans or plats for vacating or laying out, widening, extending, parking and locating streets or plans for public buildings shall first be submitted to the commission by the city engineer or other proper municipal officer, and a report thereon from the commission secured in writing before approval is given by the proper municipal official.

ORS 227.110 City approval prior to recording of subdivision plats and plats or deeds dedicating land to public use within six miles of city; exception.

1. All subdivision plats and all plats or deeds dedicating land to public use in that portion of a county within six miles outside the limits of any city shall first be submitted to the city planning commission or, if no such commission exists, to the city engineer of the city and approved by the commission or engineer before they shall be recorded. However, unless otherwise provided in an urban growth area management agreement jointly adopted by a city and county to establish procedures for regulating land use outside the city limits and within an urban growth boundary acknowledged under ORS 197.251, if the county governing body has adopted ordinances or regulations for subdivisions and partitions under ORS 92.044, land within the six-mile limit shall be under the jurisdiction of the county for those purposes.

2. It shall be unlawful to receive or record such plat or replat or deed in any public office unless the same bears thereon the approval, by indorsement, of such commission or city engineer. However, the indorsement of the commission or city engineer of the city with boundaries nearest the land such document affects shall satisfy the requirements of this section in case the boundaries of more than one city are within six miles of the property so mapped or described. If the governing bodies of such cities mutually agree upon a boundary line establishing the limits of the jurisdiction of the cities other than the line equidistant between the cities and file the agreement with the recording officer of the county containing such boundary line, the boundary line mutually agreed upon shall become the limit of the jurisdiction of each city until superseded by a new agreement between the cities or until one of the cities files with such recording officer a written notification stating that the agreement shall no longer apply.

ORS 227.215 Regulation of Development.

1. As used in this section, "development" means a building or mining operation, making a material change in the use or appearance of a structure or land, dividing land into two or more parcels, including partitions and subdivisions as provided in ORS 92.010 to 92.285, and creating or terminating a right of access.

2. A city may plan and otherwise encourage and regulate the development of land. A city may adopt an ordinance requiring that whatever land development is undertaken in the

city comply with the requirements of the ordinance and be undertaken only in compliance with the terms of a development permit.

3. A development ordinance may provide for:

a. Development for which a permit is granted as of right on compliance with the terms of the ordinance;

b. Development for which a permit is granted discretionarily in accordance and consistent with the requirements of ORS 227.173;

c. Development which need not be under a development permit but shall comply with the ordinance; and

d. Development which is exempt from the ordinance.

4. The ordinance may divide the city into districts and apply to all or part of the city.

The text of ORS 227.215 is fairly typical of state enabling acts for city zoning and subdivision (in fact, it is more concise and clearer than the authority in many states). While not mentioning either affordable or fair housing, it is facially neutral on those issues. While the power to regulate land use and the density/intensity of development raises the possibility that individual cities could restrict density in ways that raise the costs of housing, the state Act does not create or encourage that result. These statutes do not require local governments to take any actions that would restrict access to housing for FHAA-protected citizens, and do not create state level barriers to fair housing for those groups. Taken in conjunction with the requirement that local implementation measures comply with Goal 10 (Housing) discussed above, ORS 227.215 does not create barriers to the availability of fair housing in Oregon.

Counties

Oregon's grant of authority allowing its county governments to engage in planning and to regulate land use through zoning and subdivision controls are contained in ORS Chapter 215, relevant sections of which are shown in the gray box below. These regulations must be read in light of the state's many restrictions on the use of rural lands for urbanized development, which could have two results. First, it tends to reduce the density and number of people living in unincorporated areas, which may also reduce the number of FHAA-protected citizens living in those areas. As a result, the need for county governments to allow the wide variety of creative housing options discussed in the Background section above is reduced; many of those types of housing are more appropriate in urban areas. Second, however, it may reduce the ability of Oregon counties to allow creative housing solutions for those FHAA-protected citizens that do live within its jurisdiction. As an example, Oregon's limits on zoning for multi-family development in rural areas outside of growth boundaries could indirectly make it more difficult for county governments to plan for or approve larger group home development even if needed to serve its existing FHAA-protected citizens.

ORS 215.050 Comprehensive Planning, Zoning and Subdivision Ordinances.

1. Except as provided in ORS 527.722, the county governing body shall adopt and may from time to time revise a comprehensive plan and zoning, subdivision and other ordinances applicable to all of the land in the county. The plan and related ordinances may be adopted and revised part by part or by geographic area.

2. Zoning, subdivision or other ordinances or regulations and any revisions or amendments thereof shall be designed to implement the adopted county comprehensive plan.

3. A county shall maintain copies of its comprehensive plan and land use regulations, as defined in ORS 197.015, for sale to the public at a charge not to exceed the cost of copying and assembling the material

ORS 215.283 Uses Permitted in Exclusive Farm Use Zones in Nonmarginal Lands

1. The following uses may be established in any area zoned for exclusive farm use:

   d) A dwelling on real property used for farm use if the dwelling is occupied by a relative of the farm operator or the farm operators spouse, which means a child, parent, stepparent, grandchild, grandparent, stepgrandparent, sibling, stepsibling, niece, nephew or first cousin of either, if the farm operator does or will require the assistance of the relative in the management of the farm use and the dwelling is located on the same lot or parcel as the dwelling of the farm operator. Notwithstanding ORS 92.010 (Definitions for ORS 92..010 to 92.192 or the minimum lot or parcel size requirements under ORS 215.780 (Minimum lot or parcel sizes) if the owner of a dwelling described in this paragraph obtains construction financing or other financing secured by the dwelling and the secured party forecloses on the dwelling, the secured party may also foreclose on the homesite, as defined in ORS 308A.250 and the foreclosure shall operate as a partition of the homesite to create a new parcel.

ORS 215.284 Dwelling Not in Conjunction with Farm Use; Existing Lots or Parcels; New Lots or Parcels.

1. In the Willamette Valley, a single-family residential dwelling not provided in conjunction with farm use may be established, subject to approval of the governing body or its designee, in any area zoned for exclusive farm use upon a finding that:

   a. The dwelling or activities associated with the dwelling will not force a significant change in or significantly increase the cost of accepted farming or forest practices on nearby lands devoted to farm or forest use;

   b. The dwelling will be sited on a lot or parcel that is predominantly composed of Class IV through Class VIII soils that would not, when irrigated, be classified as prime, unique, Class I or Class II soils;

   c. The dwelling will be sited on a lot or parcel created before January 1, 1993;

   d. The dwelling will not materially alter the stability of the overall land use pattern of the area; and

   e. The dwelling complies with such other conditions as the governing body or its designee considers necessary.

2. In counties not described in subsection (1) of this section, a single-family residential dwelling not provided in conjunction with farm use may be established, subject to approval of the governing body or its designee, in any area zoned for exclusive farm use upon a finding that:

a. The dwelling or activities associated with the dwelling will not force a significant change in or significantly increase the cost of accepted farming or forest practices on nearby lands devoted to farm or forest use;

b. The dwelling is situated upon a lot or parcel or portion of a lot or parcel that is generally unsuitable land for the production of farm crops and livestock or merchantable tree species, considering the terrain, adverse soil or land conditions, drainage and flooding, vegetation, location and size of the tract. A lot or parcel or portion of a lot or parcel may not be considered unsuitable solely because of size or location if it can reasonably be put to farm or forest use in conjunction with other land;

c. The dwelling will be sited on a lot or parcel created before January 1, 1993;

d. The dwelling will not materially alter the stability of the overall land use pattern of the area; and

e. The dwelling complies with such other conditions as the governing body or its designee considers necessary.

3. In counties in western Oregon, as defined in ORS 321.257, not described in subsection (4) of this section, a single-family residential dwelling not provided in conjunction with farm use may be established, subject to approval of the governing body or its designee, in any area zoned for exclusive farm use upon a finding that:

a. The dwelling or activities associated with the dwelling will not force a significant change in or significantly increase the cost of accepted farming or forest practices on nearby lands devoted to farm or forest use;

b. The dwelling is situated upon a lot or parcel or portion of a lot or parcel that is generally unsuitable land for the production of farm crops and livestock or merchantable tree species, considering the terrain, adverse soil or land conditions, drainage and flooding, vegetation, location and size of the tract. A lot or parcel or portion of a lot or parcel may not be considered unsuitable solely because of size or location if it can reasonably be put to farm or forest use in conjunction with other land;

c. The dwelling will be sited on a lot or parcel created after January 1, 1993, as allowed under ORS 215.263 (4);

d. The dwelling will not materially alter the stability of the overall land use pattern of the area; and

e. The dwelling complies with such other conditions as the governing body or its designee considers necessary.

4. a. In the Willamette Valley, a lot or parcel allowed under paragraph (b) of this subsection for a single-family residential dwelling not provided in conjunction with farm use may be established, subject to approval of the governing body or its designee, in any area zoned for exclusive farm use upon a finding that the originating lot or parcel is equal to or larger than the applicable minimum lot or parcel size and:

(A) Is not stocked to the requirements under ORS 527.610 to 527.770;

(B) Is composed of at least 95 percent Class VI through Class VIII soils; and

(C) Is composed of at least 95 percent soils not capable of producing 50 cubic feet per acre per year of wood fiber.

b. Any parcel to be created for a dwelling from the originating lot or parcel described in paragraph (a) of this subsection will not be smaller than 20 acres.

c. The dwelling or activities associated with the dwelling allowed under this subsection will not force a significant change in or significantly increase the cost of accepted farming or forest practices on nearby lands devoted to farm or forest use.

d. The dwelling allowed under this subsection will not materially alter the stability of the overall land use pattern of the area.

e. The dwelling allowed under this subsection complies with such other conditions as the governing body or its designee considers necessary.

5. No final approval of a nonfarm use under this section shall be given unless any additional taxes imposed upon the change in use have been paid.

6. If a single-family dwelling is established on a lot or parcel as set forth in ORS 215.705 to 215.750, no additional dwelling may later be sited under subsection (1), (2), (3), (4) or (7) of this section.

7. In counties in eastern Oregon, as defined in ORS 321.805, a single-family residential dwelling not provided in conjunction with farm use may be established, subject to the approval of the county governing body or its designee, in any area zoned for exclusive farm use upon a finding that:

a. The dwelling or activities associated with the dwelling will not force a significant change in or significantly increase the cost of accepted farming or forest practices on nearby lands devoted to farm or forest use;

b. The dwelling will be sited on a lot or parcel created after January 1, 1993, as allowed under ORS 215.263 (5);

c. The dwelling will not materially alter the stability of the overall land use pattern of the area; and

d. The dwelling complies with such other conditions as the governing body or its designee considers necessary.

ORS 215.293 Dwelling in Exclusive Farm Use or Forest Zone; Condition; Declaration; Recordation

The county governing body or its designate shall require as a condition of approval of a single-family dwelling under ORS 215.213, 215.283 or 215.284 or otherwise in a farm or forest zone, that the landowner for the dwelling sign and record in the deed records for the county a document binding the landowner, and the landowner's successors in interest, prohibiting them from pursuing a claim for relief or cause of action alleging injury from farming or forest practices for which no action or claim is allowed under ORS 30.936 or 30.937.

ORS 215.705 dwellings in farm or forest zone

1. A governing body of a county or its designate may allow the establishment of a single-family dwelling on a lot or parcel located within a farm or forest zone as set forth in this section and ORS 215.710, 215.720, 215.740 and 215.750 after notifying the county assessor that the governing body intends to allow the dwelling. A dwelling under this section may be allowed if:

(a) The lot or parcel on which the dwelling will be sited was lawfully created and was acquired by the present owner:

(A) Prior to January 1, 1985; or

(B) By devise or by intestate succession from a person who acquired the lot or parcel prior to January 1, 1985.

(b) The tract on which the dwelling will be sited does not include a dwelling.

(c) The proposed dwelling is not prohibited by, and will comply with, the requirements of the acknowledged comprehensive plan and land use regulations and other provisions of law.

(d) The lot or parcel on which the dwelling will be sited, if zoned for farm use, is not on that high-value farmland described in ORS 215.710 except as provided in subsections (2) and (3) of this section.

(e) The lot or parcel on which the dwelling will be sited, if zoned for forest use, is described in ORS 215.720, 215.740 or 215.750.

(f) When the lot or parcel on which the dwelling will be sited lies within an area designated in an acknowledged comprehensive plan as habitat of big game, the siting of the dwelling is consistent with the limitations on density upon which the acknowledged comprehensive plan and land use regulations intended to protect the habitat are based.

(g) When the lot or parcel on which the dwelling will be sited is part of a tract, the remaining portions of the tract are consolidated into a single lot or parcel when the dwelling is allowed.

2. (a) Notwithstanding the requirements of subsection (1)(d) of this section, a single-family dwelling not in conjunction with farm use may be sited on high-value farmland if:

(A) It meets the other requirements of ORS 215.705 to 215.750;

(B) The lot or parcel is protected as high-value farmland as described under ORS 215.710 (1); and

(C) A hearings officer of a county determines that:

(i) The lot or parcel cannot practicably be managed for farm use, by itself or in conjunction with other land, due to extraordinary circumstances inherent in the land or its physical setting that do not apply generally to other land in the vicinity.

(ii) The dwelling will comply with the provisions of ORS 215.296 (1).

(iii) The dwelling will not materially alter the stability of the overall land use pattern in the area.

(b) A local government shall provide notice of all applications for dwellings allowed under this subsection to the State Department of Agriculture. Notice shall be provided in accordance

with the governing body's land use regulations but shall be mailed at least 20 calendar days prior to the public hearing before the hearings officer under paragraph (a) of this subsection.

3. Notwithstanding the requirements of subsection (1)(d) of this section, a single-family dwelling not in conjunction with farm use may be sited on high-value farmland if:

(a) It meets the other requirements of ORS 215.705 to 215.750.

(b) The tract on which the dwelling will be sited is:

(A) Identified in ORS 215.710 (3) or (4);

(B) Not protected under ORS 215.710 (1); and

(C) Twenty-one acres or less in size.

(c)(A) The tract is bordered on at least 67 percent of its perimeter by tracts that are smaller than 21 acres, and at least two such tracts had dwellings on them on January 1, 1993;

(B) The tract is not a flaglot and is bordered on at least 25 percent of its perimeter by tracts that are smaller than 21 acres, and at least four dwellings existed on January 1, 1993, within one-quarter mile of the center of the subject tract. Up to two of the four dwellings may lie within the urban growth boundary, but only if the subject tract abuts an urban growth boundary; or

(C) The tract is a flaglot and is bordered on at least 25 percent of its perimeter by tracts that are smaller than 21 acres, and at least four dwellings existed on January 1, 1993, within one-quarter mile of the center of the subject tract and on the same side of the public road that provides access to the subject tract. The governing body of a county must interpret the center of the subject tract as the geographic center of the flaglot if the applicant makes a written request for that interpretation and that interpretation does not cause the center to be located outside the flaglot. Up to two of the four dwellings may lie within the urban growth boundary, but only if the subject tract abuts an urban growth boundary. As used in this subparagraph:

(i) "Flaglot" means a tract containing a narrow strip or panhandle of land providing access from the public road to the rest of the tract.

(ii) "Geographic center of the flaglot" means the point of intersection of two perpendicular lines of which the first line crosses the midpoint of the longest side of a flaglot, at a 90-degree angle to that side, and the second line crosses the midpoint of the longest adjacent side of the flaglot.

4. If land is in a zone that allows both farm and forest uses, is acknowledged to be in compliance with goals relating to both agriculture and forestry and may qualify as an exclusive farm use zone under this chapter, the county may apply the standards for siting a dwelling under either subsection (1)(d) of this section or ORS 215.720, 215.740 and 215.750 as appropriate for the predominant use of the tract on January 1, 1993.

5. A county may, by application of criteria adopted by ordinance, deny approval of a dwelling allowed under this section in any area where the county determines that approval of the dwelling would:

(a) Exceed the facilities and service capabilities of the area;

(b) Materially alter the stability of the overall land use pattern in the area; or

(c) Create conditions or circumstances that the county determines would be contrary to the purposes or intent of its acknowledged comprehensive plan or land use regulations.

6. For purposes of subsection (1)(a) of this section, "owner" includes the wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law, mother-in-law, father-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent or grandchild of the owner or a business entity owned by any one or combination of these family members.

7. When a local government approves an application for a single-family dwelling under the provisions of this section, the application may be transferred by a person who has qualified under this section to any other person after the effective date of the land use decision.

ORS 215.720 Criteria for Forestland Dwelling Under ORS 215.705

1. A dwelling authorized under ORS 215.705 may be allowed on land zoned for forest use under a goal protecting forestland only if:

(a) The tract on which the dwelling will be sited is in western Oregon, as defined in ORS 321.257, and is composed of soils not capable of producing 5,000 cubic feet per year of commercial tree species and is located within 1,500 feet of a public road as defined under ORS 368.001. The road shall be maintained and either paved or surfaced with rock and shall not be:

(A) A United States Bureau of Land Management road; or

(B) A United States Forest Service road unless the road is paved to a minimum width of 18 feet, there is at least one defined lane in each direction and a maintenance agreement exists between the United States Forest Service and landowners adjacent to the road, a local government or a state agency.

(b) The tract on which the dwelling will be sited is in eastern Oregon, as defined in ORS 321.805, and is composed of soils not capable of producing 4,000 cubic feet per year of commercial tree species and is located within 1,500 feet of a public road as defined under ORS 368.001. The road shall be maintained and either paved or surfaced with rock and shall not be:

(A) A United States Bureau of Land Management road; or

(B) A United States Forest Service road unless the road is paved to a minimum width of 18 feet, there is at least one defined lane in each direction and a maintenance agreement exists between the United States Forest Service and landowners adjacent to the road, a local government or a state agency.

2. For purposes of this section, "commercial tree species" means trees recognized under rules adopted under ORS 527.715 for commercial production.

3. No dwelling other than those described in this section and ORS 215.740, 215.750 and 215.755 may be sited on land zoned for forest use under a land use planning goal protecting forestland.

ORS 215.730 Additional Criteria for Forestland Dwellings Under ORS 215.705.

1. A local government shall require as a condition of approval of a single-family dwelling allowed under ORS 215.705 on lands zoned forestland that:

(a)(A) If the lot or parcel is more than 30 acres in eastern Oregon as defined in ORS 321.805, the property owner submits a stocking survey report to the assessor and the assessor verifies that the minimum stocking requirements adopted under ORS 527.610 to 527.770 have been met; or

(B) If the lot or parcel is more than 10 acres in western Oregon as defined in ORS 321.257, the property owner submits a stocking survey report to the assessor and the assessor verifies that the minimum stocking requirements adopted under ORS 527.610 to 527.770 have been met.

(b) The dwelling meets the following requirements:

(A) The dwelling has a fire retardant roof.

(B) The dwelling will not be sited on a slope of greater than 40 percent.

(C) Evidence is provided that the domestic water supply is from a source authorized by the Water Resources Department and not from a Class II stream as designated by the State Board of Forestry.

(D) The dwelling is located upon a parcel within a fire protection district or is provided with residential fire protection by contract.

(E) If the dwelling is not within a fire protection district, the applicant provides evidence that the applicant has asked to be included in the nearest such district.

(F) If the dwelling has a chimney or chimneys, each chimney has a spark arrester.

(G) The owner provides and maintains primary fuel-free break and secondary break areas on land surrounding the dwelling that is owned or controlled by the owner.

2. (a) If a governing body determines that meeting the requirement of subsection (1)(b)(D) of this section would be impracticable, the governing body may provide an alternative means for protecting the dwelling from fire hazards. The means selected may include a fire sprinkling system, on-site equipment and water storage or other methods that are reasonable, given the site conditions.

(b) If a water supply is required under this subsection, it shall be a swimming pool, pond, lake or similar body of water that at all times contains at least 4,000 gallons or a stream that has a minimum flow of at least one cubic foot per second. Road access shall be provided to within 15 feet of the water's edge for fire-fighting pumping units, and the road access shall accommodate a turnaround for fire-fighting equipment.

ORS 215.740 Large Tract Forestland Dwelling; Criteria; Rules.

1. If a dwelling is not allowed under ORS 215.720 (1), a dwelling may be allowed on land zoned for forest use under a goal protecting forestland if it complies with other provisions of law and is sited on a tract:

(a) In eastern Oregon of at least 240 contiguous acres except as provided in subsection (3) of this section; or

(b) In western Oregon of at least 160 contiguous acres except as provided in subsection (3) of this section.

2. For purposes of subsection (1) of this section, a tract shall not be considered to consist of less than 240 acres or 160 acres because it is crossed by a public road or a waterway.

3. (a) An owner of tracts that are not contiguous but are in the same county or adjacent counties and zoned for forest use may add together the acreage of two or more tracts to total 320 acres or more in eastern Oregon or 200 acres or more in western Oregon to qualify for a dwelling under subsection (1) of this section.

(b) If an owner totals 320 or 200 acres, as appropriate, under paragraph (a) of this subsection, the owner shall submit proof of nonrevocable deed restrictions recorded in the deed records for the tracts in the 320 or 200 acres, as appropriate. The deed restrictions shall preclude all future rights to construct a dwelling on the tracts or to use the tracts to total acreage for future siting of dwellings for present and any future owners unless the tract is no longer subject to protection under goals for agricultural lands or forestlands.

(c) The Land Conservation and Development Commission shall adopt rules that prescribe the language of the deed restriction, the procedures for recording, the procedures under which counties shall keep records of lots or parcels used to create the total, the mechanisms for providing notice to subsequent purchasers of the limitations under paragraph (b) of this subsection and other rules to implement this section. [1993 c.792 §4(2),(3),(5)]

ORS 215.750 Alternative Forestland Dwellings; Criteria.

1. In western Oregon, a governing body of a county or its designate may allow the establishment of a single-family dwelling on a lot or parcel located within a forest zone if the lot or parcel is predominantly composed of soils that are:

(a) Capable of producing 0 to 49 cubic feet per acre per year of wood fiber if:

(A) All or part of at least three other lots or parcels that existed on January 1, 1993, are within a 160-acre square centered on the center of the subject tract; and

(B) At least three dwellings existed on January 1, 1993, on the other lots or parcels;

(b) Capable of producing 50 to 85 cubic feet per acre per year of wood fiber if:

(A) All or part of at least seven other lots or parcels that existed on January 1, 1993, are within a 160-acre square centered on the center of the subject tract; and

(B) At least three dwellings existed on January 1, 1993, on the other lots or parcels; or

(c) Capable of producing more than 85 cubic feet per acre per year of wood fiber if:

(A) All or part of at least 11 other lots or parcels that existed on January 1, 1993, are within a 160-acre square centered on the center of the subject tract; and

(B) At least three dwellings existed on January 1, 1993, on the other lots or parcels.

2. In eastern Oregon, a governing body of a county or its designate may allow the establishment of a single-family dwelling on a lot or parcel located within a forest zone if the lot or parcel is predominantly composed of soils that are:

(a) Capable of producing 0 to 20 cubic feet per acre per year of wood fiber if:

(A) All or part of at least three other lots or parcels that existed on January 1, 1993, are within a 160-acre square centered on the center of the subject tract; and

(B) At least three dwellings existed on January 1, 1993, on the other lots or parcels;

(b) Capable of producing 21 to 50 cubic feet per acre per year of wood fiber if:

(A) All or part of at least seven other lots or parcels that existed on January 1, 1993, are within a 160-acre square centered on the center of the subject tract; and

(B) At least three dwellings existed on January 1, 1993, on the other lots or parcels; or

(c) Capable of producing more than 50 cubic feet per acre per year of wood fiber if:

(A) All or part of at least 11 other lots or parcels that existed on January 1, 1993, are within a 160-acre square centered on the center of the subject tract; and

(B) At least three dwellings existed on January 1, 1993, on the other lots or parcels.

3. Lots or parcels within urban growth boundaries shall not be used to satisfy the eligibility requirements under subsection (1) or (2) of this section.

4. A proposed dwelling under this section is not allowed:

(a) If it is prohibited by or will not comply with the requirements of an acknowledged comprehensive plan and acknowledged land use regulations or other provisions of law.

(b) Unless it complies with the requirements of ORS 215.730.

(c) Unless no dwellings are allowed on other lots or parcels that make up the tract and deed restrictions established under ORS 215.740 (3) for the other lots or parcels that make up the tract are met.

(d) If the tract on which the dwelling will be sited includes a dwelling.

5. Except as described in subsection (6) of this section, if the tract under subsection (1) or (2) of this section abuts a road that existed on January 1, 1993, the measurement may be made by creating a 160-acre rectangle that is one mile long and one-fourth mile wide centered on the center of the subject tract and that is to the maximum extent possible, aligned with the road.

6. (a) If a tract 60 acres or larger described under subsection (1) or (2) of this section abuts a road or perennial stream, the measurement shall be made in accordance with subsection (5) of this section. However, one of the three required dwellings shall be on the same side of the road or stream as the tract and:

(A) Be located within a 160-acre rectangle that is one mile long and one-fourth mile wide centered on the center of the subject tract and that is, to the maximum extent possible, aligned with the road or stream; or

(B) Be within one-quarter mile from the edge of the subject tract but not outside the length of the 160-acre rectangle, and on the same side of the road or stream as the tract.

(b) If a road crosses the tract on which the dwelling will be located, at least one of the three required dwellings shall be on the same side of the road as the proposed dwelling.

7. Notwithstanding subsection (4)(a) of this section, if the acknowledged comprehensive plan and land use regulations of a county require that a dwelling be located in a 160-acre square or rectangle described in subsection (1), (2), (5) or (6) of this section, a dwelling is in the 160-acre square or rectangle if any part of the dwelling is in the 160-acre square or rectangle. [1993 c.792 §4(6),(7),(8); 1999 c.59 §58; 2005 c.289 §1]

ORS 215.755 Other Forestland Dwellings; Criteria.

Subject to the approval of the governing body or its designee, the following dwellings may be established in any area zoned for forest use under a land use planning goal protecting forestland, provided that the requirements of the acknowledged comprehensive plan, land use regulations and other applicable provisions of law are met:

1. Alteration, restoration or replacement of a lawfully established dwelling that:

   (a) Has intact exterior walls and roof structure;

   (b) Has indoor plumbing consisting of a kitchen sink, toilet and bathing facilities connected to a sanitary waste disposal system;

   (c) Has interior wiring for interior lights;

   (d) Has a heating system; and

   (e) In the case of replacement, is removed, demolished or converted to an allowable nonresidential use within three months of completion of the replacement dwelling.

2. One manufactured dwelling or recreational vehicle, or the temporary use of an existing building, in conjunction with an existing dwelling as a temporary use for the term of a hardship suffered by the existing resident or a relative of the resident. Within three months of the end of the hardship, the manufactured dwelling or recreational vehicle shall be removed or demolished or, in the case of an existing building, the building shall be removed, demolished or returned to an allowed nonresidential use. The governing body or its designee shall provide for periodic review of the hardship claimed under this subsection. A temporary dwelling established under this section shall not qualify for replacement under the provisions of subsection (1) of this section.

3. Caretaker residences for public parks and public fish hatcheries.

ORS 215.780 Minimum Lot or Parcel Sizes; Land Division to Establish a Dwelling; Recordation.

1. Except as provided in subsection (2) of this section, the following minimum lot or parcel sizes apply to all counties:

   (a) For land zoned for exclusive farm use and not designated rangeland, at least 80 acres;

   (b) For land zoned for exclusive farm use and designated rangeland, at least 160 acres; and

   (c) For land designated forestland, at least 80 acres.

2. A county may adopt a lower minimum lot or parcel size than that described in subsection (1) of this section in any of the following circumstances:

   (a) When the county can demonstrate to the Land Conservation and Development Commission that the county can adopt a lower minimum lot or parcel size while continuing

to meet the requirements of ORS 215.243 and 527.630 and the land use planning goals adopted under ORS 197.230.

(b) To divide an area of land zoned for forest use to establish a parcel for a dwelling that has existed since before June 1, 1995, subject to the following requirements:

(A) The parcel established may not be larger than five acres, except as necessary to recognize physical factors such as roads or streams, in which case the parcel shall be no larger than 10 acres; and

(B) The parcel that does not contain the dwelling is not entitled to a dwelling unless subsequently authorized by law or goal and the parcel either:

(i) Meets the minimum land division standards of the zone; or

(ii) Is consolidated with another parcel, and together the parcels meet the minimum land division standards of the zone.

(c) To divide an area of land zoned for mixed farm and forest use to establish a parcel for a dwelling that has existed since before June 1, 1995, subject to the following requirements:

(A) The parcel established may not be larger than five acres, except as necessary to recognize physical factors such as roads or streams, in which case the parcel shall be no larger than 10 acres;

(B) The parcel that does not contain the dwelling is not entitled to a dwelling unless subsequently authorized by law or goal and the parcel either:

(i) Meets the minimum land division standards of the zone; or

(ii) Is consolidated with another parcel, and together the parcels meet the minimum land division standards of the zone;

(C) The minimum tract eligible under this paragraph is 40 acres;

(D) The tract shall be predominantly in forest use and that portion in forest use qualified for special assessment under a program under ORS chapter 321; and

(E) The remainder of the tract does not qualify for any uses allowed under ORS 215.213 and 215.283 that are not allowed on forestland.

(d) To allow a division of forestland to facilitate a forest practice as defined in ORS 527.620 that results in a parcel that does not meet the minimum area requirements of subsection (1)(c) of this section or paragraph (a) of this subsection. Parcels created pursuant to this subsection:

(A) Are not eligible for siting of a new dwelling;

(B) May not serve as the justification for the siting of a future dwelling on other lots or parcels;

(C) May not, as a result of the land division, be used to justify redesignation or rezoning of resource lands; and

(D) May not result in a parcel of less than 35 acres, unless the purpose of the land division is to:

(i) Facilitate an exchange of lands involving a governmental agency; or

(ii) Allow transactions in which at least one participant is a person with a cumulative ownership of at least 2,000 acres of forestland.

(e) To allow a division of a lot or parcel zoned for forest use or mixed farm and forest use under a statewide planning goal protecting forestland if:

(A) At least two dwellings lawfully existed on the lot or parcel prior to November 4, 1993;

(B) Each dwelling complies with the criteria for a replacement dwelling under ORS 215.213 (1)(q) or 215.283 (1)(p);

(C) Except for one lot or parcel, each lot or parcel created under this paragraph is between two and five acres in size;

(D) At least one dwelling is located on each lot or parcel created under this paragraph; and

(E) The landowner of a lot or parcel created under this paragraph provides evidence that a restriction prohibiting the landowner and the landowner's successors in interest from further dividing the lot or parcel has been recorded with the county clerk of the county in which the lot or parcel is located. A restriction imposed under this paragraph shall be irrevocable unless a statement of release is signed by the county planning director of the county in which the lot or parcel is located indicating that the comprehensive plan or land use regulations applicable to the lot or parcel have been changed so that the lot or parcel is no longer subject to statewide planning goals protecting forestland or unless the land division is subsequently authorized by law or by a change in a statewide planning goal for land zoned for forest use or mixed farm and forest use.

(f) To allow a proposed division of land in a forest zone or a mixed farm and forest zone as provided in ORS 215.783.

3. A county planning director shall maintain a record of lots and parcels that do not qualify for division under the restrictions imposed under subsections (2)(e) and (4) of this section. The record shall be readily available to the public.

4. A lot or parcel may not be divided under subsection (2)(e) of this section if an existing dwelling on the lot or parcel was approved under:

(a) A statute, an administrative rule or a land use regulation as defined in ORS 197.015 that required removal of the dwelling or that prohibited subsequent division of the lot or parcel; or

(b) A farm use zone provision that allowed both farm and forest uses in a mixed farm and forest use zone under a statewide planning goal protecting forestland.

5. A county with a minimum lot or parcel size acknowledged by the commission pursuant to ORS 197.251 after January 1, 1987, or acknowledged pursuant to periodic review requirements under ORS 197.628 to 197.651 that is smaller than those prescribed in subsection (1) of this section need not comply with subsection (2) of this section.

6. (a) An applicant for the creation of a parcel pursuant to subsection (2)(b) and (c) of this section shall provide evidence that a restriction on the remaining parcel, not containing the dwelling, has been recorded with the county clerk of the county where the property is located. An applicant for the creation of a parcel pursuant to subsection (2)(d) of this section

shall provide evidence that a restriction on the newly created parcel has been recorded with the county clerk of the county where the property is located. The restriction shall allow no dwellings unless authorized by law or goal on land zoned for forest use except as permitted under subsection (2) of this section.

(b) A restriction imposed under this subsection shall be irrevocable unless a statement of release is signed by the county planning director of the county where the property is located indicating that the comprehensive plan or land use regulations applicable to the property have been changed in such a manner that the parcel is no longer subject to statewide planning goals pertaining to agricultural land or forestland.

(c) The county planning director shall maintain a record of parcels that do not qualify for the siting of a new dwelling under restrictions imposed by this subsection. The record shall be readily available to the public.

7. A landowner allowed a land division under subsection (2) of this section shall sign a statement that shall be recorded with the county clerk of the county in which the property is located, declaring that the landowner and the landowner's successors in interest will not in the future complain about accepted farming or forest practices on nearby lands devoted to farm or forest use.

While facially neutral with respect to both fair and affordable housing, the provisions above shows that the Oregon legislature has historically been willing to create exceptions to its strict controls on rural subdivision and development and its strong policies to protect farmland and timberland to achieve other state goals (in this case, the economic viability of the rural land use, or simply to reduce the burdens on rural property owners in situations that would not have major impacts on the state's overall planning system). By analogy, it could have created an exception for housing needed to meet the needs of FHAA-protected citizens in rural areas, but the absence of such an exception does not create a state-level barrier to affordable housing.

D. Manufactured Homes

Manufactured homes are a potential source of affordable housing that could accommodate FHAA-protected citizens, but the availability of manufactured homes is often restricted by local zoning and subdivision ordinances. State level regulations governing individual manufactured homes are addressed in the Oregon Revised Statues, Chapters 197, 307, and 446, relevant portions of which are shown in the gray box below.

ORS197.475 Policy

The Legislative Assembly declares that it is the policy of this state to provide for mobile home or manufactured dwelling parks within all urban growth boundaries to allow persons and families a choice of residential settings.

ORS 446.003 Definitions

22. (a)Manufactured dwelling means a residential trailer, mobile home or manufactured home.

(b) Manufactured dwelling does not include any building or structure constructed to conform to the State of Oregon Structural Specialty Code or the Low-Rise Residential

Dwelling Code adopted pursuant to ORS 455.100 to 455.450 and 455.610 to 455.630 or any unit identified as a recreational vehicle by the manufacturer.

23. Manufactured dwelling park means any place where four or more manufactured dwellings are located within 500 feet of one another on a lot, tract or parcel of land under the same ownership, the primary purpose of which is to rent or lease space or keep space for rent or lease to any person for a charge or fee paid or to be paid for the rental or lease or use of facilities or to offer space free in connection with securing the trade or patronage of such person. Manufactured dwelling park does not include a lot or lots located within a subdivision being rented or leased for occupancy by no more than one manufactured dwelling per lot if the subdivision was approved by the local government unit having jurisdiction under an ordinance adopted pursuant to ORS 92.010 to 92.192.

24. (a) Manufactured home, except as provided in paragraph (b) of this subsection, means a structure constructed for movement on the public highways that has sleeping, cooking and plumbing facilities, that is intended for human occupancy, that is being used for residential purposes and that was constructed in accordance with federal manufactured housing construction and safety standards and regulations in effect at the time of construction.

(b)For purposes of implementing any contract pertaining to manufactured homes between the department and the federal government, manufactured home has the meaning given the term in the contract.

25. (a) Manufactured structure means a recreational vehicle, manufactured dwelling or recreational structure.

(b) Manufactured structure does not include any building or structure regulated under the State of Oregon Structural Specialty Code or the Low-Rise Residential Dwelling Code.

29. Mobile home means a structure constructed for movement on the public highways that has sleeping, cooking and plumbing facilities, that is intended for human occupancy, that is being used for residential purposes and that was constructed between January 1, 1962, and June 15, 1976, and met the construction requirements of Oregon mobile home law in effect at the time of construction.

30. Mobile home park means any place where four or more manufactured structures are located within 500 feet of one another on a lot, tract or parcel of land under the same ownership, the primary purpose of which is to rent space or keep space for rent to any person for a charge or fee paid or to be paid for the rental or use of facilities or to offer space free in connection with securing the trade or patronage of such person. Mobile home park does not include a lot or lots located within a subdivision being rented or leased for occupancy by no more than one manufactured dwelling per lot if the subdivision was approved by the municipality unit having jurisdiction under an ordinance adopted pursuant to ORS 92.010 to 92.192

ORS 197.314 Required Siting of Manufactured Homes; Minimum Lot Size; Approval Standards

1. Notwithstanding ORS 197.296 197.296, 197.298, 197.299, 197.301, 197.302, 197.303, 197.307, 197.312 and 197.313, within urban growth boundaries each city and county shall amend its comprehensive plan and land use regulations for all land zoned for single-family residential uses to allow for siting of manufactured homes as defined in ORS 446.003. A local

government may only subject the siting of a manufactured home allowed under this section to regulation as set forth in ORS 197.307.

2. Cities and counties shall adopt and amend comprehensive plans and land use regulations under subsection (1) of this section according to the provisions of ORS 197.610.
3. Subsection (1) of this section does not apply to any area designated in an acknowledged comprehensive plan or land use regulation as a historic district or residential land immediately adjacent to a historic landmark.
4. Manufactured homes on individual lots zoned for single-family residential use in subsection (1) of this section shall be in addition to manufactured homes on lots within designated manufactured dwelling subdivisions.
5. Within any residential zone inside an urban growth boundary where a manufactured dwelling park is otherwise allowed, a city or county shall not adopt, by charter or ordinance, a minimum lot size for a manufactured dwelling park that is larger than one acre.
6. A city or county may adopt the following standards for the approval of manufactured homes located in manufactured dwelling parks that are smaller than three acres:

   a. The manufactured home shall have a pitched roof, except that no standard shall require a slope of greater than a nominal three feet in height for each 12 feet in width.
   b. The manufactured home shall have exterior siding and roofing that, in color, material and appearance, is similar to the exterior siding and roofing material commonly used on residential dwellings within the community or that is comparable to the predominant materials used on surrounding dwellings as determined by the local permit approval authority.

7. This section shall not be construed as abrogating a recorded restrictive covenant.

ORS 197.307 Effect of Need for Certain Housing in Urban Growth Areas

Subsections 1-7 are discussed earlier in this review.

8. In accordance with subsection (4) of this section and ORS 197.314 (Required siting of manufactured homes), a jurisdiction may adopt any or all of the following placement standards, or any less restrictive standard, for the approval of manufactured homes located outside mobile home parks:

   a. The manufactured home shall be multisectional and enclose a space of not less than 1,000 square feet.
   b. The manufactured home shall be placed on an excavated and back-filled foundation and enclosed at the perimeter such that the manufactured home is located not more than 12 inches above grade.
   c. The manufactured home shall have a pitched roof, except that no standard shall require a slope of greater than a nominal three feet in height for each 12 feet in width.
   d. The manufactured home shall have exterior siding and roofing which in color, material and appearance is similar to the exterior siding and roofing material commonly used on residential dwellings within the community or which is comparable to the predominant

materials used on surrounding dwellings as determined by the local permit approval authority.

e. The manufactured home shall be certified by the manufacturer to have an exterior thermal envelope meeting performance standards which reduce levels equivalent to the performance standards required of single-family dwellings constructed under the state building code as defined in ORS 455.

f. The manufactured home shall have a garage or carport constructed of like materials. A jurisdiction may require an attached or detached garage in lieu of a carport where such is consistent with the predominant construction of immediately surrounding dwellings.

g. In addition to the provisions in paragraphs (a) to (f) of this subsection, a city or county may subject a manufactured home and the lot upon which it is sited to any development standard, architectural requirement and minimum size requirement to which a conventional single-family residential dwelling on the same lot would be subject.

ORS 197.480 Planning for Parks, Procedures, Inventory.

1. Each city and county governing body shall provide, in accordance with urban growth management agreements, for mobile home or manufactured dwelling parks as an allowed use, by July 1, 1990, or by the next periodic review after January 1, 1988, whichever comes first:

a. By zoning ordinance and by comprehensive plan designation on buildable lands within urban growth boundaries; and

b. In areas planned and zoned for a residential density of six to 12 units per acre sufficient to accommodate the need established pursuant to subsections (2) and (3) of this section.

2. A city or county shall establish a projection of need for mobile home or manufactured dwelling parks based on:

a. Population projections;

b. Household income levels;

c. Housing market trends of the region; and

d. An inventory of mobile home or manufactured dwelling parks sited in areas planned and zoned or generally used for commercial, industrial or high density residential development.

3. The inventory required by subsection (2)(d) and subsection (4) of this section shall establish the need for areas to be planned and zoned to accommodate the potential displacement of the inventoried mobile home or manufactured dwelling parks.

4. Notwithstanding the provisions of subsection (1) of this section, a city or county within a metropolitan service district, established pursuant to ORS chapter 268, shall inventory the mobile home or manufactured dwelling parks sited in areas planned and zoned or generally used for commercial, industrial or high density residential development no later than two years from September 27, 1987.

a. A city or county may establish clear and objective criteria and standards for the placement and design of mobile home or manufactured dwelling parks.

b. If a city or county requires a hearing before approval of a mobile home or manufactured dwelling park, application of the criteria and standards adopted pursuant to paragraph (a) of this subsection shall be the sole issue to be determined at the hearing

c. No criteria or standards established under paragraph (a) of this subsection shall be adopted which would preclude the development of mobile home or manufactured dwelling parks within the intent of ORS 197.295 and 197.475 to 197.490.

ORS 197.485 Prohibition on restrictions of manufactured dwelling

(1) A jurisdiction may not prohibit placement of a manufactured dwelling, due solely to its age, in a mobile home or manufactured dwelling park in a zone with a residential density of eight to 12 units per acre.

(2) A jurisdiction may not prohibit placement of a manufactured dwelling, due solely to its age, on a buildable lot or parcel located outside urban growth boundaries or on a space in a mobile home or manufactured dwelling park, if the manufactured dwelling is being relocated due to the closure of a mobile home or manufactured dwelling park or a portion of a mobile home or manufactured dwelling park.

(3) A jurisdiction may impose reasonable safety and inspection requirements for homes that were not constructed in conformance with the National Manufactured Housing Construction and Safety Standards Act of 1974 (42 U.S.C. 5403).

ORS 197.490 Restriction on establishment of park

(1) Except as provided by ORS 446.105, a mobile home or manufactured dwelling park shall not be established on land, within an urban growth boundary, which is planned or zoned for commercial or industrial use.

(2) Notwithstanding the provisions of subsection (1) of this section, if no other access is available, access to a mobile home or manufactured dwelling park may be provided through a commercial or industrial zone.

Although a number of states have passed state legislation encouraging or requiring the accommodation of manufactured homes in both parks and on individual residential lots, the Oregon provisions cited above are very strong. By requiring the accommodation of manufactured homes in all single-family zone district on terms no stricter than those applied to "stick-built" homes, and by requiring that each housing needs analysis specifically consider the needs for new or expanded manufactured home parks, the Oregon statutes make clear that this type of housing is not to be restricted or discouraged. The legislation promotes housing affordability and does not create a barrier to fair housing choice in Oregon.

E. Farmworker Housing

Oregon statutes also address the need to protect farmworker housing in some detail. Although farmworkers are not a group specifically included in the FHAA-protected citizens, it is likely that a disproportionate share of farmworkers may have national origins outside the U.S. In addition, Oregon statutes acknowledge the need to provide adequate housing conditions for farmworker families and children. Because both national origin and familial status are categories for which the FHAA prohibits housing discrimination, we review the farmworker housing statutes below.

ORS 197.312 Limitation on City and County Authority to Prohibit Certain Kinds of Housing

2. (a) A single-family dwelling for a farmworker and the farmworkers immediate family is a permitted use in any residential or commercial zone that allows single-family dwellings as a permitted use.

(b) A city or county may not impose a zoning requirement on the establishment and maintenance of a single-family dwelling for a farmworker and the farmworkers

immediate family in a residential or commercial zone described in paragraph (a) of this subsection that is more restrictive than a zoning requirement imposed on other single-family dwellings in the same zone.

3. (a) Multifamily housing for farmworkers and farmworkers immediate families is a permitted use in any residential or commercial zone that allows multifamily housing generally as a permitted use.

   (b) A city or county may not impose a zoning requirement on the establishment and maintenance of multifamily housing for farmworkers and farmworkers immediate families in a residential or commercial zone described in paragraph (a) of this subsection that is more restrictive than a zoning requirement imposed on other multifamily housing in the same zone.

To the degree that farmworkers may be disproportionately of non-U.S. national original, these requirements ensure that farmworker housing is treated like other forms of single-family residential development. By reducing opportunities for exclusion of this type of housing, the statute removes a potential barrier to fair housing choice.

ORS 197.667 Policy

In that the agricultural workers in this state benefit the social and economic welfare of all of the people in Oregon by their unceasing efforts to bring a bountiful crop to market, the Legislative Assembly declares that it is the policy of this state to insure adequate agricultural labor accommodations commensurate with the housing needs of Oregon's workers that meet decent health, safety and welfare standards. To accomplish this objective in the interest of all of the people in this state, it is necessary that:

1. Every state and local government agency that has powers, functions or duties with respect to housing, land use or enforcing health, safety or welfare standards, under this or any other law, shall exercise its powers, functions or duties consistently with the state policy declared by ORS 197.307, 197.312, 197.677 to 197.685, 215.213, 215.277, 215.283, 215.284 and 455.380 and in such manner as will facilitate sustained progress in attaining the objectives established;
2. Every state and local government agency that finds farmworker activities within the scope of its jurisdiction must make every effort to alleviate insanitary, unsafe and overcrowded accommodations;
3. Special efforts should be directed toward mitigating hazards to families and children; and
4. All accommodations must provide for the rights of free association to farmworkers in their places of accommodation.

ORS 197.680 Legislative Findings

The Legislative Assembly finds that:

1. This state has a large stock of existing farmworker housing that does not meet minimum health and safety standards and is in need of rehabilitation;

2. It is not feasible to rehabilitate much of the existing farmworker housing stock to meet building code standards;
3. In order to assure that minimum standards are met in all farmworker housing in this state, certain interim measures must be taken; and
4. Limited rehabilitation, outside city boundaries, must be allowed to a lesser standard than that set forth in the existing building codes.

ORS 197.685 Location of Farmworker Housing

1. The availability of decent, safe and sanitary housing opportunities for farmworkers is a matter of statewide concern.
2. Farmworker housing within the rural area of a county shall be permitted in a zone or zones in rural centers and areas committed to nonresource uses
3. Any approval standards, special conditions and procedures for approval adopted by a local government shall be clear and objective and shall not have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay.

Like the provisions of ORS 197.312(2) and (3) above, the intent of these statutes is to maintain and increase the supply of farmworker housing, and to allow local governments to approve rehabilitation construction projects that do not meet the requirements of the state building code. By permitting housing maintenance and improvement to lower standards, ORS 197.667-197.685 will tend maintain (and potentially improve) a stock of housing that might otherwise fall into disrepair, which tends to improve housing choice. While the adoption of a lower standard of quality for farmworker housing may result in lower housing quality, that reduction in quality must be weighed against the probable increase in quantity of farmworker housing available. Since the thrust of the FHAA is that actions not "make unavailable" housing to FHAA-protected citizens, and the FHAA does not address the quality of housing (except as necessary to accommodate the disabilities or special needs of the occupants), the provisions of ORS 197.667-197.685 do not create a barrier to fair housing choice.

F. Assisted Living Facilities (Residential Homes and Residential Facilities)

The definition of FHAA-protected citizens includes the frail, persons with HIV/AIDS, physically and developmentally disabled, mentally ill, and recovering alcoholics and drug addicts, and many of those individuals will require supportive services in order to have a housing environment on a par with other citizens, it is important that state legislation authorize (and if possible encourage) local governments to allow a wide variety of assisted living facilities through their zoning and subdivision regulations.

There has been significant litigation over the years over whether group homes must be treated as residential (rather than commercial) uses — and therefore permitted in residential areas — under certain circumstances. In general, the courts have required that group homes that have the characteristics of single family homes, most notably in the size and number of people residing in the facility, must be treated as a residential use. That means that they should be

allowed in at least one residential district either by right or through a permit system.[7] Oregon statutes meet and exceed this basic requirement.

Some of the key Oregon statutes addressing these types of facilities are shown in the gray box below.

ORS 197.660 Definitions. As used in ORS 197.660 to 197.670, 215.213, 215.263, 215.283, 215.284 and 443.422:

(1) "Residential facility" means a residential care, residential training or residential treatment facility, as those terms are defined in ORS 443.400, that provides residential care alone or in conjunction with treatment or training or a combination thereof for six to fifteen individuals who need not be related. Staff persons required to meet licensing requirements shall not be counted in the number of facility residents, and need not be related to each other or to any resident of the residential facility.

(2) "Residential home" means a residential treatment or training home, as defined in ORS 443.400, a residential facility registered under ORS 443.480 to 443.500 or an adult foster home licensed under ORS 443.705 to 443.825 that provides residential care alone or in conjunction with treatment or training or a combination thereof for five or fewer individuals who need not be related. Staff persons required to meet licensing requirements shall not be counted in the number of facility residents, and need not be related to each other or to any resident of the residential home.

(3) "Zoning requirement" means any standard, criteria, condition, review procedure, permit requirement or other requirement adopted by a city or county under the authority of ORS chapter 215 or 227 that applies to the approval or siting of a residential facility or residential home. A zoning requirement does not include a state or local health, safety, building, occupancy or fire code requirement.

ORS197.663 Legislative Findings

The Legislative Assembly finds and declares that:

(1) It is the policy of this state that persons with disabilities and elderly persons are entitled to live as normally as possible within communities and should not be excluded from communities because their disability or age requires them to live in groups;

(2) There is a growing need for residential homes and residential facilities to provide quality care and protection for persons with disabilities and elderly persons and to prevent inappropriate placement of such persons in state institutions and nursing homes;

(3) It is often difficult to site and establish residential homes and residential facilities in the communities of this state;

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[7] See for example: Rhodes v. Palmetto Pathway Homes, Inc., 400 S.E.2d 484 (S.C. 1991); Dornbach v. Holley, 854 S.O.2d 211 (2002 FL); Evergreen Meadows Homeowners Association, 773 P.2d 1046 (Colo. 1989); and Baltimore Neighborhoods Inc., v. Rommel Builders, 40 F.Supp.2d 700 (1999).

(4) To meet the growing need for residential homes and residential facilities, it is the policy of this state that residential homes and residential facilities shall be considered a residential use of property for zoning purposes; and

(5) It is the policy of this state to integrate residential facilities into the communities of this state. The objective of integration cannot be accomplished if residential facilities are concentrated in any one area.

ORS Sec.197.665 Location of Residential Homes

(1) Residential homes shall be a permitted use in:

(a) Any residential zone, including a residential zone which allows a single-family dwelling; and

(b) Any commercial zone which allows a single-family dwelling.

(2) A city or county may not impose any zoning requirement on the establishment and maintenance of a residential home in a zone described in subsection (1) of this section that is more restrictive than a zoning requirement imposed on a single-family dwelling in the same zone.

(3) A city or county may:

(a) Allow a residential home in an existing dwelling in any area zoned for farm use, including an exclusive farm use zone established under ORS 215.203.

(b) Impose zoning requirements on the establishment of a residential home in areas described in paragraph (a) of this subsection, provided that these requirements are no more restrictive than those imposed on other nonfarm single-family dwellings in the same zone; and

(c) Allow a division of land for a residential home in an exclusive farm use zone only as described in ORS 215.263.

ORS Sec. 197.667 Location of Residential Facility; Application and Supporting Documentation

(1) A residential facility shall be a permitted use in any zone where multifamily residential uses are a permitted use.

(2) A residential facility shall be a conditional use in any zone where multifamily residential uses are a conditional use.

(3) A city or county may allow a residential facility in a residential zone other than those zones described in subsections (1) and (2) of this section, including a zone where a single-family dwelling is allowed.

(4) A city or county may require an applicant proposing to site a residential facility within its jurisdiction to supply the city or county with a copy of the entire application and supporting documentation for state licensing of the facility, except for information which is exempt from public disclosure under ORS 192.410 to 192.505. However, cities and counties shall not require independent proof of the same conditions that have been required by the

Department of Human Services under ORS 418.205 to 418.327 for licensing of a residential facility.

ORS 197.670 Zoning Requirements and Prohibitions for Residential Homes and Residential Facilities

(1) As of October 3, 1989, no city or county shall:

(a) Deny an application for the siting of a residential home in a residential or commercial zone described in ORS 197.665.

(b) Deny an application for the siting of a residential facility in a zone where multifamily residential uses are allowed, unless the city or county has adopted a siting procedure which implements the requirements of ORS 197.667.

(2) Every city and county shall amend its zoning ordinance to comply with ORS 197.660 to 197.667 as part of periodic land use plan review occurring after January 1, 1990. Nothing in this section prohibits a city or county from amending its zoning ordinance prior to periodic review.

The cross-referenced definitions are set forth below.

ORS 443.400 Definitions for ORS 443.400 to 443.455. As used in ORS 443.400 to 443.455 and 443.991, unless the context requires otherwise

(5) "Residential care facility" means a facility that provides, for six or more socially dependent individuals or individuals with physical disabilities, residential care in one or more buildings on contiguous properties.

(6) "Residential facility" means a residential care facility, residential training facility, residential treatment facility, residential training home or residential treatment home.

(7) "Residential training facility" means a facility that provides, for six or more individuals with mental retardation or other developmental disabilities, residential care and training in one or more buildings on contiguous properties.

(8) "Residential training home" means a facility that provides, for five or fewer individuals with mental retardation or other developmental disabilities, residential care and training in one or more buildings on contiguous properties, when so certified and funded by the Department of Human Services.

(9) "Residential treatment facility" means a facility that provides, for six or more individuals with mental, emotional or behavioral disturbances or alcohol or drug dependence, residential care and treatment in one or more buildings on contiguous properties.

(10) "Residential treatment home" means a facility that provides for five or fewer individuals with mental, emotional or behavioral disturbances or alcohol or drug dependence, residential care and treatment in one or more buildings on contiguous properties.

ORS 443.705 Definitions for ORS 443.705 to 443.825

As used in ORS 443.705 to 443.825:

(1) "Adult foster home" means any family home or facility in which residential care is provided in a homelike environment for five or fewer adults who are not related to the provider by blood or marriage

These definitions are clear and concise compared to those used in some other states, and appear to cover the full range of FHAA-protected citizens. More specifically, these definitions cover "socially dependent individuals", "physically disabled," "individuals with mental retardation or other developmental disabilities," "and individuals with mental, emotional or behavioral disturbances or alcohol or drug dependence." The legislation requires that each city and county permit each of these types of facilities in neighborhoods where the scale of the facility matches the general scale or occupancy of residential dwellings in that area (i.e. "homes" providing services to five or fewer individuals must be permitted in areas permitting single-family homes, and larger "facilities" must be allowed in areas where larger multi-family dwelling are permitted.) These regulations meet the intent of the FHAA regarding FHAA-protected citizens and do not create a barrier to fair housing choice for those citizens.[8]

Recommended amendments. Although the text of ORS 197.665 and 197.667 likely comply with the FHAA, there is a potential gap in the coverage of FHAA protected citizens that could be addressed through minor amendments. These two statutes define the terms "residential home" and "residential facility" through cross-references with the text of ORS 443.400, defining the types of facilities included in those terms for purposes of state licensing (and thereby requiring that they be licensed facilities). However, there may be some residential land uses of similar size and character that are not required to be licensed by the State of Oregon because they provide lower levels of supportive services or skilled care than those required to be licensed. In order to cover that gap and ensure that unlicensed facilities must be treated similarly to licensed facilities of the same size and character, ORS 197.665 and 197.667 could be amended as shown in the amended text below.

ORS Sec.197.665 Location of Residential Homes

(2) Residential homes, and a residential land use that would meet the definition of a residential home if it provided supportive services for which the Department of Human Services or the Oregon Health Authority requires a license, shall be a permitted use in:

(a) Any residential zone, including a residential zone which allows a single-family dwelling; and

(b) Any commercial zone which allows a single-family dwelling.

(2) A city or county may not impose any zoning requirement on the establishment and maintenance of a residential home, or a residential land use that would meet the definition of a residential home if it provided supportive services for which the Department of Human Services or the Oregon Health Authority requires a license, in a zone described in subsection (1) of this

[8] The cited statutes do not mention mixed use districts, but since that type of district involves residential as well as commercial uses, we assume they are included in the state's definition of a residential zone district.

section that is more restrictive than a zoning requirement imposed on a single-family dwelling in the same zone.

(3) A city or county may:

(a) Allow a residential home, or a residential land use that would meet the definition of a residential home if it provided services for which the Department of Human Services or the Oregon Health Authority requires a license, in an existing dwelling in any area zoned for farm use, including an exclusive farm use zone established under ORS 215.203.

(b) Impose zoning requirements on the establishment of a residential home, or a residential land use that would meet the definition of a residential home if it provided services for which the Department of Human Services or Oregon Health Authority requires a license, in areas described in paragraph (a) of this subsection, provided that these requirements are no more restrictive than those imposed on other nonfarm single-family dwellings in the same zone; and

(c) Allow a division of land for a residential home, or a residential land use that would meet the definition of a residential home if it provided services for which the Department of Human Services or the Oregon health Authority requires a license, in an exclusive farm use zone only as described in ORS 215.263.

ORS Sec. 197.667 Location of Residential Facility; Application and Supporting Documentation

(5) A residential facility, and a residential land use that would meet the definition of a residential facility if it provided services for which the Department of Human Services or the Oregon Health Authority requires a license, shall be a permitted use in any zone where multifamily residential uses are a permitted use.

(6) A residential facility, and a residential land use that would meet the definition of a residential facility if it provided services for which the Department of Human Services or the Oregon Health Authority requires a license, shall be a conditional use in any zone where multifamily residential uses are a conditional use.

(7) A city or county may allow a residential facility, and a residential land use that would meet the definition of a residential facility if it provided services for which the Department of Human Services or the Oregon Health Authority requires a license, in a residential zone other than those zones described in subsections (1) and (2) of this section, including a zone where a single-family dwelling is allowed.

(8) A city or county may require an applicant proposing to site a residential facility within its jurisdiction to supply the city or county with a copy of the entire application and supporting documentation for state licensing of the facility, except for information which is exempt from public disclosure under ORS 192.410 to 192.505. However, cities and counties shall not require independent proof of the same conditions that have been required by the Department of Human Services under ORS 418.205 to 418.327 for licensing of a residential facility.

Unlike some other states, the Oregon land use statutes reviewed above do not authorize local governments to adopt minimum spacing requirements between assisted living facilities. In fact, the provisions of ORS 197.665(2) appear to prevent spacing standards for residential homes by

requiring that they be treated like single family homes. Interestingly, the same restriction against special standards does not appear in ORS 197.667 and apparently does not apply to larger residential facilities. Including such a provision for residential facilities would remove a potential barrier to fair housing choice for FHAA-protected citizens in those larger residential facilities.

Although not prohibited by most court decisions, spacing requirements can create barriers to fair housing if the state authorizes (or local governments adopt) excessive requirements. Under the FHAA, the only legitimate reason to require minimum distances between group home facilities is for the benefit of those residing in those facilities. Since the goal of most smaller assisted living facilities is to allow their residents to receive treatment or assistance in a typical neighborhood environment, it is possible that the grouping of several assisted living facilities close together would defeat this purpose, since the neighborhood might no longer appear or function as a typical residential neighborhood.

To prevent that result, a spacing requirement could help distribute assisted living facilities in a way that is beneficial to their residents – i.e. in a way that is helping FHAA-protected citizens to achieve the type of housing they need. However, court decisions interpreting the legality of assisted living facility spacing requirements have not been helpful in determining how much spacing between smaller assisted living facilities is required to avoid "overcrowding" or how large a separation distance might be excessive or exclusionary under the FHAA. Unfortunately, in our experience, most conversations about spacing focus on the desires of the residential neighborhoods to limit the number of assisted living facilities in the area rather than the needs or rights of FHAA-protected citizens to live in a typical residential environment. For those reasons, assisted living facility spacing requirements can become barriers to fair housing choice. While the Oregon statutes cited above do not authorize spacing requirements, neither do they explicitly prohibit them. While an explicit prohibition on spacing requirements would remove a potential barrier to fair housing, the Oregon statutes are facially neutral on this issue, and that neutrality does not create a barrier to fair housing.

While assisted living facility spacing requirements are not addressed in Oregon's statewide planning or city and county zoning enabling statutes, the issue is indirectly addressed in the state's licensing statutes – as shown below.

ORS 443.422 Siting of Licensed Residential Facilities

To prevent the perpetuation of segregated housing patterns, the Department of Human Services, in consultation with the Oregon Health Authority, shall determine the location and type of licensed residential facilities and the location of facilities subject to the provisions of ORS 169.690. Before a license is issued for a residential facility as defined in ORS 443.400, the issuing agency shall determine the number and type of any other licensed residential facilities and the number and type of facilities subject to the provisions of ORS 169.690 within a 1,200 foot radius. None of the data collected under this section shall be used in a manner that violates the Fair Housing Amendments Act of 1988.

The text above suggests that Oregon intends to consider the possibility of overcrowding (i.e. "segregated housing patterns" in which assisted living facilities are concentrated some areas) during statewide licensing rather than during land use permitting. This approach is preferable

because the decision is more likely to be based on to professional opinions related to the housing needs of assisted living facility residents and less likely to be driven by neighborhood desires to limit the number of these facilities.

In addition, ORS Chapter 427 (Persons with Intellectual or Developmental Disabilities) addresses "community housing". ORS 427.335 addresses the state's authority to "purchase, receive, hold, exchange, operate, demolish, construct, lease, maintain, repair, replace, improve and equip community housing" for "individuals with intellectual disabilities or developmental disabilities, to provide financial assistance to community housing facilities, and to sell those facilities "upon such terms and conditions as the department considers advisable to increase the quality and quantity of community housing for individuals with intellectual disabilities or other developmental disabilities." While "individuals with intellectual disabilities or other developmental disabilities" is not as broad as the range of citizens protected by the FHAA (for example, it does not include people with HIV/AIDS or persons recovering from drug and alcohol addiction), this chapter does address state or local powers to exclude housing, it simply authorizes the state to spend public funds in certain ways. As noted above, the thrust of the FHAA is to prevent discrimination and not to require public expenditures for housing. The fact that Oregon statutes contain explicit authority to spend public funds on housing that benefits some – but not all – FHAA-protected citizens, is not a barrier to fair housing choice.

Finally, Oregon statutes address residential treatment, training, or care facilities as part of a larger category of "domiciliary care facilities. Key portions of the statutory provisions are shown below.

ORS 443.205 Definitions

As used in ORS 443.215 443.225, domiciliary care facilities means facilities providing residential care to adults, including adult foster homes, group care facilities or residential treatment, training or care facilities, established, contracted for or operated by the Department of Human Services or the Oregon Health Authority.

ORS 443.214 Policy

1. The Legislative Assembly recognizes the importance of providing a high quality of domiciliary care facilities throughout the State of Oregon.
2. It is the intent of ORS 443.205 to 443.225 to distribute domiciliary care facility capacity on the basis of population and the regional origin of institutionalized persons.

ORS 443.225 Location and Capacity of Domiciliary Care Facilities

1. Except as otherwise provided by subsections (3) and (4) of this section, the capacity of all domiciliary care facilities must be located throughout the state based on the relationship of the population of the county in which the additional capacity is proposed to be located to the number of persons originating from the county who are determined to be in need of domiciliary care. However, nothing in this subsection is intended to prevent the placement of a person who is or was not a resident of the county in a domiciliary care facility in the county.

2. The Department of Human Services shall determine the number of persons originating from a county who are in need of domiciliary care if the domiciliary care facility is an adult foster home as defined in ORS 443.705, a residential care facility or residential training facility as those terms are defined in ORS 443.400 or other group care facility.
3. The Oregon Health Authority shall determine the number of persons originating from a county who are in need of domiciliary care if the domiciliary care facility is a residential treatment facility as defined in ORS 443.400.
4. When a county is too sparsely populated to produce a meaningful ratio of county population to population in need, or a county is lacking necessary support services, the population of two or more counties may be combined. The area of the combined counties may be considered a county for purposes of subsection (1) of this section.
5. The computation required by subsection (1) of this section does not require reduction in any domiciliary care facility capacity existing on October 4, 1977.
6. Subject to the appropriate licensing requirements, the governing body of a county may authorize a domiciliary care facility located in the county to exceed the capacity limit imposed by subsection (1) of this section upon:
    a. Request of an individual or organization operating or proposing to operate a domiciliary care facility;
    b. Consultation with an advisory committee appointed by the governing body and consisting of persons who are particularly interested in the type of domiciliary care facility contemplated; and
    c. Finding of good cause following notice and public hearing.

The above text appears establishes a system in which domiciliary care facilities are distributed throughout the State or Oregon based on the population of persons needing those services. Since those facilities "must" be located throughout the state, this appears to be information that must be taken into account in city and county planning related to Goal 10 (Housing), which must in turn be implemented through local land use regulations. Since FHAA-protected citizens are among those to be served by domiciliary care facilities, this requirement for rational distribution of those facilities reduces the likelihood of local exclusion or limitation of domiciliary care facilities and helps remove a potential barrier to fair housing choice.[9]

G. Accessibility of Housing Units

The Fair Housing Act offers protection to persons with disabilities (broadly defined) to ensure they have equal access to safe and affordable housing options. However, that right will be impaired if none of the available housing is accessible to disabled persons (i.e. doors are too narrow to accommodate wheelchairs, or building entries are located above or below grade level with no means for a wheelchair to accommodate that change in grade). Oregon statutory text related to housing design and accessibility are shown below.

Permitting persons with disabilities to make modifications to a dwelling unit in order to live safely in that unit is an important aspect of providing housing choice for this class of FHAA-protected citizens. 42 U.S.C. 3604(f)(3)(A) and (B) provide that "discrimination includes:

> **(A)** a refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises except that, in the case of a rental, the landlord may where it is reasonable to do so condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.
>
> **(B)** a refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling . . .

Oregon implements this portion of the FHAA in part through the provisions of Chapter 659A, relevant portions of which are shown below.

ORS 659A. Unlawful Discrimination Against Persons with Disabilities

ORS659A.103 Policy

1. It is declared to be the public policy of Oregon to guarantee individuals the fullest possible participation in the social and economic life of the state, to engage in remunerative employment, to use and enjoy places of public accommodation, resort or amusement, to participate in and receive the benefits of the services, programs and activities of state government and to secure housing accommodations of their choice, without discrimination on the basis of disability.
2. The guarantees expressed in subsection (1) of this section are hereby declared to be the policy of the State of Oregon to protect, and ORS 659A.103 to 659A.145 shall be construed to effectuate such policy.

ORS 659A.104. Description of Disability for the Purposes of ORS 659A.103 to 659A.145

1. An individual has a disability for the purposes of ORS 659A.103 to 659A.145 if the individual meets any one of the following criteria:

a. The individual has a physical or mental impairment that substantially limits one or more major life activities of the individual.

b. The individual has a record of having a physical or mental impairment that substantially limits one or more major life activities of the individual. For the purposes of this paragraph, an individual has a record of having a physical or mental impairment if the individual has a history of, or has been misclassified as having, a physical or mental impairment that substantially limits one or more major life activities of the individual.

c. The individual is regarded as having a physical or mental impairment that substantially limits one or more major life activities of the individual. For the purposes of this paragraph:

A. An individual is regarded as having a physical or mental impairment if the individual has been subjected to an action prohibited under ORS 659A.112 to 659A.139 because of an actual or perceived physical or mental impairment, whether or not the impairment limits or is perceived to limit a major life activity of the individual.

B. An individual is not regarded as having a physical or mental impairment if the individual has an impairment that is minor and that has an actual or expected duration of six months or less.

2. Activities and functions that are considered major life activities for the purpose of determining if an individual has a disability include but are not limited to:

a. Caring for oneself;

b. Performing manual tasks;

c. Seeing;

d. Hearing;

e. Eating;

f. Sleeping;

g. Walking;

h. Standing;

i. Lifting;

j. Bending;

k. Speaking;

l. Breathing;

m. Learning;

n. Reading;

o. Concentrating;

p. Thinking;

q. Communicating;

r. Working;

s. Socializing;

t. Sitting;

u. Reaching;

v. Interacting with others;

w. Employment;

x. Ambulation;

y. Transportation;

z. Operation of a major bodily function, including but not limited to:

A. Functions of the immune system;

B. Normal cell growth; and

C. Digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine and reproductive functions; and

aa. Ability to acquire, rent or maintain property.

3. An individual is substantially limited in a major life activity if the individual has an impairment, had an impairment or is perceived as having an impairment that restricts one or more major life activities of the individual as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict, the individual from performing a major life activity in order to be considered substantially limiting. An impairment that substantially limits one major life activity of the individual need not limit other major life activities of the individual. An impairment that is episodic or in remission is considered to substantially limit a major life activity of the individual if the impairment would substantially limit a major life activity of the individual when the impairment is active. Nonetheless, not every impairment will constitute a disability within the meaning of this section.

4. When determining whether an impairment substantially limits a major life activity of an individual, the determination shall be made without regard to the ameliorative effects of mitigating measures, including:

a. Medication;

b. Medical supplies, equipment or appliances;

c. Low vision devices or other devices that magnify, enhance or otherwise augment a visual image, except that ordinary eyeglasses or contact lenses or other similar lenses that are intended to fully correct visual acuity or eliminate refractive error may be considered when determining whether an impairment substantially limits a major life activity of an individual;

d. Prosthetics, including limbs and devices;

e. Hearing aids, cochlear implants or other implantable hearing devices;

f. Mobility devices;

g. Oxygen therapy equipment or supplies;

h. Assistive technology;

i. Reasonable accommodations or auxiliary aids or services; or

j. Learned behavioral or adaptive neurological modifications.

5. Nothing in subsection (4)(c) of this section authorizes an employer to use qualification standards, employment tests or other selection criteria based on an individuals uncorrected vision unless the standard, test or other selection criteria, as used by the employer, are shown to be job-related for the position in question and is consistent with business necessity.

ORS 659A.145 Discrimination Against Individual with Disability in Real Property Transactions Prohibited

1. As used in this section:
    a. Dwelling has the meaning given that term in ORS 659A.421.
    b. Purchaser has the meaning given that term in ORS 659A.421.
2. A person may not discriminate because of a disability of a purchaser, a disability of an individual residing in or intending to reside in a dwelling after it is sold, rented or made available or a disability of any individual associated with a purchaser by doing any of the following:
    a. Refusing to sell, lease, rent or otherwise make available any real property to a purchaser.
    b. Expelling a purchaser.
    c. Making any distinction or restriction against a purchaser in the price, terms, conditions or privileges relating to the sale, rental, lease or occupancy of real property or the furnishing of any facilities or services in connection with the real property.
    d. Attempting to discourage the sale, rental or lease of any real property.
    e. Representing that a dwelling is not available for inspection, sale, rental or lease when the dwelling is in fact available for inspection, sale, rental or lease.
    f. Refusing to permit, at the expense of the individual with a disability, reasonable modifications of existing premises occupied or to be occupied by the individual if the modifications may be necessary to afford the individual full enjoyment of the premises. However, in the case of a rental, the landlord may, when it is reasonable to do so, condition permission for a reasonable modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.
    g. Refusing to make reasonable accommodations in rules, policies, practices or services when the accommodations may be necessary to afford the individual with a disability equal opportunity to use and enjoy a dwelling.
    h. Failing to design and construct a covered multifamily dwelling as required by the Fair Housing Act.

Subsections f, g, and h above reflect similar language in the FHAA requiring that modifications necessary to make a housing unit usable by a disabled tenant be permitted, at the tenant's expense. Because they closely parallel the language of the FHAA and reiterate it as the state's policy, they help remove barriers to fair housing choice.

In addition, ORS 447.210 through 447.280 address accessibility in multiple family dwellings and other areas of public accommodation in language that attempts to integrate relevant provisions of the FHAA and the Americans with Disabilities Act.

ORS 447.210-280 Standards and Specifications for Access by Persons with Disabilities

ORS 447.210 Definitions for ORS 447.210 to 447.280. As used in ORS 447.210 to 447.280, unless the context requires otherwise:

(1) "Affected buildings" includes any place of public accommodations and commercial facilities designed, constructed and altered in compliance with the accessibility standards established by the Americans with Disabilities Act. "Affected buildings" also includes any government building that is subject to Title II of the Americans with Disabilities Act. "Affected buildings" also includes private entities, private membership clubs and churches that have more than one floor level and more than 4,000 square feet in ground area or that are more than 20 feet in height, measured from the top surface of the lowest flooring to the highest interior overhead finish of the building.

. . .

(3) "Architectural barriers" are physical design features that restrict the full use of affected buildings and their related facilities by persons with disabilities.

. . .

(5) "Covered multifamily dwellings" means buildings consisting of four or more dwelling units if such buildings have one or more elevators, and ground floor dwelling units in other buildings consisting of four or more dwelling units. Dwelling units within a single structure separated by firewalls do not constitute separate buildings.

. . .

(11) "Public accommodations" means a facility whose operations affect commerce and fall within at least one of the following categories:

(a) Places of lodging not including owner-occupied establishments renting fewer than six rooms;

(b) Establishments serving food or drink;

(c) Places of exhibition or entertainment;

(d) Places of public gathering;

(e) Sales or rental establishments;

(f) Service establishments;

(g) Public transportation terminals, depots or stations;

(h) Places of public display or collection;

(i) Places of recreation;

(j) Places of education;

(k) Social service center establishments; and

(l) Places of exercise or recreation.

(12) "Related facilities" means building site improvements including, but not limited to, parking lots, passageways, roads, clustered mailboxes located either on the site or in an adjacent public right of way or any other real or personal property located on the site.

ORS 447.220 Purpose

It is the purpose of ORS 447.210 to 447.280 to make affected buildings, including but not limited to commercial facilities, public accommodations, private entities, private membership clubs and churches, in the state accessible to and usable by persons with disabilities, as provided in the Americans with Disabilities Act, and to make covered multifamily dwellings in the state accessible to and usable by all persons with disabilities, as provided in the Fair Housing Act. In requiring that buildings and facilities be usable by persons with disabilities, it is not the intention of the Legislative Assembly to require that items of personal convenience such as rest rooms, telephones and drinking fountains be provided for members of the public who have disabilities if they are not otherwise provided for members of the public who do not have disabilities. However, pursuant to the Americans with Disabilities Act, the Director of the Department of Consumer and Business Services may provide greater protection to individuals with disabilities by adopting more stringent standards than prescribed by the Americans with Disabilities Act.

ORS. 447.230 through 447.280 carry out this intent by directing state agencies to align their rules with the Americans with Disabilities Act. The Oregon state building code, in particular, is to be aligned with the ADA, including both standards for buildings and for accessible parking spaces. In addition, ORS 447.241 addresses required modifications to existing buildings in some detail, as shown below.

ORS 447.241 Standards for renovating, altering or modifying certain buildings; barrier removal improvement plan. (1) Every project for renovation, alteration or modification to affected buildings and related facilities that affects or could affect the usability of or access to an area containing a primary function shall be made to insure that, to the maximum extent feasible, the paths of travel to the altered area and the rest rooms, telephones and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, unless such alterations are disproportionate to the overall alterations in terms of cost and scope.

(2) Alterations made to the path of travel to an altered area may be deemed disproportionate to the overall alteration when the cost exceeds 25 percent of the alteration to the primary function area.

(3) If the cost of alterations to make the paths of travel to the altered area fully accessible is disproportionate to the cost of the overall alteration, the paths of travel shall be made accessible to the extent that it can be made accessible without incurring disproportionate costs.

(4) In choosing which accessible elements to provide under this section, priority shall be given to those elements that will provide the greatest access. Elements shall be provided in the following order:

(a) Parking;

(b) An accessible entrance;

(c) An accessible route to the altered area;

(d) At least one accessible rest room for each sex or a single unisex rest room;

(e) Accessible telephones;

(f) Accessible drinking fountains; and

(g) When possible, additional accessible elements such as storage and alarms.

(5) A series of small alterations to an area served by a single path of travel does not satisfy the obligation to provide an accessible path of travel created under subsection (1) of this section.

(6) If an area containing a primary function has been altered without providing an accessible path of travel to the area and subsequent alterations affecting the same path of travel are undertaken within three years of the original alteration, the total cost of the alterations to the primary function area on the path of travel during the preceding three-year period shall be considered in determining whether the cost of making the path of travel accessible is disproportionate.

(7)(a) A barrier removal improvement plan may satisfy the requirements of subsection (1) of this section. The plan shall require an equivalent or greater level of barrier removal than required by subsection (1) of this section.

(b) The barrier removal improvement plan shall include:

(A) A letter of participation from the building owner;

(B) A building survey that identifies existing architectural barriers;

(C) An improvement plan and time schedule for removal of architectural barriers; and

(D) An implementation agreement.

(c) The barrier removal improvement plan may be reviewed and accepted through the waiver process under ORS 447.250. The plan shall be reviewed upon completion or every three years for compliance with the requirements of this section.

(8) For purposes of this section, "primary function" is a major activity for which the facility is intended.

Not only is the intent of these provisions to expand the accessibility of multi-family dwellings to persons with disabilities, but its language is aligned with the requirements of both the FHAA and the ADA.

In addition, ORS 456.506-456.514 provide accessibility requirements for buildings that receive state subsidies or tax credits linked to federal laws of funding. This appears to be based on federal requirements in the 1973 Rehabilitation Act. Key portions of the statute are shown below.

ORS456.506 Subsidized Development Visitablity

The Legislative Assembly finds and declares that:

1. People with disabilities and senior citizens over 85 years of age are the fastest growing population in Oregon. The second fastest growing population in Oregon are the members of the massive baby boom generation, who will, as they age, demand services and accommodations at an unprecedented rate.
2. The policy of this state is to encourage the design and construction of dwellings that enable easy access by individuals with mobility impairments and that are adaptable to allow continued use by aging occupants.

ORS 456.508 Definitions

As used in ORS 456.510 and 456.513.

1. Accessible means that housing complies with federal accessibility guidelines implementing the Fair Housing Amendments Act of 1988, 42 U.S.C. 3601 et seq., as amended and in effect on January 1, 2004.
2. Common living space means a living room, family room, dining room or kitchen.
3. Contiguous units means units that are on the same tax lot or on contiguous tax lots that have a common boundary. Tax lots that are separated by a public road are contiguous tax lots for purposes of this subsection.
4. New means that the housing being constructed did not previously exist in residential or nonresidential form. New does not include the acquisition, alteration, renovation or remodeling of an existing structure.
5. Powder room means a room containing at least a toilet and sink.
6. Rental housing means a dwelling unit designed for nonowner occupancy under a tenancy typically lasting six months or longer.
7. Subsidized development means housing that receives one or more of the following development subsidies from the Housing and Community Services Department:
    a. The federal low-income housing tax credit under 26 U.S.C. 42(a), if no part of the eligible basis prior to the application of 26 U.S.C. 42(i)(2)(B) was financed with an obligation described in 26 U.S.C. 42(h)(4)(A), all as amended and in effect on January 1, 2004;
    b. An agriculture workforce housing tax credit, as described in ORS 315.164.
    c. A loan that qualifies the lending institution for a subsidized housing loan tax credit, as described in ORS 317.097.
    d. Funding under the federal HOME Investment Partnerships Act, 42 U.S.C. 12721 to 12839, as amended and in effect on January 1, 2004;
    e. Moneys from the Oregon Housing Fund created under ORS 458.620; or
    f. Moneys from other grant or tax incentive programs administered by the Housing and Community Services Department under ORS 456.559.
8. Visitable means capable of being approached, entered and used by individuals with mobility impairments, including but not limited to individuals using wheelchairs.

ORS 456.510 Visitability Requirements

1. Except as provided in this section and ORS 456.513, the Housing and Community Services Department may not provide funding for the development of new rental housing that is a subsidized development unless:
    a. Each dwelling unit of the housing meets the following requirements:
        A. At least one visitable exterior route leading to a dwelling unit entrance that is stepless and has a minimum clearance of 32 inches.

B. One or more visitable routes between the visitable dwelling unit entrance and a visitable common living space.

C. At least one visitable common living space.

D. One or more visitable routes between the dwelling unit entrance and a powder room.

E. A powder room doorway that is stepless and has a minimum clearance of 32 inches.

F. A powder room with walls that are reinforced in a manner suitable for handrail installation.

G. Light switches, electrical outlets and environmental controls that are at a reachable height.

b. For a development that has a shared community room or that has 20 or more contiguous units, there is at least one powder room available for all tenants and guests that is accessible.

2. For a multistory structure without an elevator, this section applies only to dwelling units on the ground floor of the structure.

3. This section does not apply to agriculture workforce housing as defined in ORS 315.163 that is located on a farm.

ORS 456.513 Exemption From Visitability Requirements

The Housing and Community Services Department shall exempt new rental housing that is a subsidized development from compliance with the requirements of ORS 456.510 if the department determines that the exemption is warranted by:

1. The topography at the construction site;

2. Community and design standards;

3. Undue costs or constraints; or

4. Conflicting funding requirements of another government agency if the agency contributes a significant amount of financial aid for the housing.

Again, the statute cited above attempts to align both in purpose and in text with the requirements of federal law, in this case the Rehabilitation Act of 1973. It tends to reduce barriers to free housing choice among persons with disabilities.

Finally, Oregon's statutes regulating construction contractors provides that contractors "may" provide potential buyers with information that could make a housing unit more accessible, but does not obligate them to do so or require them to actually make the listed features available.

ORS 701.545 Provision of Accessible Features List to Purchaser

1. As used in this section and ORS 701.547:

a. Developer means a person who contracts to construct, or arrange for the construction of, new residential housing on behalf of, or for the purpose of selling the residential housing to, a specific individual the person knows is the purchaser of the residential housing.

b. Residential housing:

A. Means a structure designed for use as a residence and containing dwelling units for three or fewer families.

B. Means a structure that is a condominium as defined in ORS 100.005.

C. Does not mean a manufactured structure as defined in ORS 446.003.

2. A developer who enters into a contract to construct or arrange for the construction of new residential housing may, at the time of providing a purchaser with a written contract, also provide the purchaser with a list of features that may make residential housing more accessible to a person with a disability. The list may include the features identified in the model list of features adopted by the Construction Contractors Board by rule under ORS 701.547.

3. The inclusion of a feature on the list supplied by the developer under subsection (2) of this section does not obligate the developer to make the feature available to a purchaser. The list supplied by the developer may specify for each feature whether the feature is standard, optional, available on a limited basis or unavailable from the developer. If a listed feature is available from the developer as an option or on a limited basis, the list of features may specify the stage of construction by which the purchaser must submit to the developer any request that the residential housing be constructed with that feature.

4. This section, or the inclusion of a feature on the model list developed under ORS 701.547, does not affect the requirement that installation of a feature comply with the state building code or be approved under ORS 455.060.

ORS 701.547 Model List of Accessibility Features

The Construction Contractors Board shall adopt by rule a model list of features recommended for inclusion in a list of features that a developer supplies to a purchaser of residential housing under ORS 701.545. In developing the model list of features, the board shall solicit the comments of advocacy groups and other organizations serving persons with disabilities.

H. Building Occupancy

Restrictions on building occupancy in residential dwelling units help preserve health and safety and prevent overcrowding in dwelling units. Over time, however, some municipalities have used this tool to restrict the number of unrelated persons living together in one dwelling unit to restrict rental housing, group homes and other affordable housing options.

Most building occupancy restrictions in zoning codes allow any number of related individuals to occupy a dwelling unit in order to avoid challenges based on due process or equal protection.[10] In contrast, many building occupancy codes simply establish a standard for overcrowding — a number of people per room, or per square foot — that cannot be exceeded regardless of whether the occupants are related or not. Building occupancy regulations that are too stringent can serve as a barrier to housing choice for lower income households and for large families. However occupancy codes — like manufactured home safety codes and building codes — are considered a public health and safety protection in which the government's desire to ensure that all housing is safe and sanitary implicitly outweighs its impact on making some sizes or types or qualities of housing unavailable for the general public. Because occupancy laws rarely mention any group of occupants by name, they are seldom implicated in FHAA analysis. At worst, their impact is to make small housing units unavailable to large households, which is not a restriction based on familial status because it would have the same impact on a household of seven members as it would on a group of seven unrelated individuals living together.

Regardless of how well-accepted they currently are, it is important to acknowledge that occupancy codes may have a disproportionate impact on FHAA-protected households in two situations. First, many assisted living facilities for FHAA-protected households have more residents than an average family (6 or 7 persons, when care providers are included, compared to the less than 4 in an average family), so an occupancy limit anywhere below the average occupancy of small assisted living facility may have a disproportionate impact on group home occupants. Second, if households (family or not) of a particular racial group are likely to be larger than average, an occupancy limit anywhere below the average household size for that racial group may have a disproportionate impact on that group.

Oregon addresses the issue of unit occupancy in part through ORS 90.262.

ORS 90.262 Use and Occupancy Rules and Regulations

1. A landlord, from time to time, may adopt a rule or regulation, however described, concerning the tenants use and occupancy of the premises. It is enforceable against the tenant only if:

a. Its purpose is to promote the convenience, safety or welfare of the tenants in the premises, preserve the landlords property from abusive use, or make a fair distribution of services and facilities held out for the tenants generally;

b. It is reasonably related to the purpose for which it is adopted;

c. It applies to all tenants in the premises in a fair manner;

d. It is sufficiently explicit in its prohibition, direction or limitation of the tenants conduct to fairly inform the tenant of what the tenant must or must not do to comply;

e. It is not for the purpose of evading the obligations of the landlord; and

f. The tenant has written notice of it at the time the tenant enters into the rental agreement, or when it is adopted.

[10] Moore v City of East Cleveland, 431 U.S. 494 (1977).

2. If a rule or regulation adopted after the tenant enters into the rental agreement works a substantial modification of the bargain, it is not valid unless the tenant consents to it in writing.
3. If adopted, an occupancy guideline for a dwelling unit shall not be more restrictive than two people per bedroom and shall be reasonable. Reasonableness shall be determined on a case-by-case basis. Factors to be considered in determining reasonableness include, but are not limited to:
    a. The size of the bedrooms;
    b. The overall size of the dwelling unit; and
    c. Any discriminatory impact on those identified in ORS 659A.421.
4. As used in this section:
    a. Bedroom means a habitable room that
        A. Is intended to be used primarily for sleeping purposes;
        B. Contains at least 70 square feet; and
        C. Is configured so as to take the need for a fire exit into account.
    b. Habitable room means a space in a structure for living, sleeping, eating or cooking. Bathrooms, toilet compartments, closets, halls, storage or utility space and similar areas are not included.

Because the power to establish occupancy limits is limited by the requirements that they not be lower than two persons per bedroom, the statute includes criteria for determining reasonable standards above that level, and the rules must be applied to all residents in a fair manner, these documents do not constitute a barrier to fair housing choice under the FHAA.

I. Regulation of Housing Prices

Oregon statutes provide that a local government cannot regulate housing rents or sales prices, but can create and implement incentives and development agreements to encourage the production of moderate or lower-cost housing.

ORS 91.225 Local Rent Control Prohibited

1. The Legislative Assembly finds that there is a social and economic need to insure an adequate supply of affordable housing for Oregonians. The Legislative Assembly also finds that the imposition of general restrictions on housing rents will disrupt an orderly housing market, increase deferred maintenance of existing housing stock, lead to abandonment of existing rental units and create a property tax shift from rental-owned to owner-occupied housing. Therefore, the Legislative Assembly declares that the imposition of rent control on housing in the State of Oregon is a matter of statewide concern.
2. Except as provided in subsections (3) to (5) of this section, a city or county shall not enact any ordinance or resolution which controls the rent that may be charged for the rental of any dwelling unit.

3. This section does not impair the right of any state agency, city, county or urban renewal agency as defined by ORS 457.035 to reserve to itself the right to approve rent increases, establish base rents or establish limitations on rents on any residential property for which it has entered into a contract under which certain benefits are applied to the property for the expressed purpose of providing reduced rents for low income tenants. Such benefits include, but are not limited to, property tax exemptions, long-term financing, rent subsidies, code enforcement procedures and zoning density bonuses.
4. Cities and counties are not prohibited from including in condominium conversion ordinances a requirement that, during the notification period specified in ORS 100.305, the owner or developer may not raise the rents of any affected tenant except by an amount established by ordinance that does not exceed the limit imposed by ORS 90.493.
5. Cities, counties and state agencies may impose temporary rent controls when a natural or man-made disaster that materially eliminates a significant portion of the rental housing supply occurs, but must remove the controls when the rental housing supply is restored to substantially normal levels.
6. As used in this section, dwelling unit and rent have the meaning given those terms in ORS 90.100.
7. This section is applicable throughout this state and in all cities and counties therein. The electors or the governing body of a city or county shall not enact, and the governing body shall not enforce, any ordinance, resolution or other regulation that is inconsistent with this section.

As noted above, individuals with low income are not a protected class under the FHAA, but there is likely a correlation between FHAA-protected citizens and lower-than-average incomes. The inability of Oregon's local governments to impose rent controls likely results in a smaller pool of housing available to lower income groups, and to the degree they are correlated, to FHAA-protected citizens. However, the state's prohibition on rent control is facially neutral with respect to each form of discrimination prohibited by the FHAA; it prohibits rent control regardless of the identity of potential renters and owners who might have been able to afford a housing unit at rent-controlled levels. While ORS 91.225 may create a barrier to affordable housing for low income groups, it does not create a barrier to fair housing choice recognized by the FHAA.

J. Inclusionary Zoning

In addition to prohibiting rent control, Oregon state statutes prohibit local governments from requiring that housing be sold at a certain price, or that housing only be sold (or not sold) to purchasers from a specific group.

ORS197.309 Local Ordinances or Approval Conditions May Not Effectively Establish Housing Sale Price or Designate Class of Purchasers

1. Except as provided in subsection (2) of this section, a city, county or metropolitan service district may not adopt a land use regulation or functional plan provision, or impose as a condition for approving a permit under ORS 215.427 (Final action on permit or zone change application) or 227.178 (Final action on certain applications required within 120 days), a requirement that has the effect of establishing the sales price for a housing unit or

residential building lot or parcel, or that requires a housing unit or residential building lot or parcel to be designated for sale to any particular class or group of purchasers.

2. This section does not limit the authority of a city, county or metropolitan service district to:

a. Adopt or enforce a land use regulation, functional plan provision or condition of approval creating or implementing an incentive, contract commitment, density bonus or other voluntary regulation, provision or condition designed to increase the supply of moderate or lower cost housing units; or

b. Enter into an affordable housing covenant as provided in ORS 456.270 to 456.295.

This statute effectively prohibits local governments from enacting "inclusionary housing" ordinances – that is, ordinances that require some private builders to set aside some portion of their newly constructed units (generally multifamily units) for sale or rent to persons within a defined income spectrum. Inclusionary housing ordinances in effect require the housing developer to cross-subsidize rental rates of sales prices within the development (or a group of housing assets). In order to rent or sell some units at below-market rates, the rents or sales prices on the remaining units generally have to be increased. As with rent control, however, the impacts of Oregon's anti-inclusionary-housing statute on FHAA-protected groups should be neutral. The statute will have the same impact on reducing the supply of lower cost housing for FHAA-protected citizens and for individuals not covered by the provisions of the FHAA. Although creating a barrier to affordable housing, these statues do not directly create a barrier to fair housing choice recognized under the FHAA.

8. Conclusion

Not surprisingly, this review of state-level statutes, regulations and programs related to fair housing, needed, housing, and housing in general, shows that Oregon has a multi-faceted regulatory framework in place. Oregon statutes include a fairly detailed system to evaluate demands for various types of housing (mostly based on income levels), to prepare plans based on those evaluations of need, and to adopt local land use regulations to implement the adopted plans. Perhaps most notably, the state has put in place numerous statutes that reflect the language of the FHAA, the ADA, and the Rehabilitation Act of 1973.

More specifically, Oregon statutes:

- Require that local governments provide for "needed housing" through both single-family and multi-family housing for both owner and renter occupancy, government assisted housing, mobile or manufactured home parks, manufactured homes on individual lots, and housing for farmworkers, and that manufactured homes and farmworker housing be treated as substantially the equivalent of other single-family and multi-family housing, through statutes that are facially neutral with respect to FHAA-protected citizens;
- Prohibit local governments from barring government assisted housing that is similar to unassisted housing;
- Grant cities and counties relatively standard zoning and subdivision powers, with the important qualification that their need be consistent with adopted comprehensive plans created through the statewide land use planning system, through statutes that are facially neutral with respect to FHAA-protected citizens.

- Create some exceptions to its strict limits on residential development on forest, agriculture, and other resource lands in order to promote economically viable rural land uses or to reduce burdens on rural property owners in ways that would not have major impacts on the overall statewide planning system. Although the state could have made additional exceptions to allow the construction of housing needed for FHAA-protected citizens (such as assisted living facilities) in rural areas, it has no legal duty to do so, and failure to do so does not constitute a barrier to fair housing choice.
- Allow rehabilitation of farmworker housing stock in areas outside cities to standards that do not meet the statewide building code. While this may have an effect on the resulting quality of farmworker housing, it appears to have been adopted in order to expand the supply that type of housing, and is facially neutral with respect to FHAA-protected citizens. The adoption of this differential standard does not constitute a barrier to fair housing choice.
- Require that residential home (for up to 5 residents, including but not limited to FHAA-protected citizens, plus caregivers) be permitted in each residential and commercial district that permits single-family homes, and that the standards for approval for a residential home be no stricter than those applied to a single family dwelling. In addition, the statutes allow residential homes to occupy existing dwelling structures in farm use zones without the imposition of requirements different than occupancy of the structure by a single-family home. These provisions are more favorable to the accommodation of assisted housing than those of many other states.
- Require that residential facilities (for 6 to 15 residents, including but not limited to FHAA-protected citizens, plus caregivers,) be permitted wherever multifamily residential uses are a permitted use, and a conditional use in any zone where multifamily residential uses are a conditional use. These strong provisions could be further strengthened by imposing a standard similar to that for residential homes prohibiting the adoption for residential facilities that are stricter than those for multifamily housing.
- Require local governments to provide reasonable modifications to housing (particularly for the disabled), as well as reasonable accommodation in housing rules and policies.
- Include key language related to housing accessibility from the Americans with Disabilities Act, the FHAA, and the Rehabilitation Act of 1973, including the FHAA's broad definition of "disability," the ADA's definition of places of "public accommodation", and requirements that renovations of "affected buildings" include improvements to accessibility.
- Prohibit discrimination on the basis of disability in the selling, renting, or making available of housing units.
- Establish building features to promote accessibility that must be included in housing development projects that include state or federal subsidies.
- Include standards to allow reasonable landlord limits on building occupancy based on health and safety concerns, and taking into account the size of the rooms and the nature of the dwelling unit, provided those standards are applied equitably.

In general, these standards are stronger, and remove barriers to fair housing choice more effectively, than those in the statutes of several other states. They are also well aligned with the requirements of the FHAA, ADA, and Rehabilitation act of 1973, which should reduce the inadvertent gaps in coverage between state and federal definitions that occur in some states.

These statutes could be made even more effective with the following:

- Making additional exceptions to allow the construction of housing needed for FHAA-protected citizens (such as assisted living facilities) in rural areas.
- Imposing a standard similar to that for residential homes prohibiting the adoption for residential facilities that are stricter than those for multifamily housing.
- We understand that not all Oregon local governments have standards that comply with the "clear and objective" requirement regulating the development of needed housing on buildable land. Improved enforcement of compliance with this requirement could have the effect of further increasing housing supply.
- While ORS 443.400 requires that all residential facilities providing care for six or more residents be licensed by the state, ORS 197.660 and 197.665 only require that residential facilities with between six and 15 residents are required to be licensed by the state—but are not required to be permitted in multifamily and commercial zone districts. If Oregon wanted to strengthen its fair housing protections, it could extend coverage of ORS 197.665 to require that the state's local governments treat residential facilities licensed by the state the same way it treats multifamily apartment buildings or condominiums of the same size. The result would be that Oregon cities and counties would need to permit a licensed residential facility of 25 or 30 residents in the same zone districts where it would allow an unlicensed multifamily dwelling structure of the same size.

Fair Housing Analysis of Transportation and Growth Management Program's Model Development Code

I Introduction: The Interplay Between Fair Housing and Model Development Codes

Land use plans and codes can play an important role in promoting fair access to decent housing for all. While public and private investment may ultimately determine what gets built, planners and other public officials help create and manage the community blueprint through publicly approved plans and codes.

The tools of planning, such as comprehensive plans, zoning maps, zoning and development codes and practices, are used to help shape the range of housing opportunities in a community. These tools affect the land available for needed housing, the cost of development, the processes that applicants must follow (including notice requirements and public hearings) and the overall complexity of the development process. All of these things have a direct impact on the cost, design and supply of housing for people of varying backgrounds and abilities. The location of various housing types—whether in asset-rich or environmentally poor areas— has significant implications for residents.

While fair housing law does not pre-empt the ability of local government to regulate land use and zoning, local governments must exercise their authority consistent with federal fair housing law. In other words, local laws cannot overtly or otherwise have the effect of discriminating against individuals in housing on the basis of protected class.

II What is the Purpose of *TGM Model Development Code*?

In response to numerous requests for planning assistance from communities throughout Oregon, the State's Transportation and Growth Management (TGM) Program developed the *Model Development Code and User's Guide for Small Cities* (*Model Code*), originally published in 1999 with the third edition issued in October 2012. The TGM Program is a partnership between the Department of Land Conservation and Development and the Oregon Department of Transportation and supports community efforts to expand transportation choices for people by linking land use and transportation planning. To support this goal, the TGM program developed a model code, hereinafter the *TGM Model Code.* The TGM Program reports that the *Model Code* has been used widely around Oregon, particularly in small cities that often lack the necessary planning resources to perform such a large-scale effort on their own. In this way, the *Model Code* provides these cities with consistent guidance and technical expertise in zoning, development standards, review procedures, and implementation of state planning rules and statutes. The *Model Code* is intended to help these cities integrate land use and transportation planning, meet new legal requirements and provide a user-friendly, flexible model code.

Limitations of the *Model Code* to affect Fair Housing
Development codes are adopted by ordinance to implement a city or county comprehensive plan – in Oregon, municipalities are required to ensure the development (or zoning) code complies with the adopted comprehensive plan. Specific elements of a comprehensive plan outline policies on needed housing and housing choice and form the basis by which zoning and development standards are applied. To allow for flexibility between municipalities, many relevant fair housing provisions of the *Model Code* are placeholders, dependent on the findings and policies adopted in each comprehensive plan.

Additionally, the content of any development code is limited by its application on the accompanying zoning map. A zoning map describes how the code is applied to a geographic area, defining which residential uses are allowed and where.

While the *Model Code* plays an important role in furthering fair housing, it must be combined with comprehensive plan policies and zoning map designations that also support and affirmatively further fair housing in order to affect meaningful change.

III How was the *Model Code* Analyzed?

In 2014, as part of a larger effort to develop their *Inclusive Communities Toolkit*[1], the Fair Housing Council of Oregon created a Land Use and Fair Housing Evaluation Tool to help planners evaluate their own local land use codes and practices, and identify potential barriers to affirmatively furthering fair housing. Alongside this effort, and in light of HUD's proposed rule, the Council commissioned a high-level assessment of the *Model Code,* using the Evaluation Tool to identify areas that could help cities further their obligation to affirmatively furthering fair housing. Working in cooperation with the Council's attorneys, the assessors tested the practical application and, ultimately, provided feedback for further revisions to the Evaluation Tool.

The goal of this preliminary scan of the *Model Code* was to highlight the zoning and/or development provisions that potentially support, or may be in conflict with, affirmatively furthering fair housing in Oregon's communities and to determine if further discussions are warranted.

The following are high-level findings and recommended next steps.

IV Summary of Analysis and Recommendations

The analysis of the *Model Code* identified issues that could be considered potential barriers to affirmatively furthering fair housing. It also found opportunities to better align the *Model Code* with the suggested requirements and best practices found in the *Inclusive Communities Toolkit's* Land Use and Fair Housing Evaluation Tool.

[1] In 2014, the Fair Housing Council of Oregon published *Inclusive Communities Toolkit* to provide additional information, resources and guidance regarding fair housing to elected officials, public sector planners and administrators, housing developers, and neighbors around the state.

The *Model Code* is organized into five articles:

Article 1 - Introduction. Article 1 describes the title, purpose, authority, organization and general administration of the *Model Code*. Article 1 also explains how city officials interpret and enforce code requirements.

Article 2 – Zoning Regulations. Zones are designated by individual city Zoning Maps, consistent with that city's Comprehensive Plan. Article 2 outlines general recommendations for zoning regulations, specifying allowed land uses, and lot and development standards that are specific to particular land uses or zones.

Article 3 – Community Design Standards. Article 3 contains model development design standards, including requirements for street access; pedestrian and vehicle circulation; parking; landscaping, screening, fences and walls; outdoor lighting; adequate transportation, water, sanitary sewer, and storm drainage facilities; and utility requirements. In practice, Article 3 would be supported by a city's more detailed engineering design standards in their Public Works Design Manual or Engineering Design Standards Manual.

Article 4 – Application Review Procedures and Approval Criteria. Article 4 contains recommended application requirements and review procedures for land use and development decisions, including but not limited to procedures for conditional use permits, site design review, land divisions, property line adjustments, master planned developments, and variances.

Article 5 – Definitions. Article 5 contains model zoning definitions and other exhibits that cities can use in interpreting and administering the code.

Overall, the *Model Code* is on solid ground, providing current thinking on land uses and development regulations. There are many provisions in the code that affirmatively further fair housing. Nevertheless, there are opportunities to strengthen connections between development standards and fair housing. The *Model Code* contains a few minor issues that could be barriers to affirmatively furthering fair housing, such as language "used to describe structures as 'single-family dwellings' rather than the more current standard of "single-dwelling unit." There are also potential issues with how local communities incorporate and/or implement the state's land use statutes regarding licensed residential care homes and facilities.

Zoning Regulations

Issues and opportunities to strengthen the language in support of housing choice and fair housing in the zoning regulations of the *Model Code*, Article 2:

1. **Special Use Standards: Residential Care Homes and Facilities.** The *Model Code* contains review procedures for licensed Residential Care Homes and Facilities that may not be in the spirit of affirmatively furthering fair housing. The Model Code repeats and follows the provisions contained in Oregon Revised Statutes (ORS), Chapter 443 Residential Care and Chapter 197 Comprehensive Land Use Planning, which define Residential Care Homes and Facilities in terms of who is living there, and how many people are occupying a structure. There

are no other uses in the *Model Code* that define living configurations in the same manner, drawing concerns that people with disabilities would (1) have to navigate a different level of development review than is necessary for other residential development, and (2) is a more restrictive regulation for people with disabilities. The standards also call for a noticing and review procedure that is different than would be required of other single-dwelling or multi-dwelling development.

Recommendations:

a. Additional review and discussion is warranted to further investigate whether or not the ORS provisions, by which local jurisdictions' land use plans must comply, places an additional burden on people with disabilities. This is a potential issue with the state law regulations, which the *Model Code* seeks to carry out.
b. Best practice: Apply the same guidelines to all structures that have the size and physical characteristics of other single-unit dwellings or multi-unit dwellings, and involve a scale of activity similar to that of dwellings occupied by non-protected classes, regardless of whether they are licensed care housing.
c. Use the Land Use and Fair Housing Evaluation Tool to guide revisions.

2. **Conditional Use: Rooming / Boarding Housing.** In the *Model Code*, Rooming / Boarding Housing is the only residential use recommended to apply Conditional Use restrictions. It may be appropriate in some contexts to regulate this type of housing differently than other housing, but the *Model Code* does not make any distinctions or guidance as to when the impacts of a boarding housing are different. There is concern with any code provision that defines development standards by the presumed households and people that will occupy the structure.

   Recommendation:

   a. Review the standard and add guidance in the *Model Code* as to when boarding housing may be different than other types of residential structures, for the purposes of applying development standards. See related comments regarding Conditional Use procedures and definitions.

3. **Special Use Standards: Housing Types**. The Land Use and Fair Housing Evaluation Tool proposes a number of land use options to increase housing choice that could be expanded upon in the *Model Code's* Special Use section. Examples of housing types in the Evaluation Tool include allowing residential development on substandard legal lots of record and alley-accessed lots. While not a major impediment, revisions to the *Model Code* provide an opportunity to introduce residential forms not typically found in small cities along with appropriate code provisions.

   Recommendation:

   a. Use the Land Use and Fair Housing Evaluation Tool to guide revisions in expanding housing choice options in the *Model Code's* Special Use section.

Design Standards

Issues and opportunities to strengthen the language in support of housing choice and fair housing in the design standards of the *Model Code*, Article 3:

1. **Building Orientation and Design: Design context.** There are opportunities to clarify the *Model Code* language as it relates to architectural and community character or context. Character and context are important concepts for design, but unless the meanings are explicit, these terms are easily misinterpreted by those of us who are not designers and can inadvertently create pathways for neighbors to legally appeal development of needed housing or housing to be occupied by people in protected classes.

   Recommendation:
   a. Review and revise *Model Code* to clarify language relating to community character or context.

2. **Minimum parking standards.** The parking standards contained in the *Model Code* are adequate. However, there is an opportunity to provide guidance regarding parking minimums for residential uses and potential impacts those minimums have on affordability and housing choice.

   Recommendations:
   a. Review the user's guide text within Automobile Parking Standards A. Minimum Number of Off-Street Automobile Parking Spaces and B. Exceptions and Reductions to Off-Street Parking.
      i. Insert language where appropriate to highlight the direct connection between parking minimums for residential uses and potential impacts on affordability and housing choice.
      ii. Explore other possible ways to get exemptions for multi-dwelling residential uses outside of main streets. Note: very small cities aren't likely to have a broad array of mixed use or multi dwelling housing outside of their downtown, so it may not be applicable.
   b. Review the *Model Code's* approach for adjustments to parking standards to ensure that certain housing types are not more burdened by the minimum standards than others (e.g. housing for mobility-challenged or elderly adults, who tend to have fewer cars to park.) *Note: Because small cities have a difficult time supporting transit and downtown areas are often the best locations to accommodate and serve multi-dwelling housing for the majority of small cities, this may not pose a barrier to fair housing.*

Application Procedures and Approval Criteria

Issues and opportunities to strengthen the language in support of fair housing in the procedures and approval criteria of the *Model Code*, Article 4:

1. **Conditional Use Permits**. There is inadequate guidance regarding potential impacts that Conditional Use standards could have on a city's ability to affirmatively further fair housing. The *Model Code* and its user's guide present an important opportunity to inform and educate planners on Conditional Use

approval, where fair housing issues are most likely to occur in development processes. It can suggest appropriate standards to regulate uses with potential impacts to neighboring properties, while still affirmatively furthering fair housing. It is also an opportunity to express the resources available to planners and planning commissioners who are making difficult Conditional Use decisions, often under community pressure.

Recommendations:

a. Use the *Model Code* and its user's guide to inform and educate planners on where issues in development processes arise related to Conditional Use permitting and how cities can address uses with potential impacts to neighboring properties and still affirmatively further fair housing.
   i. Expand on the resources and support available to planners and planning commissioners making difficult Conditional Use decisions.
   ii. Add an additional user's guide text box with special mention of the Fair Housing Act and guidance that could be expressed to the planning commission when making Conditional Use decisions.
   iii. Review the Land Use and Fair Housing Evaluation Tool for additional recommendations on types of housing and contexts that may warrant a Conditional Use process.

Definitions

1. **Residential definitions.** Most of the residential definitions are comprehensive and current. However, in a few instances the *Model Code* contains outdated and insufficient language that may limit the spirit of affirmatively furthering fair housing and carries on a standard that defines buildings by who and how many people are anticipated to live in the structure at the time a development permit is issued. Buildings' uses and occupants change over time.

   The Model Code uses "family" to describe certain housing types. If taken literally, "single-family" and "multi-family" dwelling units refer to a specific relationship between the people who live in the units, a "family." However, the term is not applicable or relevant to all household arrangements and is now often replaced with a more general term such as "unit."

   The *Model Code's* Group Living definition references "Household Living" and "average size of a household," neither of which are defined. The lack of clarity could be applied or misunderstood in such a manner to discriminate against a protected class. Placing a development review process with planners in a position to allow or disallow certain group living arrangements, poses an unnecessary risk of a discriminatory process.

   Recommendation:

   a. Review and revise the *Model Code* definitions for: Dwelling (including all applicable subsections), and Group Living. Unbundle development regulations from the various arrangements people choose to live. Ideally, these definitions would separate the concepts of occupancy (number and relations of people who do or will reside within a unit) from concepts of

physical development (number of rooms/kitchens/bathrooms, size of structure, relationship of units to lots, etc.).

Proposed concept for a fair housing approach to Residential Definitions

GENERAL DWELLING DEFINITIONS

Dwelling Structure. A structure conforming to the definition of a dwelling under applicable building codes and providing living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, and sanitation.

Dwelling Unit. A structure or a portion of a structure, that has independent living facilities including provisions for sleeping, cooking, and sanitation, and that is designed for residential occupancy by one or more persons.

1. MULTI-UNIT DWELLINGS

Multi-Unit Dwelling Structure. A Dwelling Structure containing three (3) or more Dwelling Units. The land underneath the structure is not divided into separate lots. Example: An apartment building or condo with three or more units in a single structure on a single lot.

Multi-Unit Dwelling Development. A single Multi-Unit Dwelling Structure or grouping of Multi-Unit Dwelling Structures on the same lot. Example: An apartment or condo complex consisting of one or more buildings on a single lot.

2. SHARED LIVING DWELLINGS

Shared Living Structures: A Single Dwelling Structure on a single lot containing *[insert metric – consider measuring by structural elements relevant to development permitting like number of kitchens, rather than number of unrelated people]* and in which occupants share common complete kitchens and interior recreational space(s). Any Shared Living Structure or Development that is occupied by licensed Residential Facilities, as defined by ORS 197.665, may also include provisions for accessory onsite residential care and treatment facilities.

Small Shared Living Development. A single Shared Living Dwelling Structure on a single lot that includes *[possible metric: no more than 3 rooms for independent sleeping].* Example: Any dwelling structure that meets the metric or licensed Residential Home (ORS 197.665).

Medium Shared Living Development. A single Shared Living Structure or group of Shared Living Structures that share a single complete common kitchen, in addition to common recreational space(s) and that includes *[possible metric: no more than 5 rooms for independent sleeping].* Example: A small Residential Care Facility or small rooming house.

Large Shared Living Development. A single Shared Living Structure or group of Shared Living Structures that contains more than one complete common kitchen(s) and recreational space(s) and that includes *[possible*

metric: 5 or more rooms for independent sleeping]. Example: A large Residential Care Facility or nursing home.

3. SINGLE UNIT DWELLINGS

Single Unit Dwelling Structure. A single Dwelling Unit located on a single lot. Single Unit Dwelling Structures include licensed Residential Homes and accessory care or treatment uses, as defined by ORS 197.665.

Single Unit, Detached. A detached Dwelling Unit located on its own lot. Example: A so-called “single family home.”

Single Unit, Attached. A Dwelling Unit located on its own lot that shares one or more common or abutting walls with one or more Dwelling Units on adjacent lot(s). Example: townhouse or rowhouse.

Duplex Dwelling Structure. A Dwelling Structure that contains two Dwelling Units on one lot and that share a common wall or common floor/ceiling.

Accessory Dwelling Unit. A secondary Dwelling Unit on a lot where the primary use is a Single Unit Dwelling Structure.

APPENDIX C.
Resident Survey Methodology

This section describes the resident telephone survey methodology in detail and provides a summary of respondent demographic characteristics. The telephone survey data collection was conducted by Davis Research. The survey was fielded in both English and Spanish.

Survey Sample Size and Sample Management

The survey sample source for the statewide telephone survey is a combination of Oregon landline and cell phone numbers.[1] The sampling is designed to be representative of the households living in Oregon's nonentitlement communities. In addition, subsamples were drawn of target populations for the study: nonwhite residents and persons with disabilities. The disability sample is drawn from an opt-in sample derived from four ongoing national health studies. Each working number is called a minimum of five times on varying days of the week and times of day to ensure that hard to reach respondents are included in the study.

Sample sources. Sample for the statewide sample and nonwhite oversample was purchased from Marketing Systems Group, a leading provider of sample for marketing research. The sample for the disabled oversample was purchased from Survey Sampling International's LITe sample database. Both landline and cell phone numbers were included in all sample.

A note about determining sample size. A formula for calculating sample size is shown below:

$$n = \frac{Z^2 * p * (1 - p)}{C^2}$$

Where:

- Z = Z value, here 1.96 for the 95 percent confidence level (degree of confidence)
- p = percentage of respondents making a choice, here 50 percent for the most conservative estimate
- C = confidence limit, here 5 percentage points

For populations greater than 4,000, there is no need to include a finite population correction factor in the determination of sample size.

The confidence level (Z value), is "an interval for which one can assert with a given probability 1-α, called the degree of confidence, or the confidence coefficient, that it will contain the parameter it is intended to estimate."[2] Less formally, if the survey was repeated, 95 out of 100 times we would expect to observe the same results. For each question in the survey, we will estimate the

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1 Within the general market sample, 59 percent of respondents were reached on a cell phone and 41 percent were reached on a landline. In the nonwhite oversample, 69 percent of respondents were reached on a cell phone.

2 Dictionary/Outline of Basic Statistics, p.20, Freund and Williams, 1966.

"true" population proportion that would be expected if we conducted a census. The confidence limit refers to the endpoints of a confidence interval within which the "true" population proportion is expected to be found. More commonly, this is the margin of error around the estimate. For the purposes of sample determination, we choose 5 percentage points.

Sample Implementation Results

The survey was in the field from February 10, 2015 through March 6, 2015. Each valid number was dialed up to five times on different days of the week and different times of day. If the time reached was not convenient, interviewers attempted to schedule callback times. On average, the survey took 14.2 minutes to complete. A total of 400 residents responded to the statewide survey, and an additional 200 respondents comprised the oversampling for special populations.

Using the American Association for Public Opinion Research's (AAPOR) response rate calculator developed by AAPOR's Standard Definitions Committee, the response rate for the statewide telephone survey was 12 percent. AAPOR defines the response rate as the number of complete interviews with reporting units divided by the number of eligible reporting units in the sample.[3]

Margin of Error

Figure C-1 presents the margin of error calculations for proportions estimated in the telephone resident survey for the general market sample and the three over-samples.

Figure C-1.
Margin of Error of Survey Estimates at the 95 Percent Confidence Level

	General Market	Nonwhite	Disability
Sample Size	400	156	218
Response Percent:			
10% or 90%	2.9%	4.7%	4.0%
20% or 80%	3.9%	6.3%	5.3%
30% or 70%	4.5%	7.2%	6.1%
40% or 60%	4.8%	7.7%	6.5%
50%	4.9%	7.8%	6.6%

Source: BBC Research & Consulting

[3] AAPOR, Standard Definitions: Final Dispositions of Case Codes and Outcome Rates for Surveys, Revised 2011. http://www.aapor.org/AM/Template.cfm?Section=Standard_Definitions2&Template=/CM/ContentDisplay.cfm&ContentID=3156

Survey Instrument Design

BBC designed the telephone survey instrument with review from Oregon Analysis of Impediments team. Many of the questions had been validated in previous surveys conducted by BBC in fair housing studies across the country. Demographic questions align with the 2010 U.S. Census or the American Community Surveys. New questions and attributes were specifically designed to address HUD's Planning Guide Volume 1 and most current focus on fair housing topics, primarily drawn from the proposed AFFH rule and draft template for the Assessment of Fair Housing. Questions types include binary choice, multiple choice, Likert scales, and open-ended responses. For the open-ended responses, interviewers recorded respondents' comments verbatim.

Respondent Demographics

Respondents' demographic characteristics are detailed below. The general market sample is designed to be representative of Oregon's nonentitlement area households. Subsamples consist of oversample respondents and general market respondents that meet the subsample criteria and are not intended for comparison to Oregon's demographic characteristics overall.

It should also be noted that the disability question in the survey asked if any member of the household has a disability whereas the Census data reflects the percent of the population that has a disability. As such, the survey response and the Census data are not directly comparable.

Figure C-2.
Demographic Characteristics of Telephone Survey Respondents

	General Market Sample (n=400)	Nonwhite Subsample (n=156)	Disability Subsample (n=218)
Race and Ethnicity			
African American or Black	1%	5%	1%
Asian or Asian Indian	1%	5%	1%
Hispanic	5%	52%	6%
Multi-racial	2%	10%	2%
Native American	3%	21%	10%
Native Hawaiian or other Pacific Islander	0%	2%	1%
White	86%	0%	75%
Other	0%	6%	1%
Refused	2%	0%	3%
Total	**100%**	**100%**	**100%**
Age			
Under 65 years		81%	52%
65 years or older		19%	48%
Total	**100%**	**100%**	**100%**

	General Market Sample (n=400)	Nonwhite Subsample (n=156)	Disability Subsample (n=218)
Gender			
Disability			
With a disability*	17%	31%	100%
Without a disability*	83%	69%	0%
Total	**100%**	**100%**	**100%**

Note: *BBC survey question is "do you or any member of your household have a disability?" Census reports percent of population with a disability.

Source: BBC Research & Consulting from the 2015 Oregon Resident Telephone Survey.

Figure C-5 displays the household characteristics of survey respondents.

Figure C-5.
Household Characteristics of Telephone Survey Respondents

	General Market Sample (n=400)	Nonwhite Subsample (n=156)	Disability Subsample (n=218)
Household Size			
One	9%	8%	9%
Two	30%	24%	32%
Three	20%	23%	26%
Four	22%	17%	8%
Five or more	19%	28%	15%
Total	**100%**	**100%**	**100%**
Household Composition			
Single living alone	7%	8%	9%
Single living with children	6%	9%	6%
Single living with roommates/friends	2%	3%	2%
Single living with children and roommates/friends	1%	1%	0%
Single living with other adult family members	7%	8%	8%
Single living with children and other adult family members	3%	5%	4%
Living with spouse/partner	27%	19%	26%
Living with spouse/partner and roommates/friends	1%	2%	3%
Living with spouse/partner and other adult family members	2%	3%	3%
Living with spouse/partner and children	40%	37%	33%
Living with spouse/partner, children and roommates/friends	1%	0%	0%
Living with spouse/partner, children and other adult family members	3%	6%	5%
Total	**100%**	**100%**	**100%**
n=	396	155	215

Tenure			
Homeowner	71%	59%	69%
Renter	22%	31%	25%
Living with others but not paying rent	6%	9%	6%
Other	2%	1%	0%
Total	**100%**	**100%**	**100%**
Household Income			
Less than $10,000	3%	8%	9%
$10,000 up to $25,000	12%	23%	26%
$25,000 up to $35,000	17%	19%	14%
$35,000 up to $50,000	18%	17%	23%
$50,000 up to $75,000	18%	17%	18%
$75,000 up to $100,000	14%	7%	6%
$100,000 or more	17%	8%	6%
Total	**100%**	**100%**	**100%**
n=	353	144	200

Source: BBC Research & Consulting from the 2015 Oregon Resident Telephone Survey.

APPENDIX D.
Entitlement Review of Impediments to Fair Housing Choice

The State of Oregon 2015 Analysis of Impediments, Sections I through VIII, focus on rural, or "nonentitlement" communities. This is because urban areas, determined by HUD as "entitlement" communities, receive federal block grants directly from HUD and complete their own Analysis of Impediments. Population size and/or designation as a metropolitan statistical area (MSA), in addition to other socioeconomic and housing market factors (poverty, affordability of housing), determine a community's eligibility to receive HUD block grant funds directly.

This section supplements the state's nonentitlement Analysis of Impediments by discussing fair housing barriers in entitlement communities. The purpose of this section is threefold:

- To provide a statewide view of impediments to fair housing choice by introducing entitlement fair housing barriers;
- To draw distinctions between urban and rural impediments; and
- To identify opportunities for state agencies and local governments to work together to most efficiently and effectively address fair housing barriers.

The primary source of information for this review was the Analysis of Impediments most recently completed by entitlement communities. This review was supplemented by a review of entitlement Analysis of Impediments conducted by the Fair Housing Council of Oregon (FHCO) in 2014 and early 2015. Data and information from the state Analysis of Impediments related to entitlement area barriers are included where relevant.

The Analysis of Impediments reviewed and year completed include the following:

Figure D-1.
Analyses of Impediments to Fair Housing Choice Reviewed

Entitlement Community	Year AI Completed
City of Albany	2014
City of Ashland	2009
City of Bend	2010
Clackamas County	2012
Corvallis	2012
City of Eugene and City of Springfield	2010
City of Medford	2010
City of Portland, City of Gresham and Multnomah County	2011
City of Salem and Keizer Consortium	2007
Washington County	2012

Redmond and Grants Pass, new entitlement jurisdictions, do not currently have Analysis of Impediments.

Methodology

The fair housing barriers in jurisdictional Analysis of Impediments were examined using the criteria listed below. These criteria address the most current topics in fair housing. It is important to note that when this review was being conducted, a new Analysis of Impediments template, the Assessment of Fair Housing (AFH), had been proposed by HUD and was open for public comment. Some of the proposed content in the AFH differs from past requirements and, as such, was not considered in the entitlement community Analysis of Impediments evaluation.

Concentrated areas and impact on housing choice

- Where do areas of racial or ethnic concentrations exist?
- What are the characteristics of concentrated areas?
- What reasons does the Analysis of Impediments give for the concentrations?

Private sector

- Was NIMBYism identified as a challenge?
- Do lending disparities exist between minorities and non-minorities?
- Was testing conducted and analyzed? What were the results?
- What were the results of fair housing complaint and legal cases?

Public policies

- What are the primary land use and zoning regulatory barriers to housing choice?
- Were fair housing resources and capacity examined? What are the primary needs?

Affordable housing

- Does lack of affordable housing cause barriers to fair housing choice? Are there protected classes that are affected more than others?

Impediments and Action Plan. What were the main impediments to fair housing choice and how are these impediments addressed through the Fair Housing Action Plan? Are there opportunities for collaboration with the state in fulfilling both jurisdictional and state action plans?

Primary Findings

The primary findings from the jurisdictional Analysis of Impediments review follow, organized by criteria examined.

Minority and poverty concentrated areas. Maps and tables showing areas with racial and ethnic minority concentrations appeared in most of the entitlement jurisdictions' Analysis of

Impediments. There was not a review of minority concentrated areas in the Analysis of Impediments of Bend, Medford or Salem.

Jurisdictions that undertook this analysis used varying definitions of concentration. Some used quartile percentages determined by mapping software; some used HUD's disproportionate needs definition (10 percentage points higher than city/county proportion overall); some did not define concentrations. Washington County used HUD's most recent definition of concentration of minorities, which is consistent with the state Analysis of Impediments: a Census tract in which the proportion of a protected class is 20 percentage points higher than that in the county overall, or in Census tracts that are more than 50 percent minority, are considered concentrated. The Portland/Gresham/Multnomah Analysis of Impediments defined concentrated areas as those having twice the county average racial/ethnic population.

The majority of jurisdictions that conducted this analysis found some Census tracts with concentrations of Hispanic, African American, Asian and/or American Indian or Alaska Native residents. Since different definitions were used in the concentration analysis, some of the entitlement Analysis of Impediments demonstrated concentrations where the state Analysis of Impediments did not. The state Analysis of Impediments found the following entitlement area concentrations:

Hispanic concentrations

- Thirty-three Hispanic concentrated Census tracts exist statewide. Hispanic concentrated Census tracts exist in the urban locations of greater Portland area, Hillsboro, Salem and Medford.

African American concentrations

- Three African American concentrated Census tracts exist in Oregon and all three Census tracts are in close proximity (two are adjacent) and are in the north Portland area.

Asian concentrations

- Three Asian concentrated Census tracts exist in the state. Two are located in the Hillsboro area, while the third is west of Portland near the intersection of I-205 and US 26.

Native American concentrations

- No Native American concentrations exist in entitlement areas. There are two Native American concentrated Census tracts in Oregon and both are Census tracts located within an American Indian Reservation (Warm Springs Reservation and Umatilla Reservation).

Racially and ethnically concentrated areas of poverty. A new component of fair housing studies is an analysis of "racially or ethnically concentrated areas of poverty," also called Racially/Ethnically Concentrated Area of Poverty. A Racially/Ethnically Concentrated Area of Poverty is a neighborhood with significant concentrations of high poverty and is majority-minority.

HUD's definition of a Racially/Ethnically Concentrated Area of Poverty is:

- A Census tract that has a non-white population of 50 percent or more (majority-minority) AND a poverty rate of 40 percent or more; OR

- A Census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

The state Analysis of Impediments located five Racially/Ethnically Concentrated Areas of Poverty in Oregon. All but one Racially/Ethnically Concentrated Areas of Poverty are in entitlement areas: Two are in the greater Portland Area (Hillsboro and east Portland), one is in northeast Salem, and one lies in a relatively remote area of eastern Clackamas County.

Figure D-2 presents associated characteristics for each Racially/Ethnically Concentrated Area of Poverty Census tract. All Census tracts contain Limited English Proficiency persons greatly above the state average of three percent.

The analysis of the households within Racially/Ethnically Concentrated Areas of Poverty Census tracts supports the findings of the socioeconomic analyses of concentrated areas conducted for jurisdictional Analysis of Impediments. Racially/Ethnically Concentrated Area of Poverty households are often some of the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of Racially/Ethnically Concentrated Area of Poverty households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where Racially/Ethnically Concentrated Area of Poverty households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (i.e. limited non-English information and materials), Racially/Ethnically Concentrated Area of Poverty households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

Figure D-2.
Racially/Ethnically Concentrated Areas of Poverty Census Tract Characteristics

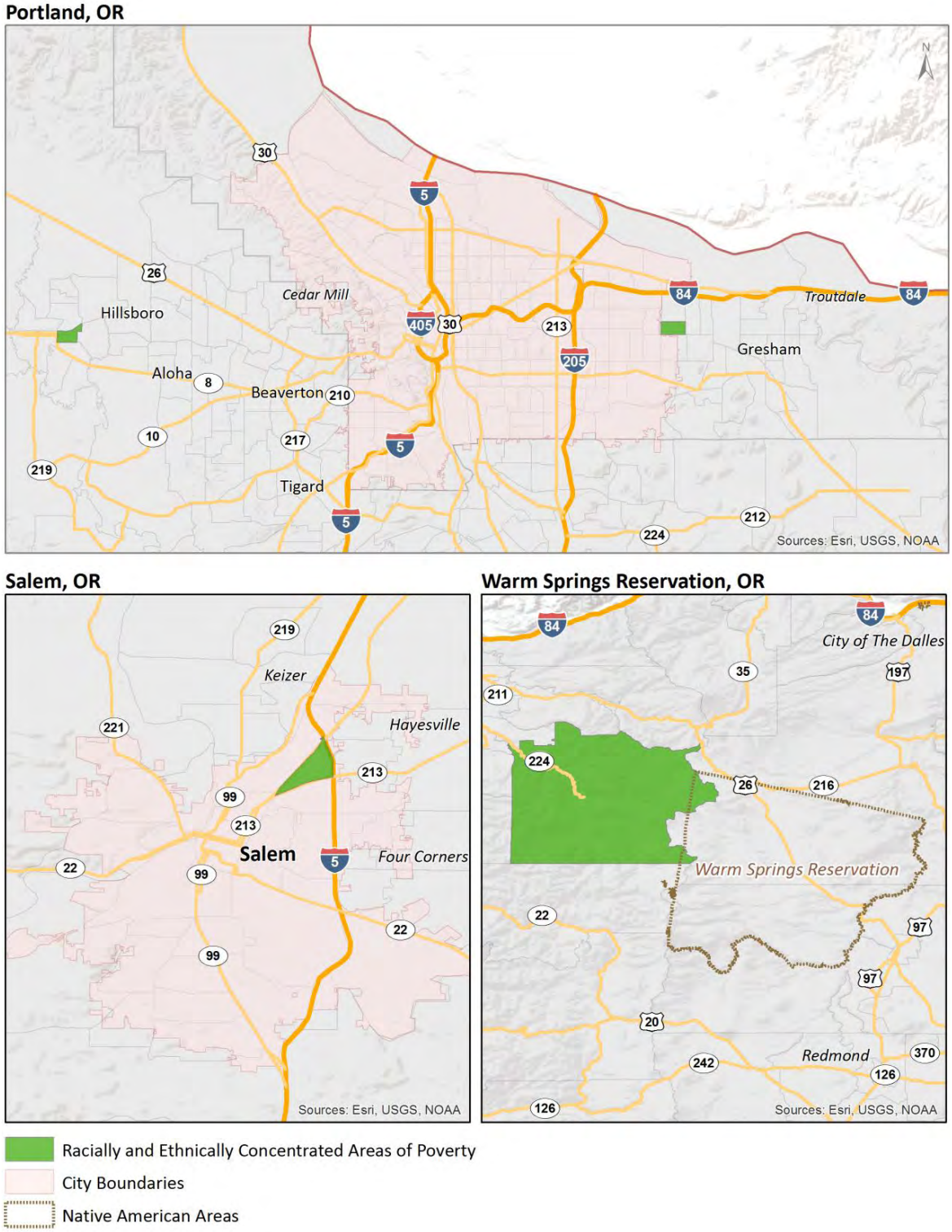
Census Tract	County	% Minority	% Hispanic	% Individual Poverty Rate	% Family Households w/ Children	% Single Mother Households	% LEP
41005980000*	Clackamas	52.2%	39.3%	39.3%	0.0%	0.0%	37.8%
41047000502	Marion	61.5%	45.9%	52.6%	47.4%	18.2%	20.5%
41051009606	Multnomah	54.1%	35.9%	42.3%	39.8%	12.6%	34.5%
41067032409	Washington	75.2%	72.2%	44.7%	55.0%	24.2%	41.5%

Note: *This Census tract has a population of only 201 residents, and given that the statistics are based on sampling data, the reported 0% for percentage of family households with children and percentage of single mother households may be underestimated. However, the Census tract is in a remote location of Clackamas County and family households is likely to be small.

Source: 2009-2013 ACS; BBC Research & Consulting.

Figure D-3 shows the visual location of Racially/Ethnically Concentrated Areas of Poverty.

Figure D-3.
Racially or Ethnically Concentrated Areas of Poverty



Source: 2009-2013 ACS; BBC Research & Consulting.

Dissimilarity index. The statewide Analysis of Impediments also used the dissimilarity index to measure segregation**.** The dissimilarity index is a metric used by researchers to measure racial and ethnic integration. The index is measured between 0 and 1. An index of 0 indicates perfect distribution of racial and ethnic groups across all Census tracts in a region; conversely, an index of 1 indicates complete segregation of racial groups across the region. HUD's ratings of dissimilarity are determined by the following score ranges: "Low Dissimilarity"—below 0.40; "Moderate"—between 0.40 and 0.54; and "High"—above 0.54. The U.S. cities found to be the most segregated using the dissimilarity index (Milwaukee, New York and Chicago) have indices approaching 0.8.

Figure D-4 presents the dissimilarity index for Oregon counties. As demonstrated in the figure, African Americans are the racial group most likely to experience segregation according to the index. This segregation is generally highest in rural, rather than urban, counties.

Figure D-4.
Dissimilarity Index by County, State of Oregon, 2013

County	Minority/NHW Dissimilarity Index		Hispanic/NHW Dissimilarity Index		African American/NHW Dissimilarity Index		Asian/NHW Dissimilarity Index		Native American/NHW Dissimilarity Index	
	Index	Rating	Index	Rating	Index	Rating	Index	Rating	Index	Rating
Baker	0.32	Low	0.37	Low	0.47	Moderate	0.37	Low	0.49	Moderate
Benton	0.21	Low	0.36	Low	0.48	Moderate	0.35	Low	0.40	Moderate
Clackamas	0.24	Low	0.33	Low	0.50	Moderate	0.44	Moderate	0.51	Moderate
Clatsop	0.21	Low	0.28	Low	0.38	Low	0.41	Moderate	0.33	Low
Columbia	0.20	Low	0.26	Low	0.72	High	0.25	Low	0.38	Low
Coos	0.23	Low	0.31	Low	0.56	High	0.28	Low	0.29	Low
Crook	0.17	Low	0.26	Low	0.41	Moderate	0.30	Low	0.21	Low
Curry	0.11	Low	0.14	Low	0.73	High	0.49	Moderate	0.31	Low
Deschutes	0.19	Low	0.26	Low	0.44	Moderate	0.35	Low	0.36	Low
Douglas	0.18	Low	0.20	Low	0.60	High	0.34	Low	0.29	Low
Gilliam	N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT	
Grant	0.07	Low	0.13	Low	0.22	Low	0.34	Low	0.12	Low
Harney	0.13	Low	0.11	Low	0.21	Low	0.44	Moderate	0.32	Low
Hood River	0.24	Low	0.26	Low	0.42	Moderate	0.24	Low	0.74	High
Jackson	0.29	Low	0.39	Low	0.52	Moderate	0.39	Low	0.37	Low
Jefferson	0.50	Moderate	0.37	Low	0.32	Low	0.56	High	0.77	High
Josephine	0.16	Low	0.22	Low	0.47	Moderate	0.35	Low	0.30	Low
Klamath	0.22	Low	0.31	Low	0.37	Low	0.40	Low	0.39	Low
Lake	0.06	Low	0.17	Low	0.28	Low	0.23	Low	0.04	Low
Lane	0.18	Low	0.31	Low	0.51	Moderate	0.40	Moderate	0.42	Moderate
Lincoln	0.22	Low	0.30	Low	0.60	High	0.41	Moderate	0.39	Low
Linn	0.25	Low	0.35	Low	0.38	Low	0.36	Low	0.33	Low
Malheur	0.26	Low	0.29	Low	0.46	Moderate	0.31	Low	0.37	Low
Marion	0.35	Low	0.40	Low	0.51	Moderate	0.37	Low	0.37	Low
Morrow	0.38	Low	0.40	Moderate	0.43	Moderate	0.07	Low	0.32	Low
Multnomah	0.27	Low	0.35	Low	0.47	Moderate	0.34	Low	0.45	Moderate
Polk	0.23	Low	0.32	Low	0.33	Low	0.34	Low	0.46	Moderate
Sherman	N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT	
Tillamook	0.26	Low	0.31	Low	0.40	Moderate	0.44	Moderate	0.42	Moderate
Umatilla	0.31	Low	0.38	Low	0.46	Moderate	0.38	Low	0.69	High
Union	0.17	Low	0.27	Low	0.58	High	0.28	Low	0.27	Low
Wallowa	0.16	Low	0.14	Low	0.28	Low	0.27	Low	0.47	Moderate
Wasco	0.22	Low	0.25	Low	0.31	Low	0.45	Moderate	0.55	High
Washington	0.24	Low	0.35	Low	0.41	Moderate	0.35	Low	0.57	High
Wheeler	N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT		N/A - only 1 CT	
Yamhill	0.23	Low	0.27	Low	0.58	High	0.35	Low	0.44	Moderate

Note: NHW is non-Hispanic white. Some dissimilarity index scores and ratings may not align in the table due to score rounding.

Source: 2009-2013 ACS; BBC Research & Consulting.

Reasons for concentrations. To better understand the reasons behind existence of concentrated areas, half of the jurisdictions analyzed the socioeconomic conditions of the areas. Concentrated areas in these jurisdictions commonly had a high share of households with Limited English Proficiency and with persons living with disabilities, a high share of female-headed households and households living in poverty and a low median family income.

Some of the findings specified by jurisdictions included:

- Census tracts with high minority concentrations in Bend had higher unemployment rates and a higher share of the population living below the poverty level than the other Census tracts in the city;

- This was also true of Ashland: the Census tract with the highest minority population in Ashland had a median family income of $17,083 compared to $49,647 citywide;

- Twenty-eight percent of the population in Eugene and Springfield's most concentrated minority Census blocks were Limited English Proficieny;

- Portland, Gresham and Multnomah County felt that concentrations could be a factor of locations of subsidized housing projects.

In all jurisdictions, low income among minority households was identified as a likely key impediment to fair housing choice.

Some jurisdictions made a connection between minority concentrations and gentrification in urban areas. The Analysis of Impediments for Portland, Gresham and Multnomah County pointed specifically to the unintended consequence of gentrification resulting from urban renewal initiatives that effectively price-out low-income and often minority and/or disabled residents. Similarly, Clackamas County and the Portland, Gresham and Multnomah County noted Not-In-My-Backyard issues may be playing a role in restricting affordable or special needs housing from locating in moderate and high-income neighborhoods. Many other jurisdictions referenced this challenge indirectly.

The City of Ashland and the City of Bend both noted concern about the possible link between concentrated neighborhoods and discriminatory lending practices, such as steering. The Analysis of Impediments reported that the presence of minority concentrations may lead to increased steering, which perpetuates areas of concentration.

In some of the Analysis of Impediments, the public input process further investigated the reasons for concentrated areas and desire of residents to relocate:

- In Washington County, 18 of 22 Hispanic interview respondents living in ethnic enclaves in Washington County indicated they would choose neighborhoods with better schools and access to opportunities over a neighborhood close to family and others who spoke Spanish. The Analysis of Impediments noted these findings were indicative of potential financial barriers to housing choice.

- In Portland, Gresham and Multnomah County, low income and instability were identified by survey respondents as the primary impediments to fair housing choice in minority concentrated areas.

- Similarly, in Corvallis, survey respondents agreed housing affordability was a key consideration in housing choice among minority households, along with a sense of community and familiar social networks.

Access to opportunity analyses, which consider the location of minority concentrated areas and/or affordable housing units in relation to schools, parks, public transportation options and other services, were conducted in Washington County, the City of Portland, Gresham and Multnomah County and Clackamas County. When Washington County was developing its most recent Analysis of Impediments, HUD began placing more emphasis on this type of analysis. As such, Washington County included a thorough geography of opportunity analysis of the distribution of minority populations and subsidized housing and Housing Choice Voucher holders in proximity to identified areas of opportunity.

Key findings from Washington County's analysis included:

- Racial and ethnic minority populations were distributed fairly evenly and similarly to Whites across all areas of opportunity;

- Subsidized housing units were located in areas with higher minority populations than the county-wide proportion; however 90 percent of subsidized housing units were located in average to high opportunity areas;

- Considerable variability was found in access to schools with high test scores and public transportation among subsidized housing residents across the county, suggesting impediments may be more pronounced in some locations; and

- Ninety percent of voucher holders across the county lived in areas with average or higher access to opportunity and there were opportunities for voucher holders to live close to good schools and access to transportation.

The City of Portland, Gresham and Multnomah County's analysis focused on areas of reduced access to opportunity that commonly include a disproportionate number of persons from protected classes. The Analysis of Impediments also found that many subsidized housing units were located in proximity to potential environmental health hazards identified by the Environmental Protection Agency and accessible housing is limited near public transit.

Private sector policies. This section discusses the private sector policies that were examined through entitlement Analysis of Impediments. Topics include Not-In-My-Backyard (NIMBYism), mortgage lending disparities, and discriminatory behavior revealed in testing and complaints.

NIMBYism—the term used to describe resistance by neighbors to certain types of housing in their neighborhoods—was discussed generally in the entitlement Analysis of Impediments as a contributor limited affordable housing in certain neighborhoods.

The state Analysis of Impediments tested aspects of NIMBYism among residents through a statistically significant survey. Most residents expressed acceptance of all types of residents; sexual orientation received the highest NIMBYism rating. Yet between 15 and 20 percent of

residents felt that certain groups are not treated equally in their communities and many attributed this to their status as immigrants, non-English speakers and/or race and ethnicity.

When asked if they would support different housing types, residents said their communities would be least supportive of apartments and residential homes for persons recovering from substance abuse.

Lending disparities. Mortgage lending disparities were analyzed in almost all of the Analysis of Impediments through analysis of Home Mortgage Disclosure Act (HMDA) data. The potential for mortgage lending barriers was of particular interest for many jurisdictions given the potential limits to fair housing choice that could result. Some jurisdictions compared lending patterns between racial and ethnic groups. Others went one step further by comparing these patterns by Census tract.

The jurisdictions that conducted HMDA analyses commonly found:

- Lower levels of overall lending activity among minority populations and in minority-concentrated areas.
- Lower loan approval rates, higher loan denial rates and higher rates of subprime loans among minority populations and in minority-concentrated areas.

Stakeholder and resident consultations in a few jurisdictions supported these trends. As one example, public input in Medford revealed residents believed discriminatory lending was occurring in their jurisdiction and potentially impeding fair housing choice.

Jurisdictions were careful to note that lending disparities do not prove direct discriminatory lending practices. For example, the Eugene and Springfield Analysis of Impediments noted there was no direct evidence of lending discrimination based on race or ethnicity because the lower activity was found in areas with a high share of low-income rental housing. Despite the recognition that lending disparities do not translate to discriminatory lending based on race or ethnicity, all of the Analysis of Impediments recommended continued monitoring of lending practices.

Other potential discriminatory behaviors. Beyond lending disparities, a few jurisdictions identified other potential discriminatory private sector practices, for example:

- The Ashland Analysis of Impediments reported that the lack of real estate agents of color in some neighborhoods may be dissuading minority communities from locating there;
- Resident survey respondents in Albany believed refusal to make reasonable accommodation, refusal to rent, steering and discriminatory advertising were occurring in their communities; and
- Some resident interview respondents in Ashland believed that landlords and Homeowners' Associations were discriminating against families with children by arbitrarily applying strict rules not applied to others.

- Landlords appear to be "actively" disinvesting in housing because they plan to sell their apartment complexes.

Testing, complaints and legal case review. The Analysis of Impediments all reviewed fair housing complaint data—mostly a cursory review—and some supplemented this with a review of legal cases and fair housing testing.

Disability (most prevalent in all Analysis of Impediments), large families and race/ethnicity were the top reasons complaints were filed.

AIs that contained multi-year complaint analysis and/or comparisons with audit findings revealed several notable trends:

- In Ashland, audit tests found high levels of race-based discrimination in rental transactions (67% of the tests found preferential treatment towards the white applicant)—yet only one complaint had been filed for race-based discrimination.

- Portland/Gresham/Multnomah County had a similar rate of discrimination in audit testing for racial and ethnic biases in rental transactions: the tests found discrimination in 64 percent of cases.

- Washington County, which found an increase in complaint filings over the three years examined, concluded that investment of resources in fair housing information and support may have resulted in more households availing themselves of the recourse available to them under federal and state law.

Public sector policies. Eight out of ten entitlement jurisdictions identified impediments within existing zoning codes and policies that may be limiting the supply of affordable and accessible housing and contributing to minority concentrated areas.

Examples of impediments found in jurisdictions' zoning codes and policies include:

- Costly development fees and lengthy permitting processes (Clackamas County, Eugene and Springfield, Medford, Salem and Keizer Consortium and Washington County). Although little detail was provided about the nature of these barriers, the Analysis of Impediments recommended considering fast-tracked permitting and reduced or waived developer fees for affordable housing development;

- Restrictive parking requirements in zoning codes (Eugene and Springfield, Washington and Clackamas counties):

    - Eugene and Springfield's requirement for one parking space per unit was considered an impediment to affordable housing development because it requires more land. Eugene's bicycle parking requirements impacted the ability to develop multifamily housing on smaller sites.

    - Washington County discussed a reduced parking requirement for specialized housing, for example for persons with disabilities who are less likely to have vehicles.

- The density bonus policy in Albany was not successfully resulting in new development of housing for very low-income households;

- Single-family zoning in some school catchment areas in Portland, Gresham and Multnomah County was limiting access for low-income families seeking multifamily housing in those areas; and

- A few Analysis of Impediments' noted a possible disincentive for the development of large units due to multifamily density requirements in zoning codes, which may be limiting housing choice for large or multi-generational families common among racial and ethnic minority groups.

At the state level, Washington County and the City of Medford suggested the illegality of mandatory inclusionary zoning in the State of Oregon was a key impediment to fair housing. The Analysis of Impediments stated the lack of mandatory inclusionary zoning limited the likelihood that low-income housing can be located in low-poverty areas and integrated within higher income developments. As a result, housing choice and access to opportunities among low-income residents who are more likely to be minority households and persons with disabilities is negatively impacted.

Affordable and accessible housing. All entitlement jurisdictions stated the lack of affordable housing was a key impediment to fair housing. The majority of jurisdictions referred to feedback from stakeholders and residents who said the lack of affordable housing was a growing challenge. The poor condition of existing affordable housing stock was also a recurring theme.

The unmet meets specified by jurisdictions included:

- Limited supply of affordable housing less than 50 percent of area median income (AMI) households (Clackamas and Albany Counties);

- Lack of affordable housing products that can accommodate multi-generational households, common among racial and minority ethnic groups (Eugene and Springfield); and

- Limited supply of housing for low-income persons with accessibility needs (Ashland, Eugene and Springfield, Portland, Gresham and Multnomah County and Washington County).

Beyond the zoning and policy related barriers to affordable housing development discussed above, declining federal funding and constrained state and local funds for the acquisition of land, development and ongoing operation of affordable housing projects were recurring themes in the Analysis of Impediments. The City of Bend referenced the limited availability of land for affordable housing due to the urban growth boundary, which is required by the State of Oregon of all cities and metropolitan areas to control urban expansion onto farm and forest lands.

The state Analysis of Impediments examined how well beneficiaries of subsidized housing in every county of the state match the eligible population (adjusting for income). Significant gaps were found for African Americans in Multnomah County only: African Americans make up 27 percent of low income households living subsidized housing in the county compared to just 8 percent of residents overall. That is, African Americans in Multnomah County are much more likely to participate in HUD programs than might be expected given their income profile. This large gap is suggestive of discrimination in the housing market.

Fair housing education and awareness. Nine out of ten entitlement jurisdictions discussed the lack of adequate education about Fair Housing laws.

The Analysis of Impediments concluded that low education and awareness was related to linguistic and cultural barriers among residents in their jurisdictions. Many of the entitlement jurisdictions are becoming increasingly diverse with growing Hispanic and racial minority populations. With this in mind, Analysis of Impediments frequently noted English educational material and training sessions may not be meeting the needs of households with Limited English Proficiency.

Public input through resident and stakeholder surveys and interviews revealed limited awareness of fair housing rights among residents and real estate professionals. For example:

- The majority of survey respondents in Albany did not know who to contact if they experienced or saw discrimination. Hispanic families that attended a fair housing training sessions indicated they did not know how to file a complaint and were hesitant to file complaints for fear of reprisal;

- Consultations with Hispanic and Islamic residents, Limited English Proficiency persons and residents with mental health challenges in Washington County revealed a low level of familiarity with fair housing laws and resources to support them in the case of discrimination; and

- Some city staff and housing providers stated they were not sure where to refer people with complaints or where to get information about their fair housing responsibilities.

A few Analysis of Impediments noted strained resources among public and nonprofit fair housing organizations limited their ability to provide sufficient and culturally and linguistically appropriate education and training opportunities. In addition, evidence of discriminatory advertising among real estate agents and discrimination in landlord testing were occasionally found and may indicate limited knowledge about fair housing laws.

Impediments and Action Plan. Figure D-5 summarizes the impediments and action items across the entitlement community Analysis of Impediments.

Figure D-5.
Commonalities in Impediments in Entitlement Jurisdictions

Entitlement Communities	Segregation of racial and ethnic minorities	Challenges with NIMBYism	Discriminatory marketing and lack of diverse staff	Possible discriminatory lending practices, e.g., steering	Other private sector and housing market impediments	Fair Housing complaints and legal issues	Limitations of land use regulations, policies and zoning	Public sector program limitations, lack of resources and staff training and capacity	Lack of education and awareness of Fair Housing	Language and cultural barriers to Fair Housing education	Lack of affordable housing	Lack of accessible and special needs housing	Data limitations	Other impediments
City of Albany	x			x			x		x	x	x			
City of Ashland	x		x	x	x	x	x	x	x		x	x		x
City of Bend	x			x							x			x
Clackamas County	x	x				x	x		x		x			
Corvallis						x			x		x		x	
City of Eugene/Springfield				x	x		x		x	x	x	x		x
City of Medford				x			x		x		x			
City of Portland, Gresham, Multnomah County	x	x		x	x		x		x	x	x	x	x	
Salem-Keizer				x		x	x	x	x	x	x			
Washington County				x	x	x	x	x	x	x	x	x	x	

Source: BBC Research & Consulting and entitlement community Analysis of Impediments.

Comparison of Urban and Rural Fair Housing Barriers

This section compares the primary findings of the entitlement and nonentitlement Analysis of Impediments by the primary areas of analysis with the Analysis of Impediments.

Concentrated areas. Minority-concentrated Census tracts are mostly located in urban areas. The exceptions are Native American concentrations, which are located on Reservations, and Hispanic concentrations, which occur in both urban and rural areas. In addition, African Americans in rural areas tend to be more heavily clustered in certain neighborhoods than in urban areas.

Urban areas attribute concentrations to low incomes of minority residents, concentrations of affordable housing and gentrification reducing the dispersion of affordable housing. In rural areas, low incomes and lack of affordable housing are the primary reasons for concentrations.

Poverty concentrations mostly occur in urban or semi-urban areas with high Hispanic and Limited English Proficiency residents, generally new immigrants. These residents not only face challenges in finding affordable housing but may be more vulnerable than other residents to fair housing discrimination due to lack of awareness of fair housing rights and reluctance to report discrimination for fear of losing their housing.

Limited affordability of housing. All entitlement jurisdictions stated the lack of affordable housing was a key impediment to fair housing. The majority of jurisdictions referred to feedback from stakeholders and residents who said the lack of affordable housing was a growing challenge.

The high proportion of households with extended family members is suggestive of lack of housing opportunities, limited affordability and the need to "double up" to live in the community.

Condition of housing. The poor condition of existing affordable housing stock was a stronger theme in rural Analysis of Impediments. Housing in poor condition appears to be a community-wide issue in rural areas. Yet in both rural and urban areas, condition may be a larger factor in housing certain types of residents (lower income, minority, Limited English Proficiency residents).

Public sector barriers. Most entitlement area Analysis of Impediments focused on a review of local land use and zoning codes; in some Analysis of Impediments, these reviews were quite detailed. Washington County and Portland/Gresham/Multnomah County's Analysis of Impediments contained a review of relevant state regulations, the conclusions of which were consistent with the state Analysis of Impediments regulatory review.

Private sector barriers. Much of the review of private sector barriers in the entitlement Analysis of Impediments focused on mortgage lending trends. In general, the Analysis of Impediments found that some minority groups have higher rates of loan denials than non-Hispanic whites and these findings were consistent with the state analysis (gaps are generally within 10 percentage points). Several entitlement Analysis of Impediments noted that minority-

concentrated areas had lower levels of lending activity than non-concentrated areas. Few of the Analysis of Impediments provide analysis of why the disparities exist; of those that do, they attribute the differences to lower property values in minority concentrated areas (e.g., areas with light or heavy industrial uses), lack/poor credit histories of minority applicants and the impact of the subprime market and foreclosures on minority applicants.

Limited fair housing resources. City staff, nonprofit organizations and public housing authorities (PHAs) generally report high levels of fair housing knowledge and feel they have adequate fair housing resources overall.

The exception is fair housing information for certain residents, particularly new immigrants and Limited English Proficiency populations. Improving fair housing education and awareness was part of every Fair Housing Action Plan.

In rural areas, stakeholders described needs beyond fair housing education. Lack of capacity for fair housing investigation and enforcement, which is thought to contribute to non-compliance of housing providers and reluctance of residents to report discrimination, is a primary barrier to housing choice.

Commonalities in fair housing impediments

- Disability is the most common reason for fair housing complaints. It is unclear if this is related to disproportionate discrimination in this area or greater awareness of fair housing rights by persons with disabilities.

- Low incomes of minority residents, lack of affordable housing and clustering of Limited English Proficiency residents into certain neighborhoods are the most significant trends affecting fair housing choice.

- The need for affordable housing to serve a variety of household types was prevalent statewide. Despite sometimes serving very different markets, the urban and rural Analysis of Impediments were in agreement about the types of households that are most likely to be negatively affected by limited affordable housing: 1) Large households, often minority and multi-generational households; 2) Persons with accessibility needs; and 3) Households earning less than 50 percent AMI.

- Limited English Proficiency populations in all areas of the state—and residents and landlords in rural areas in general—have lower levels of awareness of their fair housing rights.

- Fair housing resources are lacking and could be enhanced in both urban and rural areas. Awareness is thought to be lowest for Limited English Proficiency populations and new immigrants. In rural areas, particularly where housing options are limited, reluctance to report fair housing violations for fear of eviction or retaliation is a concern.

Differences in fair housing impediments

- Lack of capacity for fair housing investigation and enforcement in general, which is thought to contribute to non-compliance of housing providers and reluctance of residents to report

discrimination, is a larger problem in rural areas, particularly those furthest from the state's major cities.

- In rural areas, capital for residential purchases and development is reportedly difficult to obtain in general; it is not isolated to mortgage lending for certain borrower types.

Opportunities for Collaboration in Fair Housing Action Plans

The above analysis revealed four opportunities where the state and entitlement jurisdictions can collaborate to achieve mutual fair housing goals:

1. Increasing fair housing knowledge and awareness, particularly among Limited English Proficiency populations and new immigrants. Fair housing education in a wide variety of languages is needed in both urban and rural areas.

2. Financial education and counseling for residents who want to become homeowners but have poor/lack credit history.

3. Knowledge of the shortage of accessible housing and best practices and policies to address accessible housing needs.

4. Expanded resources for accessibility improvements to residential housing and public infrastructure to address the growing population of persons with disabilities who have limited housing opportunities.

APPENDIX E.
State Resources to Support Fair Housing Choice

This section describes the resources that state has in place to promote and encourage development of affordable housing and a wide variety of housing choices. This section also discusses collaborative efforts or opportunities to advance fair housing enforcement or outreach. "Collaborative efforts" defined by HUD include co-sponsored fair housing training or fair housing education/enforcement activities, or work with real estate companies, lenders, developers or others to identify or address discrimination issues.

Fair Housing Programs and Activities to Address 2011-2015 Impediments

The 2011-2015 Analysis of Impediments for the State of Oregon identified the following impediments to Fair Housing Choice:

Impediments:

1. Organizational/political constraints
    a. Lack of strategic communication regarding fair housing, further hampered by language and cultural differences
    b. Local zoning constraints and NIMBYism restrict inclusive housing production policies; existence of such policies or administrative actions that may not be in the spirit of affirmatively furthering fair housing.
2. Structural barriers
    a. Lack of coordinated fair housing outreach and methods, particularly in the nonentitlement areas
    b. Lack of understanding of fair housing laws and complaint system
    c. Lack of effective referral system
    d. Lack of sufficient enforcement capacity
3. Rental markets
    a. Refusal to allow reasonable accommodations
    b. Discrimination against Section 8 voucher holders
    c. Discriminatory terms and conditions exist in marketplace
    d. Discriminatory refusal to rent
4. Home purchase markets
    a. Disproportionately high denial rates for racial and ethnic minorities, controlling for income level
    b. Disproportionately high share of high annual percentage rate loans held by racial and ethnic minorities
    c. Concentration of denials and high annual percentage rate in areas of western Oregon

Within the state, the responsibility for identifying and coordinating the implementation of actions to address these impediments is shared by OBDD/IFA and OCHS. Jointly, they adopted a seven-element 2011-2015 Fair Housing Action Plan which included actions, a schedule, desired outcomes and measurements. The actions and related 2011-15 Analysis of Impediments (shown in brackets) are as follows:

Fair Housing Actions:

1. Renew efforts to have a broad-based active, involved Fair Housing Collaborative to coordinate implementation of actions to affirmatively further fair housing. [2 a-d]
2. Continue contracting for retail activities such as educational outreach, informative brochures, etc. [2a & b]
3. Develop a means of measuring the results of outreach efforts and, in response, consider developing new approaches. [2a]
4. Continue distribution of the Fair Housing Referral Guide. [2c]
5. Initiate and maintain better communications with Oregon's fair housing enforcement arm, the Bureau of Labor and Industries (BOLI). [2c]
6. Review non-English speaking public participation requirements and make changes where needed. [1a]
7. Conduct audit testing specific to reasonable accommodation. [3a]

In addition to taking actions directly, OBDD-IFA and OHCS contracted with the Fair Housing Council of Oregon (FHCO) and Greater Eastern Oregon Economic District to assist with implementation of selected items, especially those related to fair housing outreach and education in the nonentitlement areas of the state.

On an annual basis, OBDD-IFA and OCHS report on actions taken in the Consolidated Annual Performance and Evaluation Reports (CAPERs). OHCS typically organizes its report around the actions identified in the 2011-2015 Fair Housing Action Plan, while OBDD-IFA organizes its report around the impediments identified in the Analysis of Impediments. Both reports are detailed and cite measurable outputs, such as brochures distributed, workshops conducted and meetings held, produced by the reporting agencies or their contractors. The reports typically do not include actions taken by other entities.

The summary below draws on those detailed reports, as well as information about actions taken by other entities, to paint a picture of efforts to affirmatively further fair housing in Oregon's smaller cities and rural areas during the 2011-2015 time period. The below summary is not exhaustive; instead, it is intended to convey a broad sense of the progress made to address the impediments identified in the 2011-15 Analysis of Impediments.

Coordination [Impediment 1, Fair Housing Action 1]

OBDD-IFA and OHCS revived the Fair Housing Collaborative first created to implement the 2005 Analysis of Impediments. Members included other state agencies, the Fair Housing Council of Oregon (FHCO) and other participants. Accomplishments include the development of the 2011-2015 Fair Housing Action Plan and the solicitation of a consultant to produce the next five year Analysis of Impediments to Fair Housing Choice and Action Plan.

NIMBYism and Local Zoning Constraints [Impediment 1]
FHCO produced and distributed an Inclusive Communities Toolkit, which included publications addressing NIMBYism and fair housing for three distinct audiences: public officials, neighbors and housing developers. The toolkit also included a detailed matrix that cities and counties could use to audit their land use ordinances and practices and adopt changes that affirmatively further fair housing, which was developed in consultation with the Department of Land Conservation and Development.

The publication is available at no cost from the Fair Housing Council of Oregon. It can be downloaded from their website at: http://www.fhco.org/pdfs/Checklist-August-2014.pdf

FHCO distributed these materials, along with an educational video that explained the basic concepts of affirmatively furthering fair housing, through targeted e-mails, conferences for elected officials, planners and advocates and extensive regional road trips to Oregon's small cities and rural communities. As a result of what was learned during this initial effort to develop local tools on land use and NIMBYism, additional analysis of Oregon's land use laws and model development code for small cities was incorporated into the scope of work for this 2016-20 Analysis of Impediments.

Language and Culture [Impediment 1, Fair Housing Actions 2 & 6]
Efforts to bridge language and cultural barriers included both contracted activities and the adoption and implementation of Language Access Plans by OBDD-IFA and OHCS.

To better understand the issues, FHCO conducted listening sessions with agencies serving Limited English Proficiency and culturally distinct populations in the rural areas of the state, such as Head Start agencies serving migrant and seasonal farm worker families. To reach consumers, FHCO developed culturally-specific activities with new partners, utilized non-English media outlets to disseminate information and distributed printed materials in Spanish and other languages. For example, FHCO conducted day-long outreach activities in partnership with the Mexican Consulate that attracted approximately 300 people in southern Oregon and 120 people in The Dalles, and they participated in a Mexican Independence Day event attended by 500 people in Ontario. FHCO also initiated an ongoing program to create a network of trained local partners in rural areas capable of communicating effectively about fair housing. Nineteen partners have been trained thus far, many of which serve Limited English Proficiency populations. Through these efforts, FHCO continues to build new ongoing relationships with community partners in rural areas that serve people from different cultures or for who English is not a primary language.

New printed materials created during this period by FHCO included a simple handout using pictographs to provide information about fair housing and where to turn to get help to help. FHCO's basic fair housing brochure is available in twelve languages.

During this time period, OHCS and OBDD-IFA adopted Language Access Plans that addressed whether the agencies' services needed to be provided in languages other than English to meet the needs of Limited English Proficiency populations. The agencies followed the Four Factor Analysis prescribed by the Department of Justice for agencies receiving federal funds. The agencies' analyses concluded that, although most OHCS and OBDD-IFA program staff does not

have direct contact with Limited English Proficiency persons, most of their federal funding recipients do. While none of the state's Limited English Proficiency populations exceed the 5 percent federal threshold for Limited English Proficiency assistance, the Limited English Proficiency Spanish-speaking population was very close to that standard, at 4.3 percent of the state's population. Thus, the agencies elected to take measures to ensure that this population (as well as others) could access information in their primary language. The practices included the use of Language Line, identification and utilization of bi-lingual staff, provision of selected translated program materials on the agency's website if they were available from HUD and staff training.

Audit Testing [Impediment 3, Fair Housing Action 7]

To preliminarily explore issues around discrimination in applying for rental housing in the balance of the state, OHCS contracted with FHCO to undertake audit testing in 2013. FHCO completed 16 tests in 2013, which appears to be scaled to the size of a pilot project intended to develop and test protocols and train new testers. The tests had the following outcomes:

Audit Testing Results for Balance of State 2013				
	Positive*	**Negative**	**Inconclusive**	**Total**
Race	2	1	1	4
National Origin	1	4	0	5
Disability	1	3	0	4
Sexual Orientation	0	1	2	3
Total	4	9	3	16

*Positive results indicate tests in which differences were found between the treatment of the protected class tester and the treatment of the control tester.

The most thorough approach to addressing potential infractions is to contact the landlords whose properties were tested, provide information on the testing protocols and results, conduct training about fair housing, then follow up with a new round of testing to see if changes have occurred. If a pattern of discrimination appears in the retesting results, then a solid, defensible case for enforcement action has been built.

In 2015, FHCO followed up with the sites tested, discussed the results and provided training and information. Currently, through contracts with BOLI and OHCS, FHCO is also undertaking additional audit testing for the protected classes of source of income (compliance with new law prohibiting landlords from refusing to rent to tenants solely because their sources of income for housing includes a Section 8 voucher), national origin and sexual orientation.

Fair Housing Outreach and Education [Impediments 2 & 3, Fair Housing Action 2 & 3]

In 2011-2012, FHCO undertook a complete review of its educational and outreach strategies and made two key changes to reach remote audiences more effectively:

Utilization of more web-based materials, including live webinars, videos and podcasts of past forums and seminars

Expanded outreach through strategic partnerships with local partners serving housing consumers

Currently, FHCO's website is a major source of information on fair housing. In 2014 alone, the FHCO website received nearly 1.5 million hits. In 2015, FHCO completed a major revision of its website to a simpler design to allow stakeholders to find information more easily.

FHCO did develop collaborations with key organizations statewide, including community action agencies and community based advocacy organizations working with protected class communities. These collaborations led to the creation of new outreach events, trainings, radio programs and other activities. However, FHCO encountered two principal challenges in trying to maintain collaborations over the long term: its own capacity to sustain so many relationships throughout the state, and staff turnover in smaller organizations, which typically meant starting over with introductions and relationship-building.

FHCO's outreach and educational activities from 2011 through 2015 include:

- More than 125 onsite training events in small cities and rural areas throughout the state. The trainings were customized to meet the needs of specific audiences, which included groups such as social service providers, housing authorities, Realtors, associations of rental owners, legal services employees, inmates, foster home providers, nonprofit and subsidized housing providers, farm workers, tenants, family drug court workers, Oxford House members and retirement community staff.
- Major statewide seminars/conferences about Re-Entry Housing, Affirmatively Furthering Fair Housing and Adult Foster Care (web-based)
- Presentations at existing industry conferences, such as the Oregon chapter of the American Planning Association, Oregon League of Cities, Oregon Association of Public Housing Directors, Rural Oregon Coordinating Council, Northwest Association of Community Development Managers, Public Employees Diversity Conference, Neighborhoods USA Conference and the Real Estate and Land Use Section of the Oregon Bar Association.
- Public service announcements and interviews on local radio stations in rural and small cities throughout the state, some in Spanish.
- Ongoing educational and awareness activities, including promotion and programming for Fair Housing Month, annual youth fair housing poster contest, publication of a quarterly electronic newsletter and circulation of the traveling display *Anywhere But Here: The History of Housing Discrimination in Oregon* to public venues.
- Development of new printed materials and distribution of new and existing printed materials, including guides for housing consumers (available in 12 languages and pictograph formats), new landlords, Realtors, homeowner associations, non-profit and subsidized housing providers, senior communities, shelter and transitional housing providers, social services providers and students, as well as the new in-depth Inclusive Communities Toolkit and video.

FHCO is exploring the use of mapping software to track the location of calls and intakes as one way to measure the outcomes of training and outreach activities.

Referral System [Impediment 2, Fair Housing Action 5]
Two primary steps were taken to strengthen the system of fair housing complaint referrals. The first, described above, involved developing stronger ties with local partners that can provide information about fair housing and refer potential issues to FHCO for intake and counseling through their hotline.

The second involved developing a stronger link between FHCO and BOLI, the state agency with which HUD contracted to investigate and adjudicate consumer-driven fair housing complaints in the state. The delegation of the investigation of complaints to BOLI is said to have significantly reduced the length of time to resolve complaints. BOLI's processes conformed to the standard of Substantial Equivalency, which meant that HUD was able to delegate nearly all fair housing complaints to BOLI. To strengthen this link within the referral system, FHCO and BOLI met quarterly in 2013.

Section 8 Vouchers [Impediment 3]
The 2013 Oregon Legislative Assembly approved HB 2639, which made it illegal to refuse to rent to applicants or to treat applicants or tenants differently solely because one of their sources of income for housing was a Section 8 Housing Choice voucher. Landlords were still able to screen and reject any applicant, including those with a Section 8 voucher, for past conduct and inability to pay rent.

The new law also created the Housing Choice Landlord Guarantee Program to help compensate landlords for damages incurred as a result of tenancies by Section 8 voucher holders. The effective date of the new law was July 1, 2014. Currently, BOLI has contracted with FHCO to undertake audit testing to examine whether discrimination against Section 8 voucher holders occurs.

Responding to this action by the state legislature, in fall 2014 Meyer Memorial Trust, one of Oregon's largest foundations, awarded nine grants totaling $308,471 to increase access to private market housing units through Housing Choice Vouchers. Three of the grants were awarded to entities to develop statewide educational materials about House Bill 2639. One was awarded to the Oregon Law Center to create standardized educational materials and conduct outreach to Housing Choice Voucher holders and tenant advocates. The second was awarded to the Oregon Housing Authority to create a toolkit and training series for public housing authorities statewide. The third was awarded to Multifamily NW, the principal state property managers association, to conduct statewide landlord education. In addition, grants were awarded to Community Action Agencies and housing authorities serving rural areas of Malheur (Ontario), Lane (Eugene), Jackson (Medford) and Wasco (The Dalles) Counties to support programs that aid Housing Choice Voucher program applicants and participants with accessing and maintaining decent housing.

Home Purchase Markets [Impediment 4]
Although direct steps were not taken by the state to further investigate the disproportionate share of high annual percentage rate loans and loan denials of racial and ethnic minorities, Oregon was one of 49 states that signed on to a multistate agreement. The agreement penalized

the nation's five largest banks for wrongful conduct in lending and provided roughly $25 billion in relief for affected distressed homeowners and former homeowners who had gone through the foreclosure process.

The state also put in place several programs to assist affected homeowners and tenants. Through Senate Bill 558, enacted by the 2013 legislature, the state provided access to qualified, trained neutral mediators and facilitators for conducting face-to-face meetings between a homeowner who is in foreclosure and their lender with the goal of avoiding the loss of the home. The state also provided referrals to HUD-approved foreclosure counselors, some of which provide low cost services to homeowners and renters with low incomes.

Additional Activities that Support Fair Housing Choice

Additional activities that may not always directly address fair housing impediments but which do have the effect of expanding housing choice are discussed in this section.

Grants for housing creation and preservation. OHCS makes federal and state resources available for the development of affordable housing through competitive and non-competitive application processes. The resources include loans, grants, credit enhancements and tax credits. Multifamily state programs available on a first-come, first-served basis include Conduit Bonds, Elderly/Disabled Loan Program, Loan and Lease Guarantee Programs, Oregon Rural Rehabilitation Program for farmworker housing, Vertical Housing Program and manufactured dwelling park preservation and predevelopment loan programs.

Resources awarded competitively through a Notice of Funding Availability include the following:

- **Low Income Housing Tax Credit (LIHTC) Program**. The LIHTC Program provides federal income tax credits to developers who construct, rehabilitate, or acquire and rehabilitate qualified low-income rental housing. The state has elected to set aside a share of funds (currently 35%) for preservation projects and public housing undergoing a preservation transaction.

- **Home Investment Partnership Program (HOME).** The HOME Program provides federal funds for the development of affordable housing for low- and very low-income households. The state is responsible for administering the HOME Program for nonentitlement jurisdictions and rural Oregon. OHCS requires standard HUD forms for affirmatively furthering fair housing choice of developers who receive HOME.

Resources awarded on a rolling, first come, first served basis include the following:

- Conduit Bonds
- Elderly/Disabled Loan Program,
- Loan and Lease Guarantee Programs,
- Oregon Rural Rehabilitation Program for farmworker housing,
- Agricultural Housing Tax Credits,

- Vertical Housing Program and
- Manufactured Dwelling Park Preservation and Predevelopment Loan Program

The following resources are used to address gaps in needed resources for projects

- **Oregon Affordable Housing Tax Credit Program (OAHTC**). Through the use of Oregon tax credits, lending institutions are able to lower the cost of financing by as much as four percent (4%) for housing projects. Benefit must be used to reduce rents.
- **General Housing Account Program (GHAP).** Added in 2009, GHAP is an Oregon-generated resource designed to provide grants and loans to construct new housing, to acquire and/or rehabilitate existing structures, or to operate housing for Low or Very-Low Income households. Funding comes from the Document Recording Fee collected by county clerks. The maximum award per application of GHAP if combined with Low Income Housing Tax Credits (LIHTCs) is $200,000. The maximum award per Application of GHAP if not combined with LIHTCs is $500,000.
- **Low Income Weatherization Program (LIWP).** LIWP Funds support energy conservation measures in affordable housing projects. Applicants may apply to LIWP Funds to upgrade existing eligible areas of rehabilitation projects or to exceed energy codes on new construction. The purpose of the LIWP funds is to reduce energy use and heating costs for low and lower-income (60% of area median income and below) Oregonians through energy conservation measures. Applies to PGE & PPL service areas only.
- **Financing Adjustment Factor Savings Fund (HELP**). HELP funds provided by the Department are used for the construction, acquisition and/or rehabilitation of rental housing to be occupied by households with very low incomes. The Department has set aside HELP funds for three populations: Homeless, including victims of domestic violence, group homes for persons with developmental disabilities and group homes for persons with chronic mental illness.

Competitive funds and scoring. On an annual basis, OHCS issues a Notice of Funding Availability (NOFA) to solicit applications for competitive funding sources. The NOFA bundles available funding sources and applicants submit a single application that includes general sections and sections that responsive to specific funding sources and the rules and priorities that apply to them.

OHCS has experimented with different configurations of applicant pools to help ensure that funds reach all areas of the state and that competitive applications compete against others serving areas with similar needs, development capacities, and outside resources. Since 2014, the state has utilized three applicant pools:

- Metro Region, which consists of the three-county Portland area
- Non-Metro Participating Jurisdictions, which consists of all PJs outside Multnomah, Washington and Clackamas Counties
- Balance of State Region, which consists of Oregon's rural areas and small nonentitlement jurisdictions.

Public and private sector applicants compete for funding within a specific pool. The allocation of resources to the pools is based on two factors: the percentage of households who earn less than 60 percent of area median income, and the percentage of households who are extremely rent burdened (expend more than 50% of their income on housing). The table below shows that applications serving the Balance of the State have been targeted to receive than a third of available funding:

Figure E-1. Allocation of Competitive Multifamily Rental Housing Resources through NOFA

Regional Pool	Counties	2014	2015
Metro	Clackamas, Multnomah & Washington	45%	46%
Non-Metro Participating Jurisdiction	Corvallis, Eugene/Springfield and Salem/Keiser	18%	17%
Balance of State	All other cities and counties not included in a region listed above	37%	37%

Source: Oregon Housing and Community Services handout, April 2015

Within each region, funds are divided between new construction on one hand and acquisition and acquisition/rehabilitation on the other, with different rating criteria for each.

The state has experimented with primarily objective and primarily subjective rating factors. Beginning in 2014, awards were made using a combination of objective and subjective factors. Rating teams for each region included a combination of state staff and outside reviewers familiar with the geographic regions.

State policies governing the use of funds are principally found in 1) a General Manual that applies to all projects, regardless of funding sources; 2) source-specific Program Manuals (e.g., LIHTC, HOME, OAHTC, GHAP, etc.); 3) NOFA documents, and 4) for some sources, relevant Oregon Revised Statutes (ORS) and Oregon Administrative Codes (OAC). Within these documents, items particularly relevant to Fair Housing issues include:

- **Federal Fair Housing and other civil rights law.** The General Manual alerts applicants to the relevant Fair Housing requirements that apply to housing projects.
- **Visitability**. Since the Oregon legislature adopted ORS 456.510 in 2003, the state has formally encouraged the design and construction of apartments that are visitable, which means that units are capable of being approached, entered and used by individuals with mobility impairments. Visitability is mandatory for subsidized new construction of rental housing and encouraged for subsidized rehabilitation. For multistory structures without an elevator, it applies only to units on the ground floor. Elements include an accessible route and stepless entry with at least a 32 inch clearance, a visible common space, and a stepless entry to a visitable powder room with walls reinforced so that handrails can be added. Visitability is addressed in the General Manual, and OHCS staff review project plans to ensure compliance. Exemptions exist for state bond and non-competitive tax credit projects, farmworker housing on a farm, and if sufficient hardship exists.

Community development grants. IFA administers the state's pass-through Community Development Block Grant (CDBG), which provides funds for a wide range of community development activities in nonentitlement areas.

Recipients of CDBG funding must satisfy requirements to affirmatively further fair housing (AFFH) choice by completing the following:

- Optional review of a "Resource Packet" available from FHCO;
- Adopt and publish a Fair Housing Resolution;
- Distribute and post the Fair Housing Poster and Brochures at City Hall and/or the County Court House and other locations within the community;
- Undertake and complete at least one an additional fair housing activity for each grant prior to the final draw for grant funds;
- Collect and maintain racial, ethnic and gender characteristics of the applicants to, participants in, or beneficiaries of any CDBG funded activity/program for low and moderate income - direct benefit (LMH), presumed benefit (LMC), family size and date (LMC) and job creation/retention project (LMJ);
- Maintain the race and ethnicity data of all persons living within the service area of any low and moderate-income area wide benefit project.;
- Complete forms demonstrating how low income and minority and women owned businesses will be utilized in the project;
- Submit an Limited English Proficiency plan;
- Self-evaluate compliance with Section 504 requirements, as applicable;
- Non-housing public works projects, for new construction, must, to the maximum extent feasible, design and construct the improvements in accordance with the Uniform Federal Accessibility Standards (UFAS);
- Community facility projects, for new construction, must design and construct improvements in accordance with the Uniform Federal Accessibility Standards (UFAS);
- Refer fair housing complaints to HUD, BOLI and/or FHCO.

The full compliance checklist can be found at http://www.orinfrastructure.org/assets/docs/IFA/CDBGhandbook/ch07.pdf.

APPENDIX F.
Fair Housing Planning Guide Crosswalk

HUD's Fair Housing Planning Guide gives jurisdictions and states guidance for the content of Analysis of Impediments. The figure that appears on the following page helps guide the reader through the State of Oregon Analysis of Impediments by showing where items from HUD's *Planning Guide, Volume 1 Chapter 4, Section 4.3 AI Subject Areas* appear in the document.

Figure F-1.
HUD Crosswalk to Analysis of Impediments Subject Areas

AI Topical Areas	Location in 2015 State of Oregon AI
Public sector	
• State building, occupancy, health and safety codes	– Section IV
• State policies affecting…construction of assisted and private housing	– Section IV
• Statewide policies concerning:	
➢ *Equalization of municipal services*	– Section IV. Also gathered in surveys.
➢ *State tax policy*	– Section IV
➢ *Demolition and displacement decisions*	– Section IV. Also gathered in surveys.
➢ *Multifamily rehabilitation*	– Gathered through stakeholder interviews and surveys
➢ *Site and neighborhood standards for new construction*	– Section IV
➢ *Accessibility standards for new construction*	– Section IV
• Statewide policies…restricting provision…of resources to areas of minority concentration	– Gathered through stakeholder interviews and surveys. Minority concentration maps in Section I
• Statewide policies that inhibit employment of minority persons and persons with disabilities	– Gathered through stakeholder interviews and surveys. Sections VI and VI contain findings.
• Public policies the restrict interdepartmental coordination…in providing resources to areas of minority concentration or to persons with disabilities	– Gathered through stakeholder interviews and surveys. Sections VI and VI contain findings.
• Statewide policies…related to the provision and siting of public transportation and social services	– Gathered through stakeholder interviews and surveys. Sections VI and VI contain findings.
• Policies and practices affecting [diverse] representation on boards, commissions and committees	– Gathered through stakeholder interviews and surveys. Sections VI and VI contain findings.
Private sector	
• Banking and insurance laws and regulations…HMDA data analysis	– Section III
• State laws and practices that may allow or promote…steering, blockbusting, deed restrictions, discriminatory brokerage services	– Section IV. Also gathered through stakeholder interviews and surveys. Sections VI and VI contain findings.
• State laws covering housing rentals, trust/lease provisions, conversions of apartments	– Section IV
• State law conflicts with federal accessibility requirements	– Section IV
• State laws…restricting housing choices for persons with disabilities	– Section IV
• Availability and dissemination of information on financial assistance programs for accessibility modifications	– Gathered through stakeholder interviews and surveys. Sections VI and VI contain findings.

Source: BBC Research & Consulting and Section 3.6 of the Fair Housing Planning Guide, Volume 1.

Figure F-1. (*continued*)
HUD Crosswalk to Analysis of Impediments Subject Areas

AI Topical Areas	Location in 2015 State of Oregon AI
Public and Private sector	
• Housing discrimination complaints, violations, lawsuits	– Section III
• Contract conditions related to fair housing placed by HUD	– Reviewed for Section III; n/a
• Evidence of segregated housing conditions	– Section I
• Delivery systems of statewide programs providing social services to families with children and persons with disabilities	– Gathered through stakeholder interviews and surveys. Sections VI and VI contain findings.
• Other state laws, policies, practices affecting the location, cost and availability of housing	– Section IV

Source: BBC Research & Consulting and Section 3.6 of the Fair Housing Planning Guide, Volume 1.

APPENDIX G

2016-2020 Analysis of Impediments to Fair Housing Choice
PUBLIC REVIEW PERIOD COMMENTS

COMMENT	COMMENTOR OR AGENCY	STATE RESPONSE
Excellent information. How does this impact those who would purchase a home based on their credit? A common complaint I have from vets is. I have never been kicked out of an apartment nor have I ever missed my rent but since I don't have good credit I cannot buy a house. Now I personally believe that the right to have one's basic needs met for themselves and their family is a right especially in a nation such as America especially when one is willing to provide for themself and has the basic means to meet said obligation. IS this something that might declaw credit predators who would use such an opportunity to discriminate or financially capitalize by exacting an unfair interest rate upon the would be customer. Most realtors will work with a vet due to the home loan guarantee attached to the VA home loan but that often times does not stop them from using the situation for a short term gain by making the vet house poor and destined to fail so they can cash in and re-sell or so I am told. I am no expert in this and going on some hear-say and horror stories. Please educate me a bit.	Nathan Rogers Westcare Tillamook County Rural Veteran's Advocate	Making information about barriers to fair housing public and available is a key developing strategies on reducing opportunities to discriminate and unfairly treat individuals. The state will use the analysis and the Fair Housing Action Plan to chart a course to reduce impediments and barriers to housing choice and opportunity. Oregon currently supports Homeownership Centers that provides credit counseling, financial education services and homebuyer education.
Make following changes to the fair housing action plan: A) Provide capital sources to address the lack of affordable accessible housing, including housing available for persons with disabilities who wish to leave nursing homes or other institutions (Action Item 1-1c). B) Include polices and financial commitments to the support provided to Public Housing Authorities to implement adaptive modification programs as well as the continue efforts to expand housing choices in rural areas (Action Items 1-1d and 2-2g). C) Clarify the need to provide down payment assistance for low income home buyers in rural areas (Action Item 4-1b) D) Preservation and renovation is equally important as annual inspections of conditions and habitability (Action Item 5b). Action Items 6b, 6c and 6d should higher priority as the lack of affordable units is significant in rural areas where there may be more limited local capacity for aligning land use and housing affordability development.	Joel Madsen Executive Director Mid-Columbia Housing Authority *and* Columbia Cascade Housing Corporation	The State is committed to promoting access to fair housing choice and has increased funding for housing for low income persons and persons suffering from mental illness. The action plan charts a course for the State to take to reduce barriers for persons seeking housing free from discrimination. The Fair Housing Action Plan is a living document where priorities can shift over time as resources become available or opportunities arise. Access to affordable housing free from discrimination and increasing the availability of affordable housing, including accessible housing are urgent priorities for Oregon.
The findings and action plans seem to lack adequate consideration for education and outreach to landlords. Surely there is as great a need for education and outreach to the individuals providing housing as to housing consumers. I would note that Action Item 2.2 – "Provide stakeholder education and training on fair housing laws and requirements" – in particular could more specifically call out the need for landlord education and outreach. I believe we need to increase the available outreach to both housing providers and consumers in order to begin addressing solutions to the findings included in this report.	Jim Straub Oregon Rental Housing Association	Landlord training is one of the Oregon's strategies for ensuring access to fair housing opportunities. Landlords and property managers are key stakeholders in our efforts. Oregon is committed to exploring the use of landlord guarantee funds to ensure increased access to affordable housing.

I would also like to call out Action Item # 7 – "Consider funding second chance tenant training programs and landlord guarantee programs (e.g., similar to the Housing Choice Landlord Guarantee program)." This item would be absolutely vital to the successfully responding to Research Finding #7 regarding persons with criminal backgrounds. I would like to reiterate what I've said in earlier discussions, that the Housing Choice Landlord Guarantee program was the linchpin in assuring landlord support of the Housing Choice Act. Any efforts to respond to Research Finding #7 would almost certainly need to include a similar landlord guarantee program, and I most strongly recommend including such a program in any discussions relating to improving housing availability for persons with criminal backgrounds.		
Today, group homes are not a desired setting for many people living in them or at risk of moving into them for lack of affordable accessible housing. In short, people with IDD - especially younger generations - want to live in typical community housing similar to their peers without disabilities. They want control of every aspect of their lives like you and I - in short, they want a regular life. Having a home with your name on the lease or deed is a key accomplishment to achieving this. I recommend removing impediment 1-5. *Local zoning and land use regulations and/or inexact application of state law may impede the siting and approval of group homes*. I do not want to promote the idea that a solution to lack of accessible and affordable housing would be to build more group homes!	Jaime Daignault Executive Director Oregon Council on Developmental Disabilities	Oregon is committed to providing a range of housing options for person with disabilities. Access to affordable housing free from discrimination and increasing the availability of affordable housing, including accessible housing are urgent priorities for Oregon.
Action Item 5b. seeks to address the poor condition of affordable housing in rural areas. The action states: Require that all grantees/developers of funded rental housing projects annually inspect the condition and habitability of the units funded. OHCS has a risk based inspection program. OHCS currently uses a risk based inspection criteria, which allows the agency to focus inspection and compliance resources on the properties that have lower performance levels. The action should be revised to state "all grantees/developers of funded rental housing projects that have high risk of compliance violations or are poor performing to annually inspect the condition and habitability of the units funded."	OHCS	Accept comment.
Action item 2-2b seeks to address limited housing options for persons vulnerable for housing discrimination. It states ***Promote housing alternatives for persons reentering community from incarceration and persons surviving domestic violence.*** Because these populations, persons reentering community and persons surviving domestic violence, have different needs and require different services, they should be separated out into two separate action items. It is recommended to remove persons surviving domestic violence from 2-2-b and to add Action item to state Promote housing alternatives for persons surviving domestic violence.	OHCS	Accept comment.
Revise action items related to housing resources for persons with disabilities to include access to community based supported housing. The AI incorrectly limits the rent subsidy programs protected from discrimination. The sources covered by the protections in ORS 659A.421(d)(A) include: federal rent subsidy payments, any other local state or federal housing assistance. Revise AI to include the additional barrier individuals found guilty except for insanity, which is not a criminal conviction, experience when seeking housing. Landlords often deny housing because they mistakenly believe guilty except for	Darcy Strahan Residential Programs and Services Manager Addictions and Mental Health Division, Department of Human Services	Oregon is committed to providing a range of housing options for person with disabilities. Access to affordable housing free from discrimination and increasing the availability of affordable housing, including accessible housing are urgent priorities for Oregon. The AI will be revised to correctly state the protections of ORS 659A.421 (d)(A). The comment about additional barrier individuals found guilty

insanity is a conviction		except for insanity experience when seeking housing is accepted and will be discussed with stakeholders, including OHA.
DHS/Aging and People with Disabilities (APD) currently is serving most of these populations using current DHS/APD resources. Within APD these populations, if eligible, would be provided services and supports using Medicaid/Oregon Health Plan (OHP), other state plans (like Community First Choice – K Plan) or available Medicaid waivers. Persons with substance disorders, mental health disabilities and/or persons with HIV/AIDS would most likely be receiving services and supports from OHA [specifically Addictions and Mental Health (AMH), Medical Assistance Plan (MAP) or Public Health (PH)]. Affordable housing and/or supportive housing resources/supply/stock is large issue within Oregon and across the country. HB2547 is a bill currently being discussed by the Oregon Legislature for further discussion and planning. *Need for public facilities for the following: Senior centers, handicapped centers, Homeless facilities, Youth centers, Childcare centers, Neighborhood facilities (Community facilities), Health facilities, Facilities for special needs populations* The list above may be potential resources for use by the populations listed previously, but I don't believe any of the facilities at this time are a specific or targeted development for DHS/APD.	Jeff Putterbaugh, APD Advocacy and Development DHS	Comment received. HB 2547 (2015) has been passed into law and a task force addressing these issues will start work shortly.
Slides 7 and 8 (of the power point presentation to the Stakeholders) both state that the lack of affordable housing "limits housing choice for persons of color and low income persons." This sentence makes the incorrect assumption that all people of color are poor. It is more accurate to say that *the lack of affordable housing limits housing choice for low income persons*. While persons of color may suffer illegal housing discrimination (which is a different issue), lack of affordable housing would not impact an individual of one race any more than an individual another race, given the same income and family circumstances.	Laura Buhl, Transportation & Growth Management Oregon Department of Land Conservation and Development	Comment was received.
Regarding the rest of the document, I have a serious concern about sections that advocate repeal of ORS 91.225, which prohibits local governments in Oregon from enacting rent control ordinances. It is near universally accepted among economists and housing market experts that rent control is ineffective in providing for affordable housing opportunities and actually exacerbates problems in housing markets that impede the provision of affordable housing. The best comprehensive economic study of the negative effects of rent control is this 1981 compilation: http://www.walterblock.com/wp-content/uploads/publications/RentControlMythsRealities.pdf. A 1989 academic study of the long-term impacts of rent control in New York City, http://www.socsci.uci.edu/~jkbrueck/course%20readings/gyourko%20and%20linneman2.pdf, concluded that "rent control in New York City had little if any distributional impact due to the ineffective targeting of benefits. Thus, while many poor families were aided by rent controls, the same was true for middle and upper income families." (Pg. 73) A more recent article in the New York Times, http://www.nytimes.com/2012/02/17/us/san-francisco-rent-control-and-unintended-consequences.html?_r=1, discusses the perverse consequences of rent control in San Francisco. I would recommend that the document be edited to remove recommendations to repeal ORS 91.225	Gordon Howard, Urban Planning Specialist Community Services Division DLCD	Comment was received.

APPENDIX G - CONTINUED

2016 CDBG Method of Distribution
And
2016 – 2020 Analysis of Impediments
PUBLIC COMMENTS

COMMENT SUMMARY	COMMENTOR OR AGENCY	STATE RESPONSE
Regarding your distillation of my entire paragraph on the matter of CIP homes, the central issue that needs to be clearly stated in the plan comment line, is that when contracts between the 501c3 CIP Housing Management Corporations and DHS expire, many low income special needs population people may be suddenly without housing. Specifically, unless successive new agreements are executed, that continue existing terms between the State of Oregon and CIP Housing Brokers, those units may be sold or used to serve other low income groups than the DD special needs population, or at the very least rent per DD resident may be increased to commercial levels and lease agreements may become a source of conflict between DD Providers and Landlords due to new K-Plan HCBS rules. In order to salvage and retain current Terms, there must be a stream of funds to do ongoing: Remodel work, Repairs, Maintenance, ADA modifications as needed for clients' conditions, and to support ongoing Physical Plant Inspections. That funding stream was part of the Legislative Commitment inherent in the CIP Program, in response to the Settlement Agreement between Federal DOJ and Oregon AJ on the matter on continued use of Institutions to house DD Eligible Persons. Unless new legislation action is introduced and adopted in 2017 that funds these expenses, the CIP Program is in jeopardy.	Lynn Boos Community Services Inc.	Oregon acknowledges the need to develop strategies to preserve CIP homes.
Current restrictions on administrative allowances for CDBG grant administration, especially for environmental and labor standards compliance, are too low and should be raised.	Tillman Carr GEODC	Oregon acknowledges the concern and will evaluate the impact of shifting the allocation balance between program and administrative funds.
Current restrictions on administrative allowances Micro-enterprise grant are too low and should be raised.	Susan Roberts Wallowa County	Oregon acknowledges the concern and will evaluate the impact of shifting the allocation balance between program and administrative funds.
<u>Grant Administration Allowance – 10% up to max $25,000</u> CCD would like to see this allowance be increased – to read "10% up to max $35,000". CCD does CDBG Grant Management for projects, and has for over a decade. We feel that it is time to increase this maximum amount. CCD is	Tracy Loomis CCD	Oregon acknowledges the concern and will evaluate the impact of shifting the allocation balance between program and administrative funds.

committed to travel to project sites for necessary meetings, attend CDBG training when possible, etc., and these costs have increased over the past several years.		
"Under rare circumstances….biological assessments, arch "surveys….allow the recipient to use a portion of the grant administration allowance…" CCD would like this to be eliminated. As Grant Administrator, we are not involved in these assessments/studies – that is decided between the engineer and project owner. It is impossible to budget for CDBG Grant Administration with these unknowns – these assessments/studies are quite expensive. These costs need to come from a different Line Item, whether it be Engineering or something different.	Tracy Loomis CCD	Oregon acknowledges the concern but prefers to leave the language intact for those rare circumstances under which these conditions exist.
Regarding the decrease in funding allocation received from HUD, which decreases the maximum grant awards – CCD would, of course, prefer that there would be no decreases, even if temporary.	Tracy Loomis CCD	Oregon acknowledges the concern and will continue to annually evaluate the balance between increasing demand for CDBG dollars and the decreasing allocation.
Environmental Report: - Review the amount available to complete the report. Possible increase as the amount of work required to complete the reports has increased over the years. - Review if the project/all potential funding source requirements can be included. If not-what is the CFR citation that prohibits this.	Becky Bryant IFA	Oregon acknowledges the concern and will continue to annually evaluate the balance between increasing demand for CDBG dollars and the decreasing allocation.
Grant Administration-I believe it is time to look at the amount of funds that can be used for grant administration	Becky Bryant IFA	Oregon acknowledges the concern and will continue to annually evaluate the balance between increasing demand for CDBG dollars and the decreasing allocation.
In our review of the draft Analysis of Impediments (AI) we appreciate seeing the inclusion of points made in Darcy Strahan's letter dated August 3, 2015 to OHCS in the compilation of public review period comments. While noted in the "comments" section, based on Darcy's letter, that supported housing resources need to be a part of the action plan, it should also note, also in Darcy's letter, that the report misrepresents group homes as the sole option for persons with disabilities (Action item 1-5). We were pleased to read Jaime Daignault's comment that "group homes are not a desired setting for many people living in them or at risk of moving into them for lack of affordable accessible housing." We look forward to the final AI as an important resource in our efforts to provide housing and to further fair housing for the populations we serve.	Susan Lind OHA	Oregon is committed to providing a range of housing options for person with disabilities. Access to affordable housing free from discrimination and increasing the availability of affordable housing, including accessible housing are urgent priorities for Oregon.
Supportive of the analysis and the recommended plan. Oregon On believes that Oregon's laws limit housing opportunity across the state by limiting local jurisdictions ability to use policy and resource tools commonly in use across the	Jon Miller, Oregon ON	There is ongoing discussion about inclusionary zoning in the legislature. OHCS will track the legislation.

US. Oregonians in protected classes are directly impacted by statewide pre-emptions that result in impediments to housing opportunity. Copy of full letter is available at the end of this section.		
CAT provided extensive comments about the AI including several recommendations on how to make the AI stronger. The theme of these comments are that OHCS needs to examine how the state laws banning rent control, permitting no cause evictions, and substandard housing impact housing choice and encourage housing discrimination. Copy of the full letter is available at the end of this section. CAT also suggested there is a need to track displacement and increase both tenant education and legal resources for tenants.	Justin Buri, Community Alliance of Tenants	Oregon will consider the comments submitted by CAT and revise the AI if necessary.

Housing Land Advocates

June 1, 2015

BY E-MAIL AND U.S. MAIL

Lynn Nagasako
DOJ GC Tax & Finance
1162 Court St NE
Salem, OR 97301

RE: State laws that may be in violation of federal fair housing laws

Dear Ms. Nagasako,

Housing Land Advocates is a non-profit organization dedicated to advancing the cause of fair and affordable housing through intelligent land use planning. We understand you have made inquiries as to what Oregon Statutes, if any, might be in violation of federal fair housing laws. We suggest the following:

1. ORS 197.660-.670, relating to "special residences." These statutes were first enacted in 1989, before the enactment by Congress of the Americans with Disabilities Act (ADA). The Oregon statutes were a notable advance and may have been a legislative response to *Mental Health Division v. Lake County*, 17 Or. LUBA 1165 (1989), which was then pending. As good as they were, these statutes were insufficient under the ADA and other similar legislation of that same period:

   Title II of the ADA (42 U.S.C. §23131-12161) provides that "no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." Accordingly, zoning as a governmental process, falls within the purview of the ADA.

   The ADA does not stand alone in protecting people with disabilities from discriminatory zoning decisions. The Fair Housing Amendments Act of 1988 (42 U.S.C. §3601) prohibits discrimination against the providers and clients of residential treatment programs. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794) prohibits discrimination by all services that receive federal financial assistance. The ADA expands the protection of the Rehabilitation and Fair Housing acts to include non-residential programs that are privately funded.

   See Local Government Insurance Trust: Discriminatory Zoning at http://www.lgit.org/DocumentCenter/Home/View/303

2. ORS 197.309, prohibiting "inclusionary zoning." Oregon, along with Texas, remains the only two states that prohibit local governments from the use of "inclusionary zoning" in administering land use regulations. This means that local governments may not require developers to set aside a certain number of units or lots for low and moderate-income people. Because of this prohibition, significant tools for housing this income sector (which contains a disproportionately large percentage of minorities, disabled persons, and single-parent families) are precluded from access to housing. We note that there is proposed legislation (HB 2564) that could partly remedy this situation. The state's prohibition against rent control under ORS 91.225 is also being used as a shield against the applicability of inclusionary zoning in new rental housing developments. However, the proposal in HB 2564 that would apply to development of new for sale housing has not yet been enacted.

3. Periodic Review. Periodic Review was once the tool by which local governments were required to keep their plans consistent with the Oregon State-Wide Planning Goals, including the Goal for Housing, which provides:

"To provide for the housing needs of citizens of the state.
Buildable lands for residential use shall be inventoried and plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density."

According to the state's Land Conservation and Development Commission, these statutes are largely a dead letter:

"In 2007, the Oregon Legislature enacted a bill that revised the scope of Periodic Review to include only those cities with a population greater than 10,000. While Statewide Planning Goal 2, Land Use Planning, requires that all local governments' comprehensive plans be maintained and updated, counties and smaller cities are no longer legally obligated to complete the formal statutory requirements for Periodic Review. As part of the 2007 legislative amendments, the scope of Periodic Review was also scaled back to include only the fundamental building blocks of local planning: housing, economic development, transportation, public facilities and services, and urban land supply."

http://www.oregon.gov/lcd/pages/urbanrural.aspx

Aside from the Portland Metro Area, little attention and few resources have been placed into periodic review. As a result, local plans have not kept pace with housing trends nor fulfilled the regulations of a mandatory statewide system for providing housing. Moreover, the failure of the state to enforce periodic review even in those cities required to undertake the process, leaves many cities behind

when it comes to fair housing compliance. Once again, the burden of this indifference and negligence has fallen on those of lower income, the disabled and single-parent families.

We hope this information is useful and provides an understanding of the connection between state regulation and fair housing. Thank you for your consideration.

Sincerely,

Jennifer Bragar
President

GSB:7106017.2 [13046.00117]

Community Alliance of Tenants

2710 NE 14th Avenue, Portland, Oregon 97212

November 9, 2015

Loren Shultz
Infrastructure Financial Authority
Oregon Business Development Department
775 Summer Street, Suite 200
Salem, Oregon 97301

Submitted via email: Loren.Shultz@oregon.gov

To Lauren Shultz:

On behalf of the Community Alliance of Tenants ("CAT") please accept these comments on the State of Oregon's proposed 2016-2020 Analysis of Impediments to Fair Housing Choice ("AI"). CAT's mission is to educate and empower tenants to demand safe, stable and affordable rental homes. We believe that housing is the basis of a strong community, so we bring tenants together to organize and collectively advocate for fair and equal protections in housing practices and policies.

By publishing this proposed AI for comment, the State of Oregon has taken a very important step towards achieving Congress' vision about how the Fair Housing Act should be a tool for creating equal opportunity in our country. The Act requires that federal housing and community development programs be administered in ways that help overcome the problems associated with racial segregation and expand the housing choices available to families in America, regardless of race, color, religion, sex, national origin, familial status or disability. CAT commends the State of Oregon for its research findings, including that persons with disabilities face barriers to housing choice and that discrimination against protected classes persists statewide.

The AI rightfully acknowledges discrimination against group homes, impacting people with disabilities, and the uneven enforcement or occupancy limits, which impact immigrants and refugees. Fair Housing Council of Oregon's recent BOLI cases are listed in the case examples, including some big wins for disabled residents. We commend the recommendation of strong funding of fair housing enforcement and education throughout the state.

CAT applauds the state for including discriminatory screening practices and the statutory ban on inclusionary zoning (IZ). CAT has advocated around these two issues from a fair-housing perspective, and has been working with partners to overturn the statewide preemption on IZ since 2011. In 2012 and '13, CAT advocated for more fair screening practices related to criminal history through the landlord-tenant coalition. We thank you for including these issues in the AI. CAT urges the State to include additional issues that are so far not addressed in the current AI.

Phone: (503) 460-9702 Fax: (503) 288-8416 Renters' Rights Hotline: (503) 288-0130
www.oregoncat.org

In our view, the AI can be made stronger and more effective by addressing the following impediments to fair housing:

- The ban on rent control
- No-cause evictions
- Substandard housing in the private market, especially in rural areas
- Lack of data around displacement and substandard housing
- Lack of tenant education, and legal resources for low-income tenants

Below we explain why these points belong in a complete analysis of impediments.

1. **The ban on rent control.**
    a. While the proposed AI recognizes state law and local practices that create barriers for persons with criminal backgrounds, it does not address other statutory barriers to housing choice for protected classes. ORS 91.225 prohibits rent control. The AI does address the issue of rent control, though it is buried in Appendix A, page 65-66. The prohibition is referred to as "facially neutral" and therefore "it does not create a barrier to fair housing choice recognized by FHAA."
    b. There is authority to respond to this crisis. The City of Portland recently passed an ordinance to deal with the emergency situation for tenants that includes a 90-day notice period for no-cause evictions and on rent increases above 5%. The Portland City Attorney cited the ban on rent control as a barrier for enacting stricter protections around rent increases, beyond this 90-day notice period. This preemption was cited, even though ban is silent on the authority of Oregon jurisdictions to enact their own regulations of longer notice periods for substantial rent increases, beyond the statutory 30-days, in ORS 90.220(7).
    c. Using the test in Section III, page 5, the ban on rent control is a barrier to fair housing. First, the practice results in or would predictably result in, a discriminator effect on the basis of a protected characteristic. We know that households of color and households with disabled persons have median incomes lower than their white counter parts and we encourage the inclusion of this data in AI. We also know that according to the 2013 ACS data that 53.8% of Oregonian renters are rent burdened in that they pay more than 30% of their income towards rent. Persons of color are more likely to be renters than white residents. In Portland, for example, 60.7% of black households, 62.9% of Pacific Islander and 73.3% of Latino households are renters compared to 42.2 % of white (not Hispanic) households. Therefore, barriers in the rental market have a disparate impact on communities of color. According to the survey within the AI, non-white tenants and disabled tenants are reporting that their incomes cannot keep up with the rent at higher rates than white residents who were surveyed. See Section V, page 5 & 19. Throughout the AI, all stakeholders

list the lack of affordable housing as a barrier, some noting that they are seeing more and more households "double up" in order to stay in their desired communities. Unfettered increases in rent have a disparate impact on protected classes, especially race & disability. The current ban on rent control removes one tool to address this problem.

d. "Similar to inclusionary zoning, a ban on rent control affect members of protected classes to the extent that they have a greater need for affordable housing. […] At the very least, Oregon's state law prohibiting rent control limits the ability of cities and counties in the state to employ policies that can retain affordable housing and prevent displacement." (Section III, Page 4). As the AI notes, bills have been proposed, such as SB 452, which would have addressed inappropriate rent increases to manufactured home owners (Section III, Page 5). Non-manufactured-housing renters in private-market residential rental housing face similar and often worse rent increases, as they have fewer protections under state law, and already pay a higher portion of their total housing costs to rent.

e. If the practice is necessary to achieve one or more of its substantial, legitimate, nondiscriminatory interests, the interest could be served by practice that has a less discriminatory effect. Here, there is an interest served by less restrictive discriminatory effect. The landlord interest is in profits through raising rents. Removing the rent control prohibition does not in and of itself create rent control. Instead, a rent control statute or local ordinance could take into account inflation and normal increases in cost, while still providing tenants protections from rapid, destabilizing rent increases, which can price out tenants of protected classes, so that they can no longer afford to live in their communities.

2. **No-Cause Evictions.**

a. Under 90.427, the landlord retains the right to end a periodic tenancy without stated cause. This means that the landlord can terminate a month-to-month rental agreement, or refuse the renew a fixed-term lease, even if the tenant is current on rent and has not violated the lease or Oregon landlord-tenant law. The tenant is often given a 30- or 60-day notice, depending on the length of tenancy. These types of terminations are commonly referred to as a "no-cause eviction."

b. CAT is concerned about the proliferation of no-cause evictions and potential FHA violations stemming therefrom. When evictions have disparate impact on protected classes or are pretext for intentional discrimination, they adversely impact housing choices for protected classes.

c. As with the ban on rent control, local jurisdictions are limited to enact their own protections from no-cause evictions. As with substantial rent increases, the Portland City Attorney recently cited the right of landlord to

evict for no cause as a barrier for enacting stricter protections around no-cause evictions, beyond the new 90-day notice period. This “implicit” preemption was cited, even though the statue is silent on the authority of Oregon jurisdictions to enact their own regulations around evictions protections.

d. Many of the examples cited by Oregon landlord association groups, as to why landlords need to retain this right, is to protect other tenants’ health and safety, which are threatened by criminal activity or lease violations by a neighboring tenant. Examples cited by landlords often include gang activity, violence and threats, prostitution, domestic violence, and illegal drug sales or manufacturing. Although all of these activities are either illegal or lease violations, landlord argue that the inability to prove these violations is a barrier to properly removing the tenant by issuing a “for-cause” termination notice. With a no-cause eviction, the landlord does not have to prove or state a cause, and the tenant has no legal ability to remedy the supposed violation. However, the examples above bear an uncomfortable resemblance to instances of racial profiling that we often hear of on CAT’s Renters Rights Hotline. People of color, especially African Americans and Latinos, are often falsely accused of these activities, or accused of inviting criminal bad actors onto the premises, even when no such activities can be proven or attributed to one particular tenant. Giving landlords full discretion and little accountability in issuing no-cause evictions can have a discriminatory effect, given these circumstances.

b. In the AI, the practice of no-cause evictions is briefly mentioned as a barrier, Section II, page 17, “lower income households are more likely to be adversely affected by shorter-term leases and practices of no cause lease terminations because landlords have a greater incentive to raise prices on low rent properties… This could disproportionately affect protected classes who are more likely to be low income.” CAT has seen in our membership the problem of no cause evictions all too often. A recent building-wide eviction in North Portland forced many long-time tenants of color out of a neighborhood that has already experienced the historical displacement of African Americans and people of color. One of the Latino families who was displaced was not able to secure housing within the 60-day notice period, even with a Housing Choice Voucher (Section 8), and was forced to dispose of their belongings and furniture, to move in with a family member while their search continued.

c. Due to the often-subtle nature of discrimination, this practice deprives tenants of their ability to contest the reason for losing their home and allows discrimination to perpetuate. We have seen the only black tenants receive a no cause notice of termination. No other tenant received a notice but the landlord also never said anything overtly racist. In these situations, the tenants often move and do not report the discrimination because they

feel as though they cannot prove that is why they lost their home. Requiring for-cause evictions would allow the state to better determine and separate the terminations that are based on a just cause versus discrimination.

d. Perhaps the most troubling aspect of no-cause evictions is the threat or fear of a retaliatory eviction by the landlord, when a tenant defends, or expresses intent, to defend his or her rights under Fair Housing and/or Oregon Landlord-Tenant Law. Although technically illegal under 90.385, retaliation is very difficult to prove, and threats of retaliation can take many subtle forms, such as "if you don't like it leave," which is a common example we hear from tenants on the Renters Rights Hotline. Such threats and fears of retaliation can prevent tenants from addressing important issues related to the tenancy, such as repairs and maintenance issues that can have an impact on the tenants' health.

e. CAT recently collaborated with Multnomah County Health Department and through some preliminary data analysis, found that Native Americans, African Americans and people with disabilities were more likely to receive a no-cause eviction[1]. Other research by Matthew Desmond found that in the City of Milwaukee WI, African American women were disproportionately affected by evictions, citing low wages and children as primary reasons for the evictions[2]. However, due to the legal process by which no-cause evictions are issued in Oregon, and a general lack of attention by both academia and government institutions, very little data exists of both the prevalence and potential disparate impact of no-cause evictions.

3. **Substandard housing in the private market**

   a. While the proposed AI recognizes that the condition of subsidized, affordable housing is generally poor in rural areas, the private market provides affordable housing to low-income tenants in low quantities and bad quality in both urban and rural areas. Again, the lack of data around substandard housing is troubling. Data collection is difficult, because it requires the participation of low-income renters, and access to the interior of the rental units, both of which are costly and time intensive. National research that does exist states that "nearly six percent of all rural housing

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[1] Multnomah County Health Department.*Health Effects of End of Tenancy Notice*. Issue brief. Portland: Public Health, 2013. Print.

[2] Desmond, Matthew. *Poor Black Women Are Evicted at Alarming Rates, Setting Off a Chain of Hardship*. Research brief. Chicago: MacArthur Foundation, 2014. How Housing Matters to Families and Communities Research Initiative. *How Housing Matters*. Print. In disadvantaged neighborhoods, eviction is to women what incarceration is to men: incarceration locks men up, while evictions lock women out.

is either moderately or severely substandard. Rural minorities, - who tend to have lower incomes and higher poverty rates – are almost three times more likely to live in substandard housing that white rural residents."[3] While some jurisdictions throughout the Oregon have a rental housing code and enforcement through inspections, most non-entitlement jurisdictions no not, and an inspections program is often the only public resource that would be available to tenants to ensure the health and habitability of their rental housing.

b. CAT organizes private-market apartment buildings in substandard conditions, under the Safe Housing Project, and with Oregon Public Health Institute and other partners, published a Health Impact Assessment (HIA) of Portland's Rental Housing Inspections program. The HIA found that "groups at higher risk of various health problems – particularly communities of color and low-income households – are more likely to live in substandard housing."[4] One of the most significant problems that we find with the issue of private-market substandard housing among low-income tenants, whether rural or urban, is its relative invisibility among affordable housing providers, public agencies and policy makers. Adequate data collection could go along way to address these disparities, and help the state to identify whether or not it is a fair housing issue.

4. **Lack of data about displacement and substandard housing**

a. Failure to track displacement of protected classes and the number of protected classes living in substandard housing is a barrier to fair housing choice. In Portland, the historically black neighborhoods are being decimated, resulting in a diaspora of the black community. They have landed in lower opportunity communities with poorer housing. Communities of color and people with disabilities in rural areas, and their unique challenges to maintaining housing stability, are often not adequately represented in outreach and data-collection efforts. Further research should focus on this issue, including targeted data collection and analysis of Oregon's protected classes' experiences with housing. Based on CAT's experience, through organizing and our Renters Rights Hotline, members of protected classes have higher levels of vulnerability to displacement – through rent increases, evictions, foreclosure, etc. We cannot adequately identify whether or not displacement is a barrier to

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[3] National Rural Housing Coalition. *Rural America's Rental Housing Crisis*. Washington D.C. 2014. Print. Federal Strategies to Preserve Access to Affordable Rental Housing in Rural Areas

[4] Oregon Public Health Institute, Steve White, Moriah McSherry McGrath Multnomah County Health Department, Community Alliance of Tenants, Metro Multifamily Housing Association, Rental Housing Association of Greater Portland, City of Portland Bureau of Development Services, and City of Portland Housing Bureau. *Rental Housing and Health Equity in Portland, Oregon*. Portland: Oregon Public Health Institute, 2012. Print. A Health Impact Assessment of the City's Rental Housing Inspections Program

affirmatively furthering fair housing, if we don't adequately collect and analyze the data.

5. **Lack of tenant education, and legal resources for low-income tenants.**
    a. Given the large number of tenants and the growing rental market in Oregon, the number of tenants in need of information and legal resources has grown. The Fair Hosing Council of Oregon provides excellent and important information and education throughout the state, through its Hotline and other programs. However, the services that FHCO provides are specific to fair housing law, and not Oregon landlord-tenant law.
    b. Information and education on issues such as repairs, deposits, retaliation, access, and screening practices, often intersect with fair housing violations or issues. Through our Hotline, CAT often flags a potential fair housing issue or violation, and works with the caller to refer the tenant to the right agency or information. Tenants are often unaware that their fair housing rights have been violated, especially if the violation is hidden within a landlord-tenant law issue. Additionally, tenant education can have a great impact in reducing patterns of displacement, substandard housing, and evictions, which, as stated above, all may be barriers to fair housing choice.
    c. When low-income tenants have had their rights violated, they often lack the financial resources to afford a lawyer, and many private lawyers cannot make an adequate living representing low-income tenants, due to the imbalance of Oregon's landlord-tenant law. Legal Aid Services of Oregon, Oregon Law Center, the Oregon Bar Association, and other non-profit legal clinics do exemplary work providing access to legal resources for low-income tenants, but the need is simply too great. More public funds should be invested in legal resources and representation for low-income Oregon tenants, many of which are members of protected classes. The AI should include the lack of adequate tenant education and legal resources as an impediment to housing choice for protected classes.

Thank you for the opportunity to comment on this important document. We look forward to seeing the final Analysis of Impediments published soon, and to working with the State of Oregon to affirmatively further fair housing.

Sincerely,

Justin Buri
Executive Director
Community Alliance of Tenants

OREGON OPPORTUNITY NETWORK
Proven Partners • Thriving Communities • Lasting Value

November 9, 2015

Loren Shultz, Regional Coordinator
775 Summer St. NE, Suite 200
Salem, OR 97301

Dear Loren,

Thank you very much for the opportunity to comment on the State of Oregon 2016-2020 Analysis of Impediments to Fair Housing Choice (AI). On behalf of Oregon Opportunity Network, I applaud the entire team for this excellent and important analysis of the barriers to fair housing across our state.

As always, Oregon ON and our members are eager to assist as partners with the State to provide equitable housing opportunity to vulnerable Oregonians. The AI rightly calls out that discrimination against protected classes persists statewide and that too many Oregonians do not have a safe, decent, affordable place to call home. With over 20,000 children homeless statewide, we are truly facing a crisis.

We are strongly supportive of your analysis and recommended action plan. In particular we'd like to highlight our support for the following recommendations:

- Action item 1-1 (a): *Determine the specific housing needs for persons with disabilities and develop proactive strategies to address the need.* We are eager to help with this important work.
- Action item 3-1 (b): *Provide culturally specific fair housing education and outreach for tribal communities, Spanish speaking communities, new immigrants and persons with limited English proficiency.*

  We greatly admire the work of our friends at the Fair Housing Council of Oregon and the Community Alliance of Tenants; we hope that these and other community-based organizations will continue to be funded and given a central role in education and outreach.
- Action items 4-1 (a-c): *Explore enhancements to the single family bond program; Continue to provide down payment assistance for low income homebuyers; provide focus on home buyers of color; Continue to support funding for Homeownership Centers across Oregon to provide homebuyer education and counseling, and financial education and counseling for low income homebuyers.*

  These are all vital strategies to increase homeownership opportunities in rural areas. We appreciate the Homeownership Workgroup that OHCS has convened, and urge the State to give homeownership additional resources as it looks to support opportunity across the housing continuum.

919 NE 19th Ave., Suite A • Portland, OR 97232 • tel: 503-223-4041 • fax: 503-335-0475 • www.OregonON.org

- *Action item 4-2 (a): Continue discussions with the Oregon Affordable Housing Tax Credit workgroup and partners regarding the Tax Credit, and how this program can be used to provide additional opportunities in rural communities.*

  Oregon ON members have appreciated being part of the workgroup and stand ready to continue to assist with these efforts.

- Action item 5-a: *Consider ways to partner with local jurisdictions to improve housing code enforcement.*

  Substandard, unhealthy and often dangerous housing is a huge issue in the private market. Successful code enforcement programs like the one in Gresham should be replicated statewide.

- Action item 7 (a-d): *Reduce barriers for persons under post-prison supervision and probation to find and maintain affordable housing; Consider funding second chance tenant training programs and landlord guarantee programs; Examine the effectiveness of reentry programs, etc.*

  As part of the gradual shift to inter-agency alignment and coordination between OHCS and other state agencies like Corrections, Oregon ON would welcome any opportunities to participate in conversations and solutions around re-entry housing.

Finally, regarding Research Finding #6, *Oregon's state laws may limit the ability of cities and counties to employ programs that are known to create a significant amount of affordable units in many other jurisdictions*:

We believe that Oregon's laws **absolutely do** limit housing opportunity across the state by limiting local jurisdictions' ability to use policy and resource tools commonly in use across the United States. Oregonians in protected classes are directly impacted by statewide pre-emptions that result in impediments to housing opportunity – not just Inclusionary Zoning, but also the ban on rent control and the constitutional ban on real estate transfer taxes. In addition, no-cause evictions are unfairly creating havoc for vulnerable tenants not just in Portland but across the state.

Thank you very much for your consideration of these comments, for all the excellent work in putting this massive document together, and most of all the State's urgency and call to action for housing opportunity.

Sincerely,

John Miller
Executive Director

ATTACHMENT Q: 2016-2020 FAIR HOUSING ACTION PLAN (FHAP) - STATE OF OREGON

For purposes of this plan, the distinction between an impediment and a barrier, is that

ROW #	FAIR HOUSING BARRIER	PRIORITIZATION	ACTION ITEMS TO ADDRESS IMPEDIMENTS	FAIR HOUSING PARTNERS	TIMELINE *Short Term 1-2 Years; Moderate Term 2-3 Years; Long Term 3-4 Years*	PROGRESS, DELIVERABLES AND OUTCOMES
1	**Impediment 1-1.** Lack of affordable, accessible housing, including housing available for persons with disabilities who wish to leave nursing homes or other institutional settings.	High	**Action Item 1-1a.** Determine the specific housing needs for persons with disabilities and develop proactive strategies to address the need.	OHCS/OHA	Long Term	
2		High	**Action Item 1-1b.** Determine how to better match persons with disabilities with accessible units, including if persons with disabilities have access to units as they become available.	OHCS/FHCO	Moderate Term	
3		High	**Action Item 1-1c.** Examine how the state can increase the number of accessible units in publicly funded multifamily developments while complying with all relevant regulations and constraints.	OHCS/OHA	Moderate Term	
4		Low	**Action Item 1-1d.** Support the efforts of Public Housing Authorities to implement adaptive modification programs.	Public Housing Authorities	Moderate Term	
5		High	**Action Item 1-1e.** Promote polices that support aging in place and funding for retrofitting of senior housing. Support the continued dissemination of information on how communities can provide opportunities for residents to age in place and how to improve community access for persons with disabilities living in independent settings.	OHCS	Moderate Term	
6	**Impediment 1-2.** Refusal of some landlords to make reasonable accommodations for persons with disabilities.	Moderate	**Action Item 1-2.** Identify resources and provide opportunities for education and training on the requirements to provide reasonable accommodations.	OHCS/FHCO/OBDD-IFA	Short Term	
7	**Impediment 1-3.** Persons with disabilities who desire to transition out of institutional settings are limited by the lack of affordable, accessible and supportive services housing, in addition to financial and emotional support to assist them in their transitions.	High	**Action Item 1-3.** Convene service providers and persons with disabilities to prioritize the needs to transition persons with disabilities into the community from medical or other systems of care.	OHCS/FHCO/OHA/DHS	Moderate Term	
8	**Impediment 1-4.** Housing choices for persons with disabilities are severely limited by lack of sidewalks, paved roads and reliable and sufficient public transportation.	Moderate	**Action Item 1-4.** Prioritize accessibility improvements in publicly funded community development projects, to promote housing choice for persons with disabilities.	OHCS/OBDD-IFA/OHA/DHS	Long Term	
9	**Impediment 1-5.** Local zoning and land use regulations and/or inexact application of state law may impede the siting and approval of group homes.	Moderate	**Action Item 1-5.** Review and support best practices to further housing choice for persons with disabilities, including potential modifications to state statutes to further fair housing protections for persons with disabilities residing in group home settings.	OHCS/FHCO/OHA/DHS	Long Term	
10	**Impediment 2-1.** Lack of enforcement of fair housing violations persists statewide.	High	**Action Item 2-1a.** Continue to fund efforts of Fair Housing Council of Oregon (FHCO) to provide fair housing education and training services. Continue to fund the fair housing complaint line and provide broader assistance with landlord/tenant disputes. Promote increasing the language accessibility of these services.	OHCS/OBDD-IFA	Long Term	
11		Moderate	**Action Item 2-1b.** Strengthen the certification that all publicly funded grantees comply with all federal, state and local nondiscrimination laws. Provide educational materials to ensure grantees understand fair housing obligations.	OHCS/FHCO	Short Term	
12	**Impediment 2-2.** Limited housing options for persons most vulnerable to housing discrimination: non-English speakers, persons of Hispanic descent, Native Americans, African Americans, large families and, as discussed above, persons with disabilities.	High	**Action Item 2-2a.** Continue to fund and expand fair housing audit testing to inform educational, outreach and enforcement efforts. Incorporate retesting and verification in efforts.	OHCS/FHCO	Long Term	

ATTACHMENT Q: 2016-2020 FAIR HOUSING ACTION PLAN (FHAP) - STATE OF OREGON

For purposes of this plan, the distinction between an impediment and a barrier, is that

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13		High	**Action Item 2-2b.** Promote housing alternatives for persons reentering community from incarceration.	OHCS/Re entry Council/Gov Task Force on DV	Long Term	
14		Moderate	**Action Item 2-2c.** Provide stakeholder education and training on fair housing laws and requirements.	OHCS/OBDD-IFA	Long Term	
15		High	**Action Item 2-2d.** Fund complaint intake process at FHCO as well as technical assistance for federal funding recipients.	OHCS/OBDD-IFA	Long Term	
16		Moderate	**Action Item 2-2e.** Fund pilot program to review Post Acknowledgement Plan Amendments submitted to DLCD to identify land use proposals with a potentially discriminatory impact.	OHCS/OBDD-IFA	Short Term	
17		Moderate	**Action Item 2-2f.** Continue to staff the Housing Choice Advisory Committee and monitor implementation of HB 2639 (2013).	OHCS	Long Term	
18		High	**Action Item 2-2g.** Continue efforts to expand housing choices in rural areas.	OHCS	Long Term	
19		High	**Action Item 2-2h.** Promote access to mediation services for neighbor on neighbor harassment in manufactured home parks. These services are also available for landlord tenant disputes.	OHCS	Long Term	
20		Moderate	**Action Item 2-2i.** Promote tools and education for housing providers to understand fair housing requirements—e.g., working with apartment associations to distribute model lease agreements in English and Spanish and reasonable accommodations policies.	OHCS/FHCO	Long Term	
21		High	**Action Item 2-2j.** Continue to fund advocacy services to persons living with HIV/AIDS through locally based housing case managers.	OHA	Long Term	
		High	**Action Item 2-2k.** Promote housing alternatives for persons surviving domestic violence.	OHCS/ DHS	Moderate Term	
22	**Impediment 3-1.** Local fair housing resources statewide are limited. This is particularly true in rural communities.	High	**Action Item 3-1a.** Ensure that fair housing resources are provided statewide. Ensure that rural communities are able to effectively access services and resources. To the extent possible, prioritize long-term support for fair housing activities.	OHCS/OBDD-IFA/FHCO	Long Term	
23		High	**Action Item 3-1b.** Provide culturally specific fair housing education and outreach for tribal communities, Spanish speaking communities, new immigrants and persons with limited English proficiency.	OHCS/FHCO	Long Term	
24		High	**Action Item 3-1c.** Ensure persons living with HIV/AIDS have access to Fair Housing information and resources.	OHCS/OHA/FHCO	Long Term	
25	**Impediment 4-1.** Limited credit alternatives for households in rural areas who seek homeownership.	Moderate	**Action Items 4-1a.** Explore enhancements to the single family bond program.	OHCS	Long Term	

ATTACHMENT Q: 2016-2020 FAIR HOUSING ACTION PLAN (FHAP) - STATE OF OREGON

For purposes of this plan, the distinction between an impediment and a barrier, is that

ROW #	FAIR HOUSING BARRIER	PRIORITIZATION	ACTION ITEMS TO ADDRESS IMPEDIMENTS	FAIR HOUSING PARTNERS	TIMELINE *Short Term 1-2 Years; Moderate Term 2-3 Years; Long Term 3-4 Years*	PROGRESS, DELIVERABLES AND OUTCOMES
26	**Impediment 4-1.** Discriminatory lending practices persist for persons of color.	High	**Action Items 4-1b.** Continue to provide down payment assistance for low income homebuyers; provide focus on home buyers of color.	OHCS	Long Term	
27		High	**Action Items 4-1c.** Continue to support funding homebuyer education and counseling, and financial education and counseling for low income homebuyers.	OHCS	Long Term	
28		High	**Action Items 4-1d.** Partner with banking and mortgage industry and existing community development financial institutions to increase lending opportunities in rural communities.	OHCS	Moderate Term	
29		High	**Action Items 4-1e.** Continue the Oregon Individual Development Account (IDA) Initiative to increase opportunities for low income Oregonians to access home ownership.	OHCS	Short Term	
30		Moderate	**Action Items 4-1f.** Convene lenders to better understand the challenges—and solutions—to addressing limited capital in rural areas.	OHCS	Moderate Term	
31	**Barrier 4-2.** Lack of capital to develop multifamily housing in rural areas.	High	**Action Item 4-2a.** Continue discussions with the Oregon Affordable Housing Tax Credit workgroup and partners regarding the Tax Credit, and how this program can be used to provide additional opportunities in rural communities.	OHCS	Short Term	
32		Moderate	**Action Item 4-2b.** Partner with banking and mortgage industry and existing community development financial institutions to increase lending opportunities in rural communities.	OHCS	Long Term	
33	**Barrier 5.** Condition of affordable housing is generally poor in rural areas.	Moderate	**Action Item 5a.** Consider ways to partner with local jurisdictions to improve housing code enforcement.	OHCS/FHCO	Long Term	
34		High	**Action Item 5b.** Require that all grantees/developers of funded rental housing projects that have high risk of compliance violations, or are poor performing, will annually inspect the condition and habitability of the units funded.	OHCS	Short Term	
35	**Barrier 6-1.** The state's ban on the use of inclusionary zoning limits municipalities' ability to employ flexible tools and incentives to increase the number of affordable units built.	Low	**Action Item 6a.** Work with Department of Land Conservation and Development to examine Oregon's land use laws and planning and zoning systems and seek ways to help local jurisdictions meet their statutory housing obligations.	OHCS/DLCD	Long Term	
36	**Impediment 6-2.** The lack of affordable units significantly limits housing choice for persons of color and low income persons.	Moderate	**Action Item 6b.** Conduct deeper research into how Oregon's current land use system could accommodate creation of integrated neighborhoods and increased inventory of affordable units.	OHCS/DLCD	Long Term	
37		Low	**Action Item 6c.** Strengthen technical planning assistance for cities around creating housing choice.	OHCS/DLCD	Long Term	
38		Low	**Action Item 6d.** Encourage use of local incentives to encourage affordable housing development.	OHCS/DLCD	Long Term	

ATTACHMENT Q: 2016-2020 FAIR HOUSING ACTION PLAN (FHAP) - STATE OF OREGON

For purposes of this plan, the distinction between an impediment and a barrier, is that

ROW #	FAIR HOUSING BARRIER	PRIORITIZATION	ACTION ITEMS TO ADDRESS IMPEDIMENTS	FAIR HOUSING PARTNERS	TIMELINE *Short Term 1-2 Years; Moderate Term 2-3 Years; Long Term 3-4 Years*	PROGRESS, DELIVERABLES AND OUTCOMES
39	**Impediment 7.** Persons with criminal backgrounds have few, if any housing options.	Moderate	**Action Item 7a.** Reduce barriers for persons under post-prison supervision and probation to find and maintain affordable housing.	OHCS/ DOC/Re entry Council	Long Term	
40		Moderate	**Action Item 7b.** Consider funding second chance tenant training programs and landlord guarantee programs (e.g., similar to the Housing Choice Landlord Guarantee program).	OHCS/DOC	Short Term	
41		Moderate	**Action Item 7c.** Examine the effectiveness of reentry programs in housing environment and support best practices.	OHCS/DOC	Moderate Term	
42		Moderate	**Action Item 7d.** Provide funding opportunities for programs focused on reentry and supportive housing.	OHCS/DOC	Short Term	

Community Development Block Grant
2016 *Proposed*
Method of Distribution

(This Method of Distribution is adopted as part of Oregon Administrative Rule (OAR) 123-080-0030 (3) by reference.)

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Submitted to U.S. Department of Housing and Urban Development
December 28, 2015

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Introduction

Administration of State of Oregon CDBG Program

The Oregon Business Development Department (OBDD) administers the State of Oregon's annual federal allocation of Community Development Block Grant (CDBG) funds for non-metropolitan cities and counties. Urban cities and counties and tribes are not included in the state's program because they receive CDBG funds directly from the U.S. Department of Housing and Urban Development (HUD). Refer to Chapter 2 for more information regarding eligible applicants.

Primary Objective

The primary objective of the CDBG program is the development of viable (livable) urban communities by expanding economic opportunities, providing decent housing and a suitable living environment principally for persons of low and moderate income.

National Objective

Projects must meet one of three national objectives: 1) benefiting low- and moderate-income persons; 2) prevention or elimination of slums or blight; or 3) meeting other community development needs having particular urgency that pose a serious and immediate threat to the health or welfare of the community.

Low and Moderate Income

"Low income" means income equal to or less than 50 percent of the area median (adjusted by family size). "Moderate income" means income equal to or less than 80 percent of the area median (adjusted by family size). Applicable income limits are determined by HUD on an annual basis for all Oregon counties and metropolitan statistical areas by HUD.

Agency's Mission:

Grow Our Own

Strategy 1:

- Business, Retention, Expansion and Recruitment:
    - Build Future Job Growth from Today's Industry Leaders

Strategy 2:

- Innovation and Entrepreneurship
    - Harness Research and Technology to Start up the Companies of Tomorrow

Strategy 3:

- Infrastructure Financing
    - Invest Capital into Communities with Catalytic Growth Opportunities

Strategy 4:

- Global Trade
    - Connect Oregon Businesses to International Markets to Drive Sales

Strategy 5:

- Access to Capital
    - Harness Research and Technology to Start Up the Companies of Tomorrow

Strategy 6:

- Research & Policy
    - Drive Sophisticated Decision-making

Method of Distribution (MOD)

Oregon's 2016 CDBG program is offered to eligible cities and counties for a wide range of activities as authorized under Section 105(a) of the Housing and Community Development Act (HCDA) of 1974, as amended. The eligible activities for the 2016 program year that begins January 1, 2016 are described within this 2016 Method of Distribution.

The state expects to receive approximately $11 million in new federal funds during 2016 for grants to non-entitlement cities and counties for eligible projects.

The CDBG funds covered by this Method of Distribution include: new 2016 funds, unobligated 2015 program year funds, program income and grant funds recaptured from projects funded in prior grant years.

In accordance with Oregon Administrative Rule (OAR) 123-080-030(3), the department will manage the competitive award and funding process for eligible projects under this 2016 Method of Distribution.

Instructions on How to Use the Method of Distribution

No single chapter is a stand alone chapter. The entire Method of Distribution must be read and used in its entirety to obtain the necessary program information and requirements.

Oregon Administrative Rule

This Method of Distribution provides information to assist eligible entities prepare grant applications and is adopted as part of Oregon Administrative Rule (OAR) 123-080-0030 (3) by reference.

Contact the Department

Contact OBDD for more information at 503-986-0123.

Chapter 1 Funding Priorities/Targets

Consistency with Oregon's Consolidated Plan

Priorities for Community Development Block Grant (CDBG) funds must be consistent with the policies and priorities contained in the 2016-2020 State of Oregon Consolidated Plan for Housing and Community Development. The 2016-2020 Consolidated Plan is anticipated to be approved by the U.S. Department of Housing and Urban Development (HUD) sometime mid-2016. The 2016 Method of Distribution is the first annual update to the 2016-2020 Consolidated Plan and has been developed with participation from HUD, the OBDD Infrastructure Finance Authority and the public input received during the 30-day public comment period.

Priorities

Section 106(d)(2)(C)(iii) of the Housing and Community Development Act (HCDA) prohibits a state from declaring certain statutorily eligible activities as ineligible for funding under the state's program, but allows a state to establish funding priorities among the types of eligible activities. The State of Oregon's funding priorities for 2016 are described within the 2016 Method of Distribution (MOD). In accordance with the HCDA the state will consider applications for funding consistent with the identified funding priorities within the 2016 MOD.

There is a broad range of activities that may be assisted with CDBG funds as defined in Section 105(a) of the Housing and Community Development Act (HCDA) of 1974, as amended. States that administer a non-entitlement CDBG program are required to establish procedures for distributing the funds and identification of the activities (priorities) which will be eligible for funding under the state's program. These priorities are described within the 2016 MOD. The priorities eligible for funding under Oregon's 2016 Community Development Block Grant program are:

Programs offered through OBDD Infrastructure Finance Authority

1. **Microenterprise Assistance Public Services:** Recruitment, screening and providing classroom training to microenterprise owners and persons developing microenterprises.
2. **Public Works:** Public water and wastewater system improvements.
3. **Community/Public Facilities:** Community facilities that rarely produce a reliable or sufficient revenue stream to repay a loan.
4. **Community Capacity/Technical Assistance:** Grants for local capacity building.
5. **Emergency Projects:** Projects arising from bona fide emergencies.
6. **Housing Rehabilitation:**
   a. **Type One –** Regional Housing Rehabilitation Revolving Loan Fund.
   b. **Type Two –** Regional Housing Rehabilitation Grant Fund.

Targets

The state receives an annual allocation from HUD for the CDBG program. After subtracting amounts allowed for State Administration (2% plus $100,000) and State Technical Assistance (1%), the department intends to award available new 2016, unobligated 2015, program income and recaptured grant funds from prior year grants to projects in the categories listed below using the percentages shown. Funding priority target percentages were adjusted to be more in line with the increase demand for Community Facility and Public Works projects.

	2015	Target %	2016	Target %
Annual Allocation from HUD	**$11,744,882**		**$12,055,779**	
State Administration 2% (The required match for these funds comes from the Special Public Works Fund (SPWF).	$234,898	2%	$241,116	2%
State Administration $100,000 - no match funds	$100,000	N/A	$100,000	N/A
State Technical Assistance Set-Aside 1%	$117,449	1%	$120,558	1%
Annual Allocation Available for Projects	**$11,292,535**		**$11,594,106**	
Program Income (Note 1)	$3,500 (Note 3)		$3,500 (Note 2)	
Recaptured Funds	$500,000 (Note 3)		$500,000 (Note 2)	
ESTIMATED TOTAL AVAILABLE FOR PROJECTS	**$11,796,035**		**$12,097,606 (Note 4)**	
Microenterprise Assistance	$353,881	3%	$241,952	2%
Public Works	$5,780,057	49%	$6,169,779	51%
Community/Public Facilities	$3,066,969	26%	$3,387,330	28%
Regional Housing Rehabilitation	$2,595,128	22%	$2,298,545	19%

Note 1 When received, program income is allocated to projects using the target percentages identified above, after taking 2% for state administration.
Note 2 Estimated to be received in 2016.
Note 3 Actual as of the date of the Proposed 2016 Method of Distribution Public Hearing – November 9, 2015.
Note 4 Unobligated amounts from 2015 will be added to this figure.

The final 2016 fiscal year allocation amount will be posted on the department's website for access by eligible applicants and distributed to the CDBG list serve.

Target Funding

OBDD-IFA has no control over the type and quantity of applications submitted for funding under the program. Therefore, after each calendar quarter OBDD-IFA conducts a quarterly target review to determine if funds need to be moved from one funding category to another to address program needs. Target funding is used to give the department investment flexibility. Targeted funding does not obligate the department to award all the funds targeted for each category. **If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded. Each calendar quarter March 31, June 30, September 30 and December 31 the department will conduct a quarterly target review and determine if funds need to be moved from one category to another to address program needs.**

Program Year

The State of Oregon's 2016 program year (Fiscal Year) is from January 1 thru December 31, 2016.

Funds Remaining after December 31, 2015

On January 1, 2016 any un-obligated or recaptured FY 2015 funds, earlier program year funds or program income will be applied in conformance with the proposed or HUD approved FY 2016 target percentages and will be awarded in accordance with either the proposed or HUD approved 2016 Method of Distribution.

Funds Remaining after December 31, 2016

On January 1, 2017 any un-obligated or recaptured 2016 funds, earlier program year funds, recaptured funds or program income will be applied in conformance with the proposed or HUD approved FY 2016 target percentages and will be awarded in accordance with either the proposed or HUD approved 2017 Method of Distribution.

Recaptured Funds and Program Income

The state anticipates the receipt of approximately $500,000 of recaptured funds and $3,500 of program income during 2016.

- **Recaptured funds** are those funds that are returned to the department through closeout of a grant, termination for cause or other means.

  Recaptured funds on hand, where a grant recipient had to re-pay funds to the state, will be returned to the U.S. Treasury and recorded as such in IDIS. Once they are credited back to the state, they will be awarded/obligated in conformance with the MOD.

- **Program income** is funds received by the department from repayment of grant funds either loaned to recipients (principal and interest), proceeds from lease or disposition of real property and equipment acquired with CDBG funds, interest earned on any program income pending disposition of such income or from projects that were unable to meet the five-year change of use requirement. Refer to Chapter 4 for more information.

  Program income will be disbursed before funds are requested from the U.S. Treasury.

The state has two requirements which must be met: 1) 24 CFR 570.494(b)(2) and 2) 24 CFR Part 570.494(b)(1) which requires each state to obligate and announce (excluding state administration) 100% of each annual grant within 15 months of the state signing its grant agreement with HUD to Units of General Local Government (UGLG's). To comply with the requirements OBDD prioritizes its obligation and announcement of CDBG funds as follows:

1) CDBG awards will be obligated and announced from the current annual grant within 15 months of the state signing the grant agreement with HUD (24 CFR Part 494(b)(1);

2) Any recaptured funds and program income on hand will be expeditiously obligated and announced in accordance with (24 CFR Part 570.494(b)(2).

Any recaptured funds and program income received by the state will be tracked and disbursed to projects eligible for funding under the 2016 Method of Distribution. Funds received after December 31, 2016 will be disbursed as described above. Recaptured funds remaining after the last day of the program year will be added to the next program year's total allocation and disbursed through the regular grant award process for that year.

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Chapter 2 Eligible Applicants/Limits on Applications

Eligible Applicants

Only non-metropolitan (non-entitlement) cities and counties in rural Oregon can apply for and receive grants. Urban (entitlement) cities (Albany, Ashland, Beaverton, Bend, Corvallis, Eugene, Grants Pass , Gresham, Hillsboro, Medford, Portland, Redmond, Salem and Springfield) and counties (Clackamas, Multnomah, Washington) are not included in the state's 2016 Community Development Block Grant (CDBG) program because they receive CDBG funds directly from the U.S. Department of Housing and Urban Development (HUD).

Tribes are ineligible to directly apply for CDBG funds from the state's non-entitlement CDBG program since they receive their own CDBG allocation directly from HUD. In addition tribes are considered sovereign entities and as such are not considered a unit of general local government under the state's authority. An eligible non-entitlement city or county may apply for CDBG funds for projects that benefit both tribal and non-tribal members. However, state CDBG funds can only be used for the portion of the project that will benefit the non-tribal members.

Table A on pages 2-3 to 2-6 lists each city and county that may be eligible to apply for 2016 Oregon CDBG funds under the low and moderate income area wide national objective.

Applications on Behalf of Another Eligible Applicant

A city or county may not apply for a project where the project to be constructed will be owned and operated by another eligible applicant, a state or a federal agency.

Facilities Owned by Other Public Bodies

Cities and counties may undertake projects to improve existing facilities owned by other public bodies such as sanitary districts and water districts, including water supply authorities, or other political subdivisions of the state and organizations operated on a not-for-profit basis such as associations and cooperatives that provide drinking water to primarily residential areas. These other public or nonprofit organizations must own the facilities to be upgraded and need to contact the appropriate city or county to discuss application sponsorship. The respective city or county where the system is located must sponsor the application for an "other public or nonprofit organization".

Counties considering applying on behalf of another government body are encouraged to enter into an intergovernmental agreement with the government body, identifying the roles and responsibilities of each to ensure the county has proper authority to achieve compliance with the federal CDBG program requirements during the project. Counties also are encouraged to request a meeting with the department for technical assistance and to explain the county's responsibilities under a CDBG grant in projects of this nature.

Regional Projects

Two or more local governments (for example, a city and a county, or two cities) may work on an application for a regional project. In such cases, only one jurisdiction can be the applicant and act as the responsible party under the contract with the state. Joint applications where two or more parties are equally responsible will not be accepted. Regional projects are activities that benefit more than one jurisdiction and address a common problem in a region. Some examples of regional projects

include regional housing rehabilitation programs, regional water or wastewater systems and regional microenterprise assistance programs.

Non-Entitlement/Entitlement Boundaries

When an eligible non-entitlement city or county applicant applies for and is awarded CDBG funds for a project that will be located within the boundaries of a CDBG entitlement city or county whose residents are also residents of the non-entitlement applicant area (for example, Lane County sponsoring a project to be physically located within the City of Eugene), eligible project costs are limited to the estimated pro rata share of the project activity beneficiaries who reside in the non-entitlement portion of the project's service area.

Pass Through

Cities and counties cannot "pass through" the awarded funds to another entity to carry out the project activities. The recipient must carry out the project activities and remain fully responsible for the grant-funded project's compliance with all federal and state requirements. In other words, the project must be under the direct control of the grant recipient at all times.

Project Phasing

Projects cannot be divided into phases to obtain multiple CDBG grants for the same facility. Some examples of project phasing not allowed under the program include:

1. Separating a Public Works project into phases, such as collection system improvements in one-phase and treatment system improvements into another phase in order to apply for more than the maximum grant within a five-year period.
2. Building one portion of a Public/Community facility now, and then building the remaining portion later, in order to qualify for two grants for the same facility.

TABLE A – 2015 LOW AND MODERATE INCOME DATA

City/County	2015 LMISD	City/County	2015 LMISD
Baker County	**42.56%**	**Deschutes County**	**36.58%**
Baker City	46.44%	La Pine	82.74%
Greenhorn	0%	Sisters	35.70%
Haines	39.71%	**Douglas County**	**38.73%**
Halfway	55.84%	Canyonville	50.00%
Huntington	59.26%	Drain	44.44%
Richland	50.00%	Elkton	37.84%
Sumpter	37.93%	Glendale	60.87%
Unity	54.55%	Myrtle Creek	49.71%
Benton County	**48.22%**	Oakland	30.49%
Adair Village	35.56%	Reedsport	47.29%
Monroe	69.75%	Riddle	40.19%
Philomath	37.61%	Roseburg	37.80%
Clatsop County	**38.65%**	Sutherlin	40.16%
Astoria	42.52%	Winston	50.00%
Cannon Beach	47.95%	Yoncalla	59.60%
Gearhart	13.73%	**Gilliam County**	**41.91%**
Seaside	50.84%	Arlington	37.00%
Warrenton	42.03%	Condon	47.50%
Columbia County	**38.17%**	Lonerock	42.86%
Clatskanie	49.29%	**Grant County**	**40.88%**
Columbia City	33.33%	Canyon City	35.71%
Prescott	66.67%	Dayville	58.62%
Rainier	46.81%	Granite	0%
Scappoose	34.77%	John Day	41.28%
St. Helens	42.94%	Long Creek	54.55%
Vernonia	45.34%	Monument	24.00%
Coos County	**38.21%**	Mt. Vernon	32.11%
Bandon	46.91%	Prairie City	46.05%
Coos Bay	41.52%	Seneca	37.14%
Coquille	36.04%	**Harney County**	**38.42%**
Lakeside	39.26%	Burns	40.92%
Myrtle Point	54.56%	Hines	40.40%
North Bend	33.66%	**Hood River County**	**39.58%**
Powers	36.00%	Cascade Locks	44.50%
Crook County	**36.54%**	Hood River	44.08%
Prineville	44.40%	**Jackson County**	**38.20%**
Curry County	**44.72%**	Butte Falls	32.38%
Brookings	44.70%	Central Point	32.41%
Gold Beach	34.64%	Eagle Point	39.26%
Port Orford	42.86%	Gold Hill	41.10%

City/County	2015 LMISD	City/County	2015 LMISD
Jackson County Continued		**Linn County Continued**	
Jacksonville	34.68%	Halsey	42.31%
Phoenix	48.74%	Harrisburg	35.96%
Rogue River	41.03%	Idanha	31.58%
Shady Cove	49.91%	Lebanon	44.02%
Talent	43.25%	Lyons	27.40%
Jefferson County	**43.22%**	Mill City	43.73%
Culver	64.57%	Millersburg	22.26%
Madras	45.65%	Scio	43.36%
Metolius	24.03%	Sodaville	37.93%
Josephine County	**39.48%**	Sweet Home	42.40%
Cave Junction	52.79%	Tangent	36.70%
Klamath County	**38.48%**	Waterloo	53.19%
Bonanza	52.17%	**Malheur County**	**43.92%**
Chiloquin	71.22%	Adrian	22.22%
Klamath Falls	48.02%	Jordan Valley	32.26%
Malin	52.07%	Nyssa	35.65%
Merrill	41.96%	Ontario	49.75%
Lake County	**38.97%**	Vale	49.84%
Lakeview	29.67%	**Marion County**	**40.63%**
Paisley	46.67%	Aumsville	53.74%
Lane County	**40.10%**	Aurora	18.57%
Coburg	22.60%	Detroit	38.71%
Cottage Grove	39.80%	Donald	25.15%
Creswell	41.05%	Gates	52.55%
Dunes City	35.33%	Gervais	45.07%
Florence	47.37%	Hubbard	44.54%
Junction City	40.67%	Idanha	31.58%
Lowell	28.66%	Jefferson	45.90%
Oakridge	43.91%	Keizer	36.46%
Veneta	32.94%	Mill City	43.73%
Westfir	28.30%	Mt. Angel	39.48%
Lincoln County	**41.87%**	Scotts Mills	28.07%
Depoe Bay	39.63%	Silverton	34.42%
Lincoln City	60.01%	St. Paul	10.14%
Newport	36.87%	Stayton	41.36%
Siletz	54.36%	Sublimity	20.38%
Toledo	45.44%	Turner	42.68%
Waldport	58.17%	Woodburn	47.56%
Yachats	48.39%	**Morrow County**	**39.24%**
Linn County	**36.06%**	Boardman	46.03%
Brownsville	46.65%	Heppner	44.26%

City/County	2015 LMISD	City/County	2015 LMISD
Morrow County Continued		**Union County Continued**	
Ione	28.85%	North Powder	47.87%
Irrigon	51.43%	Summerville	19.44%
Lexington	15.22%	Union	42.41%
Polk County	**32.93%**	**Wallowa County**	**34.82%**
Dallas	35.35%	Enterprise	42.42%
Falls City	45.58%	Joseph	33.52%
Independence	39.61%	Lostine	37.88%
Monmouth	48.01%	Wallowa	31.82%
Willamina	53.97%	**Wasco County**	**39.87%**
Sherman County	**40.11%**	Antelope	88.89%
Grass Valley	66.67%	Dufur	34.51%
Moro	58.62%	Maupin	33.33%
Rufus	79.07%	Mosier	47.31%
Wasco	46.15%	Shaniko	40.00%
Tillamook County	**41.92%**	The Dalles	41.83%
Bay City	45.14%	**Wheeler County**	**41.38%**
Garibaldi	41.48%	Fossil	46.84%
Manzanita	37.50%	Mitchell	66.67%
Nehalem	45.95%	Spray	20.83%
Rockaway Beach	46.40%	**Yamhill County**	**42.12%**
Tillamook	59.04%	Amity	54.22%
Wheeler	59.65%	Carlton	40.23%
Umatilla County	**40.01%**	Dayton	43.03%
Adams	28.81%	Dundee	20.10%
Athena	41.75%	Lafayette	52.19%
Echo	45.86%	McMinnville	52.27%
Helix	7.69%	Newberg	40.27%
Hermiston	48.09%	Sheridan	47.59%
Milton-Freewater	47.97%	Willamina	53.97%
Pendleton	33.65%	Yamhill	29.96%
Pilot Rock	42.02%		
Stanfield	47.69%		
Ukiah	53.33%		
Umatilla	56.39%		
Weston	31.25%		
Union County	**40.89%**		
Cove	48.00%		
Elgin	55.81%		
Imbler	24.39%		
Island City	28.16%		
LaGrande	46.99%		

Limits on Applications

To assist the state in complying with federal requirements pertaining to the timely distribution and expenditure of funds the 2016 Community Development Block Grant program will have the following application limits for all projects assisted in whole or in part with Community Development Block Grant funds.

- **Three open grant limit**
  Applications will **not** be invited or Project Notification and Intake Forms (PNIF's) approved from a city or county with three or more open grants.
- **Age and Expenditure of Funds Requirements**
  1. City/County - Before an application is invited or a PNIF is approved by the department all cities and counties with open grants must comply with the following requirements for their existing open grants:

Table B

ONE YEAR GRANTS (microenterprise assistance)	Requirement	Multi – Year Grants (All other grants)	Requirement
For 2016 if an open grant is:			
1 year old (2015 award)	**Microenterprise Grants –** 70% of the funds must be drawn down	2 years old (2014 award)	60% of the funds must be drawn down
2 years old or more (2014 award)	**Microenterprise Grants –** The jurisdiction is ineligible to apply for any new grant unless this project is administratively closed	3 years old (2013 award)	100% of the funds must be drawn down
		4 years old or more (2012 award or earlier)	The jurisdiction is ineligible to apply for any new grant unless this project is administratively closed.

  2. Housing Rehabilitation Non-Profits - An eligible non-profit's regional housing rehabilitation program, which includes the entire service area of the housing rehabilitation program, can only have one open grant from the CDBG program, unless that open grant is meeting the same age and expenditure requirements applicable to cities and counties identified above. If the one open grant is meeting the age and expenditure requirements, the eligible non-profit can work with an eligible city/county to apply for a second grant. Under no circumstances will more than two open grants per eligible non-profit's regional housing rehabilitation program, which includes the entire service area, be awarded.

- **Unresolved Performance Issues**
  Cities and counties with unresolved performance issues under prior open or closed CDBG awards may be restricted (receive sanctions, refer to Chapter 5) by the state from receiving additional CDBG awards until such time the non-performance issues are resolved to the satisfaction of the department.

- **Application Limit**
  A city or county may only apply for one project per year from one of the following categories: Community Facilities and Housing Rehabilitation. Also, no more than two applications from

the remaining funding categories will be considered for funding at any one time. The applicant must designate which is the higher priority application; if the applicant makes no designation, and only one application can be funded, the department will make this determination.

- **Exceptions to Limits on Applications**
  - An exception to the "Age and Expenditure of Funds Requirement" may be granted if the city or county can demonstrate that timely completion and administrative closeout of a grant has been delayed by the actions of a federal or state agency.
  - The three open grant limit does not apply to disaster recovery grant funding received through special allocations from the U.S. Department of Housing and Urban Development.
  - New Emergency Projects (not previously awarded) are not subject to any of the "Limits on Applications" requirements.
  - Counties which have received a CDBG public works grant on behalf of a public body such as a sanitary district or water district, including water supply authorities, or other political subdivisions of the state and organizations operated on a not-for-profit basis may be granted an exception to any of the "Limits on Application" requirements due to the complexity of the governing/legal jurisdictional issues encountered in administering a grant that is benefitting an outside government body over which the recipient has no governing authority. Exceptions will be granted at the sole discretion of the OBDD – IFA after a thorough review by IFA staff.

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Chapter 3 National Objectives

There are three federal national objectives for the Community Development Block Grant (CDBG) Program. However, the State of Oregon only qualifies projects for funding under two of the three national objectives. All projects and the individual activities funded in whole or in part with CDBG funds must meet one of these national objectives:

- **Benefiting Low- and Moderate-income Persons** – This is the primary program objective. The state must ensure that no less than 70 percent of the CDBG funds that it administers are spent for projects that meet this objective.
- **Urgent Need –** This must be a bona fide emergency declared by the Governor. CDBG funds are generally not available for meeting other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources.

Benefiting Low- and Moderate-income Persons

The federal regulations provide that in any case where there is substantial evidence that an activity might not principally benefit low- and moderate-income persons, even though the activity conforms to the literal reading of the low- and moderate-income benefit criteria, the presumption that the activity meets the national objective will be rebutted. The grant applicant/recipient must document how the activity will meet the low- and moderate-income benefit national objective.

There are four ways a project can meet the low- and moderate-income national objective. These are: 1) Area Wide, 2) Limited Clientele, 3) Housing and 4) Jobs. With the exception of the "Jobs" objective, the remaining three objectives (Area Wide, Limited Clientele and Housing) are described in the following sections.

Area Wide Qualification (LMA)

- The Area Wide Qualification applies to an activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low- and moderate-income persons. Such an area need not be conterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity. It is critical that the service area proposed by the applicant and approved by the state is the entire area served by that activity.
- Units of general local government may, at the discretion of the state, use either U.S. Department of Housing and Urban Development (HUD) provided data comparing census data with appropriate low- and moderate-income levels or survey data that is methodologically sound and pre-approved by OBDD-IFA.
- An activity that serves an area that is not primarily residential in character will not qualify under this criterion, as determined by OBDD-IFA.

- The Area Wide Qualification also applies to an activity, where the assistance is for a public improvement that provides benefits to all the residents of an area that is limited to paying special assessments levied against residential properties owned and occupied by persons of low and moderate income.

Area Wide Documentation Needed (LMA)

1. All applicants must provide a map with their application showing the proposed project's entire service area.

   Community facility projects qualifying under this national objective must also provide written documentation such as a policy or other document demonstrating the use of the facility will be restricted to the residents within the defined service area.

2. The easiest way for applicants to document low- and moderate-income benefit for area-wide projects is to use the 2014 Low and Moderate Income Survey Data (LMISD) data. The data for counties and cities is included in Table A on page 2-3 of this handbook.

   Applicants for area-wide benefit projects, which have been determined to be eligible activities for funding under the CDBG program by OBDD-IFA, will use a special income survey in the following situations:

   a. Boundary – The geographic area where beneficiaries live does not generally coincide with census geography;

   b. Economic Changes - 2014 LMISD (effective July 1, 2014) data shows that less than 51% of the persons in an area are low and moderate income but the applicant believes that local economic conditions are significantly different. Compelling evidence, such as a mill/plant closing or other documentation must be presented by the potential applicant to substantiate that an income survey is necessary.

   c. Non-Economic Changes – 2014 LMISD (effective July 1, 2014) data shows that less than 51% of the persons in an area are low and moderate income but the applicant believes that local non-economic conditions are significantly different. Documentation of natural or human made disasters or other compelling evidence must be presented by the potential applicant to substantiate that an income survey is necessary.

   d. Demographic Changes - There is compelling evidence that current community income characteristics are **significantly different from the most current LMISD data provided by HUD.** The 2014 LMISD data was derived from 2006-2010 American Community Survey (ACS) data and published by HUD in June 2014. For example, a community with a substantial increase in population and new housing construction after 2010 cannot be assumed to have the same percentage of low- and moderate-income persons.

Population growth (increase or decrease) may be documented by comparing population data from the 2014 LMISD to the current 2013 Portland State University (PSU) population estimate issued April 15, 2014, or other most recent PSU release.

All surveys must be conducted in compliance with HUD Community Planning and Development (CPD) Notice 14-013 dated September 25, 2014 and any other more current methodology developed by HUD. A copy of the survey methodology and a sample questionnaire is available by request from the department.

Applicants must secure approval from the department on the survey instrument and process in order for the department to recognize the results of local income surveys. In addition, applicants are encouraged to contract with an organization or private contractor to do the work. The cost of the survey is not eligible for CDBG assistance and cannot be recovered if a grant is awarded.

Communities planning to conduct a survey must contact their Oregon Business Development Department Regional Coordinator (RC) prior to beginning the survey.

OBDD-IFA approved income surveys will be valid and usable for up to five (5) years, after OBDD-IFA approval. If economic, non-economic or demographic changes occur during this five (5) year period which would directly affect the low-moderate income data of a community and the applicant has a project determined to be an eligible activity for funding under the CDBG program, the applicant may contact OBDD-IFA to discuss the possibility of conducting an income survey.

In accordance with HUD CPD Notice 14-013, the HUD issued American Community Survey (ACS) derived LMISD must be used "to the fullest extent feasible" unless it can be documented that the data does not provide enough information regarding the income levels in the service area. In this case, a survey may be necessary. For projects determined to be CDBG eligible, surveys will be approved for the conditions identified in paragraphs a, b, c, and d above.

As soon as the 2015 LMISD data is published by HUD, the 2015 LMISD data must be utilized by the program, and will be immediately effective.

Limited Clientele Qualification (LMC)

Note: A facility that is open to everyone within a defined service area must qualify under the low- and moderate-income area-wide national objective.

Four possible "tests" document that beneficiaries of limited clientele facilities are principally low- and moderate-income. More than one test may be required, depending upon the project to be funded.

To qualify for the limited clientele national objective, an activity must benefit a limited clientele, at least 51 percent of whom are low- and moderate-income persons. The activity must meet one or more of the following tests:

- **Test 1 – Limited Clientele Based on Presumed Benefit** - It must benefit a clientele who are generally *presumed* to be principally low and moderate-income persons. Activities that exclusively serve a group of persons in any one or a combination of the following categories may be presumed to benefit persons, 51 percent of whom are low- and moderate-income:

  - **Abused children;**
  - **Battered spouses;**
  - **Elderly persons** - Persons 60 years of age and older;
  - **Severely disabled adults** - Adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," - Persons with a severe disability must meet one of the following:

    a. Used a wheelchair or have used another special aid for 6 months or longer;
    b. Are unable to perform one or more functional activities or need assistance with an Activity of Daily Living or Instrumental Activity of Daily Living. **(Functional Activities include: seeing, hearing, having ones speech understood, lifting, carrying, walking up a flight of stairs and walking. Activities of Daily Living include: getting around inside the house, getting out of bed or a chair, bathing, dressing, eating and toileting. Instrumental Activities of Daily Living include: going outside the home, keeping track of money, preparing meals, doing light housework and using the telephone.)**
    c. Are prevented from working at a job or doing housework;
    d. Have a condition including autism, cerebral palsy, Alzheimer's disease, senility or mental retardation; and
    e. Persons who are under 65 years of age and who are considered disabled by Medicare or receive Social Security Income are considered to have a disability (severe disability).

  - **Homeless persons** - Persons living on the street or in an emergency shelter, or who will be living on the street or in an emergency shelter without assistance;
  - **Illiterate adults;**
  - **Persons living with AIDS;** and
  - **Migrant farm workers.**

- **Test 2 – Limited Clientele Based on Family Size and Income and Test 3 – Limited Clientele Based on Income Eligibility -** If the facility does not serve a clientele that consists solely of presumed low- and moderate-income persons, it must:

- For **Test 2**, require information on family size and income from every client so that it is evident that at least 51 percent of the clientele are persons whose family income does not exceed the low- and moderate-income limit. The Community Facility User Form must be completed using income limits in Table D; or

- For **Test 3,** have income eligibility requirements that limit the activity exclusively to low and moderate-income persons; or

- **Test 4 – Limited Clientele Based on Nature and Location of the Facility –** It must be of such a nature, and be in such a location, that it may be concluded the activity's clientele will primarily be low- and moderate-income persons. (Note: The use of this criteria under the state's program is a rarity.)

  - On February 15, 2008, the state received guidance from HUD that food bank/warehouses can qualify as meeting the LMI national objective on the basis of the nature of the service and the location where the services are provided. Food bank projects will no longer have to collect family size and income data to demonstrate compliance with the federal national objective. On May 7, 2008, the department researched and approved of this approach.

- **Microenterprise Exception -** A microenterprise assistance project is limited to owners of microenterprises and persons developing microenterprises who are low- and moderate-income persons based upon the family size and income limits contained within Table D. For purposes of this paragraph, persons determined to be low and moderate income may be presumed to continue to qualify as such for up to a three-year period.

Limited Clientele Documentation (LMC)

Applicants must document how proposed activities will benefit low- and moderate-income persons in conformance with federal law. The type of documentation necessary depends upon the users of the facility. Some proposed projects may involve more than one program/activity with different clientele and different documentation. The following describes what information must be submitted for different types of limited clientele activities:

1. **Test 1 – Limited Clientele Based on Presumed Benefit**
   Documentation establishing that the facility or service is designed exclusively to serve a group of persons in any one or a combination of the following categories may be presumed to benefit persons, 51 percent of whom are low and moderate income: abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled", homeless persons, illiterate adults, persons living with AIDS and migrant farm workers; or

2. **Test 2 – Limited Clientele Based on Family Size and Income**
   Documentation that at least 51 percent of the clientele are persons whose family income does not exceed the low- and moderate-income limit (e.g., child care center that is not exclusively for low- and moderate-income persons). The current income limits can be found in Table D. Required documentation shall be one or more of the following, as appropriate:

   a. A summary that shows how many current users have family incomes above and below the low- and moderate-income limits. The summary must be based on information about the family size and family income of each user. This information may be from existing program forms (e.g., application for day care) or it can be collected using the form included in this chapter (Community Facility User Certification form) and reported on the "Documentation of Facility Users" form also contained within this chapter.

      The documentation cannot be a survey. There must be information collected about the family of each beneficiary. If a family does not provide the required information, its members must be assumed to be above the income limits.

      Individual information forms gathered by the applicant do not have to be included with the application but may be reviewed during a site visit by department staff and/or must be available upon request at any time from department staff.

   b. The applicant also must certify in the application that, if funded, it will ensure that family size and income data is collected on all current and future beneficiaries and that no less than 51 percent of the beneficiaries of the facility will be income qualified until at least five years after the grant project is closed; or

3. **Test 3 – Limited Clientele Based on Income Eligibility**
   Documentation of the income eligibility requirements that limit, or will limit, benefits from the facility exclusively to low- and moderate-income persons. The income limits must be included with the application; or

4. **Test 4 – Limited Clientele Based on Nature and Location of the Facility**
   Documentation describing how the nature and, if applicable, the location of the facility or service establishes that it is used or will be used predominantly by low- and moderate-income persons.

Note: Facilities must provide one year of family size and income data for the facility to be assisted. If one year of data is not available (new facility with no clientele history) the applicant must demonstrate how the services offered at the facility will be limited to low- and moderate-income persons so that the use of the facility will meet the national objective. This is done by

the applicant providing the department application forms, policies and other documents and procedures that will be used to limit the use of the facility so that 51% or more of the use of the facility is for low- and moderate-income persons.

The summary form Table E titled "Documentation of Facility Users" must be completed and included with the application for all "limited clientele" projects.

Housing Activities Qualification (LMH)

An eligible activity carried out for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by low- and moderate-income households. This would include, but not necessarily be limited to, the acquisition or rehabilitation of property, conversion of nonresidential structures and new housing construction. If the structure contains two dwelling units, at least one must be occupied by a low- and moderate-income household, and if the structure contains more than two dwelling units, at least 51 percent of the units must be occupied by low- and moderate-income households.

When CDBG funds are used for housing services eligible under section 105(a)(20) of the Act, such funds shall be considered to benefit low- and moderate-income persons if the housing units for which the services are provided are HOME- assisted and the requirements of 92.252 or 92.254 of this title are met.

Housing Documentation (LMH)

For each activity carried out for the purpose of rehabilitating or constructing housing which is determined to benefit low- and moderate-income households, each applicant must provide a description of how local program policies will ensure that only income qualified households will benefit along with a copy of the client intake and screening forms and applicable income limits to be used.

Note: Only the housing program gathers data by household size and household income. Household size and income is an aggregate of multiple families residing within the same residence. To determine LMI status, the household size and income is compared against the family size and income chart contained in Table D.

Urgent Need

To comply with this national objective a project must be designated to alleviate existing conditions which the local government certifies and the state determines:

- Pose a serious and immediate threat to the health or welfare of the community (Governor declared "State of Emergency" or Presidential declared disaster, through FEMA declaration);
- Are of recent origin or recently became urgent (i.e. Governor's Emergency Declaration was within 12 months preceding the local government's certification and the state's determination.);
- The applicant is unable to finance the activity on its own; and
- Other sources of funds are not available to carryout the activity.

Urgent Need Documentation

- A description of the nature and degree of seriousness of the conditions requiring assistance.
- Evidence that the state grant recipient certified that the CDBG activity was designated to address an urgent need.
- Information on the timing of the development of the serious condition.
- Evidence confirming that other financial resources to alleviate the need are not available.
-

Table C National Objective

Low and Moderate Income	
Area Wide/Sub-Area 24 CFR 570.483 (b)(1)(i)	**Definition** – The activity must serve an area that is primarily a low- and moderate-income permanent residential area (at least 51% low- and moderate-income.)
	Examples – Public Works projects, Libraries, Fire Stations, Health Clinics, Community Centers and Family Resource Center projects.
Limited Clientele – in general 24 CFR 570.483 (b)(2)(ii)	**Definition** – The activity benefits a specific group(s) of low- and moderate-income persons (excludes housing). An activity may meet this criteria if it serves a 51% low- and moderate-income clientele, exclusively serves a presumed group (see definition below), be of such a nature and location that it can be concluded to serve a low- and moderate-income clientele, or remove material or architectural barriers for the mobility or accessibility of elderly persons or adults meeting the definition of "severely disabled". To assist an entire facility, all services in a facility must be limited to those serving a clientele that is at least 51% low and moderate income. **(Facilities that are open and available to everyone in the area must qualify under the area wide national objective. Under the limited clientele national objective, the facility must qualify based on services to limited clientele, not by use of the facility, and each user must be income qualified.)**
Presumed Limited Clientele 24 CFR 570.483 (b)(2)(ii)(A) ***Test 1 – Limited Clientele based on Presumed Benefit.***	**Definition** – Clientele that are generally presumed to be low- and moderate-income as determined by Housing and Urban Development. These are abused children, elderly persons, battered spouses, homeless persons, severely disabled adults, illiterate adults, persons living with AIDS, migrant farm workers.
	Examples – Senior Centers 60+, Homeless Shelters and Domestic Violence Shelters.
Family Size and Income Eligibility Limited Clientele 24 CFR 570.483 (b)(2)(ii)(C) or 24 CFR 570.483 (b)(2)(ii)(B) ***Test 2-Limited Clientele based on Family Size and Income and Test 3-Limited Clientele based on Income Eligibility.***	**Definition** – Activities require information on family size and income that confirm at least 51% of clientele are low- and moderate-income. Information on family size and income can be determined by clients completing the Community Facility User Certification Form (Test 2) or having income eligibility requirements (Test 3).
	Examples – Head Start Centers and Microenterprise Assistance.
Nature and Location Limited Clientele 24 CFR 570.483 (b)(2)(ii)(D) ***Test 4-Limited Clientele based on Nature and Location of the facility.***	**Definition** – Facility of such a nature, and be in such a location, that it may be concluded that the facility's clientele will be primarily low- and moderate-income persons.
	Example – Food Banks and Head Start Centers

Low and Moderate Income	
Housing/Direct Benefit 24 CFR 570.483 (b)(3)	**Definition** – Activities carried out for purpose of providing or improving permanent residential structures, that upon completion, will be owned and occupied by low- and moderate-income persons. Must household size and income qualify all applicants.
	Example – Housing Rehabilitation.

Urgent Community Needs	
Urgent Need 24 CFR 570.483 (d)	**Definition** – These projects must be designed to alleviate existing conditions which the grantee certifies, pose a serious and immediate threat to the health or welfare of the community, are of recent origin, unable to finance on their own, other funding resources are not available to carry out the activity.
	Examples – Major catastrophe such as a flood or earthquake that threatens the community residents with spread of serious disease. The community's other resources may well be depleted and other federal programs may not be sufficient to cover all costs.

TABLE D - 2016 Low and Moderate Income Limits

Effective March 28, 2016

County	Median Family Income estimate for 2016	Income Level Note 1	Income Limits by Family Size							
			1-Person Family	2-Person Family	3-Person Family	4-Person Family	5-Person Family	6-Person Family	7-Person Family	8-Person Family
Baker	$52,500	Low Moderate	$18,400 $29,400	$21,000 $33,600	$23,650 $37,800	$26,250 $42,000	$28,350 $45,400	$30,450 $48,750	$32,550 $52,100	$34,650 $55,450
Benton Note 2	$76,500	Low Moderate	$26,800 $42,850	$30,600 $49,000	$34,450 $55,100	$38,250 $61,200	$41,350 $66,100	$44,400 $71,000	$47,450 $75,900	$50,500 $80,800
Clatsop	$56,300	Low Moderate	$19,750 $31,550	$22,550 $36,050	$25,350 $40,550	$28,150 $45,050	$30,450 $48,700	$32,700 $52,300	$34,950 $55,900	$37,200 $59,500
Columbia Note 3	$73,300	Low Moderate	$25,700 $41,100	$29,350 $46,950	$33,000 $52,800	$36,650 $58,650	$39,600 $63,350	$42,550 $68,050	$45,450 $72,750	$48,400 $77,450
Coos	$49,100	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Crook	$49,800	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Curry	$50,100	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Deschutes Note 2	$59,700	Low Moderate	$20,900 $33,450	$23,900 $38,200	$26,900 $43,000	$29,850 $47,750	$32,250 $51,600	$34,650 $55,400	$37,050 $59,250	$39,450 $63,050
Douglas	$50,700	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Gilliam	$58,200	Low Moderate	$20,400 $32,600	$23,300 $37,250	$26,200 $41,900	$29,100 $46,550	$31,450 $50,300	$33,800 $54,000	$36,100 $57,750	$38,450 $61,450
Grant	$47,200	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Harney	$43,700	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Hood River	$66,100	Low Moderate	$23,150 $37,050	$26,450 $42,350	$29,750 $47,650	$33,050 $52,900	$35,700 $57,150	$38,350 $61,400	$41,000 $65,600	$43,650 $69,850
Jackson Note 2	$53,300	Low Moderate	$18,700 $29,900	$21,350 $34,150	$24,000 $38,400	$26,650 $42,650	$28,800 $46,100	$30,950 $49,500	$33,050 $52,900	$35,200 $56,300
Jefferson	$47,300	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Josephine	$47,800	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Klamath	$49,100	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Lake	$48,800	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Lane Note 2	$58,900	Low Moderate	$20,300 $32,500	$23,200 $37,150	$26,100 $41,800	$29,000 $46,400	$31,350 $50,150	$33,650 $53,850	$36,000 $57,550	$38,300 $61,250
Lincoln	$55,200	Low Moderate	$19,350 $30,950	$22,100 $35,350	$24,850 $39,750	$27,600 $44,150	$29,850 $47,700	$32,050 $51,250	$34,250 $54,750	$36,450 $58,300

2016 Low and Moderate Income Limits

Effective March 28, 2016

County	Median Family Income estimate for 2015	Income Level Note 1	Income Limits by Family Size							
			1-Person Family	2-Person Family	3-Person Family	4-Person Family	5-Person Family	6-Person Family	7-Person Family	8-Person Family
Linn	$53,600	Low Moderate	$18,800 $30,050	$21,450 $34,350	$24,150 $38,650	$26,800 $42,900	$28,950 $46,350	$31,100 $49,800	$33,250 $53,200	$35,400 $56,650
Malheur	$47,000	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Marion Note 3	$56,500	Low Moderate	$19,800 $31,650	$22,600 $36,200	$25,450 $40,700	$28,250 $45,200	$30,550 $48,850	$32,800 $52,450	$35,050 $56,050	$37,300 $59,700
Morrow	$54,000	Low Moderate	$18,900 $30,250	$21,600 $34,600	$24,300 $38,900	$27,000 $43,200	$29,200 $46,700	$31,350 $50,150	$33,500 $53,600	$35,650 $57,050
Polk Note 3	$56,500	Low Moderate	$19,800 $31,650	$22,600 $36,200	$25,450 $40,700	$28,250 $45,200	$30,550 $48,850	$32,800 $52,450	$35,050 $56,050	$37,300 $59,700
Sherman	$58,600	Low Moderate	$20,550 $32,850	$23,450 $37,550	$26,400 $42,250	$29,300 $46,900	$31,650 $50,700	$34,000 $54,450	$36,350 $58,200	$38,700 $61,950
Tillamook	$52,600	Low Moderate	$18,450 $29,500	$21,050 $33,700	$23,700 $37,900	$26,300 $42,100	$28,450 $45,500	$30,550 $48,850	$32,650 $52,250	$34,750 $55,600
Umatilla	$58,300	Low Moderate	$20,450 $32,700	$23,350 $37,350	$26,250 $42,000	$29,150 $46,650	$31,500 $50,400	$33,850 $54,150	$36,150 $57,850	$38,500 $61,600
Union	$53,300	Low Moderate	$18,700 $29,900	$21,350 $34,150	$24,000 $38,400	$26,650 $42,650	$28,800 $46,100	$30,950 $49,500	$33,050 $52,900	$35,200 $56,300
Wallowa	$56,000	Low Moderate	$19,600 $31,400	$22,400 $35,850	$25,200 $40,350	$28,000 $44,800	$30,250 $48,400	$32,500 $52,000	$34,750 $55,600	$37,000 $59,150
Wasco	$55,000	Low Moderate	$19,250 $30,800	$22,000 $35,200	$24,750 $39,600	$27,500 $44,000	$29,700 $47,550	$31,900 $51,050	$34,100 $54,600	$36,300 $58,100
Wheeler	$48,100	Low Moderate	$18,200 $29,050	$20,800 $33,200	$23,400 $37,350	$25,950 $41,500	$28,050 $44,850	$30,150 $48,150	$32,200 $51,500	$34,300 $54,800
Yamhill Note 3	$73,300	Low Moderate	$25,700 $41,100	$29,350 $46,950	$33,000 $52,800	$36,650 $58,650	$39,600 $63,350	$42,550 $68,050	$45,450 $72,750	$48,400 $77,450

Note 1: "Low Income" and "Moderate Income" are defined in the federal Housing and Community Development Act of 1974, as amended. A Low-Income person is a member of a family with a gross income of no more than 50 percent of the area median income. A Moderate-Income person is a member of a family with a gross income of no more than 80 percent of the area median income. The "area" is either the county or the non-metropolitan portion of the state, whichever has the higher median income. The 2016 estimated median family income for non-metropolitan counties in Oregon is $63,400.

Note 2: Benton County, Deschutes County, Lane County, Linn County, Jackson County and Josephine County are part of a Metropolitan Statistical Area (MSA). The income limits for an entire county are based upon the median family income for the MSA, even though the specific MSA area is ineligible to apply to the state-administered Community Development Block Grant program – specifically: Corvallis in Benton County, Bend in Deschutes County, Eugene-Springfield in Lane County, Albany in Linn County, Medford-Ashland in Jackson County and Grants Pass in Josephine County.

Note 3: This County is part of a Primary Metropolitan Statistical Area (PMSA). The income limits are based on the median family income for the entire PMSA including local governments that are not eligible for the state-administered CDBG program. For example, the median family income and income limits for Columbia and Yamhill counties are the same as those for the City of Portland, Clackamas County, Multnomah County, and Washington County. Those of Marion and Polk Counties are the same as Salem PMSA.

Source: U.S. Department of Housing and Urban Development (HUD)

Documentation of Facility Users

Community/public facilities projects and public service projects intending to meet the low- and moderate-income limited clientele national objective will be required to submit information with the application that documents the specific historical and proposed clientele in accordance with the 2016 Method of Distribution, and in a format similar to the tables below in point #5.

Instructions:

1. Only one program should be shown in each line of Table E. If the proposed facility will offer more programs/services than can be recorded on this form, prepare additional copies of the form until each program offered by the proposed facility is accounted for.
2. Attach a copy of Community Facility User Certification Form(s) (intake or client screening forms) containing the requisite family size and income limits for the clientele in each program.
3. Classifications of persons who are presumed LMI: abused children, battered spouses, elderly persons, adults meeting the Census definition of "severely disabled", homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers.
4. Prospective applicants are encouraged to consult with department staff at the earliest stages of project development concerning the documentation required for Limited Clientele Projects.

Note: Do not duplicate beneficiary reporting. Each user of the service can only be counted once per calendar year.

5. Identify the Race and Ethnicity of the total beneficiaries served by the facility during the reporting period:

	White (non-Hispanic)	**Hispanic**	**Total**
White			
Black or African American			
American Indian/Alaskan Native			
Asian			
Native Hawaiian or Pacific Islander			
Two or More races			
Total (Must match total reported on Documentation of Facility Users Form)			

Table E

Program provided at proposed facility: (e.g. Senior Center, Head Start)	**Low- and Moderate-income (LMI) Limited Clientele National Objective to be met by each program/activity (Check only one for each program)**	**Current Clientele (Served in prior 12 months)** Data collected (mm/dd/yy): _____ to _____		**Proposed Clientele (Estimated to be served during the first 12 months after project completion)**	
		Total Number of Persons	**Total Number of LMI Persons**	**Total Number of Persons**	**Total Number of LMI Persons**
	___ Family size and income information are collected from all clientele and at least 51% are LMI. (2) ___ Clientele must be LMI to receive service. (2) ___ Clientele are presumed to be LMI. Classification _____. (3) ___ Clientele are LMI by Nature and Location of Facility.				
	___ Family size and income information are collected from all clientele and at least 51% are LMI. (2) ___ Clientele must be LMI to receive service. (2) ___ Clientele are presumed to be LMI. Classification_____. (3) ___ Clientele are LMI by Nature and Location of Facility.				
	___ Family size and income information are collected from all clientele and at least 51% are LMI. (2) ___ Clientele must be LMI to receive service. (2) ___ Clientele are presumed to be LMI. Classification_____. (3) ___ Clientele are LMI by Nature and Location of Facility.				
	___ Family size and income information are collected from all clientele and at least 51% are LMI. (2) ___ Clientele must be LMI to receive service. (2) ___ Clientele are presumed to be LMI. Classification_____. (3) ___ Clientele are LMI by Nature and Location of Facility.				
TOTALS -					
PERCENTAGE (LMI users)/(total users) X 100 = %		**% LMI**		**% LMI**	

COMMUNITY FACILITY USER CERTIFICATION FORM

The information below is being requested because the ____[recipient]_____ received an Oregon Community Development Block Grant (CDBG) and, as part of the operation of a CDBG funded community facility, must provide the family size and income and ethnicity/race of the persons who use the __[insert name of facility]_____. Your answers will be treated confidentially.

FAMILY SIZE – The HUD definition of family is, all persons living in the same household who are related by blood, marriage or adoption, this includes any related dependent persons over 65 or working dependent children over 18.

NOTE: A family is not a household. A household is defined as all persons occupying the same housing unit regardless of their relationship to each other. If there is more than one family residing within the housing unit, each family must complete a separate Community Facility User Certification Form.

Check the appropriate box for your family size:

( ) Single individual
( ) Family of 2
( ) Family of 3
( ) Family of 4
( ) Family of 5
( ) Family of 6
( ) Family of 7
( ) Family of 8 or more

ANNUAL FAMILY INCOME – Annual family income is defined as, the total income earned before taxes by all family members, including job earnings (wages, salary, tips, bonuses, commissions), interest, dividends, child support, alimony, welfare, social security, disability, unemployment, retirement payments, net income from business activities, farms, rents, royalties, trusts, estates and any other income received regularly by all family members.

Check the appropriate box for your family's annual total gross income *before taxes* for the most recent tax reporting year.

( ) $ 0 to 27,050
( ) $27,051 to 30,900
( ) $30,901 to 34,800
( ) $34,801 to 38,650
( ) $38,651 to 41,750
( ) $41,751 to 44,800
( ) $44,801 to 47,900
( ) $47,901 to 51,000
( ) $51,001 or more

The family income figures must be updated for the county in which the project is to occur, using Table D.

ETHNICITY AND RACE - As a person who uses a Community Facility funded by an Oregon Community Development Block Grant, you are asked to *voluntarily* respond to the Ethnicity and Race items below. If you do not provide responses, the operator of the community facility is required to supply responses based on their determination of your ethnicity and race.

Check the appropriate box of your *ethnicity*: ( ) Hispanic ( ) Not Hispanic.

Check the appropriate box of your *race*:

( ) White
( ) Black/African American
( ) Asian
( ) American Indian/Alaskan Native
( ) Native Hawaiian/Other Pacific Islander
( ) Two or more races
( ) Other

SIGNATURES AND CERTIFICATIONS - This information is subject to verification by the grant recipient, Oregon Business Development Department – Infrastructure Finance Authority or the U.S. Department of Housing and Urban Development officials.

- **Community Facility User** (Person that completed this form) - By my signature below on this Community Facility User Certification Form, I am certifying that the information provided is valid and accurate.

  _____ _____
  Signature Date

- **Community Facility Organization** (Entity that collected the information from the user.) - The [_____Insert the name of organization collecting family size and income information____] has reviewed the supporting documentation provided by the community facility user and has determined that the user:
  - ____ **MEETS** the HUD requirements contained in the most current Method of Distribution.
  - ____ **DOES NOT** meet the HUD requirements contained in the most current Method of Distribution.

  _____ _____
  Signature Date

Chapter 4 Federal Requirements

Note: Refer to Chapter 7 for a description of the environmental and uniform relocation and real property assistance (URA) trigger guidance.

The Community Development Block Grant (CDBG) Program is subject to many federal requirements that cover a wide range of activities. Some of the requirements are briefly summarized below. More detailed information can be found in the Grant/Project Management Handbook and other resources available from the Oregon Business Development Department (department). The CDBG Grant Management Handbook (2015 Edition) or most current edition, can be found on the department's web site: http://www.orinfrastructure.org/Infrastructure-Programs/CDBG/Handbooks/ OBDD-IFA encourages potential applicants to review the Grant Management Handbook prior to committing to submit an application in order to familiarize themselves with the wide array of program requirements.

Conflicts of Interest

Oregon Government Standards and Practices laws ORS Chapter 244 apply to procurement of supplies, equipment, construction and services to be paid for in whole or in part with CDBG funds. In addition, the provisions of the federal code of regulations (CFR), 24 CFR Subpart I, 570.489(h) also apply to the following activities assisted in whole or in part with CDBG funds: procurement of supplies, equipment, construction and services; acquisition and disposition of real property; and the provision of assistance to individuals, businesses and other private entities.

- **Persons Covered by the Conflict of Interest Requirements** – The conflict of interest provisions in this section apply to any person who is an employee, agent, consultant, officer, elected official or appointed official of the unit of general local government or of any designated public agencies that are receiving CDBG funds.

- **Conflicts Prohibited** – Generally, except for eligible administrative and personnel costs, none of the persons covered by the Conflict of Interest Requirements who exercise or have exercised any functions or responsibilities with respect to CDBG assisted activities or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity. Also, such persons may not have any interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business ties during their tenure or for one year thereafter.

- **Exceptions to the Conflict of Interest Requirements** – OBDD may grant an exception to the provisions of this section upon written request of the unit of general local government provided the state can fully document its determination in compliance with all federal requirements in 24 CFR Subpart I, 570.489 (h)(4) and (5).

Continued Use Requirement/Change of Use Requirements

Any change in use of a facility or disposition of property acquired or improved in whole or in part with CDBG funds within five years after closeout (NOTE: OBDD-IFA's definition of closeout is administrative closeout) of the grant project must be made in accordance with the standards

provided in 24 CFR 570.489 (j). If the facility or real property cannot meet a national objective during the five year continued use period the grant must be repaid to the state. In the event of a possible change of use of the funded facility, the grant recipient must contact OBDD-IFA prior to taking any action. More specifically, the requirements are:

- All projects which have improved or acquired real property within the grant recipients direct control (including activities undertaken by sub-grantees) which was improved or acquired in whole or in part with CDBG funds in excess of $100,000 must comply with the continued use requirements of 24 CFR subpart I, Section 570.489 (j).

- The grant recipient may not change the use or planned use of any such property (including the beneficiaries of such use) from that which the acquisition or improvement was made, unless they follow the requirements listed in Section 570.489 (j).

- **Direct Control** - Projects under the direct control of the grant recipient (publicly owned improvements) or eligible sub-grantee (nonprofit) must ensure the CDBG funded improvements remain in compliance with the federal national objective for which they originally qualified for funding.

- **Not Under the Direct Control** - Projects not under the direct control of the grant recipient or eligible sub recipient (private property owners for housing rehabilitation) do not have to comply with the continued use requirement. However, these projects must still meet the national objective requirements until the grant is closed out with the state.

- **Trust Deed -** In cases where the recipient is not and will not be the owner of the real property or facility being improved with CDBG funds, the recipient shall cause the owner of such real property or facility to duly execute and record a trust deed against the real property or facility in favor of the recipient. Said trust deed shall be in form and substance satisfactory to the state.

  The state has prescribed language that must be included in any contract, which transfers the property from the recipient to another party. This language and more information regarding these requirements are contained in the Grant Management Handbook.

Environmental Review

Recipients are required to obtain appropriate environmental clearances for their project and to maintain an "environmental review record" for each project. More detail on how to comply with these requirements and the necessary forms are contained in the Grant Management Handbook.

The grant recipient shall not commit/obligate or expend funds on any project activity before completion of the appropriate level of environmental review and, when applicable, the approval by the state of a Request for Release of Funds (RROF). This restriction applies to all project funds, even non-CDBG funds in the project.

Excessive Force Policy

All city and county recipients must adopt and enforce a policy prohibiting excessive force by law enforcement agencies within their jurisdiction against any individuals engaged in non-violent civil rights demonstrations. Enforcement of all applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction also is required.

The excessive force policy is in the federal law for the Community Development Block Grant program. The effect of the law is that the state cannot legally award a grant to a city or county that does not adopt the policy.

In-Kind Value of Volunteer Labor

For the purpose of documenting local match, the department has established that volunteer labor is to be valued as follows:

- The time of a person who donates their professional skills shall be credited at their standard hourly fee. For example, an electrician that donates time to install wiring.

- The time of a person that provides labor for which they are not normally paid shall be credited at the state's current minimum wage. For example, a teacher that volunteers to perform carpentry work.

Minority, Women and Emerging Small Businesses

The department encourages recipients to provide opportunities for minority, women and emerging small businesses. The Oregon Procurement Information Network (ORPIN) (http://orpin.oregon.gov/open.dll/welcome) or Business Oregon's Office of Minority, Women and Emerging Small Business (http://www.oregon4biz.com/How-We-Can-Help/OMWESB/) can be used for advertising procurement contracts.

Non-Discrimination Against Persons with Handicaps

Federal law prohibits discrimination against any otherwise qualified individual from participating in or benefiting from a federally funded program solely on the basis of handicap. Community Development Block Grant recipients must comply with U.S. Department of Housing and Urban Development regulations which implement this federal law (Section 504 of the Rehabilitation Act of 1973). Cities and counties who are working toward compliance with the federal Americans with Disabilities Act (ADA) will easily meet the requirements of Section 504.

Other Requirements

The recipient shall comply and cause its agents, contractors and sub grantees to comply with 30 F.R. 12319 (1965) as amended by Executive Order No. 11375, 32 F.R. 14303 (1967), reprinted in 42 U.S.C. 2000e (1994), and the regulations promulgated pursuant thereto, 41 C.F.R. 60-1.1 to 60-999.1 (1997).

Recipient shall conduct and administer the department financing in conformity with the Civil Rights Act of 1964, 42 U.S.C. 2000a-2000e (1994).

Many more federal requirements are contained within the recipient's contract with the state and the Grant Management Handbook.

Federal Prevailing Wages and Federal Labor Standards Provisions and Bureau of Labor and Industries (BOLI) Prevailing Wage Requirements

Construction projects assisted in whole or in part with CDBG funds must be carried out in compliance with the federal Davis Bacon and Related Acts and the Oregon Bureau of Labor and Industries (BOLI) requirements. This means that both Oregon Prevailing Wage Rates and the federal prevailing wage rates and Federal Labor Standards provisions will apply, effective for all projects advertised for bid on or after January 1, 2006. Extensive labor standards requirements must be followed. More detailed information can be found in the current Grant Management Handbook.

Program Income

Program Income includes, but is not limited to, the following:

- Payments of principal and interest on loans made from CDBG funds;
- Proceeds from the lease or disposition of real property and equipment acquired with CDBG funds;
- Interest earned on CDBG funds held in a revolving fund account; and
- Interest earned on any program income pending disposition of such income.

Funds derived from CDBG funded activities are considered Program Income except when:

- The total amount of funds, which does not exceed $35,000 received in a single year from activities, other than revolving loan funds that is retained by a unit of general local government and its sub-grantees (all funds received from revolving loan funds are considered program income, regardless of amount);

  Note: Oregon defines a single year as (July 1 to June 30).

  Note: All income received from any closed housing rehabilitation grant that is not utilizing the authority of 105(a)(15) of the HCDA and is still being tracked for program income by OBDD-IFA is considered program income. The miscellaneous income rule does not apply to these prior housing rehabilitation grants, effective May 23, 2012.

- The funds are generated by housing rehabilitation revolving loan fund activities eligible under Section 105(a)(15) of the Housing and Community Development Act and carried out by an entity under the authority of section 105(a)(15) of the Act. Such entities are limited to public nonprofit organizations which (1) meet the Internal Revenue Service requirements for nonprofit status; (2) are serving the development needs of non-entitlement areas; and (3) carry out community economic development, neighborhood revitalization and/or energy conservation projects. Such projects can include management of revolving funds for the purpose of housing rehabilitation and economic development.

The full definition of program income and federal rules governing its use are found in 24 CFR 570.489(e) and the preamble to the final rule and guidelines published by the U.S. Department of Housing and Urban Development in the Federal Register on May 23, 2012.

All requirements of 24 CFR 570 Subpart I apply to the use of program income retained by a unit of general local government. Failure to use program income as required may result in sanctions against the recipient.
Recipients shall not expend any income anticipated to be less than $35,000 until after the end of the applicable annual period unless it is spent in compliance with CDBG rules.

Program income shall be paid to the state except where the income is to be used by the recipient to continue the activity from which such income is derived. For example, an older housing rehabilitation grant where the grant funds are loaned by the grantee to private property owners, the loans repaid to the grantee can be used to conduct more housing rehabilitation work.

Housing rehabilitation grants awarded under the authority of 105(a)(15) of the HCDA exemplify the exception to program income rules if all the following conditions exist: 1) the state's grant to the city or county must be subgranted to an eligible nonprofit, 2) the nonprofit must loan funds directly to income-eligible homeowners, and 3) loan repayments made by those homeowners must be dedicated to CDBG-eligible activities such as housing rehabilitation for subsequent eligible homeowners, community economic development, neighborhood revitalization and/or energy conservation projects.

Property Acquisition, Relocation and Tenant Assistance Requirements

All temporary construction easements and real property acquisition, including the acquisition of permanent easements for construction projects assisted in whole or in part with CDBG funds, must be carried out in compliance with the requirements of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA or Uniform Act) and Section 104(d) of the Housing and Community Development Act of 1974. The federal rules apply even if CDBG funds will not be used to pay for the acquisition.

Due to the specialty calculations and detailed requirements for relocation activities, any applicant with a proposed project that involves relocation will be required by OBDD-IFA to hire a specialist acceptable to OBDD-IFA to complete the required URA relocation process.

Note: Refer to the "Note" in Chapter 7 for a brief description of the environmental and uniform relocation and real property assistance (URA) trigger guidance. More detailed information can be found in the current Grant Management Handbook.

Proportional Funding

Proportional funding for any project is not allowed.

Record Keeping

Recipients must maintain records that are complete and cover program and financial use of the CDBG funds for monitoring by the department. Records retention requirements for the CDBG program is three years from the date the state's grant is closed with the U.S. Department of Housing and Urban Development (HUD) as required by 24 CFR Subpart I, 570.490. The department will provide technical assistance and a Grant Management Handbook, which contains detailed record keeping information and information covering other aspects of the program's requirements.

Residential Antidisplacement and Relocation Plan

Recipients must comply with the State of Oregon's "Residential Antidisplacement and Relocation Plan".

Title I

These grants and any sub-grants of these federal grants are subject to Title I of the Housing and Community Development Act of 1974, and any regulations promulgated pursuant thereto and as may be amended from time to time.

Volunteers or Prison Inmates

Applicants planning to use volunteer or prison inmates for a project must consult with the department and receive department approval prior to submitting an application. Donated labor can help reduce the cost of the project. However, the use of volunteers also may result in coordination problems with contractors, quality of work issues, and potential local government liability for personal injury and property damage. Applicants should consider both the benefits and the drawbacks of volunteer labor before finalizing any project budget.

Volunteers

In general the following rules apply to volunteers:

- A person cannot be a volunteer if the person is otherwise employed at any time on the project activity in the construction or maintenance work for which the person volunteers.
- Volunteers cannot be paid to provide materials or supplies unless the recipient has obtained the materials/supplies through a competitive process under the appropriate procurement rules.
- Persons providing work subject to the Davis-Bacon Act (laborers and mechanics in the construction trades) must be paid the applicable federal prevailing wage unless they meet the requirements for volunteers contained in 24 CFR Part 70.3 entitled "Use of Volunteers on Projects Subject to Davis-Bacon and HUD-Determined Wage Rates". This rule is available, upon request, from the department.

Prison Inmates

There is no prohibition against the use of prison inmate labor on CDBG funded construction work. Prisoners are generally not considered volunteers because they have no choice in the matter, so they must be paid Davis-Bacon wage rates. In rare situations, prisoners may be participating in a voluntary program and they are truly volunteering their services to the local government.

Chapter 5 Program Policies and Definitions

Note: Refer to Chapter 7 for a description of the environmental and uniform relocation and real property assistance (URA) trigger guidance.

POLICIES

Eligible/Ineligible Costs

Activity Delivery Costs

Activity delivery costs are expenses directly related to carrying out eligible activities such as property acquisition. These costs are not considered to be CDBG grant/project administration expenses. Professional appraiser's fees and attorney charges necessary to complete the acquisition of property are eligible as part of the acquisition activity cost.

Audit Cost

Community Development Block Grant (CDBG) funds can pay for A-133 audit costs in proportion to the federal CDBG funds receipted by the city or county. The eligible share of the A-133 audit cost cannot exceed the ratio of these federal grant funds received to the recipient's total annual expenditures and incurred obligations – times – the cost of the audit. For example:

CDBG receipts	$ 100,000
Total Expenditures and Incurred Obligations	$1,000,000

Ratio:
(CDBG Receipts)/(Total Expenditures and Incurred Obligations)

($100,000)/($1,000,000)=0.1	0.1
Total Cost of A-133 Audit	$ 5,000

Eligible CDBG reimbursable portion of the audit cost
(Total Audit Cost) x (Ratio)

($5,000) x (0.1) = $500	$ 500

Equipment

Grant funds may be used to buy equipment for grant/project administration purposes. Examples include computers, file cabinets and other office equipment. These expenses are included in the maximum amount allowed for grant/project administration.

Entertainment/Refreshments – The cost of food, beverages, snacks and any related expenses for utensils etc., are not eligible for reimbursement under the program.

Grant (Project) Administration/ Environmental Review/ Labor Standard Compliance/Program Management Services

For all categories that allow grant administration as an eligible activity, up to 10 percent of the grant award, but not more than $25,000, may be used to pay for grant/project administration costs, including overall project management, coordination, monitoring, and evaluation. Recipients may use some of the grant/project administration allowance to conduct activities to further Fair Housing in their communities. Grant administration is not an eligible activity under the Microenterprise Assistance category.

In addition to the grant administration allowance the following limitations apply:

- **Federal Labor Standards Compliance** - Up to a maximum of $15,000 per project is allowed if needed. Any amount of funds in excess of the $15,000 must be paid for with local or non-CDBG funds. The cost associated with Bureau of Labor and Industry (BOLI) labor standards compliance must be paid for with local or non-CDBG funds.

- **Environmental Review** – Up to a maximum of $15,000 per project is allowed to prepare and complete a full environmental review record including any associated wetlands delineations, 8-step floodplain/wetlands processes, biological assessments, pedestrian survey's, SHPO/THPO communication etc., to meet all the requirements of the most current Grant Management Handbook and approved by OBDD-IFA, if needed. The complete record must be ready for public comment. Any amount of funds in excess of the $15,000 must be paid for with local or non-CDBG funds.

- **Legal Fees** - There is no maximum limit on costs associated with attorney fees.

- **Audit** – See Page 5-1 for details.

- **Property Appraisal Fees** – There is no maximum limit on costs associated with property appraisal fees related to property acquisition as long as the fee is reasonable and consistent with fees charged for projects with a similar scope of work in the local market.

- **Limited English Proficiency (LEP) Translation Services** – Up to a maximum of $3,000 per project is allowed to translate documents into other language(s), to meet the LEP requirements. The documents which are translated must be directly needed for the successful completion of the CDBG funded project, such as procurement notices, CDBG public meeting notices, etc.

- **Cultural Resource Monitoring** – Cultural resource monitoring required by Tribes in the completion of the environmental review record and during construction is an allowable expense. There is no maximum limit on the cost associated with cultural resource monitoring to satisfy Tribal compliance as long as the fee is reasonable and consistent with fees charged for projects with a similar scope of work.

- **Funding Application Preparation** – Up to a maximum of $7,500 per project is allowed under the Public Works, Public Water and Sewer System category to prepare funding applications to the department or other state and federal agency(s) for the next phase of the project.

- **Program Management Services** (Only applies to housing rehabilitation projects.) – Up to 20 percent of the grant award may be used for the combined costs associated with grant administration and program management. Of this amount no more than $15,000 may be used for grant administration costs. Program management costs are expenses directly related to carrying out eligible program activities such as working with low and moderate income eligible clients. These costs are not considered to be grant/project administration costs because they provide a direct service to clients eligible under the low and moderate income national objective.

  Recipients that are subject to the 20 percent cap on grant administration and program management, will be allowed an additional $10,000 on top of the 20 percent cap for grant administration and program management, allowing a maximum of $25,000 for grant administration expenses.

Refer to Table F for identification of the eligible grant administration, environmental review, labor standards compliance review, attorney fees, appraisal costs, program management costs and other costs.

ACTIVITY	ALLOWANCE
Grant Administration (does not apply to microenterprise assistance projects)	**10% up to a maximum of $25,000**
Federal Labor Standards Compliance	**Up to a maximum of $15,000 per project**
Environmental Review	**Up to a maximum of $15,000 per project**
Legal Fees	**There is no maximum limit**
Audit Costs	**Refer to Page 5-1 for details**
Limited English Proficiency Translation Services	**Up to a maximum of $3,000 per project**
Cultural Resource Monitoring	**There is no maximum limit**
Funding Application Preparation (Public Works Water and Sewer only)	**Up to a maximum of $7,500 per project**
Property Appraisal Fees	**There is no maximum limit**
Construction Contingency	**Capped at 10% of the estimated construction cost**
Architectural	**12 percent of project construction and construction contingency costs combined**
Engineering	**20 percent of project construction and construction contingency costs combined**
Program Management (Only applies to housing rehabilitation projects)	**Up to 20% of the requested grant, plus $10,000. This includes the $25,000 allowance for grant administration.**
Under rare circumstances, for projects involving biological assessments, archeological surveys or other required environmental studies, the department may allow the recipient to use a portion of the grant administration allowance to complete these activities. The costs must be required and reasonable, approved by OBDD-IFA and are limited by the amount of funds available in the recipient's grant award.	

Refer to Table F on page 5-11 for more details.

Indirect Costs
Indirect costs are not allowed under the state program.

Ineligible Activities
CDBG funds cannot be used for any debt financing or takeout, fines, fees or penalties. System development charges (including construction excise taxes), hook-up fees, and connection charges are also not eligible for reimbursement under the federal regulations for the CDBG program. Bureau of Labor and Industry (BOLI) fees are ineligible under the program. The use of a Construction Manager/General Contractor (CMGC) also known as the design/build construction technique is prohibited under the program.

Limitations on Architectural and Engineering Costs
The department will not approve, without explanation, grant awards that include budgets that contain more than the following percentages for architectural and engineering work regardless of whether the item is paid for with grant funds or other funding resources:

> **Architectural** – 12 percent of project construction and construction contingency costs; and
> **Engineering** – 20 percent of project construction and construction contingency costs.

Proposed amounts in excess of the above percentages are generally not allowed and must be fully explained in the application. Approval to exceed the percentages can be granted on a case by case basis by OBDD-IFA. The work included in these percentages generally includes: project design, surveying, preparation of bid and contract documents, review of bids, project/construction oversight, preparation of as-built drawings and operation and maintenance plans. Professional services contracted out by the engineering/architectural firm for project geotechnical evaluation, surveying, core samples, or other extra services are not generally included in the above stated limit for engineering and architectural costs. For further assistance contact the department's staff.

Preliminary engineering/planning documents, final design engineering documents and construction oversight in projects funded in full or in part with CDBG funds must be prepared and stamped or conducted by a registered professional engineer or architect licensed to do work within the State of Oregon.

Limits on Construction Contingencies
Construction contingencies are limited to a maximum of 10 percent of the projected construction line item cost.

Pre-Award Costs
Costs incurred prior to award of the grant are not eligible for reimbursement in any project assisted in whole or in part with CDBG funds.

Pre-Agreement Costs
In any project assisted in whole or in part with CDBG funds, costs incurred after a grant award has been made but prior to execution of a grant contract are not eligible for reimbursement unless there are provisions in the grant contract allowing for payment of specific pre-agreement costs. The activities must also be eligible and undertaken in accordance with the requirements of the Community Development Block Grant program/future contract requirements and the federal environmental review rules at 24 CFR Part 58. Consult with department staff during project development for pre-agreement cost activities.

If pre-agreement costs are to be requested, the applicant must provide a written letter with the application, requesting pre-agreement costs that clearly explains and identifies:

- The amount of funds needed, by budget line item.
- An explanation as to why pre-agreement costs are necessary for the completion of the project.
- The timeline in which the funds will be expended.
- Documentation the federal environmental review rules at 24 CFR Part 58 have been met.

The application must describe the pre-agreement costs within the project description and show the costs in the project budget.

Grant Contract Execution

Grant contracts must be signed by the highest elected official of the recipient and returned to the department.

Grant Contract Amendments

The department must approve and process a formal written grant contract amendment if any of the following changes occur on a project: change in cost, scope of work, location, objectives, time frame, budget, or budget line items of the approved activities, program beneficiaries or project completion dates. The recipient's failure to obtain an approved grant contract amendment from the department when necessary may result in sanctions. Failure to gain prior approval, when needed, could result in the recipient having to pay for the costs associated with the amendment. The grant recipient must request, in writing, an amendment from the department and the documentation must contain the reasons why the amendment is needed and identify the proposed revisions to the budget, timeframes, scope of work etc.

- **Project Completion Date** – Project completion date extension requests must be submitted in writing to the department by the recipient. The written request must contain: 1) the reason(s) for the extension including identification and justification of the reasons beyond the recipients control that caused the delay; 2) the actions taken by the recipient to overcome the reasons for the delay; and, 3) propose a date when all grant activities will be completed i.e. the extension request cannot be more than six months and must include a timeline/work plan showing that the grant can be administratively closed within the six months.

- **Budget** – A formal written grant contract amendment is required to draw funds differently than authorized in the approved CDBG grant contract budget. However, if at the time of the <u>last/final</u> disbursement request, the recipient needs to vary from the approved budget the following procedure can be used, only for the final disbursement request:
    1. The amounts being changed and a brief explanation justifying the need to change or move line item amounts must be documented, with notations on the final disbursement request. The documentation can either be filed under the grant contract amendment tab or with the disbursement request in the OBDD-IFA project file;

2. The final changes must be in conformance with the grant administration, engineering, environmental, program management etc. allowances identified on page's 5-2 to 5-4 of this MOD;
3. The costs are eligible under the CDBG program; and,
4. There is written communication from the Regional Coordinator to the grant recipient in the project file, attached to the final disbursement request that *"IFA agrees to waive the requirements in [insert precise sections in both the contract to follow the approved budget] in this instance."* The documentation can either be filed under the grant contract amendment tab or with the disbursement request.

The Department Director or Deputy Director has the authority to designate/assign grant contract amendment approval authority to the Infrastructure Finance Authority.

Matching Funds

There is no minimum project match requirement. Any matching funds necessary to complete the proposed CDBG project must be in the form of a cash contribution or project debt service. All project funds necessary to complete the proposed project must be available and committed at the time the application is received by the department. Refer to the "Readiness to Proceed" definition in this section for more details.

Mixed Use Facilities

A community/public facility that contains activities both eligible under the Method of Distribution and activities ineligible under the Method of Distribution is a mixed use facility. These types of facilities are not eligible for funding under the program.

"Pass Through" Grants

The city or county grant recipient is fully responsible for the grant-funded project and compliance with all applicable federal and state requirements. Recipients may not "pass through" any of the grant funds to another entity to undertake the project activities, <u>except</u> for regional housing rehabilitation revolving loan fund activities where the department has reviewed and/or approved a sub-grant agreement. **However, the original grant recipient remains responsible for compliance with the federal and state program requirements.**

Procurement

When procuring property or services to be paid for in whole or in part with CDBG funds, city and county recipients shall comply with the requirements of Oregon Revised Statutes (ORS) Chapter 279 and Oregon Administrative Rules (OAR) Chapter 137, as applicable. If the grant recipient has professional engineers, architects or other consultants already under contract, the recipient must provide documentation from their legal counsel showing that the procurement met state law and the procurement requirements for each grant. If necessary, all such contracts must be amended to include the required federal clauses.

Project Period (Project Completion Date)

All grants must be administratively closed within the time frame specified in Table 8-1 found in Chapter 8, unless formally amended. The project completion period begins the date the grant contract is fully executed. Projects that are not completed within the specified project period may be terminated and any unexpended grant funds may be recaptured by the state.

Publicly Owned Improvements/Facilities

All categories:

When a project requires public ownership, the improvements/facility to be constructed must be owned by the applicant or the applicant has a minimum 50-year long-term lease on the improvements/facility. **Note:** The eligible applicant must have no intention of turning over/selling the improvements or facility to another entity within 50 years.

Public infrastructure improvements must be constructed on land owned by or where proper long-term easements have been obtained by the applicant.

Public/Community facilities can be owned or operated by a non-profit if there is a trust deed covering the five-year restriction on change of use/continued use requirements.

Note: All temporary construction easements and real property acquisition, (including long-term leases of 50 years or more) including the acquisition of permanent easements for construction projects assisted in whole or in part with CDBG funds, must be carried out in compliance with the requirements of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA or Uniform Act) and Section 104(d) of the Housing and Community Development Act of 1974. The federal rules apply even if CDBG funds will not be used to pay for the acquisition.

Readiness to Proceed

All projects must meet the following readiness to proceed criteria:

- Other funds needed to complete the project are available and committed to the proposed project at the time of application for CDBG funds. Applications must contain letters of commitment/or conditional commitment from all matching resources to be used for the proposed project, bank statements, loan agreements, bond authorizations, etc. There must be clear and convincing evidence that the match is secured and readily available for project expenses; or

- If any necessary other funds are not committed, the CDBG Rating and Review Team will conduct a thorough analysis of any conditional commitment(s) and the IFA Director may grant an exception to this requirement to accommodate funding from other federal, state, philanthropic or private funding sources such as: USDA Rural Utilities Services, the Oregon Department of Environmental Quality, foundations or funding to be received from other programs offered by the IFA such as the Water/Wastewater Financing Program or the Safe Drinking Water Revolving Loan Fund program. This exception must be requested and approved by OBDD-IFA prior to application submission.

  (Note: The expected date of funding determination is not considered a "commitment" as there is no guarantee that a project will be funded.) If all project funds are not committed, and the funds are anticipated to come from a private funding source, the applicant must provide a back-up financing plan.

- The project will commence within four (4) months following the date of grant contract execution; and
    - The proposed project will be administratively closed within two years of execution of a contract between the recipient and the state or administratively closed within 36 months for combined final design and construction Public Water/Sewer or Public/Community Facilities grants.
    - All land use approvals needed for the project have been secured.
    - A microenterprise assistance public service project must be administratively closed within 12 months of execution of a contract between the recipient and the state.
    - Housing rehabilitation applicants must provide a written certification that all the initial loans/grants will be made within 24 months after execution of the grant contract with OBDD.

Note: If the project is not able to proceed within four months following the date of grant contract execution, the state may terminate the grant and re-obligate the funds.

Sanctions

The state may bar a recipient from applying for CDBG funds, withhold unallocated funds, require return of unexpended funds or require return of program income, if during the grant period, the state finds that:

- The recipient has not signed the grant contract and returned it to the department.
- None of the grant activities have commenced within 4 months after execution of the grant contract.
- Federal or state regulations have not been met.
- There is significant deviation from the grant contract-funded activities.
- There has been a monitoring finding that significant corrective actions are necessary to protect the integrity of the project funds, and those corrective actions are not, or will not be implemented within 30 days.

No sanction will be issued by the state until the recipient has been notified in writing and has been given 30 days to appeal the decision and to correct the deficiencies. Only the local government (grant recipient) has standing to submit an appeal. During this 30-day period, the grant recipient can submit documentation to the IFA disputing the appropriateness of the proposed sanction determination by the state. After the 30-day period is concluded and assuming the IFA is not persuaded to rescind the potential sanction, IFA will issue a letter to the grant recipient formally issuing the sanction. Once the formal sanction letter is issued, it will not be rescinded by OBDD-IFA.

Unexpended Grant Funds

Grant funds not used for activities as shown in the approved contract budget will be recaptured by the state and made available to other communities in accordance with the rules contained within this Method of Distribution.

Use of CDBG Funds for Facilities Owned and/or Maintained by a State or Federal Agency

Grants will not be awarded for facilities owned and maintained by another state or federal agency. CDBG funds cannot be used to offset locally budgeted funds or to replace state or federal funds. All CDBG projects must comply with OMB Circular A-87 "Cost Principals for State and Local Governments". In addition 24 CFR 570.489(d) requires that CDBG funds are not used for general expenses required to carry out other responsibilities of state and local governments. Maintenance and upgrades to roadways or property of the Oregon Department of Transportation (ODOT) and federally owned property (or maintenance agreements) is not eligible under the CDBG program.

Waivers

The Director of the Oregon Business Development Department, or his or her designee, may waive non-statutory program requirements. A request for a waiver will be approved only when it is determined necessary to further the objectives of the Community Development Block Grant (CDBG) program and the mission of the department.

The OBDD-IFA Director cannot waive an Oregon CDBG program requirement if the requested waiver conflicts with the Housing and Community Development Act statutes, the HUD regulations, or the state's community development objectives.

Waivers requested by the grant recipient or applicant must be requested in writing. The written request must contain: 1) the reason(s) for the waiver including justification of the reasons beyond the recipients control to warrant a waiver; 2) the actions taken by the recipient to overcome the problem(s); 3) the specific CDBG requirements that are proposed to be waived; and, 4) identification of the plan to complete the project. The written request must be submitted to the departments Regional Coordinator. Waivers must be prepared by the CDBG Program and Policy Coordinator and approved by OBDD-IFA management prior to the action needing the waiver is completed.

Waivers initiated by OBDD-IFA must contain written supporting documentation identifying: the reason(s) that warrant a waiver; 2) the actions taken to overcome the problem(s); 3) the specific CDBG requirements that are proposed to be waived; and, 4) identification of the plan to complete the project/activity. Waivers must be prepared by the CDBG Program and Policy Coordinator and approved by OBDD-IFA management prior to the action needing the waiver is completed.

Work Performed by Staff of the City or County Recipient (Force Account)

Applicants should be aware that federal law governing the program states, "It is the intent of Congress that the Federal assistance made available under this title may not be utilized to reduce substantially the amount of local financial support for community development activities below the level of such support prior to the availability of such assistance" (Public Law 93-383.101(c)).

This means that if the applicant intends to use existing budgeted staff to administer the grant or to work on other grant activities (such as construction), Community Development Block Grant funds cannot be used to pay for that staff. Grant funds should only be used to increase local community development activities.

Note: Cities and counties planning to pay their own staff with grant funds for administration and/or force account work including, but not limited to, engineering, design and inspection services, construction labor and operation of locally owned equipment must consult with department staff and receive department approval **prior** to submitting an application.

DEFINITIONS

Combination Facility

A combination facility is a building in which all activities offered are eligible under the CDBG Method of Distribution. Please refer to Chapter 11, page 11-1 for more information on combination facilities.

Family

All persons living in the same household who are related by blood, marriage or adoption, this includes any related dependent persons over 65 or working dependent children over 18.

Financial Review

When required by the specific funding category applicable to each project type, applications will undergo a financial review to determine that the grant, if awarded, is the minimum amount necessary, when combined with other resources, to ensure the completion of the project. Refer to the specific project type chapters for more details of the financial review required for each type of project.

Household

All persons occupying the same housing unit regardless of their relationship to each other.

Income

Annual Family Income – The total income earned before taxes by all family members, including job earnings (wages, salary, tips, bonuses, commissions), interest, dividends, child support, alimony, welfare, social security, disability, unemployment, retirement payments, net income from business activities, farms, rents, royalties, trusts, estates and any other income received regularly by all family members.

Annual Household Income – The total income earned before taxes for everyone that lives within the residence whether they are related or not including job earnings (wages, salary, tips, bonuses, commissions), interest, dividends, child support, alimony, welfare, social security, disability, unemployment, retirement payments, net income from business activities, farms, rents, royalties, trusts, estates and any other income received regularly by all household members.

Low and Moderate Income

"Low income" means income equal to or less than 50 percent of the area median (adjusted by family size). "Moderate income" means income equal to or less than 80 percent of the area median (adjusted by family size). Applicable income limits are determined by HUD on an annual basis for all Oregon counties and metropolitan statistical areas.

Permanent Resident

A person that resides within a residential dwelling unit for six months or more out of the year.

TABLE F
Guide for Grant Administration/Activity Delivery Costs/Program Management Costs

Activity	Grant Administration Cost (yes/no)	Activity Delivery Cost (yes/no)	Program Management Cost (yes/no)	Maximum amount allowed
Preparing budgets, schedules, contract amendments	Yes	No	No	10% of the grant award but not more than $25,000.
Drafting Requests for Proposals and agreements with consultants for grant administration or other consulting work (Architect and Engineer)	Yes	No	No	
Setting up systems to assure compliance with state and federal program requirements. For example: labor standards files and a grant accounting system.	Yes	No	No	
Monitoring project progress against the grant contract scope of work and budget and reporting to elected officials.	Yes	No	No	
Preparing disbursements/cash requests, reports, and other documents for submission to the Department.	Yes	No	No	
Participating in Department monitoring visits and responding to monitoring findings and concerns.	Yes	No	No	
Preparing a project completion report, assisting an auditor with required grant information.	Yes	No	No	
Costs of publishing the Fair Housing Resolution.	Yes	No	No	
Purchase of capital equipment, such as computers and file cabinets for grant administration.	Yes	No	No	
Training on CDBG grant administration requirements.	Yes	No	No	
Limited English Proficiency translation services to translate documents directly needed for the CDBG project.	No	Yes	No	Maximum $3,000 per project.
Cultural Resource Monitoring	No	Yes	No	No maximum – reasonable and necessary to complete the activity.
Preparation of the environmental assessment or other environmental documents and publishing required notices.	No	Yes	No	Maximum $15,000 per project.
Federal Labor Standards Compliance work related to conducting on-site employee interviews, verifying payroll data, reviewing payrolls, attending pre-construction conferences, and obtaining compliance with these requirements.	No	Yes	No	Maximum $15,000 per project.
Attorney fees for preparing or reviewing contract documents or property acquisition activities.	No	Yes	No	No maximum – reasonable and necessary to complete the activity.
Audit Costs.	No	Yes	No	Refer to page 5-1 for details
Funding application preparation to ensure the planned Public Water or Wastewater project is designed and constructed.	No	Yes	No	Maximum $7,500 per project
Professional appraiser fees related to property acquisition.	No	Yes	No	No maximum – reasonable and necessary to complete the activity.
Construction Contingency	No	Yes	No	10% of the estimated construction cost
Architectural	No	Yes	No	12% of project construction and construction contingency costs combined

Engineering	No	Yes	No	20% of project construction and construction contingency costs combined
Marketing Grant Activities to clients.	No	No	Yes	Up to 20% of the grant award for the combined costs associated grant administration and program management. Grant administration is limited to $25,000. **Refer to Chapter 5 for more information.**
Collecting client applications, verifying application to determine eligibility.	No	No	Yes	
Making referrals for products or services.	No	No	Yes	
Providing education or counseling to clients.	No	No	Yes	
Site-specific environmental review, on-site inspections, bid preparation, contracting, client/contractor troubleshooting, compiling cost data on individual rehabilitation homes.	No	No	Yes	

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Chapter 6 Citizen Participation Plan

Every applicant and recipient of State of Oregon Community Development Block Grant (CDBG) funds must comply with the citizen participation requirements provided in federal law and described in this chapter. Some of the requirements will be checked by the OBDD-IFA during application review; others will be verified when grant projects are monitored.

Applications from jurisdictions that fail to comply with the citizen participation requirements will not be accepted. **Applicants must use the required first public notice included in this chapter. The first public hearing notice must be advertised or posted at least 7 full days in advance of the time the public hearing is to be held by the local government.**

Requirements

Every applicant must provide evidence and certify in the application and, if funded, in the grant agreement that it is following a citizen participation plan which includes at least the seven elements required in 24 CFR Part 570.486. These seven elements are presented below. Each is followed by the state standard that will be used to determine if the applicant is complying with federal requirements.

1. **Low and Moderate income Citizen Participation** - The local government must provide for and encourage citizen participation, particularly by low- and moderate-income persons who reside within the city or county in which the grant funds are proposed to be used.

   State standard: Applicants must inform low- and moderate-income residents, and/or groups which represent them, of the opportunity to apply for CDBG funds. The purpose of this effort is to involve the residents in the identification of community development and housing needs including the needs of low-income and moderate-income families. The information shall include the following, at a minimum:

   c. The amount of funds available for proposed community development and housing activities;
   d. The range of activities that may be undertaken; and
   e. The location of additional information about the Oregon Community Development Block Grant program.

   The department encourages the grant recipient to invite at least one organization that represents low- and moderate-income persons to the public hearing. Department staff should be contacted for suggestions if a city or county cannot identify an appropriate organization for its area.

2. **Access To Information** - The local government must ensure that citizens will be given reasonable and timely access to local meetings, information and records relating to the local government's proposed and actual use of CDBG funds.

   State standard: The Oregon Public Meetings law (ORS 192.610 to 192.690) will be used by the state and local governments to assure that citizens have reasonable notice of public meetings and access to records of those meetings. The grant application must

include copies of public notices and minutes from meetings about the local community development program. Local governments must provide citizens with access to information and records about their community development program and any proposed application in accordance with the Oregon Public Records law (ORS 192.001 to 192.505).

3. **Required Information** - The local government must furnish citizens information, including, but not limited to:
    a. The amount of CDBG funds expected to be made available for the current fiscal year (including the grant and anticipated program income);
    b. The range of activities that may be undertaken with the grant funds;
    c. The estimated amount of grant funds proposed to be used for activities that will meet the national objective of benefit to low- and moderate-income persons; and
    d. The proposed activities likely to result in displacement and the local government's antidisplacement and relocation plans required under 24 CFR Part 570.488, Part 570.606, and Part 42.

State Standard: The "Public Notice and Notice of Public Hearing" included within this chapter must be used for this first hearing and for meeting this federal regulation. **The first public hearing notice must be advertised or posted at least 7 full days in advance of the time the public hearing is to be held by the local government.**

Some detail in the required notice will need to be inserted by the applicant (e.g., amount of grant funds proposed to be used). Information in the notice about the amount of CDBG funds available and the range of activities that may be undertaken may vary during the program year.

The final approved meeting minutes must record/document that items a-d above were addressed during the public meeting. On July 20, 2012 OBDD-IFA Management determined that the final approved meeting minutes could be submitted in one alternate format, MP3. Otherwise the final approved meeting minutes must be submitted in writing.

4. **Technical Assistance** - The local government must provide technical assistance to groups representing persons of low and moderate income that request assistance in developing proposals in accordance with the procedures developed by the department. Such assistance need not include providing funds to such groups. The level and type of assistance can be determined by the jurisdiction.

State standard: The applicant must also describe in the application how it has responded to requests for technical assistance from groups representing low- and moderate-income persons, such as community action agencies. The level of assistance provided can be determined based on the applicant's staff and budget limitations.

5. **Public Hearings** - The local government must provide for a minimum of two public hearings, each at a different stage of the project, for the purpose of obtaining citizen's views and responding to proposals and questions. Together, the hearings must cover community development and housing needs, development of proposed activities and a review of program performance.

The public hearing to cover community development and housing needs must be held before submission of an application to the state. There must be reasonable notice of hearings and they must be held at times and locations convenient to potential and actual beneficiaries, with accommodations for the handicapped. To meet the reasonable notice requirement **the first public hearing notice must be advertised or posted at least 7 full days in advance of the time the public hearing is to be held by the local government.** Public notices and hearings shall be presented and conducted in a manner to meet the needs of non-English speaking residents who can reasonably be expected to participate.

State standard: The governing body of the applicant (city council or county board of commissioners) must provide for a minimum of two public hearings at different stages of the grant project. Together, the hearings must cover community development and housing needs, development of proposed activities and a review of program performance.

> **Hearing #1** - The purpose of the first hearing is for the city council or county board of commissioners to take comments from citizens about **both** community development needs and the project proposed for grant funding prior to submitting an application to the department.

The notice form included in this chapter must be used for the first hearing. **The first public hearing notice must be advertised or posted at least 7 full days in advance of the time the public hearing is to be held by the local government.** The first public hearing must be no more than 12 months old and preferably conducted during the same program year using the appropriate notice contained within this Method of Distribution. The final approved meeting minutes must be submitted with the application. On July 20, 2012 OBDD-IFA Management determined that the final approved meeting minutes could be submitted in one alternate format, MP3. Otherwise the final approved meeting minutes must be submitted in writing.

> **Hearing #2** - The purpose of the second hearing is for the city council or county board of commissioners to review the results of the project with citizens and to take comments about the local government's performance as part of the grant closeout process. A model notice for the second hearing is included in the Grant Management handbook.

Each hearing must be held with enough advance notice to ensure adequate opportunity for interested citizens and groups to participate. Public hearing notices must be **advertised or posted at least 7 full days in advance of the time the public hearing is to be held by the local government.** Applicants must provide copies of the public notice, affidavit of publication or certification of posting, and final approved copy of the hearing minutes from the first public hearing with the grant application and the second hearing prior to project completion. The final draft of the application must be made available to the public once it is submitted, if not before.

NOTE: On July 20, 2012 OBDD-IFA Management determined that the final approved meeting minutes could be submitted in one alternate format, MP3. Otherwise the final approved meeting minutes must be submitted in writing.

In the grant application, the city or county must describe how it determined whether or not non-English speaking residents were expected to participate. This information can be accessed on the American Fact Finder web site. The information includes statistics about the languages spoken at home, ability to speak English, and linguistic isolation of persons living in each city and county. If any non-English language population constitutes five percent (5%) or more of the population, then the public hearing notices are required to be published or posted in those languages.

The Spanish language version of the first required public hearing notice is included in this chapter. Applicants needing assistance in reaching other language groups should contact department staff for advice.

Note: Refer to the "Note" in Chapter 7 for a description of the environmental and uniform relocation and real property assistance (URA) trigger guidance. More detailed information can be found in the current Grant Management Handbook.

6. **Opportunity to Comment on Proposed and Actual Activities** - The local government shall provide citizens with reasonable advance notice of, and opportunity to comment on, proposed activities in an application to the state and, for grants already made, activities which are proposed to be added, deleted or substantially changed from the local government's application to the state. Substantially changed means changes made in terms of purpose, scope, location or beneficiaries as defined by criteria established by the state.

   State standard: The public must be provided the opportunity to comment on a proposed application at the public hearing held for that purpose ("first" hearing) and/or to submit written comments in accordance with instructions provided in the hearing notice.

   Recipients must provide a similar opportunity for the public to comment on significant changes in an approved project. Generally, this means that if the grant recipient seeks to move grant funds to an activity that was not part of the approved project budget in the grant contract, a public hearing must be held with appropriate notice. Department staff will help the recipient determine when a proposed change is significant enough to require a hearing.

7. **Timely Response to Complaints** - The local government shall provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within fifteen (15) working days when practical.

   State standard: If awarded a grant, the local government will be monitored by department staff for compliance with all applicable federal and state regulations. Part of this monitoring will include checking to see that the grant recipient provides a prompt, written response to all written complaints concerning the community development program and grant project.

Required Notice For Public Hearing #1

Note: The notice on the next page is for the first required public hearing. The purpose of the hearing is to take comments from citizens on **both** the community development and housing needs in the city or county and the project proposed for grant funding. The final approved meeting minutes must record/document that this requirement was met.

> NOTE: On July 20, 2012 OBDD-IFA Management determined that the final approved meeting minutes could be submitted in one alternate format, MP3. Otherwise the final approved meeting minutes must be submitted in writing.

The notice must be published or posted by the applicant at least 7 full days in advance of the time the public hearing is to be held by the local government.

Public Notice and Notice of Public Hearing

The (city/county) is eligible to apply for a 2016 Community Development Block Grant from the Oregon Business Development Department. Community Development Block Grant funds come from the U.S. Department of Housing and Urban Development. The grants can be used for public facilities and housing improvements, primarily for persons with low and moderate incomes.

Approximately $11.5 million will be awarded to Oregon non-metropolitan cities and counties in 2016. The maximum grant that a city or county can receive is $2,500,000.

The (city/county) is preparing an application for a 2016 Community Development Block Grant from the Oregon Business Development Department for (name of project, location, and purpose). It is estimated that the proposed project will benefit at least (number) persons, of whom (percentage) will be low or moderate income.

A public hearing will be held by the (city council/board of commissioners) at (time) on (day) at the (location). The purpose of this hearing is for the (city council/board of commissioners) to obtain citizen views and to respond to questions and comments about: community development and housing needs, especially the needs of low- and moderate-income persons, as well as other needs in the community that might be assisted with a Community Development Block Grant project; and the proposed project.

Written comments are also welcome and must be received by (date) at (address). Both oral and written comments will be considered by the (city council/board of commissioners) in deciding whether to apply.

The location of the hearing is accessible to persons with disabilities. Please contact (name of contact person/office) at (telephone number) if you will need any special accommodations to attend or participate in the meeting.

More information about Oregon Community Development Block Grants, the proposed project, and records about the (city/county's) past use of Community Development Block Grant funds is available for public review at (location) during regular office hours. Advance notice is requested. If special accommodations are needed, please notify (name of contact person/office) at (telephone number) so that appropriate assistance can be provided.

Permanent involuntary displacement of persons or businesses is not anticipated as a result from the proposed project. If displacement becomes necessary, alternatives will be examined to minimize the displacement and provide required/reasonable benefits to those displaced. Any low- and moderate-income housing which is demolished or converted to another use will be replaced.

Aviso Público y Noticia de Audiencia Pública

La (ciudad/condado) es elegible para aplicar a un Subsidio en 2016 del Community Development Block Grant que a su vez viene del Oregon Business Development Department.

Los Subsidios del Community Development Block Grant (Bloque Subsidiario para el Desarrollo Comunitario) vienen desde el U.S. Department of Housing and Urban Development (Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos). Los subsidios pueden ser usados para instalaciones públicas y remodelación de casas, primariamente por personas con ingresos moderados o bajos.

Aproximadamente $11.5 millones serán otorgados en 2016 a ciudades y condados no-metropolitanos de Oregon. El máximo de subsidios que la ciudad o el condado puede recibir es $2,500,000.

La (ciudad/condado) está preparando una aplicación en 2016 para el subsidio del Community Development Block Grant que viene del Oregon Business Development Department para (nombre del projecto, ubicación y propósito). Está estimado que el projecto propuesto beneficiará a por lo menos (número) personas, de los cuales (porcentaje) serán de ingresos moderados o bajos.

Una audiencia pública se llevará a cabo por el (consejo de la ciudad/junta de comisionados) a las (tiempo) del (día) en la (ubicación).

El propósito de esta audiencia es para que el (consejo de la ciudad/junta de comisionados) obtenga puntos de vista de los ciudadanos y para responder preguntas acerca de:

Desarrollo comunitario y necesidades de vivienda, especialmente las necesidades de personas con ingresos moderados y bajos, así como también otras necesidades en la comunidad que podrían ser asistidas con un subsidio del projecto Community Development Block Grant; and El projecto propuesto.

Los comentarios escritos son también bienvenidos y deben ser recibidos el (día) en la (dirección). Ambos comentarios, escritos y orales serán considerados por el (consejo de la ciudad/junta de comisionados) en decidir si aplican.

La ubicación de la audiencia es accesible para personas con incapacidades. Por favor dejar (nombre de la persona de contacto/oficina) el (número de teléfono) para saber si usted necesitará cualquier tipo de acomodaciones especiales para asistir o participar en la reunión.

Más información sobre el Oregon Communitty Development Block Grants, el projecto propuesto y los pasados registros sobre la (ciudad/condados) en el uso de los subsidios del Community Development Block Grant están disponibles para la revisión pública en la (ubicación) durante las horas regulares de oficina. Se requiere del aviso anticiapado. Si las acomodaciones especiales son necesitadas, por favor notifíquelo (nombre de la persona de contacto/oficina) el (número de teléfono) de modo que la asistencia apropiada pueda proveerse.

La desalojamiento involuntaria permanente de personas o negocios no es esperada como un resultado del projecto propuesto. Si la desalojamiento llegara a ser necesaria, serán examinadas alternativas para minimizar la desalojamiento y proveer beneficios requeridos/razonables para quellos removidos. Calquier casa de ingreso moderado y bajo la cual sea demolida o convertida en otro uso será reemplazada.

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Chapter 7 OBDD-IFA CDBG Application Procedures

These procedures apply to CDBG applications submitted to the Oregon Business Development Department (OBDD or Department). These procedures do not apply to the following types of CDBG projects:

- Community Capacity/Technical Assistance Projects; and
- Emergency Grant Projects.

DEADLINE(s): Applications will be accepted year round on a quarterly basis. Applications will be rated and ranked and awards announced in accordance with the following schedule. The department will not conduct a quarterly round if remaining CDBG funds are insufficient. Notice of insufficient funds for quarterly rounds will be provided to all known eligible applicants via website postings, e-newsletters and listserve distributions.

2016 TIMELINE	ACTION
FIRST QUARTER **January 1 – March 31**	**Applications will be accepted.**
May 2016	**Awards announced for applications submitted between January 1 – March 31**
SECOND QUARTER **April 1 – June 30**	**Applications will be accepted.**
August 2016	**Awards announced for applications submitted between April 1 – June 30**
THIRD QUARTER **July 1 – September 30**	**Applications will be accepted.**
November 2016	**Awards announced for applications submitted between July 1 – September 30**
FOURTH QUARTER **October 1 – December 31**	**Applications will be accepted.**
February 2017	**Awards announced for applications submitted between October 1 – December 31 (Note: Applications will be scored, if necessary, under the 2016 Method of Distribution)**

In general, the application and award process for CDBG funding consideration shall follow the established application policies and practices established by Oregon Business Development Department – Infrastructure Finance Authority, for its funding programs, as modified for the CDBG program below:

STEP 1 Initial IFA Contact/Pre-Project Development

The project proponent contacts the department prior to being invited to submit an application. The project proponent contacts the respective Regional Coordinator (RC) serving their region to review the proposed project concept and to obtain pre-project development assistance. Contact information for the Regional Coordinators can be found on the Departments web site at: http://www.orinfrastructure.org/

The RC will work with the proponent to provide pre-project development information, including the following:

- There is every reasonable likelihood that the proposed project will meet a federal national objective;
- The applicant is not otherwise ineligible to apply under the program, refer to Chapter 2 for more information;
- The proposed sub-grantee's for housing rehabilitation and microenterprise assistance grants are a certified non-profit meeting the requirements found in the respective chapters of this 2016 Method of Distribution;
- The proposed matching funds, if any, will be secured and readily available at time of application; and
- A preliminary financial review of any proposed water and wastewater final design and/or construction project show that the project is eligible for funding and the monthly user rates are at or will exceed the Threshold Rate Criteria at construction completion of the proposed project. Refer to Chapter 10 for more details.

The proposed project will go through an initial preliminary review by the Project Development Team (PDT) for program eligibility, financial feasibility and readiness to proceed. Once the PDT provides written determination that the project appears ready to proceed, the project can proceed to Step 2, Project Notification and Intake Form (PNIF). The Project Development Team will be comprised of, at a minimum, the project RC, CDBG PPC and Finance Officer. Projects may be reviewed before or after a "One Stop" meeting.

A "One Stop" meeting may be scheduled, if warranted, or upon request by the proponent. The "One Stop" meeting will provide broad funding perspective and multiple program eligibility considerations and may include several federal and state agencies. "One Stop" meetings are generally held after the project proponent has completed a master plan or facilities plan and/or has estimated costs for final design and construction of the desired improvements.

STEP 2 Project Notification and Intake Form (PNIF)

Once the project has been reviewed by the PDT and appears ready to proceed and complies with the CDBG program eligibility requirements, the RC will prepare a Project Notification and Intake Form (PNIF) with information supplied by the potential applicant. The project proponent must provide sufficient information for the RC to complete the form.

NOTE: Contact the department's Regional Coordinator for assistance. Refer to the current Grant Management Handbook for more detailed information. An abbreviated summary of the requirements are identified below:

Environmental: *According to the NEPA (40 CFR 1500-1508) and Part 58, the responsible entity (RE) (grant recipient) is required to ensure that environmental information is available before decisions are made and before actions are taken. In order to achieve this objective, Part 58 prohibits the commitment or expenditure of CDBG funds until the environmental review process have been completed and if required, receives a Release of Funds from OBDD-IFA.*

The RE is advised to begin the environmental review process as soon as they determine the projected use of HUD assistance (58.30(b)). Therefore, the date on which a project becomes subject to the environmental review requirements is the date the potential applicant commences with STEP 2 of the required application process identified within the Method of Distribution or: 1) the initial indication of the Recipient's approval of a specific site for assistance under the program; or 2) OBDD's receipt of the "Off-Site Infrastructure for Affordable Housing Request for Pre-Screening". For other actions that will trigger the environmental review requirements, please refer to the Grant Management Handbook.

UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION REQUIREMENTS (URA): *In accordance with 49 CFR 24.2(a)(22) URA requirements apply to any project where federal financial assistance is received or anticipated in any phase. Therefore, the date on which a project becomes subject to the environmental review requirements is the date the potential applicant commences with STEP 2 of the required application process identified within the this Method of Distribution. From this point forward all the federal and state CDBG program requirements apply to the project.*

In accordance with HUD Handbook 1378, Chapter 1-4-I-2, please note that other actions will also trigger the URA requirements and need for General Information Notices (GIN), which are explained in more detail in the Grant Management Handbook.

STEP 3 Invitation to Apply for Funding Consideration

The RC will route the PNIF form for internal agency review and comment. After internal comment, if the proposed project is determined to qualify for CDBG funding, the proposed eligible applicant will be invited, in writing, by the RC to submit a complete application for CDBG funding consideration. All applicants must have been invited to apply for CDBG funding at least 3 weeks prior to the application deadline.

If the PNIF is not approved, the project proponent may be asked to improve the project information, or be considered for other IFA programs or referred to other agencies' programs for potential funding consideration.

STEP 4 Application Review and Rating

One signed original and two complete copies (3-total) of the application must be received by the department no later than 5:00 pm on the application deadline. The application must be signed by the applicant's highest elected official. Applications transmitted electronically or by fax will not be accepted.

Once an application is received, OBDD-IFA staff will date stamp the application and provide copies to the Application Review and Rating Team (ARRT) comprised of the project RC, the CDBG PPC and a Finance Officer which will bring more in-depth assessment of the project given the function of each member of the ARRT.

During the review process, the state will determine that the applicant is an eligible recipient in accordance with OMB circular A-133 and Section 0.102 of Oregon Accounting Manual 04 03 00.P0 (effective June 1, 1998) and any relevant superseding regulation. If a recipient accepts a CDBG award from the state they agree to monitor any local government or nonprofit organization sub-grantee to whom it may pass the funds to.

The ARRT will review the application to determine if the application contains all the required information, and that the proposed project meets the CDBG threshold requirements, including but not limited to:

- All parts of the application have been properly completed and all attachments were provided;

- Requested amounts are within the program limits i.e. max grant limit, grant administration, engineering/architectural, environmental review, labor standards, construction contingency etc.;
- Applicant is eligible;
- Outcome and performance data was provided;
- National objective and readiness to proceed data was provided;
- Financial viability of the project, and
- All activities are eligible under the CDBG program.

The ARRT will simultaneously but individually complete the initial application review within seven (7) calendar days from the department's receipt of the application. Following the initial review, the ARRT will convene to complete review and determine if the application is complete or if additional information or clarification is needed. The ARRT has an additional seven (7) calendar days to complete the final review.

If the application is found to be:

- Complete - If the application is determined by the ARRT to be complete, the RC will mail the applicant a "complete application letter." The application will be rated (scored) and provided to the Application Ranking Committee for processing.

- Incomplete - If the application is determined to be incomplete, based on the review by the ARRT, the RC will provide written notification to the applicant that they have fifteen (15) calendar days to submit any necessary information to make the application complete.

- Upon receipt of additional information to OBDD-IFA, if the application is found to be:

  - Complete - If the application is determined to be complete, based on the additional information provided, the RC will mail the applicant a "complete application letter". The application will be rated (scored) by the ARRT and the application will be provided to the Ranking Committee for processing.

  - Incomplete – If the application is determined to be incomplete, based on the additional information provided, the application will be returned to the applicant for re-submittal during a future quarterly application cycle. The RC will mail the applicant a letter with the returned application that identifies the incomplete status. The RC will provide project development assistance to the applicant with the missing parts/information so the application can be resubmitted in a future quarterly application cycle.

If, at any point during the application reviewing or rating process, it is determined the project does not meet the requirements or that it needs further development (i.e. to meet the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act or the Federal Environmental Review requirements), a recommendation will be made to the Infrastructure Finance Authority Director to suspend the reviewing and rating process. The respective team will document areas where further development is needed. The project RC will provide project development technical assistance to the applicant and work with the potential

applicant on possible submission in a future competitive application round. The Infrastructure Finance Authority Director has the final decision to suspend reviewing and rating and to return the project application to the applicant

STEP 5 Application Ranking

The Ranking Team (RT) will rank all complete applications in accordance with the criteria contained in the 2016 Method of Distribution. The RT will include at least one RC, at least one CDBG PPC, and at least one other internal staff and/or management personnel.

In the event, that demand exceeds available funding, the ranking recommendation may include a backup funding list and may include, for each category, a recommended award "cutoff" line, below which the staff recommends that awards not be made. The "cutoff" line for a particular category will be accompanied by written findings prepared by the Committee to support the recommendation.

STEP 6 Senior Management, Association of Oregon Counties (AOC) and League of Oregon Cities (LOC) Review

Funding recommendations prepared by the Application Ranking Committee (Committee) will be forwarded to the Program Services Manager and IFA Director for review. Once the recommendations are finalized the Committee will forward the recommendations to representatives of the League of Oregon Cities (LOC) and Association of Oregon Counties (AOC) for concurrence.

- A summary of the approved funding awards will be presented to the IFA Board for their information. The IFA Board has delegated their decision making authority to the IFA Director, AOC and LOC representatives, and senior management review process described in this step.

- All funding decisions made through the Board delegated process are final. The department reserves the right to not fund any application which it deems not eligible, properly developed, not ready to proceed or supported by the available program resources.

- OBDD-IFA may award a CDBG grant amount that is different from the amount requested by the applicant. Applicants are not penalized for requesting the maximum grant amount but the department reserves the right to award a grant amount it deems appropriate to complete the project.

STEP 7- Notice of Decision

The department will notify applicants in writing of their funding status approximately 60 days after the deadline for applications. The award letter for each project will be signed by the Regional Coordinator.

RATING AND RANKING CRITERIA

Applications from one category will not compete with applications from another category. For example: Public works applications will only compete against other public works applications not against housing rehabilitation applications.

Need for Project - 100 Points

Project Need and Solution - 80 Points: Point scores will be determined in part by 1) the severity of the identified problem compared to those of other applications received within that funding category; and 2) an analysis of the need for the project i.e. the severity of identified impact of the problem and the proposed solution. A strong application will show that the proposed use of funds will address the identified need(s) and that the applicant has anticipated and planned for the many factors that can affect successful completion of the project. For example:

- The reasonable likelihood the proposed project will meet a national objective: provide principal benefit to low and moderate income persons; or address a situation of particular urgency that poses a threat to community health and welfare.
- The proposed project is the best available solution, based upon an analysis of other alternatives.
- The facility will be of adequate size to provide the proposed level of service.
- The facility will not duplicate other services provided in the area.
- The project budget is adequate.
- The applicant has identified all the steps necessary to achieve successful completion and has a reasonable work plan.
- Applications for construction and final engineering (architectural services) will be evaluated on the overall project and engineering feasibility. Engineering feasibility reports, final engineering designs, and project cost estimates will be reviewed by the Committee and if needed a professional engineers opinion.
- Applicants for housing rehabilitation funds must provide a list of potential homeowners to support the need within the sub-grantees jurisdiction, which must include the following: addresses, primary items of repair, date of most recent contact from the proposed non-profit sub-grantee, estimated amount to be requested from the housing rehabilitation fund, a description of any preliminary eligibility work performed and the total estimated dollar amount of the rehabilitation loans or grants on the list.

Financial Need – 20 Points: To document financial review, refer to the applicable chapter of this MOD for details: Chapter 9 Microenterprise; Chapter 10 Public Works; Chapter 11 Community Facilities; and Chapter 12 Housing Rehabilitation. The Committee and the Public Finance Officer complete this review. Below is some general guidance on the documents needed, and review requirements:

- If direct and clear evidence is obtained by the department that the grant funds are not needed and that the project can or will be carried out by the applicant whether or not the grant is awarded, <u>the application will not be recommended for funding.</u>
- If an applicant is the owner and operator of the facility, the applicant's financial records will be analyzed for ability to service debt.

- If an applicant is applying on behalf of a nonprofit or other public entity and the nonprofit or other public entity will be the owner and operator of the facility and the applicant has no responsibility for providing said service, then that nonprofit's or other public entity's financial records will be analyzed for the ability to service debt.
- If an applicant is responsible for providing said service (such as mental health), whether or not the applicant is contracting out the operation of the facility to a nonprofit or another public entity, the applicant's financial records will be analyzed for the ability to service debt.
- Water and wastewater final design and construction grant applicants undergo a financial review to ensure that the monthly user rate at construction completion of the proposed project meets the threshold rate criteria.
- Housing rehabilitation projects will be evaluated by the gap identified between the non-profit's balance of available funds consisting of cash on-hand (including any prior open CDBG grants) and any other funds readily available to carry-out the proposed owner occupied housing rehabilitation program and the grant request to meet the identified need.
- The regional housing rehabilitation programs will also be evaluated by the number of open CDBG grants the sub-grantee (non-profit) is currently managing and the total unexpended balance. Applications for regions with unexpended CDBG funds will not compete as well as applications for regions with no unexpended CDBG funds.

For example:

Community Facility: An application for assistance and/or shelter needed for victims of life threatening situations such as domestic violence and homelessness will score higher than applications submitted which serve the community as a whole or specific groups such as community centers or senior centers.

Public Utility: An application submitted to bring a water or wastewater system into compliance with the Safe Drinking Water Act or Clean Water Act will score higher than an application submitted for a water or wastewater system without non-compliance issues.

PUBLIC/COMMUNITY FACILITIES		
Project Category	**Project Type**	**Maximum Possible Points**
Projects that reduce homelessness and hunger or pertain to life threatening situations	Homeless Shelters, Food Banks, Shelters for victims of domestic violence	100 points
Essential community services	Shelters/workshops for people with disabilities, Health Clinics, Mental Health treatment centers, Drug and Alcohol treatment facilities, Fire Stations, Senior Centers, Head Start facilities	80 points
Other community projects	Libraries, Community Centers, Family Resource Centers	25 points

Combination Facilities	A combination facility will not be considered two separate projects and the applicant will only be eligible for the maximum grant associated with the highest use of the facility. Applications will be rated and ranked based upon the highest use of the facility. Use is defined as "clients served". If the number of clients served by each type of facility included in the combination facility are equal, the highest use will be determined by the facility type that most closely meets HUD's priority of ending chronic homelessness and hunger.	
PUBLIC WORKS		
Project Category	**Project Type**	**Maximum Possible Points**
Water and Wastewater	Projects necessary to bring the system **into compliance** with the Safe Drinking Water Act or Clean Water Act requirements and to provide safe, healthy drinking water and wastewater services to the entire community.	100 points
Water System	Water system planning, design and construction projects necessary to eliminate water rationing. The applicant must demonstrate past (within last 2 years) and/or consistent water rationing events due to insufficient drinking water quality or supply.	90 points
Water and Wastewater	Projects necessary for the provision of safe, healthy, reliable drinking water and proper sanitary wastewater service to the entire community.	75 points
Microenterprise Assistance Public Services		
Project Category	**Project Type**	**Maximum Possible Points**
Microenterprise Assistance	3 communities participating in microenterprise assistance project.	100 points
Microenterprise Assistance	2 communities participating in microenterprise assistance project.	75 points
Microenterprise Assistance	1 community participating in microenterprise assistance project.	50 points
Housing Rehabilitation		
Project Category	**Project Type**	**Maximum Possible Points**
Housing Rehabilitation	**Priority #1** - Eligible health and safety activities including lead, septic tanks and private sewer lines and drainfields, private water lines and wells and asbestos tests, inspections and assessments. Improvements necessary to fulfill reasonable accommodation requests.	100 points
Housing Rehabilitation	**Priority #2** – Construction, rehabilitation, reconstruction, or the installation of improvements to upgrade substandard electrical, plumbing, roofing, siding, insulation, weatherization, heating systems; hot water heaters and dry rot repairs.	75 points
Housing Rehabilitation	**Priority #3** – Purchase and installation of equipment that is an integral structural fixture. (Items not normally removed from the home, light fixtures and built-in appliances.)	50 points
Housing Rehabilitation Bonus Points	Applicants for housing rehabilitation grants to construct private water or wastewater service laterals, in conjunction with a public works water or wastewater grant will receive bonus points.	25 points
All Other Project Types		
All Other Project Types		0 points

Readiness to Proceed – 70 Points

To document readiness to proceed:

- Other funds needed to complete the project are available and committed to the proposed project, at time of application for CDBG funds. Applications must contain letters of commitment/conditional commitment from all matching resources to be used for the proposed project, bank statements, loan agreements, bond authorizations, etc. There must be clear and convincing evidence that the match is secured and readily available for project expenses; or

- If any necessary funds are not committed, the ARRT will conduct a thorough analysis of any conditional commitments(s) and the IFA Director may grant an exception to this requirement to accommodate funding from federal, state or philanthropic funding sources such as: USDA Rural Utilities Services; the Oregon Department of Environmental Quality, foundations; or funding to be received from other programs offered by the department such as the Water/Wastewater Financing Program or the Safe Drinking Water Revolving Loan Fund program. This exception must be requested and approved by OBDD prior to application submission.

  (NOTE: The expected date of funding determination is not considered a "commitment" as there is no guarantee that a project will be funded.) If all of the funds are not committed, and the funds are anticipated to come from a private funding source, the applicant must provide a back-up financing plan.

- The project will commence within four (4) months following the date of grant contract execution; and
  - The proposed project will be administratively closed within two years of execution of a contract between the recipient and the state or administratively closed within 36 months for combined final design and construction public water/sewer or public/community facilities grants. A project timeline must be submitted with the application.
  - All land use approvals needed for the project have been secured.
  - A microenterprise assistance public service project must be administratively closed within 12 months of execution of a contract between the recipient and the state. A project timeline must be submitted with the application.
  - **Housing rehabilitation** applicants must also provide a written certification that all the initial loans/grants will be made within 24 months after execution of the grant contract with OBDD.

Readiness to Proceed	Maximum Possible Points
Funds needed to complete the project are available and committed. Applicant has clearly documented that the project **will commence within four (4) months from grant contract execution.**	30 points
Necessary funds are not committed but applicant has received an exception from OBDD. Applicant has clearly documented that the project **will commence within four (4) months from grant contract execution.**	15 points

Applicants will receive points based upon the percentage of the committed/secured matching funds in the project, compared to the CDBG grant requested. For example:

Total Project Cost: $1,200,000
Less Requested CDBG Grant: $800,000
Committed Matching Funds: $400,000

$400,000/$800,000X100 = 50% This project would be assigned 10 points.

Percent Matching Funds in the Project	Maximum Possible Points
75-100%	20 points
51-75%	15 points
26-50%	10 points
1-25%	5 points
0%	0 points

Persons to be served by the facility/project - 50 points

Points will be assigned for the number of unduplicated individuals the proposed facility can reasonably be expected to serve during the first year after project completion. Projects which are available to all the residents of a particular area (area wide benefit projects) will be ranked separately from projects that serve a limited clientele.

Existing Limited Clientele Facilities - Projects which involve expansion or improvement of an existing facility will provide actual use records for a period of no less than 12 months. A justified number of new users may then be added to the actual number of users based on additional services or capacity resulting from the project. The numbers cannot include family members of individual clients or counts of repeated visits or use by the same person.

New Facilities – For projects that will create a new facility, the estimate must be based upon available and verifiable data that documents the need for, and capacity of, the facility, such as the number of persons on waiting lists for existing services or referrals of potential clients to facilities in other locations. The numbers cannot include family members of individual clients or counts of repeated visits or use by the same person.

Senior Centers – The measurement of use will be the number of meals served per week to unduplicated individuals. In other words, the applicant must provide information that shows how many persons per week will eat at least one meal at the facility. Individuals receiving home-delivered meals prepared at the facility may also be counted (once each).

All Projects	
# of Beneficiaries	Max Points
1,500 or more	25
1,499 – 1,000	20
999 – 500	15
499 – 250	10
249 – 100	5
99-1	2

Non Housing Rehab Projects	
% LMI of Target Population	Max Points
100%-90%	25
89%-80%	20
79%-70%	15
69%-60%	10
59%- 51%	5
Project does not meet the low and moderate income national objective	0

Housing Rehabilitation – Housing rehabilitation projects will be scored by the total number of proposed owner occupied housing rehabilitation units which are reasonably expected to be rehabilitated as follows:

Housing Rehabilitation Projects	
# Units	**Maximum Points**
40 or more	25
30 – 39	20
20 – 29	15
10 – 19	10
0-9	5

Points for no recent CDBG awards - 10 points

The applications are reviewed for geographic distribution and the number of awards the applicant has received from the program. Ten points will be received by any applicant that has not had a grant from the CDBG program since 2011 or earlier. For housing rehabilitation projects, the points will be based on applicant or geographic location.

Recent CDBG Awards	Maximum Points
No awards from OBDD since 2011 or earlier	10 points
No awards from OBDD since 2012 or earlier	7 points
No awards from OBDD since 2013 or earlier	4 points
Applicant has received awards from OBDD in 2015	0 points

Grant Administration Capacity – 50 points

A maximum of 50 points is available to applicants with a grant administration plan and history that demonstrates that the grant award and project will be managed effectively. The review will include:

- Applicant is currently administering other CDBG grant(s) within the allotted time frames.
- Applicant has demonstrated successful completion and closeout procedures with prior CDBG projects. This includes an analysis of the applicants CDBG program history and past programmatic performance.
- Applicant has experienced staff in grant administration or will secure a grant administrator with successful grant administration experience of CDBG projects.

Applicant Capacity – 20 points

Each applicant must provide a list of all OPEN Community Development Block Grant awards. This includes all projects that are currently exempt from the three open grant rule, or were previously exempt from the three open grant rule, such as: microenterprise assistance, disaster recovery and community capacity/technical assistance grants. The list must include: award date, award amount, and project number.

Total dollar amount of grants	Maximum Points	Total Number of open grants	Maximum Points
$3,000,000 and up	0	10 and up	0
$2,999,999 - $2,500,000	2	8-9	2
$2,499,999 - $2,000,000	4	6-7	4
$1,999,999 - $1,500,000	6	4-5	6
$1,499,999 - $1,000,000	8	2-3	8
$999,999 - $500,000	9	0-1	10
$499,999 or less	10		

Sub-Grantee (non-profit) Capacity – 20 points – Housing Rehabilitation Only

In addition to applicant capacity, each housing rehabilitation applicant must provide a list of all the open CDBG funded housing rehabilitation CDBG grants within the non-profit's region where the non-profit is the sub-grantee responsible for carrying out the grant activities. This list MUST include the following for each open grant: the name of the grant recipient, the project number and the total award amount.

Total dollar amount of open grants	Maximum Points	Total Number of open grants	Maximum Points
$1,250,001 and greater	0	10 and up	0
$1,000,001 - $1,250,000	2	8-9	2
$750,001 - $1,000,000	4	6-7	4
$500,001 - $750,000	16	4-5	6
$250,001 - $500,000	18	2-3	8
$1 – $250,000	9	1	9
$0	10	0	10

SUMMARY OF MAXIMUM RATING AND RANKING POINTS

		Max Points
1.	Need for project – Impact of problem	100 points
2.	Readiness to Proceed	70 points
3.	Persons to be served by the facility	50 points
4.	Points for no recent CDBG awards	10 points
5.	Grant Administration Capacity	50 points
6.	Applicant Capacity	20 points
7.	Sub-Grantee Capacity (Housing Rehabilitation only)	20 points
	TOTAL	**300 pts non-housing** **320 pts housing rehab**

SUMMARY OF CDBG APPLICATION PROCESS			
Step #	**Step – Title**	**Timeline**	**Lead**
Step 1	Initial IFA Contact/Pre-Project Development	No defined timeline	Project Proponent and RC are the lead, Project Development Team meeting lead by RC.
Step 2	Project Notification and Intake Form	No defined timeline	RC and project proponent
Step 3	Invitation to Apply for CDBG Funding	No defined timeline	RC - Sends invitation to apply and application forms to project proponent Applicant (project proponent)- completes the application forms and submits to OBDD-IFA by application deadline
Step 4	Application Review and Rating Team (ARRT)	7 calendar days + 7 calendar days	RC is lead, Initial review simultaneously and independently conducted by ARRT (7 days); Following initial review, ARRT convenes for application rating (7 days).
	Incomplete applications – applicant provision of additional information	15 calendar days	Applicant
	Second threshold review to review applicants revised submission	5 calendar days	ARRT
Step 5	Application Ranking – Ranking Team	18-35 days	Ranking Team, consulting as needed with PSM and IFA Director
Step 6	Funding Recommendations Developed and Approved		Ranking Team, IFA Director, PSM, AOC and LOC
STEP 7	Notice of Decision	Awards announced within 60 days after application is received in Step 4 above.	RC

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Chapter 8 Table 8-1- Requirement/Summary Table Maximum Grant/Project Completion/Financial Review/ Allowed National Objective

Grant Category	Project Type	Maximum Grant	Project Completion Period (From date of execution of contract with the State)	Financial Review Required	Applications Accepted	Allowed National Objective
Microenterprise Assistance	N/A	$100,000	12 months	No	QAP	LMI – Limited Clientele
Public Works	Water/Wastewater preliminary engineering/planning – Phase 1	Total all three phases over a five-year period cannot exceed $2,500,000. There is a cap on the preliminary/engineering planning grant of $150,000.	24 months	No	QAP	LMI – Area Wide
	Water/Wastewater final design – Phase 2		24 months	Yes	QAP	LMI – Area Wide
	Water/Wastewater construction - Phase 3		24 months	Yes	QAP	LMI – Area Wide
	Water/Wastewater (Combined design & construction award)		36 months	Yes	QAP	LMI – Area Wide
Public/ Community Facilities	Combined design & construction award	$1,500,000	36 months	Yes	QAP	LMI - Area wide LMI - Limited Clientele
Housing Rehabilitation	Regional Rehabilitation Revolving Loan Funds	$400,000	24 months (The original grant must be loaned/granted within 24 months or unused funds will be recaptured by the state.)	No	QAP	LMI - Housing – direct benefit
	Emergency Home Repair Grant Program					
Community Capacity/Technical Assistance	Community Technical Assistance	No Limit	12 months	No	Year round	Dependent upon project type.
Emergency Grants	N/A	$500,000	24 months	Yes	Year round – Must be received within 12 months of the event that created the emergency	Urgent Need

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Chapter 9 Microenterprise Assistance (Public Services)

Oregon Community Development Block Grant funds are used by non-entitlement cities and counties to implement the Microenterprise Assistance Services Program to provide recruitment, screening and classroom training to microenterprise owners and persons developing microenterprises. This program enables low- and moderate-income owners of microenterprises and persons developing microenterprises access to information and resources for their individual circumstances.

The non-entitlement city or county grant recipient will secure the services of a statewide or local microenterprise support organization to provide microenterprise assistance within the grant recipient's jurisdiction by either subgranting the funds to a nonprofit or by procuring a for-profit entity.

Maximum Grant

The maximum grant in this category is $100,000.

Definition

Microenterprise means a commercial enterprise that has five (5) or fewer FTE, including one (1) or more who owns the enterprise.

Work Plan

Each application must contain a work plan that provides for a minimum performance measure of assisting at least one (1) microenterprise for every $2,500 awarded to the applicant. If at project completion, this performance measure is not attained, the department will recapture a sufficient amount of the grant awarded in order for the project to meet the minimum performance measure.

National Objective

Public services for microenterprise assistance must meet the federal national objective of benefiting low- to moderate-income persons based on family size and income, 24 CFR 570.483(b)(2)(ii)(B). National objective compliance is based on the actual number of persons served by the microenterprise assistance provider. Each grant must serve at least 51 percent or more low- to moderate-income persons who are owners of, or are developing, a qualifying microenterprise consisting of 5 or fewer employees including one or more persons who own the microenterprise. Refer to Chapter 3 for details.

Statewide Microenterprise Support Organization

A statewide microenterprise support organization is a community development corporation, a nonprofit development organization, a nonprofit social services organization or another nonprofit entity that serves as an intermediary between the department and local microenterprise support organizations.

Local Microenterprise Support Organization

A local microenterprise support organization is a community development corporation, a nonprofit development organization, a nonprofit social services organization or another locally operated nonprofit entity or a for profit entity that provides services to disadvantaged entrepreneurs.

Area of Use

The services provided by the microenterprise grant are restricted in use within the grant recipient's jurisdiction or with the jurisdictions participating in the regional microenterprise assistance project. The residential address for each potential microenterprise owner or person developing a microenterprise must be used for this determination and documented in the recipient's file(s).

Eligible Projects

- Provide general classroom training in business strategy, planning a business, marketing plans, business plans, needs assessments, financial education and access to markets to owners of microenterprises and persons developing microenterprises.

Eligible Activities

The permitted activities of providing general classroom training and support to microenterprises, as allowed under Section 105(a)(8) of the HCDA, includes:

- Limited one-on-one assistance directly associated with the initial recruitment and screening to evaluate entrepreneurial readiness and to determine degree of business feasibilitiy or if a student has questions for the instructor immediately following the general classroom training session.

- The **direct** costs associated with the provision of general classroom training to microenterprise (5 or fewer employees, including one or more who own the microenterprise) of which 51% must be documented to be low and moderate income, as allowed under Section 105(a) of the HCDA.

- Limited English Proficiency Translation Services – Refer to Chapter 5 for details.

General Classroom Training:

- **Business Strategy Training** - Core trainings and assistance focused on developing and refining business feasibiity and the creation of a business plan (strategy) that will guide the business venture. Develop demand based trainings and technical assistance including group trainings, based upon participant needs.

- **Planning a Business Training -** Developing a marketing plan, understanding financial statements and customer service.

- **Specific Training** - Developing a business plan, access to capital, access to markets and financing. Technical assistance shall also help micro-entrepreneurs develop specific information needed to implement their business plan and better understand their business, including the following:

    - Needs Assessment - Provide training that includes Financial Fitness, Introduction to Entrepreneurship, Internet marketing and specific training in their specific industry.
    - Provide business and financial education classes to groups of low/mod income rural high school students.
    - Provide business and financial education classes to adults.

- **Market Research Training** - Conduct market research to determine target markets and identify ways to penetrate each market, to assist microentrepreneurs in shaping their unique "message" and determine most effective means to deliver their message.

Ineligible Costs

- Indirect costs. Refer to Chapter 5 for details.
- Assistance to small businesses that do not meet the definition of a microenterprise on page 9-1.
- Assistance to microenterprises that are relocating or who have relocated. To maintain compliance with the federal anti-pirating rule, the state's CDBG program will not allow or assist with any business/microenterprise relocation.
- Assistance to microenterprise owners or persons developing a microenterprise that reside within an Entitlement area.
- Direct one-on-one assistance/mentoring in excess of the initial recruitment and screening, or if a student has questions for the instructor immediately following the general classroom training session.
- Pre-award costs. Refer to Chapter 5 for details.
- Unauthorized pre-agreement costs. Refer to Chapter 5 for details.
- The use of CDBG funds to replace any already budgeted federal, state, local or community college funds. Refer to Chapter 5 for details.
- The use of CDBG funds to pay for already budgeted full-time staff of the Small Business Development Centers or community colleges. Refer to Chapter 5 for details.
- The cost of food, beverages, snacks or related equipment and eating utensils.
- Grant administration and/or program management costs. Refer to Chapter 5 for details.

Entitlement Area Review

State Community Development Block Grant resources cannot be used to benefit entitlement counties and cities. If the service area of the Microenterprise Assistance Support Organization contains an entitlement area, screening policies and procedures along with documentation of percent of the entitlement versus non-entitlement residents/beneficiaries that will be served is required. The 2016 CDBG Method of Distribution lists the entitlement areas in Chapter 2.

Matching Funds Requirement

There is no minimum match requirement. Any matching funds necessary to complete the proposed CDBG project must be available and committed at the time the application is received by the department. Funds necessary to complete the project must be in the form of cash. No in-kind services or costs are allowed as match.

Financial Review

Microenterprise assistance project applications are not subject to financial review.

Outcome and Performance Measures

Each applicant must address how their project meets the objective(s), outcome(s), indicators and performance measures identified below:

Objective	Outcome	Indicators	Performance Measures	State Measurement
Creating Economic Opportunities	Sustainability/ Promoting Livable or Viable Communities	Number of persons assisted: • With new access to a service. • With improved access to a service. • Where the project is used to meet a quality standard or measurably improve quality, report the number of households that no longer only have access to a substandard facility or infrastructure (as defined by the local community).	Amount of money leveraged from other federal, state, local and private resources.	The amount of money leveraged from all other funding sources.
			Number of persons assisted.	Number of persons having access to more microenterprise assistance services including the percentage of low and moderate income persons which benefit.
			Number of communities assisted.	Number of persons benefiting from new microenterprise services including the percentage of low and moderate income persons which benefit.
			Race, ethnicity, disability (current categories for beneficiary reporting still apply).	

Minimum Information needed with application:

- A draft sub-grantee agreement between the city/county grant recipient and the microenterprise service provider.
- A copy of the written agreement between all participating communities, signed by all parties involved.
- A clear and concise description of the items to be paid for in whole or in part with CDBG funds, and the amount of CDBG funds budgeted for each activity.
- The written procedures identifying how the low and moderate income national objective will be complied with, monitored and maintained throughout the project, which must include procedures for identifying how each potential microenterprise owner or person developing a microenterprise will be screened for:
    a. Meeting the definition of a microenterprise contained on page 9-1;
    b. Residing within the defined service area;
    c. Are not residing within an Entitlement area; and
    d. Are not relocating or have not relocated their microenterprise.
- A draft of the family size and income forms that include the data collection necessary to meet the requirements of a-d listed above.

Chapter 10 Public Works

The OBDD-IFA will finance, or help finance, publicly owned, public works projects using Community Development Block Grants (CDBG) and other sources of funds. Publicly owned water and wastewater system improvement projects are necessary for the health and economic well being of every community. Federal laws, the Clean Water and Safe Drinking Water Acts in particular, require municipalities to make extensive improvements to existing systems to comply with the national standards. The funding sources and grant amounts for each project will depend on the type of facility and other circumstances of the project.

The CDBG program will only fund the planning, design and or construction of comprehensive system wide improvements addressing a 20 year time frame. All design and construction projects must be in accordance with a regulatory agency approved water master plan or wastewater facilities plan and be comprehensive system improvement projects meeting the needs of the community for the next 20 years.

Public Water and Sewer Systems – necessary for the health and economic well being of every community. Maximum grant amount $2,500,000.

OBDD-IFA Water Meter and User Rate Policy

OBDD-IFA encourages water utilities to conserve water. It is our policy to require the installation of water meters within the project area as part of an infrastructure improvement project funded by our agency. Once the project is completed, the utility must routinely read the meters installed with the project and bill those customers, in part, according to their water consumption. IFA encourages the water utility to adopt an ascending rate water fee structure.

Matching Funds Requirement

There is no minimum match requirement. Any matching funds necessary to complete the proposed CDBG project, must be in the form of cash or debt service. All project funds necessary to complete the proposed project must be available and committed at the time the application is received by the department. Refer to the "Readiness to Proceed" definition in Chapter 5 for more details.

Financial Review

All applications for public works projects, except water and wastewater preliminary engineering/planning; asset management plans; and water management and conservation planning grants will undergo a financial review. The grant, if awarded must be the minimum necessary, in combination with other resources, to ensure the completion of the project. Any project determined by the department to not be financially feasible will not be funded.

- **If an applicant (city or county) is the owner and operator** of the facility, the applicant's financial records will be analyzed for ability to service debt.

- **If an applicant (city or county) is applying on behalf of a nonprofit or other public entity (water or wastewater district)** and the nonprofit or other public entity will be the owner and operator of the facility and the applicant has no responsibility for providing said service, then the nonprofit's or other public entity's financial records will be analyzed for the ability to service debt, if any is a part of the project.

- The financial review must determine that the operating entity of the proposed facility, whether it be a non-profit, other government entity or the city/county applicant has adequate and consistent annual revenue projections to cover the annual operation and maintenance expenses associated with the facility, throughout the five year continued use period.

- **If, during staff review of the application, direct and clear evidence is obtained by the department that the grant funds are not needed and that the project can or will be carried out by the applicant whether or not the grant is awarded, <u>the application will not be processed.</u>**

- All financial information in the application must be prepared for the proposed activity, unless another funding source (e.g., USDA Rural Utilities Service) has already reviewed similar financial information and made a funding commitment based upon their review. In such cases, the financial feasibility analysis of the other funding source shall be submitted with the application in lieu of the requested documentation.

Water and wastewater final design - In addition to the financial review described above, ALL, water and sewer applications for final design and construction will undergo a financial review to ensure that the monthly user rate at construction completion of the proposed project meets the threshold rate criteria.

Threshold Rate Criteria - The projected annual utility rate for the respective system (water or wastewater), with the requested CDBG assistance, at construction completion of the proposed project must be at or exceed the current percentage (1.25%) of the current Median Household Income (MHI) as defined by the most recent American Community Survey 5 year estimate. The user rate must provide adequate operations, maintenance and debt service. If the proposed project annual utility rate meets this figure, the project will be eligible for funding.

The annual (water/sewer) rate is 12 times the monthly fee that the system would need to charge its residential service connections, on average per connection for usage up to 7,500 gallons of water consumption and similar wastewater disposal per month, as calculated by the applicant and verified by the department after taking into account the projected operations, maintenance, debt repayment and capital outlay for 10 years or less assets, and all other reasonable system expenses, including the funded project.

As applicable, this annual user rate will incorporate fee-equivalents derived from other local funding sources that are or will be used to pay specifically for the system/facility that is being upgraded/constructed with this project. This could include special levies on taxable property within the system's service area being used to pay for the system. The figure does not include system development charges.

The median household income is based on the most recent American Community Survey (ACS) 5 year estimate corresponding for the city or a more appropriate census statistical unit (e.g., census tract) that contains and is representative of the system's residential users, as approved by the department. The recipient should consult with the department if the ACS figure significantly

overstates the relative level of current household income in the local area. In such cases, a special survey that either exists already or is newly commissioned, consistent with the department's usual procedures may be used to establish a comparable, up-to-date median household income figure, which is then not inflated by the department's customary practice.

NOTE: If the user rate actually needed, and projected by the project proponent, to adequately cover operation, maintenance and replacement (OM&R) at construction completion is higher than the department's threshold rate, the higher rate shall apply to the project and will be required within any grant contract issued for this project.

Public Water and Sewer Systems

The OBDD-IFA is committed to helping Oregon communities make the necessary improvements to their water and sewer systems by providing state and federal funds according to financial need.

Land Use Information

Construction of new water and sewer facilities in areas outside urban growth boundaries is subject to the State Planning Goal 11: Public Facilities and Services, as amended on July 16, 1998, and the Department of Land Conservation and Development requirements in the Oregon Administrative Rules Chapter 660, Division 11 (Public Facilities Planning), Chapter 660, Division 4 (Interpretation of Goal 2 Exception Process) and Chapter 660, Division 22 (Unincorporated Communities). Projects outside urban growth boundaries must access funding through a city or county and must include verification from the appropriate county that the proposed activities are allowed under current state law.

Maximum Grant

Grants can be made for each of the three phases (preliminary engineering/planning, final design and construction) of an applicant's single water system or sewer system project. The maximum grant available for a single water or sewer system project is $2,500,000. The $2,500,000 per project limitation covers all aspects of the single project for a period of five years.

$20,000 Maximum Grant Amount Per Residential Connection

The maximum grant per project also is subject to an additional limit of not more than $20,000 per permanent residential connection to be served by the water or sewer improvement project. This means that at construction completion there must be a minimum of 125 residential connections served by the water or sewer system project in order for the applicant to be considered for the maximum grant of $2,500,000. Water or sewer systems currently serving, or at construction completion will be serving less than 125 residential connections may only be awarded a maximum of $20,000 per available residential connection, subject to the other program requirements.

Maximum Award During a Five-Year Period

The $2,500,000 per project limitation covers all components of a major capital improvement project for a period of five years. The five-year period is commensurate with a current regulatory agency approved/accepted water system planning document or wastewater facilities plan. A city or county may not separate a project into phases, such as collection system improvements in one phase and treatment system improvements in another, in order to apply for more than $2,500,000 in grant funds within a five-year period. The department's financing goal is to award the minimum amount of grant funds necessary to complete the project activity successfully.

For example: Greentree applied for a $2,500,000 design/build grant for their Phase II water system improvements on March 31, 2015. Greentree is not eligible for an additional $2,500,000 grant because they have already received $2,350,000 in prior grants for their water system improvements (Phase I) over the last five years. They would not be eligible for another $2,500,000 for their water system improvements until 2017. However, after March 31, 2015 they could apply for $150,000 from the program for their water system. This would assume they have a project meeting the eligibility requirements for the preparation of a water system master plan or design of the Phase II improvements.

Example Schedule of Events

2010	2011	2012	2013	2014	2015	2016	2017
Phase I Distribution					**Phase II Treatment**		
Planning	**Design**	**Construction**			**Final Design and/or Construction**		
Awarded 3-31-10 **$150,000**	Awarded 6-28-2011 **$200,000**	Awarded 8-8-2012 **$2,150,000**			Application received 3-31-2015 $2,500,000 **NOT ELIGIBLE** (But, they are eligible for $175,000)		Eligible for another $2,500,000 (or $2,350,000 if they received $150,000 in 2015)

Maximum Grant Exception for Water and Wastewater Projects

It is the department's sole discretion to exceed the maximum grant amount if the projected monthly user rate at construction completion will exceed 150 percent of the CDBG threshold rate. In making these determinations the department will consider: CDBG fund availability; the status of committed matching funds; whether increased grant funding will buy down the monthly user rate; and any other information the department considers relevant. This review will be conducted during the CDBG quarterly competitive application process. Under no circumstances shall any increased grant award from the department exceed $3,500,000 per project. The request for consideration of maximum grant exception should be reflected within the cover letter of the application along with the justification for the exception request and other supporting documentation.

Understanding the maximum grant exception is at the sole discretion of the department, the project budget within the application must be based on the maximum allowable grant amount (or the requested amount if less than the maximum allowed) for each project type and should not be based on the amount of the requested exception.

National Objective

All projects must meet a national objective of the Community Development Block Grant Program regardless if CDBG funds will or will not be used in the future phases of the same project. The low- and moderate-income area benefit national objective is the only one that is available to applicants for public water and sewer system improvements.

In order to document that the area served by the system is providing area wide LMI national objective benefit everyone served by the system must be physically connected to the water or wastewater system and being served by the system that was assisted in whole or in part with CDBG funds to meet the national objective, by construction completion.

Capacity

Federal Community Development Block Grant rules limit program assistance to activities that are necessary to benefit current residents in a primarily residential area. This means that if the main

reason for doing the project is to provide capacity for population and economic growth, other funding sources must be sought. Community Development Block Grant funds are intended to solve problems faced by current residents, such as poor drinking water quality or inadequate sewage treatment. Community Development Block Grant funds may be used for projects needed to benefit current residents (e.g., water treatment improvements to comply with Safe Drinking Water Act requirements) but which will be built with capacity for future development. In these cases, the Community Development Block Grant participation will be limited to that portion of the project cost that is necessary to serve the current population.

Applicants must complete and submit the following tables to the department for a project eligibility/capacity review determination. It is recommended that this eligibility/capacity review determination be made prior to the submission of a PNIF or prior to conducting a one stop during project development.

Population projections must be consistent with the local County Planning Department's allocated population projections that have been approved by the Department of Land Conservation and Development for the service area within the defined boundary of the project.

USE	Current		Future (20-year projected capacity)	
	EDU's	Flow	EDU's	Flow
Residential Permanent				
Commercial & Business				
Industrial				
Other				
Total				
Percent Residential	%	%	%	%

EDU – Equivalent Dwelling Unit (EDU)

These numbers can be found in the water system master plan or wastewater facilities plan.

Capacity Building - Total Current (EDU's x 2):
Is it more than the Total Future EDU's? Yes _____ No _____

Capacity Building - Total Current (Flow x 2)
Is it more than the Total Future Flow? Yes _____ No _____

Percent Residential - (Residential/Total) x 100%

Is the residential component more than 51%? Yes _____ No _____

	Population at date of income qualification (2000 census or other approved survey)	Current Population Estimate	Future Population Estimate
Total Persons			

After completing the tables above the project will be eligible for funding if it meets the following four criteria:

- The project must serve an area that is comprised of more than 51 percent permanent residents (both currently and in the future) i.e. permanent residents must reside within their residence 6 months or more out of the year;
- The permanent residents must be comprised of more than 51 percent low- and moderate-income persons;
- The facility must serve primarily permanent residential needs as determined by flow (both currently and in the future); and
- The facility is <u>not</u> needed primarily for capacity building purposes (over 100 percent growth as determined by population or flow over the 20 year planning period).

Eligible projects include

- Projects necessary to bring municipal water and sewer systems into compliance with the requirements of the Safe Drinking Water Act or the Clean Water Act administered by the Oregon Health Authority – Drinking Water Program (OHA-DWP) and the Oregon Department of Environmental Quality (DEQ);
- Projects where the municipal system has not been issued a notice of non-compliance from the Oregon Health Authority-Drinking Water Program, Safe Drinking Water Program or the Department of Environmental Quality, but the department determines that a project is eligible for assistance upon finding that; a recent letter, within the previous twelve months, from the appropriate regulatory authority (OHA-DWP, DEQ) or their contracted agent, indicating a high probability that within two years the system will be notified of non-compliance, and department staff deems it reasonable and prudent that program funding will assist in bringing the water or sewer system into compliance with current regulations or requirements proposed to take effect within the next two years.
- Water system planning, design and construction projects necessary to eliminate water rationing. The applicant must demonstrate past (within last 2 years) and/or consistent water rationing events due to insufficient drinking water quality or supply.
- Planning, design and construction projects necessary for the provision of dependable and efficient water storage, treatment and/or transmission to meet domestic drinking water needs;
- Planning, design and construction projects necessary for the provision of dependable and efficient wastewater collection, treatment and disposal/re-use, and
- The preparation of water management and conservation plans as required by the Oregon Water Resources Department through permitting processes. These may be combined with projects for the preparation of Water System Master plans required by Oregon Health Authority – Drinking Water Program, Safe Drinking Water Program.

Ineligible Projects

- Projects primarily needed for capacity building purposes. (Explained in more detail on Page 10-4);

- Projects that are needed solely to drill/develop wells. However, projects where well drilling/development is only a component of a much larger project and not the primary purpose will be eligible for funding. For example, a project that consists of distribution, treatment and well drilling improvements all in one phase would be eligible for funding;
- Deferred maintenance and/or and operational expenses.
- Work on private property.
- Projects primarily needed for fire suppression.

Eligible Activities

- Wastewater treatment facilities including all facilities necessary for collecting, pumping, treating and disposing of sanitary sewage. Included is correction of infiltration and inflow (I&I) through replacement of lines or slip lining;
- Separation of storm drainage from sanitary sewers, if necessary to meet federal or state water quality statutes, rules, orders or permits;
- Domestic water systems including all facilities necessary for supply development, storage, filtration, treatment, transmission and metering;
- Equipment that is an integral and permanent part of a water or wastewater facility. Purchase or lease of other equipment, including vehicles is not eligible;
- The acquisition of real property, including permanent easements, necessary for the proposed water or wastewater project;
- Television inspection and internal grouting of wastewater collection lines if approved in advance by the department. Since this work also can be a method of maintaining the lines, case-by-case determinations must be made because operation and maintenance expenses are considered not eligible under federal regulations for the Community Development Block Grant program;
- Preliminary planning (wastewater facilities plans, asset management plans, water system master plans and water management and conservation plans) and preliminary and final engineering, surveying, architectural and other support activities necessary to the construction of a water or wastewater project;
- Administrative costs necessary to ensure that federal requirements for the grant project are met. Refer to Chapter 5 for more information; and
- Construction contingencies. Refer to Chapter 5 for more information.
- Refer to Chapter 5 for additional information on eligible and ineligible costs under the program.

Coordinated Solutions

To the greatest extent possible, public works funds will be awarded to projects that will result in coordinated solutions to water quality management problems.

Water Meter Requirement

Projects for water supply, storage and/or treatment facility improvements will be considered only if the service connections are metered, or the project will include installation of active meters. Projects including the installation of new water lines also must include installation of water meters at all active service connections to those lines. The water meter requirement provides the applicant or

system-operating entity a useful tool for operating and maintaining the community water system. Meters are used for fair and accurate billing, water-use monitoring, conservation purposes and as a means of problem detection.

Water Quality Limited Streams

Additional review will be done for applications involving sewage treatment facilities that discharge into "water quality limited" streams for which the Oregon Department of Environmental Quality (DEQ) has not yet established TMDLs (Total Maximum Daily Loads). Consultation with DEQ will take place to determine if the project can or should be designed and constructed without established TMDLs. The applicant will be kept informed as this review takes place. The consultation will consider the following:

- DEQ's anticipated schedule for completion of the TMDL study for the affected stream;
- Specific water quality standards being violated in the affected stream and how this information may affect the nature and extent of work needed for the treatment system;
- If the project is designed and constructed prior to establishment of TMDLs, whether it is likely the community will face another design and construction project soon after completion of the grant-funded improvements; and
- If funding the design and construction of the proposed project prior to establishment of TMDLs for the affected stream is a wise investment of public funds.

Limitations on Engineering Costs

Applicants may select their engineering consultant prior to award of grant funds if they carry out a competitive selection process in accordance with state statutes and obtain department approval of the scope of work and draft contract. However, Community Development Block Grant funds cannot be used to pay for engineering costs incurred prior to the grant award or prior to clearance of the environmental review requirements. Communities will have to use their own funds to cover all engineering costs associated with the project if these conditions are violated. Refer to Chapter 5 for more information.

Engineering Requirements

For Applications – All applicants must provide the following documents prepared, stamped and signed by a registered professional engineer licensed to do work within the State of Oregon.

- **Preliminary Engineering and Planning Grants** – A scope of work and a detailed cost estimate of the project to be funded. The scopes of work must be prepared in accordance with either the "Guidelines for the Preparation of Planning Documents for Developing Community Water System Projects" or the Guidelines for "Preparing Wastewater Planning Documents and Environmental Reports for Public Utilities".
- **Final Design Only** – A water system master plan or wastewater facilities plan reviewed and approved by the appropriate regulatory agency and a detailed cost estimate, and diagram that identifies the improvements of the project to be funded.

- **Construction Only** – Plans, specifications and bid and contract documents reviewed and approved by the appropriate regulatory agency and a detailed cost estimate of the project to be funded. **Note:** Construction only grant applicants must also submit a complete environmental review record prepared in accordance with Chapter 3 of the Grant Management Handbook. Publication of environmental notices should not take place before a funding decision is made on the application.
- **Final Design and Construction** - A water system master plan or wastewater facilities plan reviewed and approved by the appropriate regulatory agency and a detailed cost estimate and diagram that identifies the improvements of the project to be funded.

For Funded Projects - Preliminary engineering/planning documents, final design engineering documents and construction oversight in projects funded in full or in part with CDBG funds must be prepared, stamped and signed or conducted by a registered professional engineer licensed to do work within the State of Oregon.

Note: Using the preliminary engineering/planning grant category does not obligate the grant recipient to construct the project if it is determined to not be feasible. Using any one of three public works funding categories does not obligate the department to fund any other portion of the project.

Table N

Oregon Community Development Block Grant Program Public Works Improvements Activities Eligibility, Project Activity Type, and Maximum Grant Awards			
	Preliminary Engineering and Planning	**Final Engineering**	**Construction**
Grant Maximum	$150,000	The only limitation to the size of these grants is the limit of $2,500,000 (including all Community Development Block Grant awards for preliminary engineering & planning, final engineering, and construction) within a five-year period. *	
Project Activities to be Funded	Water Management and Conservation plans. Asset Management Plans, Water Master plans and Wastewater facilities plans for municipal systems which include: • Problem identification studies • Preliminary engineering report • Preliminary cost estimates • Identification of funding options • Preparation of a financing application to the department or other agencies for final engineering • Grant administration and audit • Rate Studies • Environmental Reports • Legal Fees	• Final engineering designs, bid specifications, and updated cost estimates • Project financial feasibility information • Environmental review of project (does not include publishing of notices for public comment) • Preparation of application for construction financing to department or other agencies for construction funding • Grant administration and audit • Rate Studies • Land Appraisals • Legal fees • LEP Translation Services	• Construction • Construction engineering • Acquisition of property, including easements • Grant administration and audit • Legal fees • Cultural Monitoring • LEP Translation Services • Federal Labor Standards compliance
Project Period	All activities must be completed and the Project Completion Report submitted to the department, within this time from contract execution with the department:		
	24 months	24 months	24 months
		36 months if these two phases are combined in one grant	
*Community Development Block Grants awarded prior to 2012 do not count against the $2,500,000 limit.			
Note: Contracts with recipients combining final design and construction into one grant will have a contract condition prohibiting the department from releasing construction funds until the recipient provides evidence that all necessary construction funding, to complete the activity, has been secured and, if applicable, regulatory agency approvals have been received. These grants are not considered (design/build) grants.			

Preliminary Engineering and Planning Grants

Note: The grant contract will require that the completed planning/engineering document must contain a complete rate study for the system. For CDBG projects, the rate study is defined as follows: "a thorough evaluation to assist the community in evaluating the existing water/sewer rates and provide recommendations that would help in the community's decision making process to adequately fund water/sewer utility operations, capital costs and all other reserves needed for replacement and maintenance.

These grants will help communities pay for water system master plans, wastewater facilities plans, capital improvement plans, asset management plans and problem identification studies (e.g., sanitary surveys, value engineering, inflow and infiltration studies). Funding for the future project may come from other sources, but the future project must meet a national objective.

Funds may be requested for preliminary engineering and planning that will result in a comprehensive assessment of a community's entire water or sewer system and that can reasonably be expected to result in a construction project within two years of the grant award for preliminary engineering and planning. The maximum grant for preliminary engineering and planning is $150,000 given that the community has not exceeded the $2,500,000 per project limitation of Community Development Block Grant assistance for a community's overall project within a five-year period. Based upon the five year project limitation the community may not be eligible for the maximum grant of $150,000.

The applicant must demonstrate that the specific future construction project will meet the Community Development Block Grant low- and moderate-income area-wide national objective. This rule applies even if the applicant does not intend to use CDBG funds for future phases of the same project.

Examples of preliminary engineering and planning work include, but may not be limited to:

- The facilities plan for a wastewater system required by the Oregon Department of Environmental Quality prior to its funding of a capital construction project;
- The preliminary engineering report and other information required by USDA-Rural Development prior to issuance of a Letter of Conditions by that agency for a water or sewer system project;
- The master plan or feasibility plan for municipal drinking water system required by the regulatory agency (Oregon Health Authority - Drinking Water Program [OHA] or Department of Environmental Quality [DEQ]);
- Water Management Plans or Conservation Plans required by the Oregon Water Resources Department;
- Planning projects necessary for the provision of dependable and efficient water and wastewater needs;
- Rate Studies;
- Environmental reports;
- Legal fees;
- Design and/or construction funding application preparation for the department or other funding agencies; and
- Asset Management Plans.

Preliminary engineering and planning grants for comprehensive system assessments must result in a plan with at least a 20-year time frame addressing the public facility (wastewater or water) needs of the jurisdiction and matching the costs of future improvements to anticipated revenues. Applicants must contact department staff about the contents that must be included in the specific scope of work in all circumstances. Applicants are required to develop scopes of work that follow the "Guidelines for the Preparation of Planning Documents for Developing Community Water System Projects" and the Guidelines for "Preparing Wastewater Planning Documents and Environmental Reports for Public Utilities" available from department staff. Plans resulting from these grants must be coordinated with the local planning and budget processes. They must include a timetable for completing future improvements with a determination of project priorities, project timing, cost estimates and consideration of methods of financing.

For each project, the scope of work and final product description will be determined on a case-by-case basis by the recipient or its representative, the OBDD-IFA and the appropriate state or federal regulatory agency.

The grant contract will require recipients of preliminary engineering and planning grants to obtain a review of draft reports and documents by the appropriate regulatory agencies. The regulatory agency(s) comments must be obtained before the recipient accepts a final product. If the preliminary engineering and planning grant is for a wastewater facilities plan or a water system master plan, the draft must be accepted by the regulatory agency. The department will not make the final disbursement of grant funds for these projects until the above approvals/acceptance have been received from the appropriate regulatory agency.

Some of the preliminary engineering and planning grant may be used to pay for:

- The preparation of a funding application to the department or other state or federal agency for the next phase of the project. Refer to Chapter 5 for details; and
- Grant Administration/Audit. Refer to Chapter 5 for more information.

Final Engineering Grants

Grant funds are available to help the applicant obtain the products listed below which will be required elements of a construction application. The only limit to the size of these grants is the limit of no more than $2,500,000 in Community Development Block Grant assistance for a community's overall project within a five-year period. A single grant may be awarded for both final engineering and construction. Eligible projects must be in accordance with a regulatory agency approved water system master plan, wastewater facilities plan or other regulatory approved planning document. A copy of the planning document and the subsequent regulatory agency approval must be submitted with the application.

The most common eligible activities include but are not limited to:

- Project description, including an explanation of the basis for the size and/or capacity of the proposed facility;
- Pre-design reports, final engineering design and bid specifications. Refer to Chapter 5 for more information on the limits of engineering costs;
- Detailed cost estimates, including all items necessary to complete the project;

- Identification of all permits and approvals necessary to construct the project with a schedule showing a realistic review and approval process for each;
- Financial feasibility information, including information regarding the applicant's or utility system's financial situation. For projects where a financial review was prepared by another funding source (e.g., USDA Rural Development) a copy must be provided to the department for review with the application;
- Maps showing the general location of the project, tax lots or parcels in the project area and the specific location of the project, including, if applicable, line sizes, road widths, etc.;
- Environmental review of the proposed project that complies with the National Environmental Policy Act (NEPA), other applicable federal authorities and the implementing regulations of the U.S. Department of Housing and Urban Development. The review would not include issuance of a Finding of No Significant Impact or publishing of a Request for Release of Funds, since these are not appropriate until construction financing is obtained. For applicable situations, publishing flood plain notices as part of the "8 step" process must be done as part of the final engineering grant project. Refer to Chapter 5 for details;
- Grant Administration/Audit. Refer to Chapter 5 for more information;
- Constuction funding application preparation to the department or other funding agencies. Refer to Chapter 5 for details;
- Rate studies;
- Legal fees;
- LEP Translation Services. Refer to Chapter 5 for details;
- Land appraisals; and
- Refer to Chapter 5 for additional information on eligible and ineligible costs under the program.

In addition to the above products, the applicant may use some of the final engineering grant to pay for preparation of a construction application or an application to another federal or state program for construction financing.

Final engineering projects may not include the use of grant funds to pay for the actual acquisition of property, whether sites or easements. Costs for activities leading up to acquisition, such as appraisals, are allowable. Grant recipients for final engineering only must have regulatory agency approval of final plans and specifications before the grant is administratively closed and before a Community Development Block Grant construction application is submitted.

Note: An applicant may apply for a final engineering grant without having been awarded a grant for preliminary engineering and planning. Applicants who already have completed the work involved in what these rules term a preliminary engineering and planning project may apply directly for a final engineering grant. The department may determine upon review of the application that an award for a preliminary engineering and planning grant is necessary to obtain information to justify a final engineering award.

Construction Grants

Maximum Grant

$2,500,000, minus any prior CDBG award for preliminary engineering and planning or final engineering grants that have been awarded to the applicant within the five-year period for the same project. This is also subject to the maximum overall limit calculated at $20,000 of CDBG funds per residential connection within the water or sewer system. Grants will be awarded for the minimum amount considered necessary to provide the improvements needed to benefit current residents. A single grant may be awarded for both final engineering and construction. Eligible projects must be in accordance with regulatory agency approved final design documents and plans. A copy of the final design documents and plans and the regulatory agency approval must be submitted with the application.

Eligible Activities

Community Development Block Grants for construction may be used to pay for:

- Preparation of the environmental review. Refer to Chapter 5 for details;
- Bid process;
- Construction of improvements;
- Engineering oversight and construction management. Refer to Chapter 5 for more information;
- Construction contingencies. Refer to Chapter 5 for more information;
- Federal Labor Standards Compliance. Conducting on-site employee interview/verifying certified payroll report data. Refer to Chapter 5 for details;
- Appraisal and acquisition of real property including permanent easements, preparation of as-built drawings, operation and maintenance manuals;
- Grant administration/audit. Refer to Chapter 5 for more information;
- Cultural Monitoring;
- LEP Translation Services;
- Legal Fees; and
- Refer to Chapter 5 for additional information on eligible and ineligible costs under the program.

Applicants may apply for a construction grant without having been awarded a preliminary engineering and planning or a final engineering grant from the Community Development Block Grant program. Applicants who have completed the work involved, described by the rules as preliminary engineering and planning and final engineering projects, may apply for a construction grant. Following review of the application, the department may determine an award for preliminary engineering and planning or final engineering is necessary to obtain information to justify a construction award.

Outcome and Performance Measures

Each applicant must address how their project meets the objective(s), outcome(s), indicators and performance measures identified below:

Public Works Water and Wastewater Projects

Objective	Outcome (Pick One)	Indicators	Performance Measures	State Measurement
Suitable Living Environment	• Availability/ Accessibility • Sustainability/ Promoting Livable or Viable Communities	Number of households assisted with: • New access to service or benefit • Improved access to service or benefit • Where the project is used to meet a quality standard or measurably improve quality, report the number of households that no longer only have access to a substandard facility or infrastructure (as defined by the local community)	Amount of money leveraged from other federal, state, local and private resources	The amount of money leveraged from all other funding sources
			Number of persons, households or units assisted (pick the one most appropriate to your project – pick only one)	Number of persons having access to more affordable facilities and services including the percentage of low- and moderate-income persons who benefit from the improvements
			Number of low- and moderate-income persons served by the project.	Number of systems brought up to environmental/safety standards or upgraded
			Number of communities assisted	Number of persons benefiting from new or improved facilities including the percentage of low- and moderate-income persons who benefit from the improvements
			Race, ethnicity, disability (current categories for beneficiary reporting still apply)	

Chapter 11 Public Community Facilities

Oregon Community Development Block Grant (CDBG) funds can be used for the acquisition, rehabilitation and construction of facilities needed to provide shelter or deliver services to persons with special needs.

Maximum Grant Amount

The maximum grant amount for a single community facility project is $1,500,000. The $1,500,000 per project limitation covers both final design and construction necessary to complete community facility projects. A city or county may not separate a single project into phases, such as building one portion of the facility now, and then building the remaining portion later, in order to exceed the grant limit per project.

Combination Facilities

Under special circumstances the department may consider funding combination facilities. An applicant must demonstrate the following to be considered for such funding:

- The applicant has successfully administered prior CDBG projects (e.g. complied with federal and state program requirements, few monitoring findings and concerns and no unresolved findings or concerns).
- The combination facility must **only** house eligible community facility projects, listed on page 11-2, and eligible activities identified within this 2016 Method of Distribution.

A combination facility will not be considered two separate projects and the applicant will only be eligible for the maximum single community facility award of $1,500,000. Applications will be rated and ranked, if necessary based upon the highest use of the facility. Use is defined as "clients served." If the number of clients served by each type of facility included in the combination facility are equal, the highest use will be determined by the facility type that most closely meets HUD's priority of ending chronic homelessness and hunger.

Grants for combination facilities will only be awarded at the department's discretion.

National Objective

All public/community facility projects must meet one of the three National Objectives. All proposed projects are expected to meet the national objective of providing "principal benefit to low- and moderate-income persons". When using the low- and moderate-income national objective, applicants must submit the supportive documentation identified in Chapter 3.

Maximum Grants of $1,500,000 are available only for the facilities contained within the list below.

Facility/Project Type	National Objective the Project must qualify under
Shelters for Victims of Domestic Violence	Low and Moderate Income – Limited Clientele
Homeless Shelters	Low and Moderate Income – Limited Clientele
Head Start Centers	Low and Moderate Income – Limited Clientele Low and Moderate Income – Nature and Location
Shelters or workshops for people with disabilities	Low and Moderate Income – Limited Clientele
Health clinic operated by a nonprofit organization	Low and Moderate Income – Area Wide Benefit
Mental Health Treatment centers	Low and Moderate Income – Limited Clientele
Drug and Alcohol Treatment facilities	Low and Moderate Income – Limited Clientele
Full Service Senior Centers (Includes kitchen and minimum meal service five days/week) The senior center must exclusively serve persons 60 years of age and older.	Low and Moderate Income – Limited Clientele
Community Centers - (Only cities are eligible to apply for community center projects. These facilities are open to the entire population of a defined area and contain kitchen facilities for serving meals. The facility must be owned by the applicant city and constructed on land owned by the applicant city. Refer to Chapter 5 for a definition of publicly owned.)	Low and Moderate Income – Area Wide Benefit
Family Resource Centers – These multi-service centers must operate as a community center in that they must be open to the entire population of a defined service area that is comprised of 51% or more LMI persons.	Low and Moderate Income – Area Wide Benefit
Food Banks – Food Banks collect, sort, store and distribute surplus food products and edible but unmarketable food that has been acquired from growers, grocers and other sources in food boxes to food pantries and low and moderate income persons for free.	Low and Moderate Income – Nature and Location
Fire Stations	Low and Moderate Income – Area Wide Benefit
Libraries	Low and Moderate Income – Area Wide Benefit

Definitions

Head Start Programs - Persons 0-5 years of age.
Child – Persons 6-12 years of age.
Youth – Persons from 6-18 years of age.
Adult – Persons 18 years of age and older.
Senior/Elderly – Persons 60 years of age and older.

Eligible Activities

CDBG funds may be used for the following activities. Refer to Chapter 5 for more details about the eligible costs under the program:

- Property acquisition (including appraisal costs), clearance and disposition by the city or county grant recipient;
- Construction, rehabilitation, reconstruction or installation of improvements;
- Purchase and installation of equipment that is a fixed and integral structure to the building;
- Architectural and Engineering services. Refer to Chapter 5 for limits;
- Environmental Review Record Preparation;
- Relocation assistance to meet federal requirements. [Due the specialty calculations and detailed requirements for relocation activities, any applicant with a proposed project that involves relocation will be required by OBDD-IFA to hire a specialist acceptable to OBDD-IFA to complete the required URA relocation process.;

- Federal labor standards compliance. Conducting on-site employee interviews/verifying certified payroll report data;
- Administrative services needed to ensure federal requirements for the grant project are met. Refer to Chapter 5 for more information;
- Legal/Audit;
- Cultural Monitoring;
- LEP Translation Services; and
- Construction contingencies. Refer to Chapter 5 for more information.

Note: Any preliminary engineering/planning documents, construction engineering documents (plans and specifications) and construction oversight in projects funded in full or in part with CDBG funds must be prepared and stamped or conducted by a registered professional architect or engineer licensed to do work within the State of Oregon.

Matching Funds Requirement

There is no minimum match requirement. Any matching funds necessary to complete the proposed CDBG project must be in the form of cash or debt service. All project funds necessary to complete the proposed project must be available and committed at the time the application is received by the department. Refer to the "Readiness to Proceed" definition in Chapter 5 for more details.

Financial Review

All applications will undergo a financial review. All financial reviews will be conducted to determine the funding package to be offered. The grant, if awarded must be the minimum necessary, in combination with other resources, to ensure the completion of the project. Any project determined by the department to not be financially feasible will not be funded.

If an applicant (county or city) is the owner and operator of the facility, the applicant's financial records will be analyzed for ability to service debt and ability to operate and maintain the facility.

If an applicant (county or city) is applying on behalf of a nonprofit or other entity and the nonprofit or other entity will be the owner and operator of the facility and the applicant has no responsibility for providing said service, then that nonprofit's or other entity's financial records will be analyzed for the ability to service debt and ability to operate and maintain the facility.

If an applicant (county or city) is responsible for providing said service (such as mental health), whether or not the applicant is contracting out the operation of the facility to a nonprofit or another entity, the applicant's financial records will be analyzed for the ability to service debt and ability to operate and maintain the facility.

The financial review must determine that the operating entity of the proposed facility, whether it be a non-profit, other government entity or the city/county applicant has adequate and consistent annual revenue projections to cover the annual operation and maintenance expenses associated with the facility, throughout the five year continued use period.

If, during staff review of the application, direct and clear evidence is obtained by the Department that the grant funds are not needed and that the project can or will be carried out by the applicant whether or not the grant is awarded, <u>the application will not be processed.</u>

All financial information in the application must be prepared for the proposed activity, unless another funding source (e.g., USDA Rural Utilities Service) has already reviewed similar financial information and made a funding commitment based upon their review. In such cases, the financial feasibility analysis of the other funding source shall be submitted with the application in lieu of the requested documentation.

Table O

Public/Community Facilities Activities Eligibility, Activity Type, and Maximum Grant Awards	
	Final Design and/or Construction
Grant Maximum	The only limitation to the size of these grants is the limit of $1,500,000 (Includes all prior Community Development Block Grant awards for final design and construction for the same project.)
Project Activities to be Funded	Final Engineering/Architectural designs, bid specifications and updated cost estimates Financial Feasibility Information Environmental Review of project Construction and Construction contingencies Construction engineering/architectural services Acquisition of property/permanent easements Grant administration and audit Legal fees Cultural Monitoring LEP Translation Services Federal Labor Standards Compliance
Project Completion Period	All activities must be completed and the Project Completion Report submitted within **36 months** from contract execution with the department.
Note: Contracts with recipients who are combining final design and construction grants into one award will have a contract condition prohibiting the department from releasing construction funds until the recipient provides evidence that all necessary construction funding to complete the project has been secured and, if applicable, regulatory agency approvals have been received. These grants are not considered (design/build) grants.	

Architectural/Engineering Requirements

Preliminary engineering/planning documents, final design engineering documents and construction oversight in projects funded in full or in part with CDBG funds must be prepared and stamped or conducted by a registered professional engineer or architect licensed to do work within the State of Oregon.

Final Design and/or Construction Grants

(These grants are not considered design/build grants.)
Grant funds are available to help the applicant prepare the final design and to construct the proposed public/community facility project. Grants will be awarded for the minimum amount considered necessary to provide the improvements needed.

The most common activities for design and construction grants are:

- Project description, including an explanation of the basis for the size and or capacity of the proposed facility;
- Final Engineering/Architectural design and bid specifications. Refer to Chapter 5 for more information;
- Detailed cost estimates;
- Identification of permits and approvals necessary to construct the project, including a schedule with a realistic review and approval process for each;

- Financial Feasibility Information;
- Maps showing both the general and specific location of the project and tax lots or parcels in the project area;
- Environmental review of the proposed project, compliance with the National Environmental Policy Act (NEPA) and other applicable federal authorities. Implementation of the U.S. Department of Housing and Urban Development regulations;
- Grant Administration/Audit. Refer to Chapter 5 for more information;
- Construction;
- Bid Process;
- Engineering/Architectural construction management. Refer to Chapter 5 for more information;
- Construction Contingencies. Refer to Chapter 5 for more information;
- Acquisition of real property or permanent easements, appraisals;
- Preparation of as-built drawings;
- Legal fees; and
- Preparation of operation and maintenance manuals.

Outcome and Performance Measures:

Each applicant must address how their project meets the objective(s), outcome(s), indicators and performance measures identified below:

Public/Community Facility Projects

Objective (Pick One)	Outcome (Pick One)	Indicators	Performance Measures	State Measurement
• Decent Housing • Suitable Living Environment	• Availability/ Accessibility • Affordability	Number of households assisted with: • New access to service or benefit • Improved access to service or benefit • Where the project is used to meet a quality standard or measurably improve quality, report the number of households that no longer only have access to a substandard facility or infrastructure (as defined by the local community) Homeless Shelter activities: • Number of homeless persons given overnight shelter • Number of beds created in overnight shelter	Amount of money leveraged from other federal, state, local and private resources	The amount of money leveraged from all other funding sources
			Number of persons, households or units assisted (pick the one most appropriate to your project – pick only one)	Number of persons having access to more affordable facilities and services including the percentage of low- and moderate-income persons who benefit from the improvements
			Number of low- and moderate-income persons served by the project	Number of systems brought up to environmental/safety standards or upgraded
			Number of communities assisted	Number of persons benefiting from new or improved facilities including the percentage of low- and moderate-income persons who benefit from the improvements
			Race, ethnicity, disability (current categories for beneficiary reporting still apply)	

Chapter 12 Housing Rehabilitation

OBDD-IFA will finance low and moderate income, owner occupied, single family housing rehabilitation projects through awards granted to city/county applicants. The applicant will sub-grant the funds to eligible non-profits who serve a locally determined regional service area. The department offers two types of housing rehabilitation assistance:

Type 1 – Regional Housing Rehabilitation Revolving Loan Fund – A regional revolving loan fund that provides loans to low and moderate income homeowners to repair their owner-occupied homes, using construction contractors licensed by the Oregon Construction Contractors Board (CCB) and the Oregon Corporate Division.

Type 2 – Regional Housing Rehabilitation Grant Fund – A fund that provides grants to low and moderate income homeowners to repair their owner-occupied homes, using construction contractors licensed by the Oregon Construction Contractors Board (CCB) and the Oregon Corporate Division.

Note: A sole proprietor does not have to be registered with the Oregon Corporate Division's Business Registry unless they are using an assumed business name.

General Description

City/County applicants must sub-grant the funds to a 501(c)(3) or (c)(4) nonprofit organization that is eligible under 105(a)(15) of the Housing and Community Development Act (HCDA)to carry-out housing rehabilitation activities.

Under Type 1- The original eligible non-profit that receives the CDBG sub-grant from the local government must own and administer all the loan repayments and interest earnings, associated with the CDBG funded housing rehabilitation revolving loan fund program. Income generated by the CDBG loans originated from the award (repayments and interest earnings) must be repaid to the same original eligible non-profit which met the requirements of 105(a)(15) of the HCDA. The generated income must be used for the continuance of the housing rehabilitation activities or other eligible neighborhood revitalization, community economic development, or energy conservation projects in accordance with 105(a)(15) of the HCDA.

Under Type 2 – There will be no income generated to be monitored by OBDD since the funding assistance to the low and moderate income homeowners will be in the form of a grant, not a loan.

Joint Projects

A combination of cities and counties can be involved in a regional or joint project. However, only one jurisdiction can be the applicant in the given CDBG program year. The jurisdiction that applies and receives an award incurs the responsibility for the CDBG funds. Joint applications submitted for review in which two or more units of local government are equally responsible will not be accepted. Either jurisdiction may take the lead and still allow the funds to be used in all jurisdictions as outlined in the Intergovernmental Agreement (IGA) or other IFA approved form of local government agreement for the region.

Intergovernmental Agreement (IGA)

The service area of the proposed housing rehabilitation project must be clearly defined and acknowledged by all the participating jurisdictions through an IGA or other IFA approved form of local government agreement. The IGA must be signed by all participating jurisdictions.
At a minimum the applicant must partner with at least two other city/county jurisdictions to form a regional housing rehabilitation program. At a minimum the agreement must clearly define:

1) The lead applicant;
2) The participating city/county jurisdictions;
3) The eligible 105(a)(15) non-profit organization that will be carrying-out the housing rehabilitation program on behalf of the lead applicant; and
4) A clear description of the area to be served with the requested grant. All activities funded with CDBG funds must be within the defined service area contained in the IGA.

NOTE: The IGA does not apply to any income (repayments and interest earnings) generated by the loans under the Type 1 grants.

Maximum Grant Amount

The maximum CDBG grant in this category is $400,000. A regional housing rehabilitation program area may only apply for one Type 1 or Type 2 award once per year.

Project Timeline

All the initial loans/grants from the CDBG funded housing rehabilitation award must be made within 24 months after execution of the funding contract with OBDD. Any unobligated funds, in the CDBG award <u>will</u> be recaptured by the state after 24 months.

Matching Funds Requirement

There is no minimum match requirement. Any matching funds necessary to complete the proposed CDBG project, must be in the form of cash or debt service. All project funds necessary to complete the proposed project must be available and committed at the time the application is received by the department. Refer to the "Readiness to Proceed" definition in Chapter 5 for more details.

National Objective

All housing rehabilitation projects must meet the housing/direct benefit federal national objective as identified in 24 CFR 570.483(b)(3). One-hundred percent (100%) of the benefitted owner occupied household occupants must have incomes below the federal low- and moderate-income limit (80% of the median family income as adjusted by family size). Refer to Chapter 3 for more information.

Financial Review

During staff review of the application, if direct and clear evidence is obtained by the department that the CDBG funds are not needed and that the project can or will be carried out by the applicant or non-profit sub-grantee, whether or not the funding is awarded, the application will not be rated and ranked or recommended for an award.

Program Structure

Community Development Block Grant funds are regulated by 24 CFR Part 570.489(e)(2)(ii). The city/county grant recipient is required to:

- Enter into a sub-grant agreement with an eligible nonprofit organization meeting the requirements of the Housing and Community Development Act 105 (a) (15) to carry out the housing rehabilitation activities.
- The (sub-grantee) eligible non-profit organization must carry out the housing rehabilitation activities on behalf of the grant recipient. The city/county grant recipient retains ultimate responsibility for compliance with all state and federal program requirements and must ensure the (sub-grantee) eligible non-profit adheres to these requirements.
- The eligible non-profit is in control of all decisions regarding the Community Development Block Grant funds. The nonprofit may undertake all activities or may utilize a professional services agreement to accomplish grant administration and limited program management work.
- **Type 1** - The original (sub-grantee) eligible non-profit organization must be the owner and lender of all loans against the property title, responsible for all loan and program decisions and must comply with all federal and state rules and statutes. All loan repayments must be received and re-conveyed by the original (sub-grantee) eligible non-profit certified under 105(a)(15) of the HCDA. The (sub-grantee) eligible non-profit will use the funds to support housing needs in accordance with the requirements of 105(a)(15) of the HCDA for continuance of the housing rehabilitation activities or neighborhood revitalization, community economic development, or energy conservation projects.
- **Type 2** – The (sub-grantee) eligible non-profit must award all funds in the form of grants to qualified homeowners.

Eligible Homes

All of the single family, owner occupied housing units must have had a HUD, Section 8, housing quality standards evaluation that resulted in substandard conditions.

Under the Type 2 Regional Housing Rehabilitation Grant Fund, the (sub-grantee) eligible non-profit may award grant funds to low and moderate income homeowners who own their manufactured home and reside in mobile home parks (except as noted below for pre-1977 mobile homes).

HUD prohibits the use of CDBG funds to repair or rehabilitate any manufactured home made before June 15, 1976. Therefore, the state CDBG program prohibits the expenditure of any CDBG funds to rehabilitate a pre-1977manufactured home. While replacement or substantial reconstruction of a pre-1977 mobile home is allowed by regulation, it will not be allowed as an eligible activity under the state's CDBG program due to the cost prohibitive nature and complexity of the program. De-federalized funds from previous housing rehabilitation revolving loan fund awards could be used for this purpose.

Eligible Activities

The following table summarizes the eligible activities, the maximum amount allowed for each activity in the original grant from OBDD, and the requirements for future loan repayments.

Eligible Activities	Maximum Allowed in Original Grant from OBDD	Maximum that can be budgeted for a full $400,000 grant request	Requirements for use of "De-Federalized" Loan Re-payments (Only for Type 1 projects)
Grant Administration: Work related to overall grant management, coordination, monitoring and evaluation. Meeting the grant contract requirements and federal requirements. Refer to Chapter 5 for more details.	Maximum allowed 10% of the requested grant, but no more than $25,000.	$25,000	None – There will no longer be any federal requirements.
Program Management*: Work related to carrying out housing rehabilitation activities, working directly with the LMI clients. Such as: screening applicants, processing loans/grants, and loan servicing. Program management is considered direct service to clients. Refer to Chapter 5 for more details.	Up to 20% of the award, plus an additional $10,000 can be used for the combined costs of program management and grant administration. Of this amount no more than $25,000 can be for grant administration, the remainder must be used for program management.	$65,000 Calculated as follows: 20%x$400.000=$80,000 $80,000+$10,000=$90,000 $90,000-$25,000=$65,000	A maximum of 20% of the annual loan repayments and interest earnings.
Environmental Review - Refer to Chapter 3 of the Grant Management Handbook for more details.	Up to $15,000 per project	$15,000	None – There will no longer be any federal requirements.
LEP Translation Services - Refer to Chapter 5 for details.	Up to $3,000 per project	$3,000	None – There will no longer be any federal requirements.
Legal	There is no maximum limit	There is no maximum limit	None
Audit	Refer to page 5-1 for details	Refer to page 5-1 for details	None – There will no longer be any federal requirements.
Activities • Eligible health and safety activities including lead, septic tanks and private sewer lines and drainfields, private water lines and wells and asbestos tests, inspections and assessments. • Improvements necessary to fulfill reasonable accommodation requests. • Construction, rehabilitation, reconstruction, or the installations of improvements to upgrade substandard electrical, plumbing, roofing, siding, insulation, weatherization, heating systems,	Maximum Grant $400,000 less the items listed above.	$295,000, less costs for legal, audit, and LEP	The loan repayments and interest earnings less the allowance for program management can be used for either continuing the HRRLF or they can be used for other community economic development, energy conservation and/or neighborhood revitalization projects, as allowed by 105(a)(15) of the HCDA.

hot water heaters and dry rot repairs. • Purchase and installation of equipment that is an integral structural fixture. (Items not normally removed from the home, light fixtures and built-in appliances.)			

***Program management services are performed by the sub-grantee for the city or county grant recipient. Sub-grantees typically develop or prepare such items as: application procedures, process applications, verification of program eligibility, notices of loan approvals, filing of trust deeds, construction oversight, owners certification that improvements were accepted and other necessary documents.**

Ineligible Activities

- No indirect costs are allowed under the program;
- Costs associated with providing Regional Housing Center services;
- Any equipment that is not fixed and structurally integral to the residence such as: washing machines, clothes dryers, freezers and window mounted air conditioners;
- Fees, which are considered part of the program management costs already reimbursed with CDBG funds:
    - Application fee
    - Credit Report fee
    - Loan origination fee
    - Loan Servicing fee
    - Grant Processing fee
    - Homeowner training class fees
    - General home inspection fee's by the eligible sub-grantee
    - Miscellaneous fees that are undefined or are considered program management activities already being paid for with CDBG funds. Consult the department's RC about the eligibility of these fees.
    - All fees need to be reviewed and approved by OBDD-IFA's RC for an eligibility determination with the CDBG program requirements and for compliance with the amended program income requirements enacted on May 23, 2012.

Sub-Grant

The city or county grant recipient enters into a sub-grant agreement with an **eligible nonprofit organization** to implement and **carryout** the housing rehabilitation activities. <u>All federal CDBG compliance requirements assigned to the (sub-grantee) eligible non-profit remain the obligation of the original city/county funding recipient until administrative closeout of the CDBG grant with the state.</u> No formal procurement process is necessary by the city or county when the funding recipient sub-grants the funds to an eligible non-profit.

Eligible Nonprofit (sub-grantee)

The nonprofit must meet the following requirements of a sub-grantee by the department:

- Documentation from the Internal Revenue Service (IRS) that certifies the nonprofit organization is organized under 501(c)(3) or (c)4 of the IRS Code.

- Documentation that the organization must have as one of its primary purposes (as outlined in its bylaws, article of incorporation or charter) to provide affordable housing that is decent, safe and sanitary for low and moderate income Oregonians.
- Documentation that the organization serves the development needs of the communities in the non-entitlement areas of the state and is carrying out a neighborhood revitalization, community economic development, or energy conservation project in accordance with 105(a)(15) of the HCDA.
- Provide a copy of their reasonable accommodation policies.
- The sub-granted nonprofit must comply with all CDBG requirements.
- The eligible nonprofit must approve all loans and be named as the lender of the loans against property titles or be the grantor of all grants and owner of all the grant agreements/contracts.
- All loan repayments must be received and reconveyed by the original eligible non-profit.

Carry-Out (Program Implementation)

The original eligible non-profit must carry-out the housing rehabilitation project.

- The eligible nonprofit is responsible for carrying out (implementing) the housing rehabilitation activities and will be the owner of all program policies and procedures.
- The eligible non-profit will be responsible for these minimum activities:
    - All final loan/grant decisions, owner of all loan portfolios, owner of all grant agreements/contracts, compliance with all CDBG requirements, owner of future loans and repayments, and final accountability for all CDBG funds.
    - Lender of all the loans and grantor of all grants.
    - **Type 1 only -** All loan repayments must be received and owned by the original eligible non-profit. Loans made by the eligible non-profit cannot be sold or transferred.
    - **Type 1 only -** The subsequent loan repayments are not subject to the program income requirements as long as the eligible non-profit uses the funds to continue the housing rehabilitation revolving loan fund program or uses them for other community economic development, energy conservation and/or neighborhood revitalization projects, as allowed by 105(a)(15) of the HCDA.
    - The grants and initial loans must be used for activities that will meet the CDBG low and moderate housing direct national objective CFR 570.483(b)(3).

Non-Competition with Local Financing Institutions

Each sub-grantee's (eligible non-profit) Housing Rehabilitation Revolving Loan Fund (HRRLF) polices must have requirements that loan/grant funds provide gap financing, and will work with local financing institutions to complete the financing package, require letters of rejection from financing institutions, and/or otherwise demonstrate that the loan/grant amount requested is not available from any conventional banking source of funds.

Reasonable Accommodation Policies

As federally required, each sub-grantee (eligible non-profit) must have reasonable accommodation policies. A copy of their reasonable accommodation policies must be submitted with the application.

Lead-Based Paint

All applicants must demonstrate how the rehabilitation work will be conducted in accordance with the Lead Based Paint Poisoning Prevention Act and HUD implementing regulations at 24 CFR 570.487(c) and any subsequent amendments. Effective September 15, 2000 revisions to the Lead Based Paint regulations 24 CFR Part 35 were implemented. More information about these requirements can be found in the Grant Management Handbook.

Entitlement Area Review

State Community Development Block Grant resources cannot be used to benefit entitlement counties and cities. If the geographic area served by the non-profit's (sub-grantee's) Housing Rehabilitation Program contains an entitlement county or city (entitlements include: the counties of; Multnomah, Washington and Clackamas, and the cities of: Albany, Ashland, Beaverton, Bend, Corvallis, Eugene, Grants Pass, Gresham, Hillsboro, Medford, Portland, Redmond, Salem and Springfield) within their service area that applicant must provide documentation to satisfy the following with the application:

1. Documentation of the screening procedures, forms and policies used to determine if the beneficiaries of the Housing Rehabilitation activities are entitlement or non-entitlement residents.
2. Documentation that ensures that CDBG funds are only benefitting non-entitlement residents.

TYPE 1 - Additional Requirements

Eligible Non-Profit Asset Reversion

If for some reason the original eligible non-profit dissolves or is re-organized under state law and an asset reversion occurs contact Oregon Business Development Department for assistance. An asset reversion could change the federal identity of these funds.

De-Federalization of Loan Repayments

The housing rehabilitation revolving loan fund category is designed under 105(a)(15) of the HCDA so the loan repayments lose their federal identify (de-federalized) as long as the income generated by the loan repayments and interest earnings continue to be used by the original eligible non-profit to continue housing rehabilitation activities, provide neighborhood revitalization, community economic development, or energy conservation projects.

This section is meant as a guide to assist applicants and eligible non-profits in pursuing this outcome. By not following this guide an entity risks failing to de-federalize their repaid funds resulting in the retroactive application of HUD rules on all expenditure of these repaid funds.

- A city/county grant recipient must sub-grant the CDBG funds to a 105(a)(15) HCDA eligible nonprofit entity.

- The eligible non-profit (sub-grantee) entity will carry-out the program with its own staff or, will contract for professional staff (enter into a **professional services agreement**), or a combination of the two.

- A **professional services agreement** between the eligible non-profit (sub-grantee) and the professional services provider for grant administration and limited program management is acceptable to OBDD-IFA, and must be entered into for any contracted staff. This contract must:
  - ✓ Pay for eligible CDBG expenses on a reimbursement basis. This basis may be by the hour, by the number of successfully completed rehabilitation projects, or lump sum,
  - ✓ Clearly define the roles and responsibilities of the professional services covered by the agreement,
  - ✓ Direct the contracted staff to follow the policies and procedures set by the eligible non-profit (sub-grantee),
  - ✓ Clearly define the eligible non-profit (sub-grantee) as the final authority for all decisions pertaining to the housing rehabilitation activities.
- The eligible non-profit (sub-grantee) must retain control of the funds, manage the bank accounts and disbursements through its Secretary/Treasurer, even if it has no employed staff. The non-profit Board must retain approval authority for all expenditures.
- The composition of the eligible non-profit (sub-grantee) Board must be established as outlined in the By-laws and Articles of Incorporation of the eligible non-profit entity, cannot be comprised substantially of individuals of any one government agency to where it contains a quorum of any one government entity and must be independent and void of any conflict of interest with any government agency.
- The eligible non-profit (sub-grantee) cannot relinquish its responsibility for the oversight and management of the CDBG funds.
- Contracts/agreements must be approved by OBDD-IFA to determine that the eligible non-profit (sub-grantee) entity is maintaining control and will carry out the activities as the active and responsible party of the CDBG funds.

Loan Portfolio Requirements

The state is requiring that loan portfolios will not be sold or transferred and that all loans must be repaid to the original eligible non-profit under 105(a)(15) of the Housing and Community Development Act.

Defaults

OBDD encourages the eligible non-profit (sub-grantee) to set-aside 10 percent of the loan receivables to cover legal remedies in pursuit of default collection.

Outcome and Performance Measures for BOTH Type 1 and Type 2 projects:

Decent affordable housing as a housing program that meets individual family needs is our objective. Sustainability as a project that promotes livability by improving neighborhoods is our desired outcome. The amount of money leveraged from other sources is also a factor. Each applicant must address how their project meets the objective(s), outcome(s), indicators and performance measures identified below:

Objective	Outcome (Pick One)	Indicators	Performance Measures
Decent Affordable Housing	Sustainability/ Promoting Livable or Viable Communities	Number of owner occupied units rehabilitated or improved: • Number using lead safe working practices (Pre-1978 units, where $5,000 or more of rehab work is to be completed and any lead safe practices were used.) • Number subsidized by federal, state, or local program • Number occupied by elderly (head of household or spouse age 60 or older) • Number of units made handicapped accessible	Amount of money leveraged from other federal, state, local and private resources)
			Number of persons, households or units assisted (pick the one most appropriate to your project – pick only one)
			Number of low and moderate-income persons served by the project.
			Number of communities assisted,
			Race, ethnicity, disability (current categories for beneficiary reporting still apply)
			Number of units rehabilitated

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Chapter 13 Community Capacity/Technical Assistance

Community Development Block Grant (CDBG) 1 percent funds will be used to make grants for the development of local capacity and to provide technical assistance to units of general local government and nonprofits (IRS documentation of 501c(3) or c (4) status) and to fund state administration of the program.

Maximum Grant

The maximum grant cannot exceed the state's annual allocation for this category.

Project Eligibility

All funds will be used for projects that comply with HUD Community Planning and Development Notice CPD 99-09. The state has used and will continue to use un-obligated prior year One-Percent (1%) funds for local capacity development and technical assistance projects in accordance with the requirements of CPD 99-09.

Beginning in Fiscal Year (FY) 2004, states may spend up to $100,000 + 3 percent of their annual HUD allocation on state administrative costs and spend $0 on Technical Assistance, or they could spend up to 3 percent of the annual allocation on technical assistance and $0 on state administration costs beyond the $100,000 automatic allowance. The department will reserve the right to use all flexibility provided by the program and to focus the funding on priority training for the state's program.

Eligible Activities

Eligible activities for these funds include:

- Giving workshops on applying for and implementing CDBG programs;
- Writing technical assistance handbooks or developing assistance in other media;
- Compiling infrastructure needs of the non-entitlement jurisdictions;
- The purchase of appropriate materials and equipment including computers and software for units of general local government to aid in developing and sustaining increased capacity;
- Funding attendance by units of general local government and nonprofit personnel at workshops and academic courses that will enable the attendees to improve their capacity to implement a CDBG project;
    - In general the department will strive to equitably fund each workshop using the following:
        - $3,000 for each full day
        - The workshop sponsor can demonstrate the topics/content will improve local capacity to implement a CDBG project.
- State staff time provided for technical assistance sessions to assist potential applicants for state CDBG funds learning the application process;
- Training of state staff to provide technical assistance on specific aspects of the CDBG program;
- Assistance to further fair housing;
- Plan and implement community revitalization strategies;
- Development and implementation of a community development certified practitioner certification program; and
- State administration.

Ineligible Activities

Ineligible activities include:

- Local administration expenses not related to community development; and
- Any activity that cannot be documented as meeting a technical assistance need.
- CDBG 1 percent funds cannot be used to fund any activity that is otherwise already eligible for funding under this MOD.

Matching Funds Requirement

There is no minimum match requirement. Any matching funds necessary to complete the proposed CDBG project, must be in the form of cash or debt service. All project funds necessary to complete the proposed project must be available and committed at the time the application is received by the department. Refer to the "Readiness to Proceed" definition in Chapter 5 for more details.

Financial Review

No financial review is conducted for these projects.

Applications Accepted

Applications are accepted year round - contact a regional coordinator for assistance and more information.

Step 1 - (Initial Contact/Project Concept)

The project proponent must contact the department prior to submitting an application. One of the IFA's CDBG Program and Policy Coordinators (PPC) will be assigned to work with the project proponent to develop and review the proposed concept. The potential applicant must submit a written proposal explaining the need and the technical assistance to be provided. This proposal must identify how the funds will be used, a scope of work, the deliverables, a detailed budget, time lines for completion etc. The Project Notification and Intake Form can be used for this purpose, but is not required.

Step 2 – (Review)

The CDBG Program and Policy Coordinators will review the information from the proponent to ensure it meets the following eligibility requirements:

- The project is eligible under CPD 99-09 and this MOD;
- The costs are eligible under the CDBG program;
- The applicant is unable to finance the activity on its own;
- Other sources of funds are not available to carryout the activity; and
- The project is ready to proceed.

Step 3 – (Processing)

Concepts will be reviewed the PPC for completeness and preparation of the initial staff recommendation. The initial staff recommendation will be reviewed by the Program Services Manager and the CDBG Program and Policy Coordinator for development of a funding recommendation.

Step 4 – (Decision)

The funding recommendation will be forwarded to the Infrastructure Finance Authority Director for review and approval.

The department reserves the right to not fund any proposal, which it deems not eligible, properly developed or not ready to proceed. All funding decisions made by the department's Infrastructure Finance Authority Director and/or if applicable, department director are final.

Step 5 – (Notification)

The department shall notify project proponents, in writing, of their funding status approximately 60 days after receipt of a compete concept for funding.

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Chapter 14 Emergency Projects

The state may use CDBG funds at any time during the program year to provide grants to eligible applicants for projects arising from bona fide emergencies. To be considered a bona fide emergency the situation must be:

- Officially declared by the Governor as a "State of Emergency" needing immediate action; and/or
- A Presidential declared federal disaster declaration has been issued for the event.

CDBG Emergency project funds may only be used to repair or mitigate damages that were a direct result of the qualifying disaster.

NOTE:

An applicant for a CDBG award is considered a recipient under the Environmental Review and URA requirements starting with the date of submission of a CDBG application. An "Applicant" is one who submits an application, request, plan or statement required to be approved by an official as a condition of eligibility for federal financial assistance.

The federal program regulations, under Part 58-Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities, Subpart C, 58.22(a), specifies that neither a recipient nor any participant in a HUD CDBG funded project may commit HUD assistance on an activity or project until HUD or the state has approved the recipient's Request for Release of Funds (RROF) and related certification from the responsible entity (recipient). In addition, until the RROF and related certification have been approved, neither a recipient nor any participant may commit non-HUD CDBG funds on or undertake an activity or project if the activity or project would have an adverse environmental impact or limit the choice of reasonable alternatives. Under 58.22(b), if a project or activity is exempt or categorically excluded, no RROF is required and the recipient may undertake the activity immediately after the responsible entity has documented its determination activity but must comply with applicable requirements. Before committing any HUD and non-HUD funds to a project or activity, the recipient should consult with the department's Regional Coordinator.

HUD Handbook 1378 provides HUD policy guidance on acquisition and relocation under the federal Uniform Relocation Assistance and Real Property Acquisition Act (URA) and other HUD requirements. Chapter 1-4-I-2, identifies the date of submission of an application as an event that establishes a rebuttable presumption that a project begins and triggers the Initiation of Negotiations requirement of URA and the need for issuance of the Notice of Eligibility for Relocation Assistance or Notice of Nondisplacement. Before initiating any real property acquisition activity, an applicant should consult with the department's Regional Coordinator.

Available Funds

Funds available for emergency grants will be limited to 5 percent of the state's annual allocation from the U.S. Department of Housing and Urban Development. Actual funds available at any given point in time may be less than the 5 percent of the annual allocation.

Priority
In the event that an emergency grant is needed while one or more projects are on the backup funding list, the emergency project will have priority.

Maximum Grant
The maximum grant per project will be $500,000.

The maximum grant for projects receiving federal disaster funds also is limited to the amount required by the local government to match the federal disaster grant funding, but in no case shall it exceed $500,000.

Matching Funds Requirement
There is no minimum match requirement. All matching funds necessary to complete the proposed CDBG project, must be in the form of cash or debt service. All project funds necessary to complete the proposed project must be available and committed at the time the application is received by the department. Refer to the "Readiness to Proceed" definition in Chapter 5 for more details.

Financial Review
All applications will undergo a financial review to assure that the grant is the minimum necessary, in combination with other resources, to ensure the completion of the project. In addition to determining that the applicant is unable to finance the activity on its own and other sources of funds are not available to carry out the activity.

National Objective
Prior to awarding an emergency project grant, the state must determine that the proposed use of grant funds will meet the urgent need national objective as defined by 24 CFR Part 570.483(d). Refer to Chapter 3 for more information. The Housing and Community Development Act of 1974, as amended and promulgated, further assists in determining eligible activities.

Urgent Need
This national objective requires a project to be designated to alleviate existing conditions the local government certifies and the state determines:

- Pose a serious and immediate threat to the health or welfare of the community (Governor declared "State of Emergency" or Presidential declared disaster, through FEMA declaration);
- Recently became urgent (application must be received within 12 months from the date of the Presidential or Governor disaster declaration);
- The applicant is unable to finance the activity on its own; and
- Other sources of funds are not available to carryout the activity.

Urgent Need Documentation
The applicant must submit written certification of the following to the state:

- A description of the nature and degree of seriousness/urgency of the conditions requiring assistance.
- Eligibility certification from the applicant's governing body that the CDBG activity is designated to address an urgent need.

- The timeline of the development of the urgent need condition.
- Evidence confirming that other financial resources to alleviate/remedy the situation are not available.
- A description of how the proposed project addresses a need identified in the applicable jurisdiction's hazard mitigation plan and/or hazard element of the local land use plan.

Eligible Projects

The proposed project must be for an activity that is eligible under Section 105(a) of the Housing and Community Development Act. The portions of the Act, applicable to the state's program and "urgent" need projects, are listed below.

- **105(a)(1)** the acquisition of real property (including air rights, water rights, and other interests therein) which is (A) blighted, deteriorated, deteriorating, undeveloped, or inappropriately developed from the standpoint of sound community development and growth; (B) appropriate for rehabilitation or conservation activities; (C) appropriate for the preservation or restoration of historic sites, the beautification of urban land, the conservation of open spaces, natural resources, and scenic areas, the provision of recreational opportunities, or the guidance of urban development; (D) to be used for the provision of public works, facilities, and improvements eligible for assistance under this title; or (E) to be used for other public purposes;
- **105(a)(2)** the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements;
- **105(a)(3)** code enforcement in deteriorated or deteriorating areas in which such enforcement, together with public or private improvements or services to be provided, may be expected to arrest the decline of the area;
- **105(a)(4)** clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings);
- **105(a)(5)** special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly and handicapped persons;
- **105(a)(6)** payments to housing owners for losses of rental income incurred in holding for temporary periods housing units to be utilized for the relocation of individuals and families displaced by activities under this title;
- **105(a)(7)** disposition (through sale, lease, donation, or otherwise) of any real property acquired pursuant to this title or its retention for public purposes;
- **105(a)(8)** provision of public services, including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, energy

conservation, welfare or recreation needs, if such services have not been provided by the unit of general local government (through funds raised by such unit, or received by such unit from the state in which it is located) during any part of the twelve month period immediately preceding the date of submission of the statement with respect to which funds are to be made available under this title, and which are to be used for such services, unless the Secretary finds that the discontinuation of such services was the result of events not within the control of the unit of general local government;

- **105(a)(9)** payment of the non-federal share required in connection with a federal grant-in-aid program undertaken as part of activities assisted under this title;

- **105(a)(11)** relocation payments and assistance for displaced individuals, families, businesses, organizations, and farm operations, when determined by the grantee to be appropriate;

- **105(a)(12)** activities necessary (A) to develop a comprehensive community development plan, and (B) to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively (i) determine its needs, (ii) set long-term goals and short-term objectives, (iii) devise programs and activities to meet these goals and (iv) evaluate the progress of such programs in accomplishing these goals and objectives, and (v) carry out management, coordination, and monitoring of activities necessary for effective planning implementation;

- **105(a)(14)** provision of assistance including loans (both interim and long term) and grants for activities which are carried out by public or private nonprofit entities, including (A) acquisition of real property; (B) acquisition, construction, reconstruction, rehabilitation, or installation of (i) public facilities (except for buildings for the general conduct of government), site improvements, and utilities, and (ii) commercial or industrial buildings or structures and other commercial or industrial real property improvements; and (C) planning;

- **105(a)(15)** assistance to neighborhood-based nonprofit organizations, local development corporations, nonprofit organizations serving the development needs of the communities in non-entitlement areas, or entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out a neighborhood revitalization or community economic development or energy conservation project in furtherance of the objectives of section 101(c) of this title, and assistance to neighborhood-based nonprofit organizations, or other private or public nonprofit organizations, for the purpose of assisting, as part of neighborhood revitalization or other community development, the development of shared housing opportunities (other than by construction of new facilities) in which elderly families (as defined in section 3(b)(3) of the United States Housing Act of 1937) benefit as a result of living in a dwelling in which the facilities are shared with others in a manner that effectively and efficiently meets the housing needs of the residents and thereby reduces their cost of housing;

- **105(a)(17)** provision of assistance to private, for-profit entities, when the assistance is appropriate to carry out an economic development project (that shall minimize, to the extent practicable, displacement of existing businesses and jobs in neighborhoods) that (A) creates or retains jobs for low- and moderate-income persons; (B) prevents or

eliminates slums and blight; (C) meets urgent needs; (D) creates or retains businesses owned by community residents; (E) assists businesses that provide goods or services needed by, and affordable to, low- and moderate-income residents; or (F) provides technical assistance to promote any of the activities under subparagraphs (A) through (E);

- **105(a)(19)** provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities, which assistance shall not be considered a planning cost as defined in paragraph (12) or administrative cost as defined in paragraph (13);

- **105(a)(20)** housing services, such as housing counseling, in connection with tenant-based rental assistance and affordable housing projects assisted under title II of the Cranston-Gonzalez National Affordable Housing Act, energy auditing, preparation of work specifications, loan processing, inspections, tenant selection, management of tenant-based rental assistance, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in housing activities assisted under title II of the Cranston-Gonzalez National Affordable Housing Act;

- **105(a)(22)** provision of assistance to public and private organizations, agencies, and other entities (including nonprofit and for-profit entities) to enable such entities to facilitate economic development by (A) providing credit (including providing direct loans and loan guarantees, establishing revolving loan funds, and facilitating peer lending programs) for the establishment, stabilization, and expansion of microenterprises; (B) providing technical assistance, advice, and business support services (including assistance, advice, and support relating to developing business plans, securing funding, conducting marketing, and otherwise engaging in microenterprise activities) to owners of microenterprises and persons developing microenterprises; and (C) providing general support (such as peer support programs and counseling) to owners of microenterprises and persons developing microenterprises;

- **105(a)(23)** activities necessary to make essential repairs and to pay operating expenses necessary to maintain the habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration of such housing in primarily low- and moderate-income neighborhoods;

- **105(a)(24)** provision of direct assistance to facilitate and expand homeownership among persons of low and moderate income (except that such assistance shall not be considered a public service for purposes of paragraph (8)) by using such assistance to (A) subsidize interest rates and mortgage principal amounts for low- and moderate-income homebuyers; (B) finance the acquisition by low- and moderate-income home buyers of housing that is occupied by the homebuyers; (C) acquire guarantees for mortgage financing obtained by low- and moderate-income homebuyers from private lenders (except that amounts received under this title may not be used under this subparagraph to directly guarantee such mortgage financing and grantees under this title may not directly provide such guarantees); (D) provide up to 50 percent of any down payment required from low- or moderate-income homebuyer; or (E) pay reasonable closing costs (normally associated with the purchase of a home) incurred by low- or moderate-income home buyers; and

- **105(a)(25)** lead-based paint hazard evaluation and reduction, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992.

Ineligible Projects/Costs

- Buildings for the general conduct of government
- Typical government expenses
- Political activities
- Purchase of equipment that is not fixed and integral
- General operating and maintenance expenses
- New housing construction
- Income payments - a series of subsistence type grant payments for food, clothing, housing, (rent and mortgage) or utilities. **Note:** Under the entitlement regulations 24 CFR Part 570.207(b)(4) allows emergency grant payments made over a period of three consecutive months directly to a provider of such items or services on behalf of an individual family. One time grants for such purposes may be authorized under the category of public services.
- Pre-award costs. Refer to Chapter 5 for more information.

Eligible Costs (Refer to Chapter 5 for more details about eligible costs)

- Grant Administration, as detailed in Chapter 5.
- Program Management, as detailed in Chapter 5. (Restricted in use to revolving loan fund projects).
- Preparation of the environmental review for the proposed project in compliance with the National Environmental Policy Act (NEPA) and other applicable federal authorities implemented by HUD. Refer to Chapters 4 and 5 for more information.
- Architectural/engineering design, oversight and construction management, including as-built drawings and operation and maintenance manuals, as detailed in Chapter 5.
- Construction and construction contingencies, as detailed in Chapter 5.
- Work write-up and bidding expenses for eligible projects.
- Public services.
- Housing Rehabilitation.
- Appraisals and acquisition of real property, including permanent easements, clearance and disposition. Refer to Chapter 4 for more information.
- Relocation Assistance to meet federal requirements. Refer to Chapter 4 for more information. Due the specialty calculations and detailed requirements for relocation activities, any applicant with a proposed project that involves relocation will be required by OBDD-IFA to hire a specialist acceptable to OBDD-IFA to complete the required URA relocation process.
- Construction, rehabilitation, reconstruction or installation of improvements.
- Purchase and installation of equipment that is fixed and integral.
- Clearance – Demolition of buildings and improvements, removal of demolition products (rubble) and other debris.
- Legal services.

- Costs associated with labor standards monitoring. Refer to Chapters 4 and 5 for more information.
- Pre-agreement costs, requested in accordance with the requirements contained in Chapter 5.

Applications Accepted

Emergency project applications are accepted year round - contact a regional coordinator for assistance and more information. Complete applications for emergency projects must be received by the department within 12 months of either the Governor's declaration or a Presidential disaster declaration of emergency for the event creating the emergency.

Step 1 - (Initial Contact/Project Concept)

The project proponent must contact the department prior to submitting an application. One of the department's regional coordinators (RC) will be assigned to work with the project proponent to develop and review the proposed concept.

The RC will work with the proponent and the Department's Program and Policy Coordinators to provide project development and to determine if the proposed project will meet the CDBG funding criteria and is ready to proceed with a well defined statement and scope of work, including the following:

- The project is eligible under 105(a) of the HCDA;
- The project will meet the urgent need national objective;
- The costs are eligible under the CDBG program;
- The applicant is unable to finance the activity on its own;
- Other sources of funds are not available to carry-out the activity; and
- The project meets the readiness to proceed criteria contained in Chapter 5.

A "One Stop" meeting will be scheduled if warranted or requested by the proponent. A Project Notification and Intake Form will be developed and the RC will then route the form for internal agency comment.

Step 2 – (Invite Application)

The RC will inform the proponent and the unit of general local government (city or county) about the department's review of the Project Notification and Intake Form. If the proposed project is determined to qualify for CDBG funding by the Program Services Manager, the applicant will be invited in writing to submit a complete application for CDBG funding.

Step 3 – (Application)

One signed original and two copies (3 total) of the complete application must be received by OBDD no later than 12 months after the disaster declaration by the President or Governor. The applicant's highest elected official must sign the application. Applications transmitted electronically or by fax will not be accepted.

Step 4 – (Review)

The RC will review applications for completeness and prepare the initial staff report. The CDBG Program and Policy Coordinator will evaluate the initial staff report for final recommendation.

Step 5 – (Decision)

The final recommendation prepared by the CDBG Program and Policy Coordinator will be forwarded to the Infrastructure Finance Authority Program Services Manager and the IFA Director for review and approval.

Ineligible, improperly developed, untimely or not ready to proceed applications will not be funded. All funding decisions made by the department director are final.

Step 6 – (Notification)

The department shall notify applicants, in writing, of their funding status approximately 60 days after receipt of a complete application.

Chapter 15 Certified Sub-grantee Program

To become a certified sub-grantee, a potential grantee must submit the required documentation identified within each funding category under "eligible nonprofit (sub recipient)" and evidence that the sub-grantee has a qualified grant administrator employed to manage the Community Development Block Grant sub-grants. In addition each request from a sub-grantee also must contain a copy their existing reasonable accommodation policies.

Within 30 days of receipt of the information identified above the agency will mail a certification letter to each sub-grantee, which will either certify the sub-grantee's eligibility or identify the items still needed for certification.

A certified sub-grantee will not have to resubmit the information identified in each funding category under "eligible nonprofit (sub-grantee)" with the application. They need only submit a copy of the state's certification with the application.

Sub-grantee certification expire 5 years after issuance or on the date the state becomes aware that the certified sub-grantee no longer has a qualified grant administrator employed or the nonprofit's by laws, charter or other documents have been amended. If this occurs, the state will issue a letter to the sub-grantee revoking their certification. A sub-grantee can become re-certified once the deficiency(s) that caused the de-certification have been rectified and the appropriate documents submitted to the state for review and approval.

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Chapter 16 Outcome and Performance Measure Reporting

Summary of CDBG Projects Funded

During Consolidated Plan Year 2011-2015

Code Index:

Outcomes → / Objectives ↓	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH1	DH2	DH3
Suitable Living Environment	SL1	SL2	SL3
Economic Opportunity	EO1	EO2	EO3

Program Year 2015 data through December 31, 2015 (Fourth Quarter) and accrued data from January 1, 2011 to December 31, 2015

Program Year 2015 Data				OUTCOMES [See note #1 below]				
Outcome/ Objective	Funding Category	Performance Indicators [See note #2 below]	Actual Number Funded in 2015	Total Number Funded by 12-31-15	Short Term Annual Goal	Actual Number Funded in 2015 and % of Annual Goal Achieved	Long Term Goal by 12-31-2015	Actual Number Funded by 12-31-15 and % of Five Year Goal Achieved
EO3	Economic Development	Jobs Created/Retained	0	35	Fund 1 project per year, if category is offered under the program	Funding category only offered in 2011 [See note 2 below]	Fund 5 projects	1 (20%)
		Total LMI Jobs created/Retained	0	19				
		Funds Leveraged	0	$0				
EO3	Microenterprise Assistance	Total Microenterprises Assisted	1	399	Fund 5 projects per year	4 (80%)	Fund 25 projects	12 (48%)
		Total LMI Microenterprises Assisted		305				
		Funds Leveraged	0	$10,000				
SL3	Public Works – Water/Wastewater and Downtown Revitalization	Number Systems Assisted	4	41	Fund 5 systems per year	11 (220%)	Assist 25 systems	41 (164%)
		Total Persons Assisted	0	65,880				
		Total LMI Persons Assisted	0	41,233				
		Funds Leveraged	$22,000	$9,634,509				

DH3	Publicly Owned Off-Site Infrastructure	Total Housing Units Assisted	0	0	Fund 1 project every other year	0 (0%)	Fund 2.5 projects	0 (0%)
		Total LMI Housing Units Assisted	0	0				
		Funds Leveraged	0	$0				
SL1	Public/Community Facilities (fire stations, libraries, senior centers, food banks, family resource centers, community centers)	Total Facilities Assisted	1	7	Fund 1 project per year	2 (200%)	Assist 5 facilities	7 (140%)
		Total Persons Assisted		24,244				
		Total LMI Persons Assisted		20,168				
		Funds Leveraged	$475,000	$1,937,871				
SL3	Public/Community Facilities (drug and alcohol treatment, head starts, mental health, health clinics, shelters/workshops for persons with disabilities)	Total Facilities Assisted	2	3	Fund 1 project every other year	2 (200%)	Assist 2.5 facilities	3 (120%)
		Total Persons Assisted		273				
		Total LMI Persons Assisted		270				
		Funds Leveraged	$4,509,520	$40,594.94				
DH1	Public/Community Facilities (domestic violence shelters, emergency/homeless shelters)	Total Number of Beds Created	0	8	Fund 1 project per year	0 (0%)	Assist 5 facilities	1(20%)
		Funds Leveraged	0	$0				
DH3	Housing Rehabilitation	Total Number of Units rehabbed	0	416	Fund 6 projects per year	5 (83%)	Fund 30 projects	21 (70%)
		Funds Leveraged	$81,000	$878,500				
SL1	Public Services	Total Persons Assisted	0	0	Fund 3 projects per year, if category is offered under the program.	Funding category not offered in2011, 2012, 2013 or 2014 [See note 2 below]	Fund 15 projects	Does not apply. Funding category has not been offered.
		Total LMI Persons Assisted	0	0				
		Funds Leveraged	0	$0				
SL3	Emergency Projects	The Department does not anticipate future disasters but will ensure that if a bona fide disaster occurs in the future the projects will meet the CDBG program requirements and will be reported accordingly.						
N/A	Community Capacity/Technical Assistance	Number of Training Events Held	2	13	Fund 3 per year	5 (167%)	15 training events funded	17 (113%)
		Number of Attendee's	90	1,369				

Note #1 - Outcomes - Actual Number Funded – The actual number funded is based upon the awards made during the program year. The final actual outcomes/accomplishments from each grant awarded by the state will be collected when the grant activities are complete and the grant contract between the city/county and the state is administratively closed and will be reported in IDIS as part of the CAPER. Each grant recipient is allowed a specified period of time to complete the CDBG funded activities and this time period varies by type of grant. This time period is referred to as the Project Completion Date (PCD). The state allows PCD extensions if the local circumstances warrant the extensions. Each PCD extension is reviewed on a case by case basis. A summary of the standard PCD time periods are:

- 1 year PCD – Applies to microenterprise assistance grants and housing center grants.
- 2 year PCD – Planning grants, final design only grants, construction only grants, off-site infrastructure grants and housing rehabilitation grants.
- 3 year PCD – Final design and construction activities combined into one grant.

Note #2 - The state may select activities/priorities for the 2011-2015 CDBG program from the table above. The proposed outcome and performance measure requirements, performance indicators and the short and long term goals for each activity will only be triggered, if the activity is actually offered by the program.

Summary of CDBG Projects Funded During Consolidated Plan Year 2016-2020

This Method of Distribution is the first annual update under the 2016-2020 Consolidated Plan. Since there have been no CDBG awards under this 2016 Method of Distribution to report, the section contains the short term and long term objectives and performance measure criteria for the program contained in the 2016-2020 Consolidated Plan, which will be reported on in future Methods of Distribution (MOD) and Consolidated Annual Performance Evaluation Reports (CAPER). The following outcomes, objectives, performance indicators, and short and long term goals are in conformance with the primary objective of the CDBG program; to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for low and moderate income persons.

Program Year 2016 data through December 31, 2016 (Fourth Quarter) and accrued data from January 1, 2016 to December 31, 2020

Program Year 2016 Data				OUTCOMES [See note #1 below]				
Outcome/ Objective	**Funding Category**	**Performance Indicators [See note #2 below]**	**Actual Number Funded in 2016**	**Total Number Funded by 12-31-16**	**Short Term Annual Goal**	**Actual Number Funded in 2016 and % of Annual Goal Achieved**	**Long Term Goal by 12-31-2020**	**Actual Number Funded by 12-31-20 and % of Five Year Goal Achieved**
EO3	Microenterprise Assistance	Total Microenterprises Assisted			Fund 3 projects per year		Fund 15 projects	
		Total LMI Microenterprises Assisted						
		Funds Leveraged						
SL3	Public Works – Water/Wastewater	Number Systems Assisted			Fund 2 systems per year		Assist 10 systems	
		Total Persons Assisted						
		Total LMI Persons Assisted						
		Funds Leveraged						
SL1/SL3/DH1	Public/Community Facilities (fire stations, libraries, senior centers, food banks, family resource centers, community centers) (SL1)	Total Facilities Assisted			Fund 1.5 project per year		Assist 7.5 facilities	
		Total Persons Assisted						
		Total LMI Persons Assisted						
		Funds Leveraged						

	Public/Community Facilities (drug and alcohol treatment, head starts, mental health, health clinics, shelters/workshops for persons with disabilities (SL3) Public/Community Facilities (domestic violence shelters, emergency/homeless shelters) (DH1)							
DH3	Housing Rehabilitation	Total Number of Units rehabbed			Fund 6 projects per year		Fund 30 projects	
		Funds Leveraged						
SL3	Emergency Projects	The Department does not anticipate future disasters but will ensure that if a bona fide disaster occurs in the future the projects will meet the CDBG program requirements and will be reported accordingly.						
N/A	Community Capacity/Technical Assistance	Number of Training Events Held			Fund 3 per year		15 training events funded	
		Number of Attendee's						

Note #1 - Outcomes - Actual Number Funded – The actual number funded is based upon the awards made during the program year. The final actual outcomes/accomplishments from each grant awarded by the state will be collected when the grant activities are complete and the grant contract between the city/county and the state is administratively closed and will be reported in IDIS as part of the CAPER. Each grant recipient is allowed a specified period of time to complete the CDBG funded activities and this time period varies by type of grant. This time period is referred to as the Project Completion Date (PCD). The state allows PCD extensions if the local circumstances warrant the extensions. Each PCD extension is reviewed on a case by case basis. A summary of the standard PCD time periods are:

- 1 year PCD – Applies to microenterprise assistance grants and housing center grants.
- 2 year PCD – Planning grants, final design only grants, construction only grants, off-site infrastructure grants and housing rehabilitation grants.
- 3 year PCD – Final design and construction activities combined into one grant.

Note #2 - The state may select activities/priorities for the 2016-2020 CDBG program from the table above. The proposed outcome and performance measure requirements, performance indicators and the short and long term goals for each activity will only be triggered, if the activity is actually offered by the program.

Oregon Business Development Department (OBDD) held a public comment period for the 2016 CDBG Method of Distribution (MOD). Public comments submitted are provided in the table below.

2016 CDBG Method of Distribution
PUBLIC COMMENTS

COMMENT SUMMARY	COMMENTOR OR AGENCY	STATE RESPONSE
Current restrictions on administrative allowances for CDBG grant administration, especially for environmental and labor standards compliance, are too low and should be raised.	Tillman Carr GEODC	The Grant Administration (GA) and Program Management (PM) allowances under the program have been slowly and steadily increased through the years however, OBDD-IFA will re-consider additional increases to the base allowances for grant administration and program management for 2016. OBDD-IFA will also consider some grant administration allowances for the Microenterprise Program.
Current restrictions on administrative allowances Micro-enterprise grant are too low and should be raised.	Susan Roberts Wallowa County	The Grant Administration (GA) and Program Management (PM) allowances under the program have been slowly and steadily increased through the years however, OBDD-IFA will re-consider additional increases to the base allowances for grant administration and program management for 2016. OBDD-IFA will also consider some grant administration allowances for the Microenterprise Program.
<u>Grant Administration Allowance – 10% up to max $25,000</u> CCD would like to see this allowance be increased – to read "10% up to max $35,000". CCD does CDBG Grant Management for projects, and has for over a decade. We feel that it is time to increase this maximum amount. CCD is committed to travel to project sites for necessary meetings, attend CDBG training when possible, etc., and these costs have increased over the past several years.	Tracy Loomis CCD	The Grant Administration (GA) and Program Management (PM) allowances under the program have been increased slowly and steadily increased through the years however, OBDD-IFA will re-consider additional increases to the base allowances for grant administration and program management for 2017. OBDD-IFA will also consider some grant administration allowances for the Microenterprise Program.
<u>"Under rare circumstances….biological assessments, arch "surveys….allow the recipient to use a portion of the grant administration allowance…"</u> CCD would like this to be eliminated. As Grant Administrator, we are not involved in these assessments/studies – that is decided between the engineer and project owner. It is impossible to budget for CDBG Grant Administration with these unknowns – these assessments/studies are quite expensive. These costs need to come from a different Line Item, whether it be Engineering or something different.	Tracy Loomis CCD	OBDD-IFA will take this comment into consideration as we evaluate all grant administration and program management-related costs.
Regarding the decrease in funding allocation received from HUD, which decreases the maximum grant awards – CCD would, of course, prefer that there would be no decreases, even if temporary.	Tracy Loomis CCD	OBDD-IFA understands the preference that maximum grant awards not be decreased, however the decrease to the maximum grant awards under the Public Works and Community Facilities projects will enable OBDD-IFA to fund more projects thereby allowing us to assist more communities in Oregon.
Environmental Report: - Review the amount available to complete the report. Possible increase as the amount of work required to complete the reports has increased over the years. - Review if the project/all potential funding source requirements can be included. If not-what is the CFR citation that prohibits this.	OBDD-IFA Regional Coordinator	• The current amount of $15,000 for environmental reviews will remain the same for 2016 however, OBDD-IFA will take the cost associated with the environmental review under advisement. • The CDBG regulations specify that costs can be reimbursed if they are undertaken in accordance with the requirements of CDBG regulations which includes the environmental review requirements founds at 24 CFR 58. Environmental review expenses that exceed HUD's requirements in part 58 would not be an allowed expense.
Grant Administration-I believe it is time to look at the amount of funds that can be used for grant administration	OBDD-IFA Regional Coordinator	The Grant Administration (GA) and Program Management (PM) allowances under the program have been increased slowly and steadily increased through the years however, OBDD-IFA will re-consider additional increases to the base allowances for grant administration and program management for 2017.

ATTACHMENT S:
ESG Written Standards

EMERGENCY SOLUTIONS GRANT WRITTEN STANDARDS
(August 2015)

All Subgrantees are required to comply with the department's state minimum standards for providing ESG assistance and when established, those standards relevant to ESG that are required by their Continuum of Care. A Subgrantee may set their own standards that exceed the state minimum standards subject to OHCS review and approval.

MINIMUM STANDARDS

Eligibility for Assistance

Subgrantees are required to participate in and comply with their Continuum of Care centralized or coordinated intake and assessment system including utilizing standard COC assessment tools and protocols once they are established. Subgrantees may choose to utilize a different intake and assessment system for victims of domestic violence and other crimes where safety is a predominant concern.

The minimum eligibility process will include an initial phone or in person screening to determine whether or not the applicant meets one of HUD's categorical definitions of homeless or at risk of homelessness. If yes, then a more comprehensive assessment will be completed in person by Subgrantee staff to verify applicants' homeless status and determine which ESG service components they qualify for and that will address their housing need. Eligibility determinations must be documented in client files and preferably through third-party documentation. Intake worker observation or participant self-certification can be used when due diligence by staff and client is documented in the file indicating third-party verification is unavailable.

Re-evaluations of eligibility for continued receipt of homelessness prevention and rapid re-housing assistance are required—every three (3) months for prevention and annually for rapid re-housing. Minimally, each re-evaluation of eligibility must verify that the client household does not have an annual income that exceeds thirty (30) percent of HUD determined median family income for the service area **and** the household continues to lack sufficient resources and support networks needed to retain housing without ESG assistance. If a client household informs, but is not required to notify the Subgrantee of a change in income or other

circumstances that may affect eligibility, there is no immediate effect on the program participant's eligibility and assistance can continue at the discretion of the Subgrantee until the next required re-evaluation. There is no HUD or OHCS requirement that the client notify the Subgrantee of changes to income prior to the required re-evaluations as specified above.

Targeting and Providing Essential Services Related to Street Outreach

Subgrantees are required to target unsheltered homeless individuals and/or families whose primary nighttime residence is a public or private place not meant for human habitation. It is recommended that preference be given to those special populations who are most vulnerable to being harmed by living in unsafe and unprotected places, i.e. victims of domestic and other forms of violence, youth, families with children, disabled, elderly, etc.

Engagement activities must include an initial assessment of needs and eligibility in order to prioritize the type and source of assistance required with safety and urgent health needs being the highest priority. Emergency health services, including mental health, can be funded with ESG only to the documented extent that other non-ESG funded appropriate health services are inaccessible or unavailable within the service area. Based on need and assessment, qualifying individuals and/or families will be offered essential services beyond emergency health and other crisis intervention assistance that include case management, transportation, and housing stabilization. Whenever feasible, rapid re-housing will be a priority over the provision or referral to emergency shelter or transitional housing.

Emergency Shelter Operations

Admission
Subgrantees are required to have standardized screening and intake criteria in writing for determining eligibility for admission to emergency shelter. The criteria must be in compliance with Fair Housing Law and cannot force involuntary family separation by denying family admission based on the age of a child less than 18 years. The admission process requires an initial assessment to determine the homeless status of the applicant based on HUD's four categorical definitions of homeless (24 CFR 576.2) and meeting other Subgrantee determined eligibility criteria. The assessment process and tools must meet the service area's Continuum of Care centralized or coordinated assessment requirements (24 CFR 576.400(d) once developed.

Diversion from Shelter
Based on screening results, individuals and families should be diverted when appropriate to the most stable housing available including supportive or subsidized permanent housing using the Housing First or Rapid Re-housing service models.

Essential Services and Referral
Emergency shelter participants must have access to essential services either through direct service delivery by the Subgrantee 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; legal services; life skills training; mental health services; substance abuse treatment services; transportation; services for special populations and mainstream income and health benefits where appropriate.

Length of Stay and Discharge
Provision of essential services and shelter must be available for homeless individuals and families for at least the time period during which the ESG funds are provided. Limitations on individual and family shelter stays, if any, must be identified in writing in the Subgrantees' policies and procedures governing shelter operations.

Safety and Accommodations for Special Populations
Any shelter facility that receives ESG assistance for conversion, major rehabilitation, renovation or operations is required to meet all federal, state and local government safety, sanitation and accessibility standards including compliance with the safety, sanitation and privacy requirements contained in 24 CFR 576.403.

Subgrantees are required to develop and implement written procedures and communication tools/materials that ensure persons of any particular race, color, ethnicity, religion, sex, age, national origin, familial status, or disability who may qualify for shelter and essential services are aware of and have access to such facilities and assistance. Reasonable accommodations for persons with disabilities must be available in order to ensure disabled participants have an equal opportunity to utilize the shelter and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

Subgrantees are also required to have written procedures in place that ensure access to shelter facilities, assistance and services for limited English proficiency (LEP) persons. It is highly recommended that Subgrantees develop and implement an agency Language Access Plan following guidelines provided in the Fair Housing Guide for Shelter and Transitional Housing Providers which can be accessed at www.fhco.org or HUD guidelines located at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq.

Domestic violence victims and other persons in need of victim services must have access to a safe setting and have their identity protected. Subgrantees are required to implement procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention, treatment or other services. Subgrantees must also certify that the

address of a family/individual violence shelter will not be made public without permission of the shelter agency.

Subgrantee emergency shelter policies and procedures must:

- Prohibit disclosing personally identifying victim information to any third party without consent of the victim;
- Ensure victim consent is reasonably time-limited, written and specific as to who information will be shared;
- Identify and utilize an alternative HMIS to collect program data that will prevent the disclosure of personally identifying victim information; and
- Include confidentiality policies and procedures that require staff to refrain from discussing client information in public and ensure client records are secure and only accessible to authorized staff.

Assessing, Prioritizing and Reassessing Needs for Essential Services Related to Shelter Essential Services

Subgrantees are required to have a written standard assessment process and tool(s) that are applied to all eligible recipients of shelter essential services. Prioritization for services must align with service area homeless and/or community needs assessment plans. When developed, Subgrantees are required to comply with their services area(s) Continuum of Care assessment and prioritization requirements (576.400(d), including verifying and documenting eligibility.

Shelter essential services include: case management; child care; education services; employment assistance and job training; outpatient health services; legal services; life skills training; mental health services; substance abuse treatment services; transportation; and services for special populations. Provision of services should be determined based on client need and in alignment with Subgrantee's targeted populations.

Provision of essential services and shelter must be available to shelter residents for at least the time period during which the ESG funds are provided. Services do not need to be limited to a particular site as long as the site serves the same categories and types of homeless originally provided with essential services or serves homeless persons in the same service area where the Subgrantee originally provided the services.

Coordination with Homeless and Mainstream Providers

The state's Continuums of Care are community-based homeless assistance program planning networks whose responsibilities include the promotion of access to and effective utilization of homeless and mainstream programs by the homeless. Subgrantees are required to be active members of their respective COC and contribute to the identification and coordination of

resources that will promote and increase the efficiency and effectiveness of the community's homeless system.

Subgrantees must coordinate and integrate, to the extent possible, their ESG-funded assistance with other programs serving homeless and at-risk of homelessness people within their service area (refer to 24 CFR 576.400). Documentation of such coordination will minimally include written COC verification of review and support of the Subgrantee's plan for utilizing ESG funds as part of the Subgrantee's biennial funding application to the state.

Determining and Prioritizing Eligibility for Homeless Prevention and Rapid Re-housing Assistance

Determination of eligibility for homeless prevention requires an in-person assessment (in compliance with COC coordinated/centralized assessment procedures when established) to verify that applicants meet HUD's categorical definition for imminent risk of homelessness, homeless under other federal statutes, fleeing/attempting to flee domestic violence, or at-risk of homelessness **and** have an annual income below 30% of area median income. Homeless status and income eligibility must be documented in client files through third-party verification unless written justification is provided showing that due diligence was conducted substantiating that third-party was not available/accessible. Additionally, the assessment must indicate that prevention assistance would likely allow the applicant to regain stability in their current permanent housing or access other permanent housing and achieve stability.

Prioritization for homeless prevention assistance must comply with Continuum of Care standards once developed. Minimally, prioritization should align with vulnerable homeless and at-risk of homelessness populations identified in Subgrantee's service area homeless plans and/or community assessment(s).

Determination of eligibility for rapid re-housing requires an initial assessment to verify that clients meet HUD's categorical definition for literally homeless or fleeing/attempting to flee domestic violence and are literally homeless. Homeless status must be documented in client files in accordance with HUD documentation standards with preference given to third-party verification where available.

Prioritization for rapid re-housing must comply with Continuum of Care standards once developed and be supported by Subgrantee service area homeless plans and/or community assessment data. When appropriate, local prioritization should also align with HUD's homeless strategic plan goals for ending chronic homelessness, homelessness among Veterans, and families with children and youth homelessness.

Determining Client's Share of Rent and Utility Costs

Subgrantees must comply with existing Continuum of Care standards once developed for determining client's required share of rent and utility costs. State minimum standards require that whatever rent assistance model is chosen must be consistently implemented for all households within each ESG funded program. Acceptable models include a client flat rate (specific dollar amount) contribution, percent of gross household income (typically not to exceed 30%) or a graduated client share over a fixed time at intervals predetermined by the Subgrantee and communicated in advance to the client. Subgrantees can choose to not require any client contribution toward rent or utility costs unless their Continuum of Care standards require such contribution.

Utility assistance is limited to 24 months within a 3-year period and can be used to pay the cost of utility deposits, utility arrears, and gas, electric, water and sewage services. Assistance can only be provided if the utility account is in the name of a member of the client household or there is documented proof of household responsibility for utility payments. Utility arrears assistance for homeless prevention requires a shut off notice and for rapid re-housing must result in utilities being turned on at the new permanent housing location. The client's share of the utility costs, in the absence of COC standards, is at the discretion of the Subgrantee who is encouraged to assist clients in accessing energy assistance programs for which they are eligible as a first option in providing utility assistance. It is recommended that utility deposits be returned to households when feasible.

Determination of Duration and Amount of Rental Assistance

The duration of rental assistance is limited to twenty-four months within a 3-year time period. Short-term assistance can be provided up to three (3) months and medium-term assistance is limited to twenty-four (24) months. The amount of rent assistance provided must be the least amount needed to stabilize clients in their permanent housing. Subgrantees have the discretion to further set a maximum number of months that a client may receive rental assistance and the maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for all households within each ESG funded program, incorporated into the Subgrantee's ESG policies and procedures and communicated in advance to eligible clients.

Rent arrearage assistance is defined as: past due rent owed to a current or previous landlord. If arrears are owed to a previous landlord, these arrears may be paid, but only when there is documented evidence that payment of those arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing. Payment of arrears is restricted to a one-time payment for up to 6 months.

ATTACHMENT T:
Needs Assessment and Market Analysis Data Sources

1. Centers for Disease Control and Prevention. (2011). *The National Intimate Partner and Sexual Violence Survey, 2010 Summary Report*. Retrieved from http://www.cdc.gov/violenceprevention/pdf/nisvs_report2010-a.pdf

2. National Low Income Housing Coalition. (2015, March). *Housing Spotlight: Affordable Housing is Nowhere to be Found for Millions*. Retrieved from http://nlihc.org/article/housing-spotlight-volume-5-issue-1

3. National Low Income Housing Coalition. (2015, May). *Out of Reach 2015: Low Wages & High Rents Lock Renters Out*. Retrieved from http://nlihc.org/oor

4. Oregon Department of Corrections. (2011, January). *Revocation from Post-Prison Supervision*. Retrieved from http://www.oregon.gov/doc/RESRCH/docs/revocation_final_draft.pdf

5. Oregon Department of Corrections. (2015). *Issue Brief: Quick Facts*. Retrieved from http://www.oregon.gov/doc/GECO/docs/pdf/IB-53-Quick%20Facts.pdf

6. Oregon Department of Corrections. (2015). *Number of DOC Releases by County, 2012-2014.* Retrieved from staff at the Oregon Department of Corrections.

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8. Oregon Department of Human Services. (2015*). Seniors and People with Disabilities: Developmental Disabilities Data Book*, *2011-2014*. Retrieved from http://www.oregon.gov/dhs/DD/Pages/data-reports.aspx

9. Oregon Department of Human Services. (2015). *SFY2014 Unique Persons by County and Primary Race: Aging and People with Disabilities Program* [Data File]. Retrieved from staff at the Department of Human Services.

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11. Oregon Health Authority. (2013, January). *Epidemiological Data on Alcohol, Drugs and Mental Health, 2000 to 2012.* OHCS staff compiled data from each county report to get statewide numbers. Retrieved from http://www.oregon.gov/oha/amh/sew/Pages/county-reports.aspx

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13. Oregon Health Authority. (2015). *Count of Clients Discharged from Mental Health Services by County of Provider, 2012-2014*. Retrieved from staff at the Oregon Health Authority.

14. Oregon Health Authority. (2015). *Count of Clients Discharged from Substance Use Treatment by County of Provider, 2012-2014*. Retrieved from staff at the Oregon Health Authority.

15. Oregon Health Authority. (2015). *HIV/AIDS Reports and Data.* Retrieved from https://public.health.oregon.gov/DiseasesConditions/CommunicableDisease/DiseaseSurveillanceData/HIVData/Pages/EpiProfile.aspx

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17. Oregon Housing and Community Services. (2015). January 2015 Point-in-time count data retrieved from each Oregon Continuum of Care.

18. Oregon Office of Economic Analysis (2015, September). *Oregon Economic and Revenue Forecast.* Retrieved from http://www.oregon.gov/das/oea/pages/economic.aspx

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20. U.S. Census Bureau. (2014). 2009-2013 American Community Survey 5-year estimates. Retrieved from http://factfinder2.census.gov

21. U.S. Department of Housing and Urban Development. (2011). *HUD Notice – Estimated Median Family Incomes for Fiscal Year 2011.* Retrieved from http://www.huduser.gov/portal/datasets/il/il11/medians2011_sig.pdf

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23. U.S. Department of Housing and Urban Development. (2014*). Multifamily Assistance and Section 8 Contracts Database* [Data file]. Retrieved from http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/exp/mfhdiscl

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ATTACHMENT U:
CDBG Supplemental Information – Anticipated Resources Table 73

CDBG funds would be utilized to fund Units of General Local Government CDBG-eligible projects. A portion of the resources, not to exceed 3% of the total base allocation, plus $100,000 (24 CFR 570.489(a)), will be reserved for the state administration and technical assistance funds. OBDD will provide additional funds as match to the CDBG allocation fulfilling the one-to-one matching requirements of the CDBG Program after the first $100,000. The state anticipates less than $3,000 per year in PI and an estimated $500,000 per year in recaptured funds. The Prior Year Resources (PRR) are for recaptured funds; yearly allocations are fully awarded within the required program timeframe. Any PI and PRR will be reallocated in accordance with the MOD.

Over the past five years, the State has seen a decrease in the overall annual allocation in CDBG funds by approximately 2% per year. Therefore we have reduced the potential funds available for the remaining years of the Consolidated Plan to reflect the reduced allocation. If annual allocations remain the same or increase, additional projects will be awarded based on targeted percentages reflected.

National Disaster Resilience Competition – The State of Oregon has been invited to participate in Phase 2 of the National Disaster Resilience Competition. Within the state proposal there are two demonstration communities, City of Brookings and City of Reedsport, for which the state will utilize the award. The application period will conclude October 2015, and it is currently unknown if the proposal will be awarded nor the amount of the award until the end of the application review process; the end of December 2015.

ATTACHMENT V:
Oregon Housing and Community Services' Residential Anti-displacement and Relocation Assistance Plan

Uniform Relocation Act
The HOME Program is subject to the Uniform Relocation and Real Property Acquisition Act (URA). Under the URA, all persons (families, individuals, businesses, nonprofit organizations and farms) displaced (forced to move) as a direct result of rehabilitation, demolition or acquisition (privately undertaken or public) for a HUD-assisted project are entitled to relocation benefits.

OHCS Anti-displacement and Relocation Assistance Policy: OHCS encourages applicants to pursue only those projects that will not permanently displace tenants, and reserves the right to prioritize funding to projects with no permanent relocation and/or reasonable temporary relocation. To the extent feasible, the HOME assisted projects' Relocation Plan must give residential tenants an opportunity to lease and occupy the same or another suitable, decent, safe, sanitary, and affordable dwelling unit in the building/complex upon completion of the project. HOME recipients are encouraged to stage rehabilitation work to allow tenants to remain in their units as long as possible by working with empty units first.

Displacement not only includes the physical displacement of persons, it also includes "economic displacement" which means that as a direct result of the project, the existing tenant is not able to afford a new, higher rent for their current unit. If a HOME applicant intends to rehabilitate an occupied property, the issue of economic displacement needs to be of particular concern. Tenants who are economically displayed qualify for relocation benefits, so HOME recipients must modify future rent increase to ensure affordability.

URA Application Requirements:

1. Existing Tenant Survey: This survey identifies who currently occupies the property and potential URA problems. Survey all residential and commercial tenants. Use the Existing Tenant Survey form provided in the NOFA.

2. Develop a Relocation Plan: Provide a description of how the rehabilitation will impact existing tenants:
   - Will any existing tenants be ineligible to remain in the project and be required to move permanently?
   - Will any tenants need to move temporarily during the rehab?
   - How will temporary moves be accomplished?
   - Does overcrowding exist in any of the units?
   - Is there a way to phase the rehabilitation work to avoid moving tenants?
   - Are there tenants who need specific accommodations such as accessible units?

3. General Information Notice: A General Information Notice (GIN) must be sent to all tenants (residential and commercial) prior to submission of a HOME application. The GIN must be sent certified receipt requested or hand-delivered, and a delivery receipt obtained. Copies of sample GINs are provided in the NOFA. There are several different types of GINs: 1) intended for residential tenants who will be permitted to reside in the project after completion; 2) intended for residential tenants who will be required to move or who may be displaced because of the project; and 3) sent to commercial tenants. OHCS HOME Program staff can provide guidance.

4. "Relocation Assistance to Persons Displaced from Their Homes": Provide a copy of this HUD brochure to all residential tenants along with the General Information Notice. A copy of the brochure can be found in the NOFA. Contact OHCS for the appropriate brochure if the tenant in the property is a business in order to provide the business brochure with the General Information Notice.

5. Permission to Send Notices: Advise the owner / seller of the property of the noticing requirements for all tenants. Obtain agreement from the property owner that tenants will not be required to move, except for cause.

URA Requirements Subsequent to the Application for HOME Funding

1. New Tenants: Each new prospective tenant must receive a notice informing about the rehabilitation project before signing a lease or rental agreement. The tenant must sign a form acknowledging receipt of this notice. Failure to issue this notice can be very costly. A copy of the Notice to Prospective Tenants can be found in the NOFA.

2. Tenants Who Move: Each tenant who moves after the HOME application submission date must document the reason for moving in a Vacate Notice. A tenant may be evicted for cause, if properly documented, but not in order to avoid paying relocation assistance.

Requirements on Date of Execution of HOME Grant Agreement

1. Update Tenant Survey: Update the tenant survey to reflect tenants who have moved; new tenants, and other new information.

2. Notice of Displacement/Non-Displacement: As soon as possible after the date the HOME Grant Agreement is executed, a notice must be issued to each tenant who was in occupancy on the date the HOME application was submitted. The notice must either contain a specific offer of a suitable, affordable unit in the project, or provide a Notice of Displacement, if the tenant will be permanently displaced. The notice informs the tenant of their eligibility of any relocation benefits.

3. Temporary Moves: Arrange for temporary moves if necessary. Document temporary move notices and document all temporary moving costs. Tenants must receive reasonable advance written notice, notified of the terms and conditions of the move, and reimbursed for all reasonable out-of-pocket expenses.

4. Lead-Based Paint Disclosure forms: This disclosure form is in effect if the rental units were constructed prior to 1978.

URA – HUD's Seven Things to Know Now

1. HUD cares about this. The federal government takes the rights of tenants in rental rehabilitation properties very seriously.
2. So should we. Recipients and developers who are working on HUD-funded projects need to understand that the Uniform Relocation Act (URA) is basic consumer legislation that addresses "fairness" issues. Tenants whose living circumstances are changed by a project, either by higher rents or involuntary moves, should and will be protected and compensated.
3. The relocation rules are not all one-sided. The landlord can take actions to control costs and prevent displacement. These actions include informing tenants about the project, treating them fairly during the process, staging work if it is feasible and keeping their rents affordable. Tenants must continue to pay rent and comply with the lease during the process.
4. Mistakes can be costly. Planning for relocation and tenant concerns is critical because tenants can take actions that cause financial liability for the sponsor/developer. Displaced tenants are entitled to 42 or 60 months of rental assistance, depending on the situation. Many claims exceed $40,000 per household. Although some claims are unavoidable, there is no reason to incur these costs by failure to follow the rules.
5. Planning is critical. Thoughtfully consider relocation concerns early in the process so decisions about rents, construction timing and project feasibility can be considered before they are a crisis.
6. Cooperation is essential. All parties involved in the project must "do the right thing" in to make the process work.
7. There are five basic requirements for tenants in rental rehabilitation projects:
    - Give timely information to tenants about the pending application.
    - If HOME funding is approved, advise the tenants about any changes that could impact them. Without proper notification, they could claim they were displaced even if that was not the recipient's intension.
    - If displacement occurs, offer a comparable replacement unit that is decent, safe and sanitary. Owners must pay Moving expenses.
    - Tenants cannot be required to move without a 90 days' notice.
    - Offer tenants who will stay in the property after the work is completed, a suitable unit that is decent, safe, and sanitary, and affordable to them.

One-for-One Replacement

HOME funds may not be used to reduce the number of affordable housing units available in a community. All affordable occupied or vacant-occupiable dwelling units that are demolished or converted to a use other than affordable housing (including conversion to transitional housing) must be replaced on a bedroom-by-bedroom basis.

In addition to assuring replacement housing will be provided, there are specific public disclosure and submission requirements that must be met as a condition of the funding reservation prior to demolition of the structures and prior to the award of HOME funding.

If a project receives HOME funding, the recipient must submit the following as a condition of funding:

- A written description of the proposed project;
- The address, number of bedrooms and map location of the housing to be demolished;
- A time schedule for the commencement and completion of the demolition;

- The address, number of bedrooms and map location of the replacement housing to be provided. Replacement housing must be located in the same geographic area or neighborhood;
- The source of funding and schedule for the proposed replacement housing;
- The basis for concluding the replacement housing will remain lower-income housing for at least 10 years from the date of initial occupancy; and
- Information demonstrating that the replacement units are sufficient in number and size to house the same number of occupants that could have been housed in the converted or demolished unit.
- After OHCS approval of the packet, OHCS will provide recipients instructions to publish a public notice in a newspaper of general circulation. This notice will identify the replacement plan for the existing structures. This newspaper notice should not be located in the legal notice section, but rather as a public notice or a display ad. Recipients must submit a tear sheet of the published notice to OHCS immediately upon publication. OHCS will reimburse publication costs.

ATTACHMENT W:

Supplemental Information for Section SP-40 Institutional Delivery Structure – Organizational Analysis

CDBG - There are a wide range of organizations, both public and private, involved in providing all varieties of non-housing community development and economic development assistance funded by CDBG Program. The non-entitlement cities and counties are ultimately the key partners in carrying out the non-housing community development and economic development components of the consolidated Plan. The local non-entitlement cities and counties assisted in identifying needs from the funding to the implementation tools and the CDBG program is indeed designed to accommodate their needs and support their ability to navigate through the CDBG requirements from award to completion of the project. OBDD-IFA strives to assist them in building the capacity by providing technical and planning assistance.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Oregon Business Development Department-Infrastructure Finance Authority	Governmental	Administer CDBG program, provide implementation tools, monitor and provide guidance to ensure successful CDBG and federally complied program.	Non-entitlement areas statewide

Table 1 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

CDBG Capacity Analysis:

City Capacity Analysis – Due to the intricateness of CDBG program requirements, smaller non-entitlement cities struggle in the development and retention of local capacity to administer CDBG funded projects and are considered high risk communities. Due to the sheer number of cities within this "high risk" category it increases the complexity of administering the CDBG program state-wide.

County Analysis – The 33 counties within the geographic area served by the states non-entitlement CDBG program, have a larger institutional structure and generally have the ability to successfully administer CDBG grants. Counties do experience unique difficulties when they are the applicant on behalf of non-profit association or district which lacks capacity. The unique difficulties are presented below.

Non-Profit Analysis - Oregon funds numerous projects where the City/County is the applicant on behalf of a non-profit organization. Therefore we need to analyze the ability of the non-profits to assist in administering the CDBG grants.

Nationally the non-profit fiscal health situation is severe due to the national economic crisis and Oregon is no exception. The National Council of Nonprofits reports the following:

- **Increasing Demand** - As more families find themselves struggling financially due to unemployment, underemployment and disappearing savings they seek assistance from their local non-profits.
- **Escalating Costs** – The cost to provide the services of each program offered by the non-profit, increases proportionately with demand, along with their own increase in operating costs.
- **Decreasing Revenues** – Corporate donations have dropped dramatically, fees for services have faltered, foundation assets have shrank, Governments have delayed or even stopped paying nonprofits for services that they previously contracted for, and individual giving has decreased.

Due to the three issues identified above many non-profits have had to lay off critical employees, yet the demand for their services escalates and the need to construct more facilities to meet the increased demand exists. However, the non-profit capacity to keep up with day to day program delivery and construct new facilities is nearly non-existent.

The decline in non-profit capacity identified above, coupled with the fact that the focus of the non-profit is the delivery of their programs and not the complex requirements of the CDBG program, cities and counties who are applicants on behalf of these non-profits, experience difficulty. Based on the report, Oregon has observed a decline in non-profit capacity to complete the CDBG funded activities over the last several years. OBDD-IFA has seen some evidence of this as well through delays in project completion and lack of knowledge of CDBG program requirements. As noted above, much of these capacity issues can be linked back to change or reduction in staffing at the non-profit level.

Special District Analysis - Many Oregon counties apply for CDBG funding on behalf of sanitary districts, water districts, water supply authorities and organizations operated on a not-for-profit basis. This section provides a brief overview of the ability of these districts to assist in the administration of these CDBG funded projects.

Sanitary districts, water districts, water supply authorities and organizations operated on a not-for-profit basis, and providing basic water and wastewater service to small rural population pockets located outside incorporated cities. Due to the very nature that the majority of these systems serve a population that is very small 500 or less in population, they are considered "high risk" in terms of capacity, identical to cities with populations of 500 or less. Therefore, when a county is the applicant on behalf of one of these systems not only are they dealing with the complexity of the governing/legal jurisdictional issues encountered in administering a grant that is benefitting and being implemented by an outside government body, which they have no governing authority, they are also dealing with reduced local capacity to implement and complete the funded project.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The CDBG program is statutorily designed to assist high risk populations, and as such creates difficulties by its own nature. To assist in reducing the local capacity gaps identified above, the state allows every grant recipient 10% of the requested grant, up to a maximum of $25,000 per project for grant administration services. These funds can be used by the grant recipient to secure the services of a retained grant administrator.

OBDD-IFA also provides Technical assistance to the assist the cities and counties in navigating the CDBG program requirements through the 10 Regional Coordinators assigned to the different regions throughout the state, from the point of grant award to closeout process along with training opportunities in the regions.

OBDD-IFA also has a mandatory certified sub-grantee program. The certified sub-grantee program is primarily for non-profit organizations who will be assisting recipients of CDBG funding under the housing rehabilitation program activity. OBDD-IFA also has a voluntary certified grant administrators program. While this is not a mandatory requirement at this point in time, grant administrators working with the CDBG program are encouraged to consider becoming a certified grant administrator. Further, OBDD-IFA is assessing the potential to offer the following:

- Development of Regional Professional Capacity – This would require the development of a special training program for existing or new local professional's to develop their skills in the funding agency program requirements and to contract with local cities and counties to provide this service.

- Re-evaluate the need for a mandatory certified grant administrators program.

Attachment X: SF-424s

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☐ New	
☒ Application	☒ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
	FY2016

5a. Federal Entity Identifier:	5b. Federal Award Identifier:
41-001	BC-16-DC-41-001

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Oregon

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
93-0621491	8095795430000

d. Address:

* Street1:	775 Summer Street NE, Ste.200
Street2:	
* City:	Salem
County/Parish:	
* State:	OR: Oregon
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	97301-1280

e. Organizational Unit:

Department Name:	Division Name:
Oregon Business Dev Department	Infrastructure Finance Authori

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Mrs.	* First Name:	Becky
Middle Name:			
* Last Name:	Baxter		
Suffix:			

Title: CDBG Program and Policy Coordinator

Organizational Affiliation:
Oregon Business Development Dept-Infrastructure Finance Auth

* Telephone Number:	503-986-0104	Fax Number:	503-581-5115

* Email: becky.baxter@oregon.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

CFDA 14.228

CFDA Title:

Title I HUD Community Development Block Grant Program - State non-entitlement

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Non-entitlement communities Statewide

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

PY2016 Annual update to Oregon's Consolidated Plan (2016-2020) 2016 Method of Distribution

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 1-6
* b. Program/Project: 1,2,4,5,6

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 01/01/2016
* b. End Date: 12/31/2016

18. Estimated Funding ($):

* a. Federal	12,055,779.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	3,500.00
* g. TOTAL	12,059,279.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on .
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [ ] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	Mr.
* First Name:	Chris
Middle Name:	
* Last Name:	Cummings
Suffix:	
* Title:	OBDD Assistant Director
* Telephone Number:	503-986-0158
Fax Number:	503-581-5115
* Email:	Chris.Cummings@oregon.gov
* Signature of Authorized Representative:	
* Date Signed:	3/7/16

View Burden Statement

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

3. Date Received:	4. Applicant Identifier:
03/01/2016	

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Housing & Community Services, Oregon Department of

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
93-0952117	8095802930000

d. Address:

* Street1:	725 Summer Street NE, Suite B
Street2:	
* City:	Salem
County/Parish:	Marion
* State:	OR: Oregon
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	97301-1266

e. Organizational Unit:

Department Name:	Division Name:
OHCS	Housing Stablization

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:		* First Name:	Vicki
Middle Name:			
* Last Name:	Massey		
Suffix:			

Title: Program Analyst

Organizational Affiliation:
State of Oregon

* Telephone Number:	503-986-2146	Fax Number:	

* Email: vicki.massey@oregon.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grants Program

*** 12. Funding Opportunity Number:**

6

* Title:

Emergency Solutions Grants Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Emergency Solutions Grants Program

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 1-6
* b. Program/Project: 1-5

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 01/01/2016
* b. End Date: 12/01/2016

18. Estimated Funding ($):

* a. Federal	1,773,057.00
* b. Applicant	
* c. State	1,673,057.00
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	3,446,114.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:
* First Name: Margaret
Middle Name:
* Last Name: Van Vliet
Suffix:

* Title: Director, Oregon Housing and Community

* Telephone Number: 503-986-2000
Fax Number:

* Email: margaret.vanvliet@oregon.gov

* Signature of Authorized Representative:
* Date Signed: 3.2.16

View Burden Statement

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☐ New	
☒ Application	☒ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier: E13-DC-41-0001

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Oregon Housing and Community Services

* b. Employer/Taxpayer Identification Number (EIN/TIN): 93-0952117

* c. Organizational DUNS: 8095802930000

d. Address:

* Street1: 715 Summer Street, Suite B
Street2:
* City: Salem
County/Parish: Marion
* State: OR: Oregon
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 97301-1266

e. Organizational Unit:

Department Name: OHCS

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Carole
Middle Name:
* Last Name: Dicksa
Suffix:

Title: HOME Program Manager

Organizational Affiliation: State of Oregon

* Telephone Number: 503-986-2137
Fax Number:

* Email: carole.dicksa@oregon.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership Program (HOME)

*** 12. Funding Opportunity Number:**

6

* Title:

State HOME Investment Partnership Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

The HOME Program makes funding available for multifamily rental housing development and tenant based rental assistance for low and very low income families.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 1-6
* b. Program/Project: 1-5

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 01/01/2016
* b. End Date: 12/31/2016

18. Estimated Funding ($):

* a. Federal	6,312,927.00
* b. Applicant	
* c. State	1,578,232.00
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	7,891,159.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:
* First Name: Margaret
Middle Name:
* Last Name: Van Vliet
Suffix:

* Title: Director

* Telephone Number: 503-986-2000
Fax Number:

* Email: margaret.vanvliet@oregon.gov

* Signature of Authorized Representative:
* Date Signed: 3.2.16

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☐ New	
☒ Application	☒ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:

5a. Federal Entity Identifier:	5b. Federal Award Identifier:
	ORH15-F999

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Oregon Health Authority

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
93-6001752	8781440210000

d. Address:

* Street1:	800 NE Oregon Street
Street2:	Suite 1105
* City:	Portland
County/Parish:	Multnomah
* State:	OR: Oregon
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	97232-2187

e. Organizational Unit:

Department Name:	Division Name:
Center for Public Health Pract	Public Health Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:		* First Name:	Veda
Middle Name:			
* Last Name:	Latin-Green		
Suffix:			

Title: HIV/STD/TB Section Manager

Organizational Affiliation:

* Telephone Number:	971-673-0153	Fax Number:	971-673-0178

* Email: veda.latin@state.or.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

HUD

11. Catalog of Federal Domestic Assistance Number:

14.241

CFDA Title:

Housing Opportunities for Persons with AIDS

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Assist people living with HIV/AIDS in creating a continuum of stable, sustainable housing.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 3
* b. Program/Project: 1-5

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 01/01/2016
* b. End Date: 12/31/2016

18. Estimated Funding ($):

* a. Federal	387,474.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	387,474.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	
* First Name:	Veda
Middle Name:	
* Last Name:	Latin-Green
Suffix:	
* Title:	HIV/STD/TB Section Manager
* Telephone Number:	971-673-0153
Fax Number:	971-673-0178
* Email:	veda.latin@state.or.us
* Signature of Authorized Representative:	Veda Latin Green
* Date Signed:	2-25-16

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

*** 1. Type of Submission:**
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

*** 2. Type of Application:**
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Oregon Housing and Community Services

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS: 8095802930000

d. Address:

* Street1: 715 Summer Street, Suit B
Street2:
* City: Salem
County/Parish:
* State: OR: Oregon
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 97301-1266

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Carole
Middle Name:
* Last Name: Dicksa
Suffix:

Title:

Organizational Affiliation:

* Telephone Number: 503-986-2137
Fax Number:

* Email: carole.dicksa@oregon.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

*** 12. Funding Opportunity Number:**

* Title:

Housing Trust Fund

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Funding made availalbe for development of multifamily rental housing

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 1 - 5

* b. Program/Project: 1 - 5

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding ($):

* a. Federal	3,000,000
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	
* First Name:	Claire
Middle Name:	
* Last Name:	Seguin
Suffix:	
* Title:	Interim Director
* Telephone Number:	503-986-2000
Fax Number:	
* Email:	claire.seguin@oregon.gov
* Signature of Authorized Representative:	
* Date Signed:	

Attachment Y: Certifications

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts

under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, HTF, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

8/2/16
Date

Interim Director
Title

Specific CDBG Certifications

The State certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments -- It has or will comply with the following:

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;

2. It engages in or will engage in planning for community development activities;

3. It provides or will provide technical assistance to units of local government in connection with community development programs; and

4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) ~~199~~, 2015, and 2017 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. Special Assessments. The state will require units of general local government that receive CDBG funds to certify to the following:

   It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

   However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

   It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official

4-12-16
Date

Asst. Director
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Appropriate Financial Assistance -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official

3.8.15
Date

Director, OHCS
Title

ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

Signature/Authorized Official

3.8.15
Date

Director, OHCS
Title

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts

under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

3-4-16
Date

HST Section Manager
Title

HOPWA Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,

2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

3-4-16
Date

HST Section Manager
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

ATTACHMENT Z:

Oregon Housing and Community Services
National Housing Trust Fund
2016 Allocation Plan

Purpose of the Program

The National Housing Trust Fund (HTF) is a new federal affordable housing production program that will complement existing federal, state, and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income (ELI) people and families, including those experiencing homelessness.

Statutory Background

The HTF was established under Title I of the Housing and Economic Recovery Act of 2008 (HERA), Section 1131 (Public Law 110-289). Section 1131 of HERA amended the Federal Housing Enterprises Financial Safety and Soundness Act of 1992 (12 U.S.C. 4501 et seq.) (Act) to add a new section 1337, entitled "Affordable Housing Allocation" and a new section 1338, entitled "Housing Trust Fund." 2016 is the first year funds from the HTF are allocated.

State of Oregon Receipt of HTF Funds

Oregon's 2016 allocation from the HTF is $3 million. Amounts for subsequent years are dependent on a formula distribution.

Implementation Timeline

Due to the allocation schedule, the 2016 HTF allocation will be included in both the 2017 9% LIHTC NOFA and 2017 HOME NOFA anticipated to be issued in January 2017. HTF received in subsequent years will generally be allocated through the OHCS annual NOFA process.

HUD Allocation Plan Requirements

Consistent with the HTF Interim Rule (24 CFR Part 93), the regulations for the Consolidated Plan are applied to the HTF program. As a result, the HTF allocation plan must be consistent with Oregon's Citizen Participation Plan, Strategic Plan, and Annual Action Plan. OHCS must also submit the HTF Allocation Plan, for review and approval. The HTF Allocation Plan must describe how HTF funds will be distributed, including how priority housing needs will be addressed, what activities may be undertaken with HTF funding, and how recipients and projects will be selected. This HTF Allocation Plan is designed to meet the above outlined requirements.

Geographic Priorities

OHCS is committed to ensuring public resources are invested in a way that is responsive to the diversity of low-income housing needs and the need for economic development around the state. Therefore, HTF

funding will be allocated to eligible multifamily rental projects, on a statewide basis, through the established competitive NOFA process currently used by OHCS to allocate LIHTC and HOME funds.

Priority Needs

In Oregon's 2016-2020 Consolidated Plan, all of the listed priority needs are ranked with a high priority. The priority below is relevant to the HTF allocation. The population served column is prescribed by HUD to verify that target populations designated by HUD are being served during the plan period.

Priority Needs with Description and Basis for Priority

Priority Need/Description	Priority: High Low	Population Served
Affordable Housing- Oregon needs more affordable units, especially units available to extremely low-income and low-income residents. Partnerships with developers to increase existing rental units available for low-income renters and incentives such as rent guarantees are key elements to success.	**High**	**Extremely Low-income, Low Income, Moderate, Income, Large Families, Families with Children Elderly, Rural Chronic Homelessness Individuals, Families with Children, People with Mental Illness or Chronic Substance Abuse, Veterans, Victims of Domestic Violence, Unaccompanied Youth, Elderly, Frail Elderly, People with Mental Disabilities, People with Physical Disabilities, People with Developmental Disabilities, People with Alcohol or Other Addictions People with HIV/AIDS and their Families Victims of Domestic Violence**

Influence of Market Conditions

Housing production has not kept pace with demand. The foreclosure and housing crisis has increased the numbers of persons competing for housing at every income level. Skyrocketing rental increases and record low vacancy rates indicate a high level of need for new unit production, especially for affordable rental housing for low income and extremely low income households.

Rehabilitation of existing units is a cost effective way to insure that units remain affordable to low-income and extremely low-income renters. Rehabilitation extends the useful life of existing units, and improves the quality of the homes available to low and extremely low-income renters. There are a number of subsidized units with expiring subsidy contracts at risk of transitioning to market rate rentals. As the demand for affordable rental units continues to increase, the loss of these units will place additional households in need of assistance.

OHCS has determined that creating and preserving multifamily rental units affordable to house extremely low-income tenants is the most cost effective and most efficient use of the HTF at this time.

HTF Affordable Units

Because the overall 2016 HTF allocation is less than $1 billion dollars nationwide, HUD's regulations require all HTF units to be restricted to serve ELI households where rents are established at 30 percent of area median income or less. HTF units will most likely be incorporated into newly-constructed or rehabilitated (including preservation) multifamily housing projects receiving other funding resources from OHCS.

Anticipated / Expected Resources

Assuming funding levels remain constant throughout the 2016-2020 Consolidated Plan period Oregon will receive the following HTF funds:

- National Housing Trust Fund $15,000,000 (based on $3,000,000 per year for five years)

There is no match requirement for the HTF funding.

Goals Summary

The goal below, found in Oregon's 2016-2020 Consolidate Plan, identifies the estimated program allocation, and the number of units to be constructed or rehabilitated over the Consolidated Plan period.

Goal #	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Five Year Goal Outcome Indicator
11	Fund Affordable Housing	2016	2020	Affordable Housing	HOME = Balance of State HTF = Statewide	Accessible Housing Affordable Housing Rehabilitation and Preservation of Units	HOME: $25,823,650 HTF: $15,000,000	Rental units constructed: 300 Housing Units Rental units rehabilitated: 200 Household Housing Units Accessible Units: Minimum of five percent of units built

Goal Description

11	Goal Name	HTF- Fund affordable housing
	Goal Description	Oregon HTF funds will be used to finance the development of affordable housing for low-income households. Funds can be used for new construction, acquisition, and rehabilitation.

The HTF funds will be used serve 60-75 ELI households each year over the plan period.

Allocation Priorities

This is the first year the State of Oregon has received an allocation of HTF funding. OHCS HTF allocation priorities will be similar to those of the HOME program. HTF funds will be used to finance the development of multifamily rental housing statewide.

HTF is a federal affordable housing production program that will complement existing federal, state, and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income families and persons, including those experiencing homelessness. These new funds will be allocated through the established competitive NOFA process currently utilized by OHCS to allocate LIHTC and HOME funds. Applicants for HTF funds will be required to provide a description of the proposed project to demonstrate that it conforms to 24 CFR Part 92.200.

OHCS will implement a funding preference for projects with site-based rental assistance. If no site based rental assistance is available, the applicants must demonstrate financial feasibility and a sustainable project cash-flow with rents on the designated HTF units set at 30 percent of area MFI to be eligible for HTF funds.

Method of Distribution

HTF funds for multifamily rental housing development will be distributed annually through the OHCS Notice of Funding Availability (NOFA). Projects are selected based on criteria published in the NOFA, as well as the LIHTC Qualified Allocation Plan (QAP). The competitive selection criteria include the following factors:

1. Need 20%
    a. Target Population: percentage of units dedicated to families with children and special needs populations such as veterans, elderly, persons with disabilities, previously incarcerated, survivors of domestic violence;
    b. Severity of Need: population growth rate, rental housing age, severe housing burden, housing gap (difference between the supply of affordable housing and population in need of housing); and
    c. Equitably Served Geography: need for affordable housing vs. actual distribution of affordable housing in a geographic area.
2. Impact 40%
    a. Plan Alignment: connection between the proposed project and established local, regional, and/or state published housing plan documents;
    b. Leverage: committed leverage of local or state funding;

c. State Initiative: way in which the project will advance long-term statewide human service policy priorities;

d. Resident Services: resident services delivery which includes outcome tracking;

e. Affirmative Fair Housing Marketing: proposed marketing plan achieves above and beyond the elements required by HUD;

f. Location Efficiency: including walk-ability, food access, medical access, public transit, education opportunities; and

g. Location Preferences: vulnerable gentrification areas and opportunity areas.

3. Preferences 10%

   a. Serving Lowest Incomes: income restrictions on qualified units, dedicated site based rental assistance; and

   b. Federal Preferences: energy efficiency.

4. Financial Viability 15%

   a. Development Pro forma Review: realistic and available resources, relocation plan and costs identified, developer fee within OHCS limits, valid construction costs;

   b. Operating Pro forma Review: affordable rents, debt coverage ration within OHCS guidelines, cash flow within OHCS guidelines, acceptable vacancy rate, income inflation factor less than expenses inflation factor; and

   c. Reasonable Request and Demonstrated Need for Resources: well documented and explained construction costs, CNA if rehabilitation project, construction estimates agree with pro forma, contractor overhead, profit, and general conditions within OHCS limit.

5. Recipient Capacity 15%

   a. Owner, Sponsor, Management Performance: OHCS Portfolio performance review;

   b. MBE/WBE: plan to engage MBE/WBE contractors and subcontractors during development and construction; and

   c. Readiness to Proceed: demonstrated ability to begin construction within 12 months, ability to secure funding commitment for planned project funds, adequate schedule.

Project Specific Requirements

OHCS generally requires a 60 year affordability period for multifamily rental housing projects. However, due to the extremely low-income requirement for HTF, tenants must be at or below 30 percent of area MFI, OHCS' Housing Stability Council approved a 30-year affordability period for HTF projects. OHCS will seek to incentivize project sponsors to pledge an increased affordability period through the scoring criteria for the HTF NOFA.

Non-federal match is not a requirement of the HTF program. HTF funds will be leveraged with other federal and state funds. Funds from the HTF allocation will be made available through OHCS' annual LIHTC and HOME NOFA, providing an additional source of funding for multifamily rental housing projects. The number of HTF designated units will be calculated using the HOME allocation formula. HTF funds will be offered in the form of a grant to eligible applicants.

Rental housing owners and developers will be allowed to give preference to a specific population in accordance with 24 CFR Part 93.303(d)(3) if it is proposed, and the need justified in the application for funding.

HTF recipients will be required to meet program deadlines similar to those required in the HOME Program for spending HTF funds and completing HTF funded projects..

Maximum Per-unit Development Subsidy Limits

OHCS will utilize per-unit subsidy limits that are "reasonable" based on the actual costs of developing affordable housing in Oregon and are adjusted for the number of bedrooms in the units and the geographic location of the project. OHCS will utilize the same per unit limits for HTF as are used for LIHTC and HOME programs.

The cost limits below, based on unit size, were established using a five year history of OHCS funded projects.

2016 Oregon LIMIT cost / unit	**Studio**	**1 Bedroom**	**2 Bedroom**	**3 Bedroom**	**4 Bedroom**
Urban*	$200,000	$240,000	$280,000	$320,000	$355,000
Balance of State	$155,000	$190,000	$235,000	$270,000	$300,000

*Urban definitions would apply in the Metro Region and to any project where the project meets two of the urban project criteria:

- more than four (4) stories,
- elevator,
- required structured parking, and
- located on urban infill site).

HTF Property Standards

HTF assisted housing is required to meet OHCS design and construction standards as defined in the OHCS Project Development Manual, which can be accessed on the OHCS website. In addition, OHCS developed HTF Rehabilation Standards, which can be reviewed in Attachement AA to the 2016-2020 Consolidated Plan Amendment.

New Construction Projects: In addition to OHCS design and construction standards, HTF assisted new construction projects must meet all State and local residential building codes, as applicable, or in the absence of a State or local building code, the International Residential Code or International Building Code (as applicable to the type of housing) of the International Code Council. All newly constructed housing must meet the current edition of the Model Energy Code published by the Council of American Building Officials.

Rehabilitation Projects: A Capital Needs Assessment is required for all multifamily rental projects to determine a scope of work that addresses the following: health and safety, habitability and functionality, useful life or major systems, lead-based paint, accessibility, and other improvements. In addition, OHCS has established rehabilitation standards (see OHCS Project Development Manual) for HTF assisted housing rehabilitation activities that must be met upon project completion.

Acquisition Only Projects: Existing rental housing to be acquired with HTF assistance that is newly constructed or rehabilitated (less than 12 months before application for HTF funding) must meet the HTF Program Property Standards. An inspection to determine eligibility for HTF funding will be conducted within 90 days of a reservation for HTF assistance.

Accessibility: HTF assisted housing must meet the accessibility requirements of 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601-3619).

Disaster Mitigation: Where relevant, the housing must be constructed and/or rehabilitated to mitigate the impact of potential disasters (e.g., earthquakes, hurricanes, flooding, and wildfires), in accordance with State and local codes, ordinances, or such other requirements as HUD may establish.

Uniform Physical Condition Standard (UPCS): Upon completion, HTF assisted projects and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703.

Summary of Lead-Based Paint Regulations for Rehabilitation Projects

HUD has issued regulations to protect young children under the age of six from lead-based paint hazards in housing that is financially assisted, or sold, by the federal government. The regulation addresses the requirements for notification, evaluation and reduction of lead-based paint hazards in federally assisted properties. The new regulation appears within title 24 of the Code of Federal Regulations (24 CFR 35).

Notices That Must Be Issued To Occupants of Properties: New regulations require four types of notices:

- Distribute lead hazard information pamphlet to all existing tenants and all new tenants. Tenants must sign last page verifying receipt of pamphlet (current EPA/HUD notice still in effect).
- Disclose all known lead hazards that exist in project to occupants.
- Notice to occupants of result of lead hazard evaluation within 15 days of completed evaluation. This notice can be posted in a public place such as lobby or mailroom.

- Notice to occupants of reduction activities undertaken within 15 days of completion. A notice posted in a public area is allowed.

Regulations and Affected Properties: The lead-based paint regulations affect acquisition and rehabilitation of housing projects constructed prior to 1978. All pre-1978 HTF funded projects must comply with the regulations. All units in the project must comply with these regulations not just the designated HTF-assisted units

Eligible Recipients

Eligible recipients are project sponsors, developers, for-profit entities, non-profit entities, and housing authorities. Recipients are required to certify that housing assisted with HTF funding will comply with HTF requirements by signing and recording legal documents with restrictive covenants.

A recipient must:

- Make acceptable assurances to the grantee that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;
- Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;
- Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and
- Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

ATTACHMENT AA

OHCS Rehabilitation Standards

National Housing Trust Fund (HTF)

October 28, 2016

I. Applicability of the HTF Rehab Standards

a) Rehabilitation projects funded by OHCS and subsidized with any amount of HTF funds.

II. Purpose

a) The purpose of the OHCS HTF program is to aid in the development of functional, safe, affordable and durable housing that meets the needs of the occupants and the communities in which the housing is located. At a minimum, The OHCS HTF Standards promote rehabilitation in which all health and safety deficiencies are addressed.

III. Quality of Work

a) The Owner's Development Team must ensure that all rehabilitation work is completed in a thorough and workmanlike manner in accordance with industry best practices and contractually agreed upon plans and specifications and other relevant contract documents.
b) Design professionals currently licensed in the State of Oregon shall be contractually engaged by the Owner for all design work undertaken. At a minimum, each licensed professional will be responsible for ensuring that their scope of work is performed in accordance with generally accepted industry practices and that their work scope is completed in full conformance with these HTF Standards and with Chapter 4 of the Agency's Project Development Manual (PDM).
c) In addition to other industry standard contract documents, design professionals shall provide technical specifications which stipulate quality standards, materials choices and installation methods and standards. Technical specifications may reference other appropriate standards set by generally accepted trade associations and testing agencies such as ASTM, Underwriters Laboratory (UL), SMACNA, etc.
d) The construction contract must include warranties on all materials, equipment and workmanship.

IV. Code Compliance

a) All work performed shall comply with all applicable building and development related codes, ordinances, and regulations. It is the responsibility of the Owner's Development Team to identify and satisfy all such requirements.
b) Per standard industry practice the project architect shall produce a Code Analysis for the project demonstrating how the proposed design complies with the applicable codes and development related regulations.

V. Uniform Physical Conditions Standards (UPCS)

a) These HTF Standards have been established to ensure that, at a minimum, the project achieves compliance with the UPCS and that the completed project will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703.

Note:
Table 1.0 at the end of this document is a list of Inspectable Items and Observable Deficiencies, developed from the UPCS that describes some of the most common types of housing deficiencies encountered. For each of the example deficiencies listed, the table also describes the degree of deficiency that, at a minimum, is considered a "needed repair" on OHCS HTF-assisted projects. Table 1.0 is intended as a general guide only and is not to

be considered a universal prescriptive path to compliance with these HTF Standards. Each project will have its own unique set of rehabilitation issues and needs that must be independently assessed and addressed by the Owner's Development Team.

VI. Serious Health and/or Safety Deficiencies

a) If the housing is occupied at the time of rehabilitation, all known serious health and safety deficiencies must be identified and addressed immediately. Table 1.0 located at the end of these Standards consists of a list of UPCS based Inspectable Items and Observable Deficiencies, including the listing of a number serious health and safety deficiencies (highlighted in orange). Table 1.0 is included in these Standards as an aid in the identification of serious Health & Safety Deficiencies. The highlighted items are not to be regarded as a comprehensive listing of all such issues. It is the responsibility of the Owner's Development Team to identify all project specific serious Health & Safety Deficiencies.

b) A serious health and/or safety deficiency shall, for the purpose of these Standards, be generally defined as any known or readily observable issue that in the opinion of the Owners' Building Assessment Professional or a representative of OHCS has the potential to cause serious harm to an occupant of, or visitor to, the subject property.

VII. Scope of Work Determination & Agency Approval

a) In developing scopes of work, the Owner's Development Team will base the project scope on the Capital Needs Assessment (CNA) and any other related assessment documentation. Additionally, the Owner's Development Team will work with OHCS to ensure that all requirements under these HTF Standards are satisfactorily addressed. The Agency will approve all scopes of work prior to any construction work commencing on the project.

VIII. Expected Useful Life & Capital Planning

a) In developing scopes of work on housing rehabilitation projects, the Owner's Project Development Team will consider the remaining expected useful life of all building components. Building components nearing the end of their expected useful life shall be considered for replacement, repair, or updating. Both new and existing building components that have a remaining expected useful life of less than 30 years shall be considered for future replacement in the project's Capital Plan. Project Capital Plans are required by the Agency to be included as part of the Capital Needs Assessment (CNA). See Section 3.30.01 of the Agency's Project Development Manual (PDM) for agency requirements related to Capital Needs Assessments.

b) A Capital Needs Assessment (CNA) is required on all HTF-assisted projects and shall comply with Section 3.30.01 of the Agency's Project Development Manual (PDM).

c) Whether or not a particular building component has been replaced, repaired, updated or has been determined to remain functional as-is with a planned replacement schedule, all building components and major systems must have a remaining useful life of at least 20 years or they must be scheduled and demonstrate adequate funding in the Project Capital Plan to be viable for at least 20 years, the length of the Capital Plan, with subsequent updates every five years during the affordability period.

d) The Owner's Development Team must ensure that all building components are analyzed as part of a comprehensive effort to balance rehabilitation scope and capital planning in a way which maximizes long-term building performance as much as possible within the parameters of both development and projected operational funding available.

IX. Energy Efficiency

a) In addition to any minimum energy code requirements that may apply, emphasis should be placed on maximizing the energy efficiency of the project to the greatest extent possible. Opportunities for improving the energy efficiency of the project should be energetically sought and implemented as deemed practical and financially feasible.

X. Disaster Mitigation

a) To the extent applicable/relevant, the housing must be improved to mitigate the potential impact of potential disasters (e.g. earthquakes, hurricanes, floods, wildfires) in accordance with state or local codes, ordinances, and requirements, or such other requirements that HUD may establish.

XI. Accessibility Requirements

a) The project must meet all relevant local, state, and federal accessibility requirements. An overview of these requirements is given in Chapter 4 of the Agency's Project Development Manual (PDM). Regulations regarding accessibility in housing, particularly housing subsidized with federal funding is complex. Inclusion of a licensed architect with experience in the design of federally subsidized housing within the Owner's Development Team is highly recommended.

XII. Rehabilitation Standards

a) Site (CSI Division 2)
   1. Site elements are restored as needed to be safe, clean and usable. Assemblies and materials are used to provide ongoing durability without undue future maintenance.
   2. Site Drainage is rehabilitated as needed and to the greatest extent practical such that grading surrounding the building slopes away from the building(s) and is adequately managed without ponding or erosion.
   3. Existing sewer laterals that are to be reused are evaluated to assure that they are serviceable and have a remaining useful life of 30 years, or are covered by the project's Capital Plan.
   4. Existing municipal water supply lines to buildings shall be evaluated to assure that they are serviceable, of adequate capacity and have a remaining useful life of 30 years, or are covered by the project's Capital Plan.
   5. On-site Parking, to the greatest extent practical is brought into conformance with current codes.
   6. Pedestrian walkways and hardscapes are restored and/or improved to provide sensible code compliant access from the public way into the site, to and from parking areas and access points to buildings.
   7. Site amenities are improved or added as needed to restore or enhance the livability of the project including playground areas, seating, benches, patio areas, picnic tables, bike racks, grills, fencing, etc.
   8. Landscaping is restored and/or improved to restore or improve the livability of the site.
      Plants specified should be low maintenance, non-invasive species, of an appropriate size and scale taking in to account their size at maturity.
   9. Solid waste collection and storage facilities are restored or updated as needed.
   10. Site lighting is restored, upgraded and/or added to illuminate parking and pedestrian walkways and to conform to current codes and local development standards.

b) Foundations (CSI Division 3)
   1. Foundations to be adequately sized, free of broken components or deterioration which may compromise the load bearing structural integrity.
   2. Design and implement structural reinforcements or reconstruction as necessary.
   3. Above-grade masonry unit block or brick shall be reasonably stable, plumb and sound with no missing units or voids.
   4. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly.
   5. New below-grade structures to conform to Chapter 18 of IBC as appropriate.
   6. Basement floors:
      At mechanical rooms provide sound concrete floors with raised housekeeping pads for equipment.
      At tenant accessed utility spaces (storage, laundry rooms, etc.) provide sound concrete floors.
      At non-habitable spaces with earthen floors provide sound vapor barriers.

7. Moisture mitigation:
   Provide Waterproofing or damproofing as appropriate and where possible.
8. Provide ventilation of basements and crawl spaces per OSSC, Chapter 1203.

c) Masonry Components (CSI Division 4)
1. Buildings with masonry bearing walls shall be examined for their structural integrity. Existing masonry building components shall be examined to assure sound condition, and repaired as necessary to provide the load-bearing capacity, resistance to water penetration, and aesthetic quality per standard industry standards.
2. Masonry shall be plumb, and structurally sound.
3. Repair or replace deteriorated portions or missing units.
4. Brick veneer shall be sound, or repaired to be sound.
5. Masonry mortar joints shall be sound, and free of loose or deteriorated mortar, with no voids.
6. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly, and prevent water intrusion.

d) Structure
1. A qualified professional shall examine each building's load-bearing structure, and assess its existing condition to determine suitability of continued use.
2. Repairs shall be made to any deteriorated load-bearing structural elements.
3. Reinforce, install supplemental or replace structural members determined not to be adequate for use.

e) Building Envelope (CSI Division 7)
1. Existing Roofing:
   Examine existing roofing and flashing systems to determine suitability for continued use. Continued life expectancy of existing roofing should be a minimum of 30 years, or covered by the project's Capital Plan.
   Repair existing roofing as required.
2. New Roofing:
   New roofing shall be installed where existing roofing does not meet requirements for continued use.
   New roofing system components shall be compatible, and include - the nail base, the underlayment layer, ice & water shield self-adhesive membrane flashings, metal flashings and roofing.
   Examine exposed existing substrate for structural soundness
   Install new roofing system per code and per NCRA trade practices, and manufacturer specifications.
   Deteriorated flashings shall be replaced, and the weather proof integrity of the roof system shall be assured.
   Roof assemblies shall be properly ventilated in accordance with applicable code requirements, and appropriate building science detailing.
3. Cladding:
   Examine existing siding for soundness – shall be free of major cracks, rot, and other deterioration which may compromise its useful life and be suitable to hold exterior finishes.
   Siding shall be free of gaps and holes and provide continuous weather barrier system.
   Repair or replace as necessary to provide a weather resistant enclosure.
   Masonry bearing walls and veneers shall be restored as necessary - Refer to Section XII C – Masonry
   Other existing cladding system types and materials shall be repaired and/or restored in-kind with matching or similar materials to provide a durable weather resistant enclosure.

4. Trim:
   Existing trim to remain must be sound, free of defects and deterioration which compromises its use.
   Repair and restore trim to usable condition. Patch or replace in kind any deteriorated wood trim components.

Other trim materials (PVC, cement-composites, etc.) which are suitable may be used as appropriate and shall be installed per manufacturer's recommendations.
Trim which is part of the weather tight enclosure shall be flashed or caulked with joint sealers as necessary to prevent water intrusion.

5. Paint:
   In general, all existing exterior wood surfaces shall receive new paint coatings, except as appropriate due to the recent application of paint and/or the sound condition of existing coatings
   Examine surfaces and apply paint only to sound acceptable materials / surfaces.
   Prepare surfaces properly, removing loose or peeling previous paint.
   Paint prep shall be done in accordance with applicable lead safe standards.
   Before painting, assure that any moisture issues which may compromise the life expectancy of the paint system are remedied.
   Exterior paint systems shall be compatible, and installed in accordance with manufacturers' specifications.
6. Porches, Decks and Steps:
   Existing porches, decks, steps and railings proposed to remain shall be examined and repaired as necessary. Repair and reconstruction shall be carried out to assure that they will have a continued useful life of 30 years, or covered by the project's Capital Plan.
   Inspect structure for soundness and reconstruct any deteriorated members as required.
   Install new support piers as may be required.
   Patch existing decking with matching materials, or install new durable decking.
   Railings shall be sound and adequately fastened to meet code requirements for structural loading.
   Repair or replace existing railings in-kind as appropriate.
   Shall meet code requirements for height of protective guards, or have supplemental guards installed.
   Steps shall be safe and sound and meet applicable codes, with railings as necessary.
   All porch elements shall be able to withstand the weather elements to prevent premature deterioration.

f) Thermal Enclosure (CSI Division 7)
   1. Energy Efficiency:
      In general, buildings shall be rehabbed with a goal of increasing the thermal shell efficiency.
   2. Insulation:
      Insulation levels shall be upgraded where practical and the maximum extent possible.
   3. Air Sealing:
      Attention must be paid to the air barrier of each building and should be well thought out, detailed, and carefully executed.
   4. Indoor Air Quality:
      In general, all thermal upgrades to a building will take into consideration indoor air quality and moisture control/mitigation, and apply the current state of the art building science in this regard.

g) Acoustics
   1. Dwelling unit separations shall be upgraded as practical to meet requirements of OSSC Chapter 1207 or better.

h) Doors (CSI Division 8)
   1) General:
      Doors are to be sound and secure.
      New doors shall be installed per manufacturers' recommendations and standard trade practice standards.
      Existing doors to remain should be examined and determined to be suitable for reuse with a remaining life after restoration of 30 years, or covered by the project's Capital Plan.
      Shall be tested and modified as necessary to operate properly.

Install new weather stripping and sweeps to provide seal against weather elements and air infiltration.
Door hardware shall operate properly, be secure and shall meet accessibility standards as applicable.

i) Windows (CSI Division 8)
   1. General:
      Windows shall be of legal egress size when required by code
      Existing windows which are non-conforming egress size shall be replaced with code conforming windows
      Existing windows to remain should be examined and determined to be suitable for reuse with a reasonable remaining life after restoration of 30 years without undue future maintenance, or covered by the project's Capital Plan.
      Capable of providing adequate seal against air infiltration, weather elements, and be determined to be appropriately energy efficient in keeping with the overall energy efficiency strategy of the project.
      Install new weather stripping to provide seal against weather elements and air infiltration.
      Air seal shim spaces and window weight pockets if possible.
      Restore and modify as required to provide useful life.
      Shall be tested and modified as necessary to operate smoothly and properly per code.
      Where existing windows do not meet the standards for egress, condition, and/or energy efficiency deemed appropriate to the project, they shall be replaced by new windows.
      New window units should be tested assemblies meeting ASTM standards for water penetration & air leakage.
      All windows shall be installed per manufacturer's installation guidelines and specifications, and shall incorporate appropriate detail, flashings, joint sealers, and air sealing techniques.

j) Interior Finishes (CSI Division 9)
   1. General:
      In general, all interior finishes will be new and installed per manufacturer's recommendations and the standards of quality construction per trade practices and associations related to the particular product or trade.
      Where existing finishes are proposed to remain, they will be determined to meet the standard of being sound, durable, lead-safe, and have a remaining useful life of no less than 30 years, or covered by the project's Capital Plan.
      Existing wood flooring in good condition should be repaired, sanded and refinished.
      All new flooring materials (resilient flooring, wood flooring, laminate flooring, carpet, and/or ceramic tile) shall be installed over suitable substrates per manufacturer's specs and the trade association practices.
      Existing trim shall be repaired and restored to usable condition, free of deterioration which compromises its use.
      New wood trim shall be installed in a workmanlike manner.
      In general, all interior ceiling, wall, and trim surfaces shall receive renewed coatings of paint (or other clear/stain) finishes. Painting shall be done in a workmanlike manner, and in accordance with the manufacturer's recommendations. All painting including preparation of existing surfaces shall be done in a lead-safe manner.

k) Specialties (CSI Division 10)
   1. General:
      Bathrooms will have appropriate accessories such as towel bars, robe hooks, bath tissue holders, etc., installed and securely fastened in place. Accessories shall be located per accessibility requirements where necessary.
      Medicine cabinets and mirrors shall be in good working condition or new components installed in each apartment bathroom as appropriate.

Building signage and identification shall be provided as appropriate Including building address, apartments' identification, building directory, exits, stairways, common and utility spaces, etc.
Exit signage will be provided as required by code and be accessibility compliant as required.
Fire extinguishers shall be provided in buildings and in apartments as required by code and/or by state or local fire authorities. Locate as directed by authorities.
Durable, cleanable shelving shall be provided in pantries, linen closets, clothes closets and other storage areas as appropriate and shall be securely fastened in place.

l) Equipment (CSI Division 11)
1. General:
All new equipment shall be ENERGY STAR® rated.
Existing equipment to be retained and continued to be used shall be in serviceable condition with an expected useful life of 30 years, or covered by the project's Capital Plan.
Where existing appliances are not re-used, new a appliances shall be installed.
Existing appliances to be reused shall be in good and serviceable condition.
Provide other appliances (such as microwaves) as may be appropriate to the project.
Common trash and recycling areas and associated equipment are to be in good working condition.
Playground equipment shall be safe, code-approved and in good working condition.

m) Furnishings - Casework (CSI Division 12)
1. General:
Existing cabinetry and/or countertops proposed to remain shall be in good condition with a remaining useful life of 30 years, or covered by the project's Capital Plan.
New cabinetry shall be of good quality, meeting ANSI/KCMA A161.1-2012 "Performance & Construction Standards for Kitchen Cabinetry and Bath Vanities" standards. Other industry standards for cabinetry may be used as guidelines, such as the Kitchen Cabinet Manufacturer's Association (KCMA) "Severe Use Specification – 2014," the Architectural Woodwork Institute's (AWI) Woodwork Standards and Cabinet Fabrication Handbook.
New counters shall be provided with a cleanable sanitary surface material impervious to water such as high pressure laminate (HPL).
Shop fabricated as one piece assembly where possible. Seal all field joints.

n) Special Construction (CSI Division 13)
1. Asbestos:
Project will be assessed for the existence of asbestos-containing building materials by qualified professionals. Removal of asbestos shall be carried out per Federal EPA and State regulations and rules.
2. Lead Based Paint:
Conform to HUD Lead Safe Housing Rule (Title 24, Part 35) which requires various levels of evaluation and treatment of lead paint hazards when federal money is used for rehabilitation of target housing. Also conform to EPA Renovation Repair and Painting Rule (40 CFR Part 745) which requires contractors conducting renovation, repair or maintenance that disturbs paint in target housing or child-occupied facilities to be licensed by EPA and use lead-safe work practices to complete the work. Developers must ensure contractors are properly trained and licensed. More information is available at: http://www2.epa.gov/lead

o) Conveyance Systems (CSI Division 14)
1. General:
Elevators may be installed when appropriate and possible, when such elevator is part of the project's program goals, or as required by code.
Existing elevators and lifts may be retained if they are appropriate to the use of the building and in serviceable condition with an expected useful life of 30 years, or covered by the project's Capital Plan.

p) Mechanical (CSI Division 15)
   1. General:
      All mechanical systems shall be designed by a mechanical engineer or other qualified professional.
   2. Energy efficiency:
      In both the design and implementation of project rehabilitation scopes of work, particular emphasis should be made to maximize the effectiveness of the energy efficiency related work scopes.
   3. Fire Suppression:
      Provide fire suppression as required by applicable codes with approved sprinkler systems installed as required by NFPA 101 and NFPA 1, and approved by the State Fire Marshal.
      System design to conform to applicable NFPA standard 13 or 13R
      Underground water services for sprinkler system shall meet NFPA 24
   4. Plumbing
      Where existing components of a system are to be reused, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by the project's Capital Plan.
      Water-saving shower heads and faucet aerators shall be used where practical.
      All fixtures, piping fittings and equipment shall be lead-free.
      When existing kitchen fixtures are not reused new sinks and faucets, and associated plumbing shall be installed in each apartment.
      When existing bath fixtures are not reused in accordance with a. above, new water saving toilets, tubs and tub surrounds, lavatory sinks, and faucets shall be installed in each apartment.
      Provision for laundry rooms or laundry hook-ups may be made per project's program requirements.
      Provision for other utility plumbing for janitor sinks, floor drains, outdoor faucets, drains for dehumidification systems, etc., may be made as desired or required.
   5. Heating System:
      Where existing components of a system are proposed to be reused, they will be examined and determined to be in good and serviceable condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by the project's Capital Plan.
      Temperature control - The temperature in each apartment shall be individually thermostatically controlled.
      Provide adequate heat in common spaces.
      Provide minimum equipment efficiencies per the Energy Code.
   6. Ventilation:
      Code-compliant indoor air quality will be addressed by the installation of either exhaust only or balanced (heat recovery) ventilation systems as required by:

q) Electrical (CSI Division 16)
   1. General:
      Project electrical design shall be done by a licensed electrical engineer, or other qualified professional.
      Project electrical must be installed by a licensed electrician
      Where existing service entrances, disconnects, meters, distribution wiring, panels, and devices are proposed to remain, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by the project's Capital Plan.
      Substandard or critical non-code compliant components shall be replaced.
      Utility connections shall be installed per the rules and regulations of the electrical utility.
   2. Electrical Service and Metering:
      The service entrance size shall be calculated to handle the proposed electrical loads.
      Metering and disconnects shall be per code and mounted at approved locations.
   3. Electrical Distribution System:

Lighting and receptacle circuits shall be designed per code.
Locations and layout of devices and lighting are to be logical and accessibility compliant where required.
Provision shall be made for the wiring of dedicated equipment circuits and connections for heating, ventilation equipment/exhaust fans, pumps, appliances, etc.
Lighting shall be provided using OSSC 1205 as a minimum guideline.
Developers are encouraged to upgrade to Energy Star® rated components.
Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning requirements.
Emergency and exit lighting/illuminated signage shall be per the NFPA 101, Life Safety Code.

4. Fire detection and Alarms:
   Shall be installed as required by code: NFPA 101, Chapters 9.6, 30.3.4 and/or 31.3.4, and comply with NFPA 72, and NFPA 1.
   Smoke detectors shall be installed per NFPA 30.3.4.5 and 9.6.2.10.
   Where required – system annunciation shall be in accordance with NFPA 1.
5. Communication Low-Voltage Wiring:
   Provisions for TV, telephone, internet data, security, and intercoms should be considered and installed as appropriate to the project's use and livability.

ATTACHMENT AA Table 1.0
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Uniform Physical Condition Standards for Multifamily Housing Rehabilitation - October 2016

Table 1.0 is provided as an example of the type and level of deficiency that typically requires remediation.
The Owner's Development Team with consultation and approval by OHCS will determine project specific Work Scopes for each indevidual project.

NOTE: Deficiencies highlighted in orange are life-threatening and must be addressed immediately, if the housing is occupied.

Requirements for Site		
Inspectable Item	***Observable Deficiency***	***Type and Degree of Deficiency that must be addressed***
Fencing and Gates	Damaged/Falling/Leaning	*Fence or gate is missing or damaged to the point it does not function as it should*
	Holes	*Hole in fence or gate is larger than 6 inches by 6 inches*
	Missing Sections	*An exterior fence, security fence or gate is missing a section which could threaten safety or security*
Grounds	Erosion/Rutting Areas	*Runoff has extensively displaced soils which has caused visible damage or potential failure to adjoining structures or threatens the safety of pedestrains or makes the grounds unusable*
	Overgrown/Penetrating Vegetation	*Vegetation has visibly damaged a component, area or system of the property or has made them unusable or unpassable*
	Ponding/Site Drainage	*There is an accumulation of more than 5 inches deep and/or a large section of the grounds-more than 20%-is unusable for it's intended purpose due to poor drainage or ponding*
Health & Safety	Air Quality - Sewer Odor Detected	*Sewer odors that could pose a health risk if inhaled for prolonged periods*
	Air Quality - Propane/Natural Gas/Methane Gas Detected	*Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled*
	Electrical Hazards - Exposed Wires/Open Panels	*Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)*
	Electrical Hazards - Water Leaks on/near Electrical Equipment	*Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion*
	Flammable Materials - Improperly Stored	*Flammable materials are improperly stored, causing the potential risk of fire or explosion*
	Garbage and Debris - Outdoors	*Too much garbage has gathered-more than the planned storage capacity, or garbage has gathered in an area not sanctioned for staging or storing*
	Hazards - Other	*Any general defects or hazards that pose risk of bodily injury*
	Hazards - Sharp Edges	*Any physical defect that could cause cutting or breaking of human skin or other bodily harm*
	Hazards - Tripping	*Any physical defect in walkways or other travelled area that poses a tripping risk*
	Infestation - Insects	*Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk*
	Infestation - Rats/Mice/Vermin	*Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk*
Mailboxes/Project Signs	Mailbox Missing/Damaged	*Mailbox cannot be locked or is missing*
	Signs Damaged	*The project sign is not legible or readable because of deterioration or damage*
Parking Lots/Driveways/Roads	Cracks	*Cracks that are large enough to affect traffic ability over more than 5% of the property's parking lots/driveways/roads or pose a safety hazard*
	Ponding	*3 inches or more of water has accumulated making 5% or more of a parking lot/driveway unusable or unsafe*
	Potholes/Loose Material	*Potholes or loose material that have made a parking lot/driveway unusable/unpassbale for vehicles and/or pedestrians or could cause tripping or*
	Settlement/Heaving	*Settlement/heaving has made a parking lot/driveway unusable/unpassable or creates unsafe conditions for pedestrians and vehicles*
Play Areas and Equipment	Damaged/Broken Equipment	*More than 20% of the equipment is broken or does not operate as it should or any item that poses a safety risk*
	Deteriorated Play Area Surface	*More than 20% of the play surface area shows deterioration or the play surface area could cause tripping or falling and thus poses a safety risk*
Refuse Disposal	Broken/Damaged Enclosure-Inadequate Outside Storage Space	*A single wall or gate of the enclosure has collapsed or is leaning and in danger of falling or trash cannot be stored in the designated area because it is too small to store refuse until disposal*
Retaining Walls	Damaged/Falling/Leaning	*A retaining wall is damaged and does not function as it should or is a safety risk*
Storm Drainage	Damaged/Obstructed	*The sytem is partially or fully blocked by a large quantity of debris , causing backup into adjacent areas or runoffs into areas where runoff is not*
Walkways/Steps	Broken/Missing Hand Railing	*The hand rail is missing, damaged, loose or otherwise unusable*
	Cracks/Settlement/Heaving	*Cracks, hinging/tilting or missing sections that affect traffic ability over more than 5% of the property's walkways/steps or any defect that creates a tripping or falling hazard*
	Spalling/Exposed rebar	*More than 5% of walkways have large areas of spalling--larger than 4 inches by 4 inches--thay affects traffic ability*
Requirements for Building Exterior		
Inspectable Item	***Observable Deficiency***	
Doors	Damaged Frames/Threshold/Lintels/Trim	*Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim*
	Damaged Hardware/Locks	*Any door that does not function as it should or cannot be locked because of damage to the door's hardware*
	Damaged Surface (Holes/Paint/Rusting/Glass)	*Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass*
	Damaged/Missing Screen/Storm/Security Door	*Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing*
	Deteriorated/Missing Caulking/Seals	*The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should*
	Missing Door	*Any exterior door that is missing*
Fire Escapes	Blocked Egress/Ladders	*Stored items or other barriers restrict or block people from exiting*
	Visibly Missing Components	*Any of the functional components that affect the function of the fire escape--one section of a ladder or railing, for example--are missing*
Foundations	Cracks/Gaps	*Large cracks in foundation more than 3/8 inches wide by 3/8 inches deep by 6 inches long that present a possible sign of a serious structural problem, or opportunity for water penetration or sections of wall or floor that are broken apart*
	Spalling/Exposed Rebar	*Significant spalled areas affecting more than 10% of any foundation wall or any exposed reinforcing material--rebar or other*
Health and Safety	Electrical Hazards - Exposed Wires/Open Panels	*Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)*

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	Electrical Hazards - Water Leaks on/near Electrical Equipment	*Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion*
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	*The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit*
	Emergency Fire Exits - Missing Exit Signs	*Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign*
	Flammable/Combustible Materials - Improperly Stored	*Flammable materials are improperly stored, causing the potential risk of fire or explosion*
	Garbage and Debris - Outdoors	*Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing*
	Hazards - Other	*Any general defects or hazards that pose risk of bodily injury*
	Hazards - Sharp Edges	*Any physical defect that could cause cutting or breaking of human skin or other bodily harm*
	Hazards - Tripping	*Any physical defect in walkways or other travelled area that poses a tripping risk*
	Infestation - Insects	*Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk*
	Infestation - Rats/Mice/Vermin	*Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk*
Lighting	Broken Fixtures/Bulbs	*10% or more of the lighting fixtures and bulbs surveyed are broken or missing*
Roofs	Damaged Soffits/Fascia	*Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible*
	Damaged Vents	*Vents are missing or so visibly damaged that further roof damage is possible*
	Damaged/Clogged Drains	*The drain is damaged or partially clogged with debris or the drain no longer functions*
	Damaged/Torn Membrane/Missing Ballast	*Balast has shifted and no longer functions as it should or there is damage to the roof membrane that may result in water penetration*
	Missing/Damaged Components from Downspout/Gutter	*Drainage system components are missing or damaged causing visibile damage to the roof, structure, exterior wall surface, or interior*
	Missing/Damaged Shingles	*Roofing shingles are missing or damaged enough to create a risk of water penetration*
	Ponding	*Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials*
Walls	Cracks/Gaps	*Any large crack or gap that is more than 3/8 inches wide or deep and 6 inches long that presents a possible sign of serious structural problem or opportunity for water penetration*
	Damaged Chimneys	*Part or all of the chimney has visibly seperated from the adjacent wall or there are cracked or missing pieces large enough to present a sign of chimney failure or there is a risk of falling pieces that could create a safety hazard*
	Missing/Damaged Caulking/Mortar	*Any exterior wall caulking or mortar deterioration that presents a risk of water pentration or risk of structural damage*
	Missing Pieces/Holes/Spalling	*Any exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage*
	Stained/Peeling/Needs Paint	*More than 20% of the exterior paint is peeling or paint is missing and siding surface is exposed thereby exposing siding to water penetration and*
Windows	Broken/Missing/Cracked Panes	*Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane*
	Damaged Sills/Frames/Lintels/Trim	*Sills, frames, lintels, or trim are missing or damaged, exposing the inside of the surrounding walls and compromising its weather tightness*
	Damaged/Missing Screens	*Missing screens or screens with holes greater than 1 inch by 1 inch or tears greater than 2 inches in length*
	Missing/Deteriorated Caulking/Seals/Glazing Compound	*There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure*
	Peeling/Needs Paint	*More than 20% of the exterior window paint is peeling or paint is missing and window frame surface is exposed thereby exposing window frame to water penetration and deterioration*
	Security Bars Prevent Egress	*The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks*
Requirements for Building Systems		
Inspectable Item	***Observable Deficiency***	
Domestic Water	Leaking Central Water Supply	*Leaking water from water supply line is observed*
	Missing Pressure Relief Valve	*There is no pressure relief valve or pressure relief valve does not drain down to the floor*
	Rust/Corrosion on Heater Chimney	*The water heater chimney shows evidence of flaking, discoloration, pitting, or crevices that may create holes that could allow toxic gases to leak from*
	Water Supply Inoperable	*There is no running water in any area of the building where there should be*
Electrical System	Blocked Access/Improper Storage	*One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency*
	Burnt Breakers	*Carbon residue, melted breakers or arcing scars are evident*
	Evidence of Leaks/Corrosion	*Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures, or any evidence of water leaks in the enclosure or hardware*
	Frayed Wiring	*Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire*
	Missing Breakers/Fuses	*Any open and/or exposed breaker port*
	Missing Outlet Covers	*A cover is missing, which results in exposed visible electrical connections*
Elevators	Not Operable	*The elevator does not function at all or the elevator doors open when the cab is not there*
Emergency Power	Auxiliary Lighting Inoperable (if applicable)	*Auxiliary lighting does not function*
Fire Protection	Missing Sprinkler Head	*Any sprinkler head is missing, visibly disabled, painted over, blocked, or capped*
	Missing/Damaged/Expired Extinguishers	*There is missing, damaged or expired fire extinguisher an any area of the building where a fire extinguisher is required*
Health & Safety	Air Quality - Mold and/or Mildew Observed	*Evidence of mold or mildew is observed that is substantial enough to pose a health risk*
	Air Quality - Propane/Natural Gas/Methane Gas Detected	*Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled*
	Air Quality - Sewer Odor Detected	*Sewer odors that could pose a health risk if inhaled for prolonged periods*
	Electrical Hazards - Exposed Wires/Open Panels	*Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)*
	Electrical Hazards - Water Leaks on/near Electrical Equipment	*Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion*
	Elevator - Tripping	*An elevator is misaligned with the floor by more than 3/4 of an inch. The elevatordoes not level as it should, which causes a tripping hazard*
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	*The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit*

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	Emergency Fire Exits - Missing Exit Signs	*Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign*
	Flammable Materials - Improperly Stored	*Flammable materials are improperly stored, causing the potential risk of fire or explosion*
	Garbage and Debris - Indoors	*Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing*
	Hazards - Other	*Any general defects or hazards that pose risk of bodily injury*
	Hazards - Sharp Edges	*Any physical defect that could cause cutting or breaking of human skin or other bodily harm*
	Hazards – Tripping Hazards	*Any physical defect in walkways or other travelled area that poses a tripping risk*
	Infestation - Insects	*Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk*
	Infestation - Rats/Mice/Vermin	*Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk*
HVAC	Boiler/Pump Leaks	*Evidenceof water or steam leaking in piping or pump packing*
	Fuel Supply Leaks	*Evidence of any amount of fuel leaking from the supply tank or piping*
	General Rust/Corrosion	*Significant formations of metal oxides, significant flaking, discoloration, or the development of a noticable pit or crevice*
	Misaligned Chimney/Ventilation System	*A misalighnment of an exhaust system on a combustion fuel-fired unit (oil, natural gas, propane, wood pellets etc.) that causes improper or dangerous*
Roof Exhaust System	Roof Exhaust Fan(s) Inoperable	*The roof exhaust fan unit does not function*
Sanitary System	Broken/Leaking/Clogged Pipes or Drains	*Evidence of active leaks in or around the system components or evidence of standing water, puddles or ponding--a sign of leaks or clogged drains*
	Missing Drain/Cleanout/Manhole Covers	*A protective cover is missing*
Requirements for Common Areas		
Inspectable Item	***Observable Deficiency***	
Basement/Garage/Carport	Baluster/Side Railings - Damaged	*Any damaged or missing balusters or side rails that limit the safe use of an area*
Closet/Utility/Mechanical	Cabinets - Missing/Damaged	*10% or more of cabinet, doors, or shelves are missing or the laminate is separating*
Community Room	Call for Aid - Inoperable	*The system does not function as it should*
Halls/Corridors/Stairs	Ceiling - Holes/Missing Tiles/Panels/Cracks	*Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 11 inches long*
Kitchen	Ceiling - Peeling/Needs Paint	*More than 10% of ceiling has peeling paint or is missing paint*
Laundry Room	Ceiling - Water Stains/Water Damage/Mold/Mildew	*Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 foot square*
Lobby	Countertops - Missing/Damaged	*10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate* ---not a sanitary surface to prepare food
Office	Dishwasher/Garbage Disposal - Inoperable	*The dishwasher or garbage disposal does not operate as it should*
Other Community Spaces	Doors - Damaged Frames/Threshold/Lintels/Trim	*Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim*
Patio/Porch/Balcony	Doors - Damaged Hardware/Locks	*Any door that does not function as it should or cannot be locked because of damage to the door's hardware*
Restrooms	Doors - Damaged Surface (Holes/Paint/Rust/Glass)	*Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass*
Storage	Doors - Damaged/Missing Screen/Storm/Security Door	*Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing*
	Doors - Deteriorated/Missing Seals (Entry Only)	*The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should*
	Doors - Missing Door	*Any door that is missing that is required for the functional use of the space*
	Dryer Vent -Missing/Damaged/Inoperable	*The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside*
	Electrical - Blocked Access to Electrical Panel	*One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency*
	Electrical - Burnt Breakers	*Carbon residue, melted breakers or arcing scars are evident*
	Electrical - Evidence of Leaks/Corrosion	*Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidenceof water leaks in the enclosure or hardware*
	Electrical - Frayed Wiring	*Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire*
	Electrical - Missing Breakers	*Any open and/or exposed breaker port*
	Electrical - Missing Covers	*A cover is missing, which results in exposed visible electrical connections*
	Floors - Bulging/Buckling	*Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types*
	Floors - Floor Covering Damaged	*More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.*
	Floors - Missing Floor/Tiles	*More than 5% of the flooring or tile flooring is missing*
	Floors - Peeling/Needs Paint	*Any painted flooring that has peeling or missing paint on more than 10% of the surface*
	Floors - Rot/Deteriorated Subfloor	*Any rotted or deteriorated subflooring greater than 6 inches by 6 inches*
	Floors - Water Stains/Water Damage/Mold/Mildew	*Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area greater than 1 foot square*
	GFI - Inoperable	*The GFI does not function*
	Graffiti	*Any graffiti on any exposed surface greater than 6 inches by 6 inches*
	HVAC - Convection/Radiant Heat System Covers Missing/Damaged	*Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans*
	HVAC - General Rust/Corrosion	*Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice*
	HVAC - Inoperable	*HVAC does not function. It does not provide the heating and coolingit should. The system does not respond when the controls are engaged*
	HVAC - Misaligned Chimney/Ventilation System	*Any misalignment that may cause improper or dangerous venting of gases*
	HVAC - Noisy/Vibrating/Leaking	*HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged*
	Lavatory Sink - Damaged/Missing	*Sink has extensive discoloration or cracks in over 50% of the basin or the the sink or associated hardware have failed or are missing and the sink can't*
	Lighting - Missing/Damaged/Inoperable Fixture	*More than10% of the permanent lighting fixtures are missing or damaged so they do not function*
	Mailbox - Missing/Damaged	*The U.S Postal Service mailbox cannot be locked or is missing*
	Outlets/Switches/Cover Plates - Missing/Broken	*Outlet or switch is missing or a cover plate is missing or broken, resulting in exposed wiring*

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	Pedestrian/Wheelchair Ramp	*A walkway or ramp is damaged and cannot be used by people on foot, in wheelchair, or using walkers*
	Plumbing - Clogged Drains	*Drain is substantially or completely clogged or has suffered extensive deterioration*
	Plumbing - Leaking Faucet/Pipes	*A steady leak that is adversely affecting the surrounding area*
	Range Hood /Exhaust Fans - Excessive Grease/Inoperable	*A substantial accumulation of dirt or grease that threatens the free passage of air*
	Range/Stove - Missing/Damaged/Inoperable	*One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or*
	Refrigerator - Damaged/Inoperable	*The refrigerator has an extensive accumilation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance*
	Restroom Cabinet - Damaged/Missing	*Damaged or missing shelves, vanity top, drawers, or doors that are not functioning as they should for storage or their intended purpose*
	Shower/Tub - Damaged/Missing	*Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is*
	Sink - Missing/Damaged	*Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing*
	Smoke Detector - Missing/Inoperable	*Smoke detector is missing or does not function as it should*
	Stairs - Broken/Damaged/Missing Steps	*A step is missing or broken*
	Stairs - Broken/Missing Hand Railing	*The hand rail is missing, damaged, loose or otherwise unusable*
	Ventilation/Exhaust System - Inoperable	*exhaust fan is not functioning or window designed for ventilation does not open*
	Walls - Bulging/Buckling	*Bulging, buckling or sagging walls or a lack of horizontal alignment*
	Walls - Damaged	*Any hole in wall greater than 2 inches by 2 inches*
	Walls - Damaged/Deteriorated Trim	*10% or more of the wall trim is damaged*
	Walls - Peeling/Needs Paint	*10% or more of interior wall paint is peeling or missing*
	Walls - Water Stains/Water Damage/Mold/Mildew	*Evidence of a leak, mold or mildew--such as a common area--covering a wall area greater than 1 foot square*
	Water Closet/Toilet - Damaged/Clogged/Missing	*Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed*
	Windows - Cracked/Broken/Missing Panes	*Any missing panes of glass or cracked pains of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane*
	Windows - Damaged Window Sill	*The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness*
	Windows - Inoperable/Not Lockable	*Any window that is not functioning or cannot be secured because lock is brocken*
	Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound	*There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure*
	Windows - Peeling/Needs Paint	*More than 10% of interior window paint is peeling or missing*
	Windows - Security Bars Prevent Egress	*The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks*
Health & Safety	Air Quality - Mold and/or Mildew Observed	*Evidence of mold or mildew is observed that is substantial enough to pose a health risk*
	Air Quality - Propane/Natural Gas/Methane Gas Detected	*Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled*
	Air Quality - Sewer Odor Detected	*Sewer odors that could pose a health risk if inhaled for prolonged periods*
	Electrical Hazards - Exposed Wires/Open Panels	*Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)*
	Electrical Hazards - Water Leaks on/near Electrical Equipment	*Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion*
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	*The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit*
	Emergency Fire Exits - Missing Exit Signs	*Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign*
	Flammable/Combustible Materials - Improperly Stored	*Flammable or combustible materials are improperly stored, causing the potential risk of fire or explosion*
	Garbage and Debris - Indoors	*Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing*
	Garbage and Debris - Outdoors	*Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing*
	Hazards - Other	*Any general defects or hazards that pose risk of bodily injury*
	Hazards - Sharp Edges	*Any physical defect that could cause cutting or breaking of human skin or other bodily harm*
	Hazards - Tripping	*Any physical defect in walkways or other travelled area that poses a tripping risk*
	Infestation - Insects	*Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk*
	Infestation - Rats/Mice/Vermin	*Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk*
Pools and Related Structures	Fencing - Damaged/Not Intact	*Any damage that could compromise the integrity of the fence*
Trash Collection Areas	Chutes - Damaged/Missing Components	*Garbage has backed up into chutes, because the collection structure is missing or broken or compactors or componenents--chute, chute door, and other componenets--have failed*
Requirements for Unit		
Inspectable Item	***Observable Deficiency***	
Bathroom	Bathroom Cabinets - Damaged/Missing	*Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose*
	Lavatory Sink - Damaged/Missing	*Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing*
	Plumbing - Clogged Drains, Faucets	*Drain or faucet is substantially or completely clogged or has suffered extensive deterioration*
	Plumbing - Leaking Faucet/Pipes	*A steady leak that is adversely affecting the surrounding area*
	Shower/Tub - Damaged/Missing	*Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is*
	Ventilation/Exhaust System – Absent/Inoperable	*exhaust fan is not functioning or window designed for ventilation does not open*
	Water Closet/Toilet - Damaged/Clogged/Missing	*Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilrt seat is cracked or has a broken hinge or toilet cannot be flushed*
Call-for-Aid (if applicable)	Inoperable	*The system does not function as it should*
Ceiling	Bulging/Buckling/Leaking	*Bulging, buckling or sagging ceiling or problem with alignment*
	Holes/Missing Tiles/Panels/Cracks	*Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 6 inches long*

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	Peeling/Needs Paint	*More than 10% of ceiling has peeling paint or is missing paint*
	Water Stains/Water Damage/Mold/Mildew	*Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 foot square*
Doors	Damaged Frames/Threshold/Lintels/Trim	*Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim*
	Damaged Hardware/Locks	*Any door that does not function as it should or cannot be locked because of damage to the door's hardware*
	Damaged/Missing Screen/Storm/Security Door	*Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing*
	Damaged Surface - Holes/Paint/Rusting/Glass/Rotting	*Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass*
	Deteriorated/Missing Seals (Entry Only)	*The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should*
	Missing Door	*Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit*
Electrical System	Blocked Access to Electrical Panel	*One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency*
	Burnt Breakers	*Carbon residue, melted breakers or arcing scars are evident*
	Evidence of Leaks/Corrosion	*Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidenceof water leaks in the enclosure or hardware*
	Frayed Wiring	*Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire*
	GFI - Inoperable	*The GFI does not function*
	Missing Breakers/Fuses	*Any open and/or exposed breaker port*
	Missing Covers	*A cover is missing, which results in exposed visible electrical connections*
Floors	Bulging/Buckling	*Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types*
	Floor Covering Damage	*More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.*
	Missing Flooring Tiles	*Any flooring or tile flooring that is missing*
	Peeling/Needs Paint	*Any painted flooring that has peeling or missing paint on more than 10% of the surface*
	Rot/Deteriorated Subfloor	*Any rotted or deteriorated subflooring greater than 6 inches by 6 inches*
	Water Stains/Water Damage/Mold/Mildew	*Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area greater than 1 foot square*
Health & Safety	Air Quality - Mold and/or Mildew Observed	*Evidence of mold or mildew is observed that is substantial enough to pose a health risk*
	Air Quality - Sewer Odor Detected	*Sewer odors that could pose a health risk if inhaled for prolonged periods*
	Air Quality - Propane/Natural Gas/Methane Gas Detected	*Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled*
	Electrical Hazards - Exposed Wires/Open Panels	*Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)*
	Electrical Hazards - Water Leaks on/near Electrical Equipment	*Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion*
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	*The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit*
	Emergency Fire Exits - Missing Exit Signs	*Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign*
	Flammable Materials - Improperly Stored	*Flammable materials are improperly stored, causing the potential risk of fire or explosion*
	Garbage and Debris - Indoors	*Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing*
	Garbage and Debris - Outdoors	*Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing*
	Hazards - Other	*Any general defects or hazards that pose risk of bodily injury*
	Hazards - Sharp Edges	*Any physical defect that could cause cutting or breaking of human skin or other bodily harm*
	Hazards - Tripping	*Any physical defect in walkways or other travelled area that poses a tripping risk*
	Infestation - Insects	*Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk*
	Infestation - Rats/Mice/Vermin	*Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk*
Hot Water Heater	Misaligned Chimney/Ventilation System	*Any misalignment that may cause improper or dangerous venting of gases*
	Inoperable Unit/Components	*Hot water from hot water taps is no warmer than room temperature indicating hot water heater is not functioning properly*
	Leaking Valves/Tanks/Pipes	*There is evidence of active water leaks from hot water heater or related components*
	Pressure Relief Valve Missing	*There is no pressure relief valve or pressure relief valve does not drain down to the floor*
	Rust/Corrosion	*Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice*
HVAC System	Convection/Radiant Heat System Covers Missing/Damaged	*Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans*
	Inoperable	*HVAC does not function. It does not provide the heating and coolingit should. The system does not respond when the controls are engaged*
	Misaligned Chimney/Ventilation System	*Any misalignment that may cause improper or dangerous venting of gases*
	Noisy/Vibrating/Leaking	*The HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged*
	Rust/Corrosion	*Deterioration from rust or corrosion on the HVAC system in the dweling unit*
Kitchen	Cabinets - Missing/Damaged	*10% or more of cabinet, doors, or shelves are missing or the laminate is separating*
	Countertops - Missing/Damaged	*10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate* -- not a sanitary surface to prepare food
	Dishwasher/Garbage Disposal - Inoperable	*The dishwasher or garbage disposal does not operate as it should*
	Plumbing - Clogged Drains	*Drain is substantially or completely clogged or has suffered extensive deterioration*
	Plumbing - Leaking Faucet/Pipes	*A steady leak that is adversely affecting the surrounding area*
	Range Hood/Exhaust Fans - Excessive Grease/Inoperable	*A substantial accumulation of dirt or grease that threatens the free passage of air*
	Range/Stove - Missing/Damaged/Inoperable	*One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or*
	Refrigerator-Missing/Damaged/Inoperable	*The refrigerator has an extensive accumilation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance*
	Sink - Damaged/Missing	*Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing*

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Laundry Area (Room)	Dryer Vent - Missing/Damaged/Inoperable	*The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside*
Lighting	Missing/Inoperable Fixture	*A permanent light fixture is missing or not functioning, and no other switched light source is functioning in the room*
Outlets/Switches	Missing	*An outlet or switch is missing*
	Missing/Broken Cover Plates	*An outlet or switch has a broken cover plate over a junction box or the cover plate is missing*
Patio/Porch/Balcony	Baluster/Side Railings Damaged	*Any damaged or missing balusters or side rails that limit the safe use of an area*
Smoke Detector	Missing/Inoperable	*Smoke detector is missing or does not function as it should*
Stairs	Broken/Damaged/Missing Steps	*A step is missing or broken*
	Broken/Missing Hand Railing	*The hand rail is missing, damaged, loose or otherwise unusable*
Walls	Bulging/Buckling	*Bulging, buckling or sagging walls or a lack of horizontal alignment*
	Damaged	*Any hole in wall greater than 2 inches by 2 inches*
	Damaged/Deteriorated Trim	*10% or more of the wall trim is damaged*
	Peeling/Needs Paint	*10% or more of interior wall paint is peeling or missing*
	Water Stains/Water Damage/Mold/Mildew	*Evidence of a leak, mold or mildew covering a wall area greater than 1 foot square*
Windows	Cracked/Broken/Missing Panes	*Any missing panes of glass or cracked pains of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane*
	Damaged Window Sill	*The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness*
	Missing/Deteriorated Caulking/Seals/Glazing Compound	*There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure*
	Inoperable/Not Lockable	*Any window that is not functioning or cannot be secured because lock is brocken*
	Peeling/Needs Paint	*More than 10% of interior window paint is peeling or missing*
	Security Bars Prevent Egress	*The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks*